

Joint Utilities

Technical Resource Manual

Management Plan

September 26, 2017

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I. Introduction

As directed in the February 26, 2015 Order Adopting Regulatory Policy Framework and Implementation Plan (the “REV Track One Policy Order”) in the Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision (the “REV Proceeding” or “REV”) issued by the New York State Public Service Commission (“Commission”),¹ and subsequently augmented by the January 22, 2016 Order Authorizing Utility-Administered Energy Efficiency Portfolio Budgets and Targets for 2016-2018 (the “2016 Utility Energy Efficiency Order”) in the Matter of Utility Energy Efficiency Programs,² Central Hudson Gas and Electric Corporation (“Central Hudson”), Consolidated Edison Company of New York, Inc. (“Con Edison”), National Fuel Gas Distribution Corporation (“National Fuel”), New York State Electric & Gas Corporation (“NYSEG”), Niagara Mohawk Power Corporation d/b/a National Grid, The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid (collectively “National Grid”), Orange and Rockland Utilities, Inc. (“O&R”), Rochester Gas and Electric Corporation (“RG&E”), and Long Island Electric Utility Servco LLC as agent of and acting on behalf of Long Island Lighting Company d/b/a LIPA (“LIPA”) (collectively the “TRM Administrators”³) hereby submit this Technical Resource Manual (“TRM”) Management Plan.

The REV Track One Policy Order stated:

The utilities will work collectively to support the maintenance of a New York State TRM, while allowing for utility territory specific inputs, as appropriate. The Joint Utilities will file a TRM Management Plan by no later than June 1, 2015. Upon filing this plan, the utilities will assume responsibility for the TRM from Staff. This plan should include a process that ensures each utility’s and NYSERDA’s input is considered, all

¹ Case 14-M-0101 – *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision* (“REV Proceeding”), Order Adopting Regulatory Policy Framework and Implementation Plan (issued and effective February 26, 2015).

² Case 15-M-0252 – *In the Matter of Utility Energy Efficiency Programs*, Order Authorizing Utility-Administered Energy Efficiency Portfolio Budgets and Targets for 2016-2018 (issued and effective January 22, 2016).

³ Long Island Electric Utility Servco LLC, as agent of and acting on behalf of Long Island Lighting Company d/b/a LIPA (“LIPA”), was added in 2016, changing the reference from “Joint Utilities” to “TRM Administrators” as a result.

changes to the TRM are transparent to Staff and stakeholders, and an updated TRM will be filed annually in accordance with the schedule discussed below. In addition the TRM Management Plan should include any plans for the use of contractor support, including the expected schedule for obtaining such support. Staff will retain a monitoring and auditing role.⁴

Accordingly, the Joint Utilities' representatives, with the participation of New York State Department of Public Service ("DPS") Staff ("Staff"), the New York State Energy Research and Development Authority ("NYSERDA"), and Public Service Enterprise Group ("PSEG")/Long Island Power Authority ("LIPA") began the TRM Transition Subcommittee with a kick-off meeting on April 1, 2015. Representatives from the Joint Utilities were present at the initial meeting, and subsequent meetings were held with the aforementioned parties in order for the Joint Utilities to successfully issue an initial TRM Management Plan on June 1, 2015.

On June 19, 2015, the Commission issued an Order Authorizing Utility-Administered Gas Energy Efficiency Portfolios for Implementation Beginning January 1, 2016 (the "2015 Gas Energy Efficiency Order"), which directed: (1) "all gas utilities implementing energy efficiency programs in 2016 to participate in the maintenance of the TRM," and (2) the "TRM Management Plan filed on June 1, 2015 in Case 15-M-0252 to be modified."⁵

On October 15, 2015, the Secretary to the Commission established a new matter number dedicated to the TRM, Matter 15-01319, In the Matter of the Technical Resource Manual. This Matter was intended by Staff to facilitate the transparent and orderly conduct of activities related to the TRM, aiding parties in tracking developments.

⁴ REV Proceeding, *supra* note 1.

⁵ Case 15-M-0252 – *In the Matter of Utility Energy Efficiency Programs*, Order Authorizing Utility-Administered Gas Energy Efficiency Portfolios for Implementation Beginning January 1, 2016 (issued and effective June 19, 2015) ("2015 Gas Energy Efficiency Order"), at 13.

On January 22, 2016, the Commission issued the 2016 Utility Energy Efficiency Order, which directed the Joint Utilities to make additional modifications to the TRM Management Plan.⁶

II. Purpose

The initial purpose of the TRM Transition Subcommittee (a “form and fold” subcommittee of the E2 Working Group⁷) was to prepare a plan that will facilitate an effective transition, from Staff to the Joint Utilities, of the functional responsibility for maintaining the TRM. As part of this transition, the TRM Transition Subcommittee provided input, and the Joint Utilities designed the TRM Management Plan to provide the foundational venue for utilities to work together to maintain and update the TRM prospectively. Now that the transition from Staff to the Joint Utilities has been effectuated, the TRM Transition Subcommittee has folded.

