

MN Department of Commerce ECO Act Implementation Efficient Fuel-Switching Working Group Meeting 1

November 23, 2021

1:00 – 3:00 p.m.

Type of Meeting: Microsoft Teams Webinar

Meeting Facilitator: Grey Staples

Attendees:

Name	Organization	Name	Organization	Name	Organization
Adam Heinen	Dakota Electric Association	Eric Flower	Xcel Energy	Laura Silver	MN Dept. of Commerce
Adam Zoet	MN Dept. of Commerce	Eric Johansen	CenterPoint Energy	Lisa Beckner	Minnesota Power
Adway De	MN Dept. of Commerce	Ethan Warner	CenterPoint Energy	Lisa Lancaster	Slipstream
Allen Anderson	Franklin Energy Services, LLC	Graeme Miller	Energy Resources Center - University of Illinois Chicago	Lisa Rafferty	Applied Energy Group
Amalia Hicks	Cadmus	Grey Staples	The Mendota Group, LLC	Lisa Severson	Minnkota Power Cooperative
Anna Roberts	Otter Tail Power Company	Jamie Stallman	Great River Energy	Luke Hollenkamp	City of Minneapolis
Anthony Fryer	MN Dept. of Commerce	Jared Hendricks	Owatonna Public Utilities	Maddie Wazowicz	Midwest Energy Efficiency Alliance
Ashly McFarlane	Xcel Energy	Jason Grenier	Otter Tail Power Company	Martin Kushler	ACEEE, CEE
Audrey Partridge	Center for Energy and Environment (CEE)	Jeffrey Haase	Great River Energy	Matt Gluesenkamp	Cadmus
Barbara Schmit	Lake Country Power	Jeremy Petersen	Xcel Energy	Michelle Dreier	Electrical Association
Ben Rabe	Fresh Energy	Jill Eide	Great River Energy	Mike Bull	Minnesota Rural Electric Association
Bob Dibella	ICF	John O'Neil	Southern Minnesota Municipal Power	Patrick Mathwig	Dakota Electric Association
Carl Samuelson	Michaels Energy	Joseph Dammel	Fresh Energy	Rebekah Billings	CenterPoint Energy
Carter Dedolph, Jr.	CenterPoint Energy	Joseph Reilly	Ameresco	Robert Jagusch	MMUA
Chad Trebilcock	Minnesota Power	Josh Quinell	CEE	Robin Lisowski	Slipstream
Chris Baker	Willdan	Katie Frye	Minnesota Power	Todd Berreman	CenterPoint Energy
Chris Duffrin	CEE	Kelsey Kopp	Great River Energy	Tom Sagstetter	Elk River Municipal Utilities
Christopher Davis	MN Dept. of Commerce	Kent Sulem	Minnesota Municipal Utilities Association (MMUA)	Travis Hinck	GDS Associates
Cory Hetchler	Connexus Energy	Kurt Hauser	Missouri River Energy Services		
Dave Reinke	Dakota Electric Association	Kyle Schleis	Connexus Energy		

AGENDA

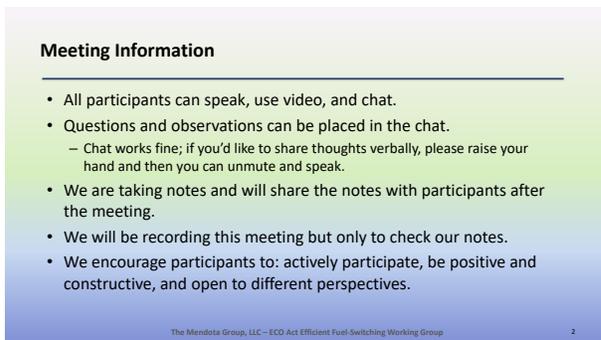
1:00 p.m.	Welcome and Introductions
1:10 p.m.	Efficient Fuel-Switching Guidelines Context and Resources
1:25 p.m.	EFS Guidelines – Discussion
2:00 p.m.	Break
2:10 p.m.	Guidelines Development Process
2:40 p.m.	Next Steps
3:00 p.m.	Adjourn

NOTES

Meeting Began: Tuesday, November 23, 2021, 1:02 p.m.

