



national fuel

March 28, 2013

Honorable Jeffrey Cohen
Acting Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Case 07-M-0548 – Proceeding on Motion of the Commission Regarding an Energy Efficiency Portfolio Standard

Case 07-G-0141 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of National Fuel Gas Distribution Corporation for Gas Service – Conservation Incentive Program

Dear Acting Secretary Cohen,

Pursuant to the Energy Efficiency Portfolio Standard (“EEPS”) reporting guidelines, attached please find the 2012 Annual Report Summarizing Evaluation Activities.

Any questions you may have regarding the attached can be directed to the undersigned at (716) 857-7805 or at meinle@natfuel.com.

Respectfully submitted,

Eric H. Meinl
General Manager, Rates & Regulatory Affairs

Attachments

Program Administrator	National Fuel Gas Distribution Corporation
Program/Project	Residential Rebate Program
Reporting Period	Annual (January – December) 2012
Report Contact Person	Eric Meinl

Summary of Evaluation Activities

National Fuel Gas Distribution Corporation has received and forwarded to Staff a draft Process Evaluation report from its evaluation contractor¹ in December 2011. The Company has started to take action on the recommendations from the Process Evaluation report, has developed a formal implementation plan, and has completed work on some of the recommendations. The Company is awaiting Staff's formal approval of the report.

Distribution has prepared a pre/post billing analysis of customer consumption for determining savings associated with the program. The proposed pre-post analysis is one of several statistical techniques for determining the savings of energy-efficiency programs. This method involves using monthly—or interval—consumption data to measure program impacts. Cadmus has conducted an assessment of Distribution's pre post billing analysis. Distribution included a copy of the results of the Cadmus pre post billing analysis in Appendix I of its quarterly CIP status report filed with the Commission on November 15, 2011.² The billing analysis does provide solid evidence that customers participating in our Residential Rebate Program are reducing consumption significantly more than the average customer base.

Distribution is participating with other program administrators in a statewide Residential Gas HVAC Program impact evaluation. Distribution attended the project kickoff meeting on October 25, 2012, and has continued to attend project meetings. Before the end of calendar year 2012, the Company provided responses to the Program Design and Weather data requests. The Company also began work on the Program Tracking Database and Monthly Billing data requests, which were completed in the first quarter of 2013.

Additional evaluation detail is provided in Distribution's Conservation Incentive Program Implementation Plan, filed on March 21, 2013, at docket 07-M-0548 and filing number 1934.

¹ The Cadmus Group, Inc. / Energy Services; 720 SW Washington Street, Suite 400; Portland, OR 97205.

² <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={CDD359CA-F0DD-4161-A273-11E5C8111FF7}>.

Program Administrator	National Fuel Gas Distribution Corporation
Program/Project	Small Non-Residential Rebate Program (NRCIP)
Reporting Period	Annual (January – December) 2012
Report Contact Person	Eric Meinel

Summary of Evaluation Activities

National Fuel Gas Distribution Corporation has received and forwarded to Staff a draft Process Evaluation report from its evaluation contractor³ in December 2011. The Company has started to take action on the recommendations from the Process Evaluation report, has developed a formal implementation plan, and has completed work on some of the recommendations. The Company is awaiting Staff's formal approval of the report.

The NRCIP program is administered by NYSEERDA. The Company has received confirmation from NYSEERDA that a joint impact analysis of the program could be completed in the future, when NYSEERDA is ready to initiate the project. The Company is looking forward to this collaborative opportunity.

If a joint impact analysis cannot be completed with NYSEERDA, the Company will continue to explore participating in statewide impact studies of the small commercial market place, where such studies are determined to be cost effective. If there is no opportunity to participate in statewide studies to determine the impact of this program, the Company will develop an individual impact study proposal for this program.

The Company is also considering using the evaluation contractor to complete a review of NYSEERDA's impact analysis for Existing Facilities, when the analysis is completed and information is available, to assess its applicability to NRCIP.

Additional evaluation detail is provided in Distribution's Conservation Incentive Program Implementation Plan, filed on March 21, 2013, at docket 07-M-0548 and filing number 1934.

³ The Cadmus Group, Inc. / Energy Services; 720 SW Washington Street, Suite 400; Portland, OR 97205.

Program Administrator	National Fuel Gas Distribution Corporation
Program/Project	Low Income Usage Reduction Program (LIURP)
Reporting Period	Annual (January – December) 2012
Report Contact Person	Eric Meinl

Summary of Evaluation Activities

National Fuel Gas Distribution Corporation has received and forwarded to Staff a draft Process Evaluation report from its evaluation contractor⁴ in December 2011. The Company has started to take action on the recommendations from the Process Evaluation report, has developed a formal implementation plan, and has completed work on some of the recommendations. The Company is awaiting Staff’s formal approval of the report.

Distribution has prepared a pre/post billing analysis of customer consumption for determining savings associated with the program. The proposed pre-post analysis is one of several statistical techniques for determining the savings of energy-efficiency programs. This method involves using monthly—or interval—consumption data to measure program impacts. Cadmus has conducted an assessment of Distribution’s pre post billing analysis. Distribution included a copy of the results of the Cadmus pre post billing analysis in Appendix I of its quarterly CIP status report filed with the Commission on November 15, 2011.⁵ The billing analysis does provide solid evidence that customers participating in LIURP are reducing consumption significantly more than the average customer base.

The LIURP program is administered by NYSERDA. The Company is planning on participating in a joint impact evaluation NYSERDA on the Home Performance with Energy Star and EmPower programs, as well as Distribution’s LIURP, for program years 2010 and 2011. The project kicked off on February 7, 2013. Providing that final project contracting issues can be completed, Distribution plans to continue to provide program information and data, to work with NYSERDA in to further advance the project, and keep the project moving according to schedule.

If a joint impact analysis cannot be completed with NYSERDA, the Company will continue to explore participating in statewide impact studies for LIURP, where such studies are determined to be cost effective. If there is no opportunity to participate in statewide studies to determine the impact of this program, the Company will develop an individual impact study proposal.

⁴ The Cadmus Group, Inc. / Energy Services; 720 SW Washington Street, Suite 400; Portland, OR 97205.

⁵ <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={CDD359CA-F0DD-4161-A273-11E5C8111FF7}>.

In the mean time, our evaluation contractor has completed a review of NYSERDA's impact analysis for EmPower, to assess its applicability to LIURP. The review notes that the gas impact results from NYSERDA's impact analysis appear to be applicable to LIURP. Further, the evaluation contractor believes that the billing analysis can be used to assess usage impacts for LIURP.

Additional evaluation detail is provided in Distribution's Conservation Incentive Program Implementation Plan, filed on March 21, 2013, at docket 07-M-0548 and filing number 1934.