Per the REV Track One Policy Order, the Joint Utilities assumed responsibility from Staff for maintaining and updating the TRM, effective June 1, 2015, when the Joint Utilities filed the initial TRM Management Plan. As part of the initial TRM Management Plan filing, the Joint Utilities established a TRM Management Committee (“TRM MC”) that replaced the folded Technical Manual Subcommittee, the details of which are described in greater detail herein. Version 3 of the TRM, also known as the *New York Standard Approach for Estimating Energy Savings from Energy Efficiency Programs- Residential, Multi-family, and Commercial/Industrial Measures, Version 3*, was provided to the Joint Utilities by Staff. A letter indicating this fact was filed by Staff on June 1, 2015 in case 15-M-0252.⁸ Supporting documentation, as listed in Appendix A to this Plan, was also provided to the Joint Utilities by Staff.⁹

⁶ Case 15-M-0252 – *In the Matter of Utility Energy Efficiency Programs*, Order Authorizing Utility-Administered Energy Efficiency Portfolio Budgets and Targets for 2016-2018 (issued and effective January 22, 2016), at 40 and 41.

⁷ The E2 Working Group was established in February 2014 and operated in the context of broader Commission proceedings. The E2 Working Group has been subsumed into the Clean Energy Advisory Council (“CEAC”). The CEAC Steering Committee consists of Staff, NYSERDA, representatives from the major electric and gas utilities, LIPA, the New York Power Authority (“NYPA”), PSEG, and designees from various working groups. CEAC meetings are open to all stakeholders and parties in Cases 07-M-0548, 15-M-0252, 14-M-0094, and 14-M-0101. The CEAC’s primary objective is to support innovation and collaboration leading to the development of the most impactful clean energy programs and to reduce cost and achieve scale for these resources, including an effective transition from current clean energy program offerings and on-going delivery thereafter.

⁸ Case 15-M-0252 – Letter from Colleen L. Gerwitz, DPS Director of the Office of Clean Energy, to the Commission Secretary, filed on June 1, 2015.

⁹ Staff developed and provided Appendix A to the Joint Utilities for use and inclusion in the TRM Management Plan.

The primary purpose of the TRM is to provide a standardized, accurate, fair, and transparent approach for estimating gross savings. To do so, the TRM provides standardized energy savings calculations and assumptions at the measure level for estimating energy savings.¹⁰ It should be noted that the TRM is not intended to measure net energy and demand savings (*i.e.*, savings that have been adjusted based on completed evaluation study results, incorporating free ridership, spillover, etc.). The Plan presented herein addresses the on-going methodology and practices that the TRM MC will undertake to maintain and update the TRM.

III. Overview

The TRM Management Plan generally describes the overall process used to maintain and update the TRM, as described in greater detail herein. This process accommodates a variety of inputs, including but not limited to: (1) impact evaluation findings or focused Measurement and Verification (“M&V”) analyses relevant to savings algorithms; (2) developments or enhancements in technology; (3) updates to industry standards or energy conservation codes; and (4) demand savings assumptions.

The TRM will continue to evolve over time and will incorporate various inputs, some of which are currently not known. The complexity of some of the inputs may require further analysis in order to be understood and appropriately integrated into the TRM. Additionally, there may be a need to engage specialized industry expertise to aid in such understanding and integration.

In the future, utility program administrators will continue to plan and conduct Evaluation, Measurement and Verification (“EM&V”) studies or focused M&V analyses at any of the following levels: technology or measure level, program level, portfolio level, and/or statewide level. TRM revisions will make use of relevant EM&V impact study findings or detailed impact M&V analyses, in accordance with Clean Energy Guidance Document CE-01, Utility Energy Efficiency Program Cycle, issued by the DPS Office of Clean Energy on May 1, 2015 (“Clean Energy Guidance Document CE-01”).

¹⁰ Additionally, the TRM provides measure-specific effective useful lifetimes.

IV. Organizational Structure

A TRM MC was formally established on June 1, 2015, with the initial filing of the TRM Management Plan. To create the TRM MC, each utility identified one lead representative who would participate in ongoing TRM MC activities. Representation on the TRM MC from the major utilities, consisting of Central Hudson, Con Edison, National Fuel, NYSEG, National Grid, O&R, and RG&E is required.¹¹ Each lead representative is responsible for inviting other company representatives to participate in ongoing TRM MC meetings as appropriate.