- Grey Staples begins meeting.
- Anthony Fryer - We were hoping that everyone has a better sense as to what the next steps are and we have buy-in regarding the approach we're taking.

Slide 1

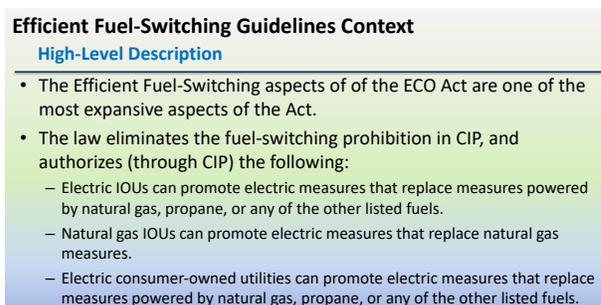


Meeting Information

- All participants can speak, use video, and chat.
- Questions and observations can be placed in the chat.
 - Chat works fine; if you'd like to share thoughts verbally, please raise your hand and then you can unmute and speak.
- We are taking notes and will share the notes with participants after the meeting.
- We will be recording this meeting but only to check our notes.
- We encourage participants to: actively participate, be positive and constructive, and open to different perspectives.

The Mendota Group, LLC – ECO Act Efficient Fuel-Switching Working Group 2

Slide 3



Efficient Fuel-Switching Guidelines Context

High-Level Description

- The Efficient Fuel-Switching aspects of the ECO Act are one of the most expansive aspects of the Act.
- The law eliminates the fuel-switching prohibition in CIP, and authorizes (through CIP) the following:
 - Electric IOUs can promote electric measures that replace measures powered by natural gas, propane, or any of the other listed fuels.
 - Natural gas IOUs can promote electric measures that replace natural gas measures.
 - Electric consumer-owned utilities can promote electric measures that replace measures powered by natural gas, propane, or any of the other listed fuels.

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Efficient Fuel-Switching Guidelines Context Statutory Language (excerpt)

Definitions

216B.2402, Subd. 4. "Efficient fuel-switching improvement" means a project that:

(1) replaces a fuel used by a customer with electricity or natural gas delivered at retail by a utility subject to section 216B.2403 or 216B.241;

(2) results in a net increase in the use of electricity or natural gas and a net decrease in source energy consumption on a fuel-neutral basis;

(3) otherwise meets the criteria established for consumer-owned utilities in section 216B.2403, subdivision 8, and for public utilities under section 216B.241, subdivisions 11 and 12; and

(4) requires the installation of equipment that utilizes electricity or natural gas, resulting in a reduction or elimination of the previous fuel used.

An efficient fuel-switching improvement is not an energy conservation improvement or energy efficiency even if the efficient fuel-switching improvement results in a net reduction in electricity or natural gas use. An efficient fuel-switching improvement does not include, and must not count toward any energy savings goal from, energy conservation improvements when fuel switching would result in an increase of greenhouse gas emissions into the atmosphere on an annual basis.

Subd. 8. Fuel. "Fuel" means energy, including electricity, propane, natural gas, heating oil, gasoline, diesel fuel, or steam, consumed by a retail utility customer.

- Grey – This is but one excerpt from the law related to efficient fuel-switching (EFS). There are other aspects, six or seven, sprinkled throughout the law related EFS.
- Grey - The law defines fuel to include electricity, propane, natural gas, heating oil, gasoline, and diesel fuel. In essence, electricity and natural gas and what we call “delivered fuels”, includes petroleum. This is a pretty big change.

Slide 6

Efficient Fuel-Switching Guidelines

Resources

- The Working Group will develop materials to send to the Department of Commerce for consideration in crafting proposed guidelines that can be reviewed by the public and considered by the DOC Deputy Commissioner for adoption.
- Working Group members are encouraged to upload to the site other information that can help inform the Working Group's efforts.
- For those interested in learning more about the process can review information from a similar DOC proceeding, related to utilities including Electric Utility Infrastructure (EUI) projects in their CIPs.
 - This info is in the Resources folder on the ECO Act Coordinating Committee SharePoint.

Slide 7

Efficient Fuel-Switching Guidelines Working Group Timeline

Reminder

- The EFS Guidelines Working Group has a tight timeline – for the Deputy Commissioner to issue a Decision by **3/15/22**, this group will need to submit draft advisory language to Department by mid to late January 2022.
- We will have meetings to follow this meeting, although much work can be done online (and we encourage this).

Slide 9

Comments Received from Eight Groups 45 Total Questions / Comments in Tracker

- We categorized items, mostly to better understand the types of questions / observations we had.
- The largest category is “Definitions” but there were a number of comments about “Technical” aspects including cost-effectiveness, and energy and GHG savings.
- Underscores the challenges of answering all questions – which will be unable to do through this group.
- Determine what is clearly permissible, what we can clarify and what will need to be handled post March 15, 2022.

- Grey – There was a lot of thought that went into questions and observations folks put into their memos.

Slide 10

Comments Side-by-Side Mostly Responses to Own Questions

Question	Response	Response	Response	Response
Does a natural gas utility requirement for fuel-switching equipment from electric to natural gas utility fuel to be based on a natural gas utility requirement or on a natural gas utility requirement?	Yes, we recommend to address this question to require about any limitations or restrictions to the EIC standard when switching to natural gas. For example, what is a natural gas utility requirement if it is to be based on a natural gas utility requirement?			The EIC would also ask whether an electric utility could implement a fuel-switching requirement that electric to natural gas, to electric, both electric, and gas utility can be able to provide and/or to be based on a natural gas utility requirement. It is unclear that there must be a natural gas utility requirement.
Does EIC require electric utility public utility switching natural gas switching equipment to be electric utility source energy or to be electric utility?	Yes, we recommend to address this question to require about any limitations or restrictions to the EIC standard when switching to natural gas. For example, what is a natural gas utility requirement if it is to be based on a natural gas utility requirement?			
What greenhouse gas emissions calculations should be used for each category?	The document appear to require that electric utilities measure EIC emissions reductions based on the hourly emissions of the utility.	Are existing modeling for electric fuel switching realistic and consistent to methodology details particularly with respect to source and emissions levels. There are several methodology details to consider by working group. Some of these are presented in a high level below Source and emissions methodologies should be listed and Methodology . Electricity supply changes that reduce emissions also increase source efficiency. In general, source energy levels are more difficult to determine. However, the quality of emissions modeling is the more important driving factor from an environmental accounting perspective. In order to develop a consistent set of assumptions and calculation framework such that these calculations are comparable to a specific fuel switching method. In practice, this means source energy flows should not have variations over the full measure lifetime based on forecasted supply with changes.	Are EIC emissions using a marginal heat rate and emissions rate when assessing fuel switching applications, instead of an average rate. Marginal emissions are the generation that is substituted or added when gas is demand is reduced, and marginal emissions factor are typically different from average emissions factors. How they directly affect the energy and emissions factors of generation has a utility specific efficiency and emissions rate. How they directly affect the energy and emissions factors of generation has a utility specific efficiency and emissions rate. How they directly affect the energy and emissions factors of generation has a utility specific efficiency and emissions rate.	Are EIC emissions using a marginal heat rate and emissions rate when assessing fuel switching applications, instead of an average rate. Marginal emissions are the generation that is substituted or added when gas is demand is reduced, and marginal emissions factor are typically different from average emissions factors. How they directly affect the energy and emissions factors of generation has a utility specific efficiency and emissions rate. How they directly affect the energy and emissions factors of generation has a utility specific efficiency and emissions rate.