Although each of the nine utility legal entities specified in the introduction have equal representation on the TRM MC, in accordance with the requirements specified in the REV Track One Policy Order and further clarified in the 2015 Gas Energy Efficiency Order, there are differences with respect to the TRM MC's voting structure and funding structure, both of which are described in greater detail herein. With respect to voting, there are a total of seven votes, with Con Edison, Central Hudson, National Fuel, National Grid, NYSEG/RGE, O&R, and LIPA each representing a single vote. With respect to funding, the member companies of the TRM MC have agreed upon a set funding methodology which is also described in greater detail herein. The funding methodology is at the utility legal entity level, with the exception of National Grid which is shown as a consolidated number for all three National Grid legal entities. These differences are specified here for transparency purposes and have been agreed upon by the member companies of the TRM MC.

The TRM MC will ensure NYSERDA has input (by inviting NYSERDA to participate in TRM MC meetings and activities), and that all changes made to the TRM are transparent to both Staff and stakeholders, as described in greater detail below. The TRM MC is responsible for adding new measures to the TRM, and maintaining and updating the TRM annually per the Clean Energy Guidance Document CE-01.

¹¹ Representation on the TRM MC from Corning Natural Gas Corporation and St. Lawrence Gas Company, Inc. is strongly encouraged, to the extent that these utilities have energy efficiency interests in the future.

Two co-chairs from the TRM MC are selected to serve a term of twelve months.¹² The co-chairs are responsible for establishing the monthly meeting schedule, facilitating meetings, prioritizing workloads, managing all TRM MC activities, and ensuring that TRM MC deliverables are met. Additional meetings, beyond monthly meetings, are scheduled on an as needed basis. Through regular meetings of TRM MC, and through work contributions from “form and fold” subcommittees,¹³ the TRM will be maintained and updated.

Within the organizational structure, the co-chairs may appoint designees or request assistance from members of the TRM Administrators in order to complete specific detailed tasks. For example, the co-chairs have appointed a Secretary designee that is responsible for general administration work, scheduling meetings, facilitating communication, and other ad hoc assignments.

The TRM MC has agreed upon the fixed cost share percentages¹⁴ outlined below for contracting purposes, based on an on-going productive dialogue and negotiation process facilitated amongst member companies. To the extent that the TRM MC incurs costs associated with: (1) obtaining administrative support, or (2) maintaining and updating the TRM, the following percentages will be utilized:

- Central Hudson 3%
- Con Edison 38%
- LIPA 11%
- National Fuel 4%
- National Grid 31%

¹² Co-chairs are not prohibited from serving multiple consecutive terms, with the TRM MC’s consensus. In addition, the member companies of the TRM MC have agreed that co-chair representatives only be from combination utilities, as these companies have the necessary expertise in both the electric and natural gas industries. After the conclusion of a twelve month term, the TRM MC reserves the right to identify new co-chairs or continue operating with the existing co-chairs. To the extent agreement is not reached in selecting new co-chairs, the existing co-chairs will continue to serve for the next twelve-month term.

¹³ “Form and fold” subcommittees would be comprised of TRM MC member company personnel.

¹⁴ Cost share percentages were informed by EM&V work previously completed under EEPs. The cost share percentages outlined in this document are derived from contract negotiations amongst the TRM MC member companies, which occurred as part of bringing on-board the TRM Administrative Vendor (described in greater detail herein). The cost share percentages shown above will be applied to TRM Administrative Vendor invoices, which are approved for payment, as support work is completed. Each member company is responsible for paying such approved invoices through their Commission-approved EM&V budget.

- NYSEG 6%
- O&R 2%
- RG&E 5%

To the extent that the TRM MC identifies a need to switch cost methodologies, or make further adjustments to individual cost shares resulting from new contract negotiations for TRM Administrative Vendor support, the TRM MC will revise the TRM Management Plan accordingly and file the updated TRM Management Plan with the Commission.

V. TRM Administrative Details

A. Cyclical Filing Schedule

The primary function of the TRM MC will be to issue annual TRM updates that reflect information from EM&V studies, M&V analyses, or technology changes. The annual update will also include changes (*e.g.*, new measure additions, revisions, etc.) that have been adopted by the TRM MC and filed in accordance with Clean Energy Guidance Document CE-01.¹⁵ The TRM MC will also file quarterly record of revisions for any additions or revisions to the TRM, for stakeholder benefit and transparency purposes. A representative example of a typical cyclical filing schedule is included as Appendix B to this filing. The cyclical filing schedule will document, the filing schedule for record of revisions and the annual update.