- Grey – Put questions into categories or buckets to organize it a bit more and clarify. Most common categories related to definitions while the second most common were technical aspects of the law
- Grey – Large list underscores the challenge of developing proposed guidelines. We’ll have to determine what is clearly permissible and impermissible and what is less clear.
- Grey – The side-by-side and the comments are all accessible from the SharePoint. The full Issues Tracker is in the Project Management folder. The side-by-side is in the Efficient Fuel-Switching Working Group folder.

Slide 11

What We Know Eligible scenarios and projects based on statute

- Electric utilities (IOUs and COUs) can promote projects that switch fuel use from natural gas (and delivered fuels) to electricity.
- Natural gas utilities (IOUs) can promote projects that switch fuel use from natural gas to electricity.
- All projects need to meet the four-part test (IOUs from 216B.241, subd. 12 and COUs from 216B.2403, subd. 8).

- Grey – We'll have to determine what is clearly permissible and impermissible and what is less clear.
- Grey – This is what's clear.

Slide 12

What We Don't Know

Utility project eligibility scenarios that need to be explored

- Can electric utilities (IOUs and COUs) promote projects that switch fuel use from electricity to natural gas?
- Can natural gas COUs promote projects that switch fuel use from natural gas to electricity?
- Can natural gas utilities (IOUs) promote projects that switch fuel use from electricity and delivered fuels to natural gas?
- Can utilities implement projects that reduce fuel use other than the one they sell (e.g., natural gas IOU promoting lighting program)?
- Others?

- Grey – This is what's less clear.
- Josh Dammel [chat] - Is the 3rd bullet a typo? Should it also be in the form of a question?
 - Grey – Yes, it should be in the form of a question (*modified to a question in the revised slides*). It was an item that we thought we were clear on but then moved to the unclear slide.
- Mike Bull – I can provide some context from the statutory discussions.
 - Can electricity electric utilities promote projects at switch, switch from fuel use from electricity and natural gas? There's not a prohibition that I can see, but it would have to meet the criteria of lower cost, lower carbon, save energy, etc. I don't know if they could satisfy these.
 - Can natural gas COUs promote projects that switch from natural gas to electricity. Again, no prohibition but would have to meet criteria.
 - I don't think the natural gas utilities have this third bullet, don't have the authorization to switch from electricity to natural gas. They have a special provision that allows them to promote switches to electricity.
 - Can utilities implement projects that reduce fuel use other the one they sell? I believe so.
- Grey – Anyone have any different take on things than Mike?
 - [chat - Robert Jagusch and Jason Grenier agree with Mike].
 - What about the third one, whether natural gas utilities can promote projects that switch from electricity to natural gas?
 - Chris Baker – If someone is currently using electric resistance heating, switching to natural gas could meet the four criteria but do we want to encourage that? You could wind up switching them to natural gas and a year later providing an incentive to switch to a heat pump.
 - Grey – CenterPoint provided an example in memo talking about customer who had a delivered fuel (propane) and were reluctant to switch to a heat pump, so were interested in natural gas. Is it

eligible? Quick read might be “yes”. But, can it satisfy the four criteria?

- Ethan Warner – As a natural gas utility, with delivered fuels (more so than electric resistance heating), puts us in a position of forcing their choice in order to participate in CIP. It’s more difficult to explain than before. Wanted to raise issue. In terms of overall questions, there is some ambiguity given the definition of efficient fuel-switching but I agree that it may be a thinner argument than switching from gas to electricity but there are use cases that should be considered. Whether there will be hard prohibition vs. a soft prohibition (CenterPoint would argue for soft).
- Audrey Partridge – Third bullet. Agree with Mike. Written clearly for natural gas utilities, can propose to install electric technologies and lays out criteria for electric technologies but don’t see anything that speaks to broader programs for natural gas utilities. [in chat – Jason Grenier agrees]
- Grey – Also to number 4 (to Audrey)?
- Audrey Partridge – I don’t know about number 4. Number 3 seems clearer.
- Josh Quinnell – Agree with Audrey. Number 4 seems out of scope. Doesn’t seem like fuel switching. On first bullet, more ambiguity (flexibility) in that COUs can make some more complicated fuel switching pathways than might be the case with IOUs. COUs may be able to go electricity or natural gas pathways. Most are fairly explicit in encouraging delivered fuels to electricity.
- Grey – Mike’s point that the statute may not explicitly prohibit and, if not, leaves room for the potential as long as can satisfy the four criteria.
 - Adam Heinen [in chat] – May come down to approach to legal analysis.
 - Maddie Wazowicz [in chat] - Agree with the hesitation to make a conclusion on the legality of these scenarios, but ultimately any fuel-switching scenario needs to meet the four requirements laid out in the law, as Mike said.
 - Jason Grenier – Question whether approaches need to be explicitly prohibited or allowed. Prior to ECO, fuel switching wasn’t explicitly prohibited, except in DOC rules. This was created to allow approaches. Approaches need to be explicitly called out in order to allow it.
 - Anthony to Jason – Scenarios on slide 11 are the limited scenarios?
 - Jason – Yes. To say “not prohibited by the legislation” isn’t sufficient. Should be specifically permitted.
 - Anthony to Jason – So, none of the scenarios on slide 12 would be permitted?
 - Jason – Was thinking only of number 3. And, for number 3, agree with Josh that it’s outside the scope of the law. No opinion on first two.
 - Adam Heinen – May need to chat with Commerce’s attorney. It is written in statute as permissions given to someone or permissions restricted. When I

worked at Commerce, discussed things with attorneys from time to time. Or whether it has to go into some administrative process.

- Marty Kushler [in chat] – Is this something for this group or is it a legal question?
- Anthony – Chicken and egg scenario. Need to establish what we think the scenarios are to develop technical guidelines. As we develop scenarios and guidelines, and then will need legal review from the Department to ensure approach is legally sound. With ECO and CIP statute before ECO, in terms of legal review. Fuel switching prohibition issued from DOC (statute was silent). Point taken from Adam and Marty. From this process, looking to determine what legal questions are to be answered at some point.
- Bob Dibella – A scenario we have seen that needs to be figured out is where a heat pump gets added onto a home that has natural gas or some other form of heating. So you're you are theoretically switching usage from a fuel to electricity, but you don't know how much because the other fuel may continue. The household may continue to use the fossil fuel either as a primary or a backup heating system, and so there that's that hybrid scenario that might be something that come where you would need some guidance as to. You know whether the electric system is the primary heating system. If there is any controls in place and that type of thing.
 - Grey – CenterPoint raised some of these questions in their memo. Issues with respect to switching to a heat pump and retain electric resistance heating as back up or questions of sizing the unit to provide sufficient heating. This is particularly relevant to heat pumps in cold climates. Questions around M&V and the technical aspects of project eligibility and, in turn, how will estimate the savings.
- Jeff Haase – Question in my mind is, thinking about delivery mechanisms for efficiency. Weatherization providers, within those programs to switch from electric to natural gas. While it's focused on heating fuels, there is also a cooling impact associated with that, and so the focus should be on optimizing and looking at that comprehensive approach to any household or business energy utilization to move in the direction of optimizing but recognizing that utilities will be working with other entities and these discussions could add confusion to those interactions.
- Matt Gluesenkamp [in chat] - For heat pumps, we might end up in a position where we really need to record the specific install scenario for each project. Replaced fuel / backup, changeover temp, possibly sizing information. (Anthony adds “sizing information as well”).
- Grey – Yes, is going to have to be ported to the TRM discussions in terms what's going to establish the baseline. Need to identify the technical scenarios and define them. There will be some that we can't answer.
- Audrey – Can someone provide context regarding how a gas utility could promote a lighting program? Seems not to be fuel switching unless they had gas lights. Is there an example that would make this more clear?
 - Anthony – This is at the far end of the fuel switching spectrum. Natural gas utility just being involved in efficiency programs beyond their fuel type. Not promoting this scenario but getting feedback regarding where the line is.

- Grey – This was offered up by commenters. Why it’s included in the list. Answer seems to be clear. Not eligible.
- Marty – Another aspect, regarding what fuels can be saved. A utility may encourage building shell installation. Who would get credit from the installation – would it be gas or electric or some combination? Added complexity.
 - Grey – Weatherization, PCTs ... measures that double dip on gas and electric savings. Larger project that includes EFS, how do you ascribe savings to the utility.
 - Marty – Good policy would encourage building shell insulation with heat pump installation.
 - Grey – From Marty’s written comments. Also, looking to exploit the opportunity to maximize benefits.
- Carl Samuelson [in chat] - Can someone share a link/line reference for the special direction provided to Natural Gas IOUs in statute? I can't find it.
 - Audrey [in chat] - Carl, I'm looking at Subd. 12 here <https://www.revisor.mn.gov/statutes/cite/216B.241>

Slide 13

Issues Applicable to Projects
Identify those applicable to all versus those applicable to specific

- Applicable to all:
 - Estimates of utility-specific GHGs.
 - Guidelines for estimating EFS project cost-effectiveness.
 - Guidelines for estimating EFS project energy savings.
- Applicable to specific situations.
 - What types of projects will be eligible (new construction)?
 - What baselines to apply for measures not previously rebated (e.g., EVs)?
 - What differs between COUs and IOUs in terms of projects that will qualify?

- Grey – In California, fuel switching (substitution) does not apply to new construction. It’s new. You’re not switching from anything.
- Anthony – The omission here is in regard to system load factor. As Mike was saying, whatever the scenario might be, would be subject to four-point criteria. Question for Mike or natural gas utilities. For system load factor, is that applicable to natural gas (say, for switch from electricity or another fuel to gas)?
 - Jared Hendricks – If I’m understanding the question. Would not be applicable.
 - Grey – Fourth criterion is it needs to improve system load factor. Gas utilities have loads and certain amount of capacity. Electric utilities have load factors. Is this applicable to gas? Jared said “no”.
 - Ethan – Agrees that load factor doesn’t apply to gas.

Slide 14

Goals

Will further categorize items in terms of whether guidance will address

Groupings

- Those that should/must be answered by DOC guidance.
- Those that would be good to answer in guidance.
- Those that cannot be answered in guidance and we'll tee-up for longer-term consideration.

Prioritize

- These will dictate priorities in terms of what can be accomplished by mid to late-January to send to DOC.

10-minute Break

- Grey – Give folks an opportunity to provide input regarding what things need to be clarified. Focused on eligibility opportunities for utilities. But, will also have technical eligibility criteria. Lots of comments in memos. Open the opportunity for anyone else to offer up questions/issues they raised in memos or not put into memos.
- Josh Quinnell – Have been thinking about details. On technical details, as consistent and transparent about what EFS is. Best way is through tests. Tests require us to go beyond where we have been before. Understand emissions in terms of source energy efficiency – both in terms of time and equipment perspectives. These will matter. Consistent testing methodology will be important.
- Grey – Plug for memos. Encourage people to read them. More detailed were from Josh (CEE) and Graeme Miller.
 - (Graeme unable to unmute so Grey paraphrases memo) – Graeme uploaded ICF/EPA documents. Also, how CHP was treated in Illinois TRM. What role would CHP play in terms of EFS?
 - Grey – CHP is combined heat and power .. a form of cogeneration. Using excess heat from combustion process to provide heat from heating load. Question about switching from electricity usage to natural gas because CHP tends to be natural gas.
 - Bob – CHP issue. Didn't upload the documents. Where it has come up in the past with electrification. More related to resiliency vs. electrification. If trying to switch things to electricity does provide more resiliency when has CHP.
 - Ethan – Wondering how legislation intersects with current way of handling CHP in CIP. Current approach is case-by-case basis. Situation at the particular facility. Would those be affected by legislation? Offer rebates to CHP. Need to document base case and high-efficient case?
 - Anthony – Haven't done a deep dive into the ECO language and how it will impact current guidance regarding CHP. Would be on to do list. First blush, doesn't seem to necessitate revision of current approach but need more thorough scan.

Slide 17

Input from Working Group

Timeline

- Request that Stakeholders provide listing of specific scenarios, whether organization thinks they qualify, and the reasoning for why it qualifies (as well as questions you may have).
- Provide this by December 1 through memos.
- We will then combine this information into the list of eligible/ineligible utility scenarios in time for a December 8 target meeting.
- For Dec. 8 meeting, will have more clearly defined eligibility items and draft guidance, along with additional questions (technical and otherwise) that will need to be addressed.

- Hoping to, coming out the Dec. 1 and Dec. 8 meetings, be able to assign individuals and groups to further flesh out the technical guidelines.
- Anthony – Regarding first bullet, scenarios, please cite statutory language that you believes enables that scenario.
- Grey – Another plug, for items in the Resources folder. See the California guidance based on changes to their rules in 2019. There are commonalities regarding efficient fuel-switching across jurisdictions. CPUC has a calculator to assess efficient fuel-switching ... encourage members to take a look. If there are other documents, we would welcome those.
- Anthony [for Marty in chat] - One element that I hope this group will address, if not today then in future meetings, is this question I had submitted: What protocols and requirements will be established for monitoring, reporting, evaluation, and enforcement to ensure that any fuel switching programs, customer incentives, etc. operated by utilities are properly complying with the statute definition of “efficient fuel switching”?
 - Anthony – Important point. As we go through process, as we better understand the scenarios and what will be allowed, will be able to understand how utilities can demonstrate that they are satisfying the criteria to have programs approved and justify savings in reports.
 - [John O’Neill in chat] - Good question Marty, but do you think it requires any more scrutiny than other utility CIP activities?
 - [Josh Quinnell in chat] - John, good point. I think due to the nature of different assumptions and perhaps more forecasting it will require thinking about Marty's question with that new info.
 - [Marty in chat] - In theory, no, but since this is pretty new and could be seen as more controversial, it may deserve additional initial scrutiny. Recall that EE was subjected to a lot of questioning and scrutiny in the early years. & certainly some of the details will be different than EE.

Slide 18

Next Steps

- Working Group members review comments in ECO Act Implementation Issues Tracker (Efficient FS WG tab and EFS Side-by-Side) and add items and comments as you see fit.
- Members will draft memos with any additional utility eligibility questions and answer those that have already been identified:
 - Can electric utilities (IOUs and COUs) promote projects that switch fuel use from electricity to natural gas?
 - Can natural gas COUs promote projects that switch fuel use from natural gas to electricity?
 - Can utilities implement projects that reduce fuel use other than the one they sell (e.g., natural gas IOU promoting lighting program)?

- Jeremy Peterson – Electric and gas system impacts and how they will be used to meet the ECO requirements of BTU savings and emission savings; but, we also have this cost effectiveness work group that will be tackling those same questions answered. If we go down the electric avoided costs road, that could take a while.
 - Anthony – We’re hoping, coming out of this process, where technical guidance is actionable from the utilities’ standpoint, including EFS programs in plans. For cost effectiveness, want a methodology that is usable by utilities on March 15, 2022. Many rabbit holes can go down. If not perfect, utilities can at least use. For both EFS and load management. Then will move to cost effectiveness advisory committee for further development.
 - Jeremy – Sounds like we should make as much progress on those efforts in this WG and then hand to cost effectiveness advisory committee.
 - Grey – We’ll only be identifying the methods and not actually updating the electric avoided costs (would likely apply to Cost Effectiveness Advisory Committee).
 - Adam agrees.
 - Grey says that this should give utilities sufficient information to be able to file programs.

End at: 2:36 p.m.