B. Addition/Change Process

The TRM MC has established a functional workflow process to outline how submittals for measure additions, or revisions to existing measures in the TRM, will be worked and advanced through the TRM MC. A copy of this functional workflow process is included as Appendix C

¹⁵ Clean Energy Guidance Document CE-01 “The Commission directed the utilities to work collectively to maintain a New York State TRM, while allowing for utility territory specific inputs, as appropriate. Each year, the utilities must submit an updated TRM that reflects the best available information and incorporates the findings from the previously filed EM&V studies.”

“TRM MC-Addition/Change Process” to this filing, and will be posted to the website¹⁶. Submittals prepared by TRM MC member companies and submittals prepared by non-TRM MC entities (described in more detail below) will both follow the same functional workflow process.¹⁷ Proposed new and proposed revised measures may be submitted at any time during the calendar year. Submitted measures will then be considered by the TRM Administrators on a continuous basis in accordance with the functional workflow. The TRM MC will seek to complete submittals requiring a short-term review within five weeks. For items requiring a more comprehensive review, review will typically take at least eight weeks to complete. Specific start dates and estimated end dates will be established when submittals are received. Such dates will be communicated to the TRM MC and the submitting party. Dates will ultimately be tracked and updated within the detailed work plan maintained by the TRM MC. TRM Administrators will discuss if a submittal should undergo a short-term review or a more comprehensive review during TRM MC meetings. This determination will be based on member company judgment (*e.g.*, items that could influence this judgment could include workload, availability of resources, the complexity of the submittal, necessary filing requirements, etc.). It should be noted that emerging technologies and new market innovations will also be accommodated within this workflow, however; the timelines for these submittals will be discussed and established during TRM MC meetings. The TRM MC reserves the right to accelerate or temporarily postpone the review of submittals, as necessary. In addition, the TRM MC may elect to postpone the review of a submittal when appropriate (*e.g.*, if additional information has been requested or if consultation with technical expertise is deemed necessary). A resubmittal is required when there is a “NO” vote on the proposed addition or revision, while a postponement is required when the TRM MC requires further research or supporting documentation. In the case of a postponement or resubmittal, the TRM MC will communicate to the submitting party the reason behind the postponement or resubmittal. The TRM MC will vote on submittals for their potential inclusion in the TRM. The voting structure is described in greater detail in the Organizational Structure section. Votes cast by TRM Administrators are defined below. The following voting definitions have been further refined by the TRM MC during the preparation of the TRM Management Plan:

¹⁶ <http://www3.dps.ny.gov/W/PSCWeb.nsf/All/72C23DECFF52920A85257F1100671BDD?OpenDocument>

¹⁷ The term “entity” is not restrictive – this could include utilities, Staff, NYSEDA, technology providers, stakeholders, or any other entity not specified that is working on a submittal. The TRM MC also recognizes that multiple entities may be working together on a submittal.

- “YES” – defined as no technical issues with the submittal being presented based on the best available information known by the TRM MC.
- “NO” – defined as technical issues with the submittal being presented, or outstanding questions that have not been addressed in full. “NO” votes are meant to work towards a consensus process, and require further discussions (between or during TRM MC meetings), to move the submittal forward. The entity¹⁸ presenting a submittal that receives a “NO” vote is responsible for responding to the technical issues or outstanding questions identified by the TRM MC, or to inform the TRM MC that the submittal should no longer be considered. “NO” votes can be re-voted to “YES” or “ABSTAIN” based on discussions that ensue or additional information that is ultimately presented. To the extent a submittal receives a “NO” vote and no action has occurred to respond to the “NO” vote within two calendar months, then TRM MC member companies can elect to nullify the submittal; requiring a new submittal if the measure is presented in the future. Reasons for a nullified submittal will be documented in quarterly record of revision filings for transparency purposes.¹⁹
- “ABSTAIN” – defined as a vote that does not stop the TRM MC’s consensus process from moving forward. The reason a TRM MC member is electing an “ABSTAIN” vote can be provided: (1) during the voting process, or (2) during discussions at TRM MC meetings. These reasons will be documented in TRM MC voting spreadsheets.

It should be noted that the TRM Administrator’s voting process only considers the technical accuracy of submittals being presented. If a measure or technology is included in or added to the TRM, it does not mean that it is supported or expressly endorsed by the member companies of the TRM MC (*e.g.*, for gas-only utilities, non-gas measures or technologies may never be

¹⁸ *Id.*

¹⁹ Rather than filing exhaustive meeting notes from each of these discussions, the TRM MC will summarize reasons for nullified submittals within the quarterly record of revision filings, for transparency purposes.

supported or expressly endorsed). There is no guarantee that measures included in the TRM will be offered by all utilities.

When a submittal receives “YES” or “ABSTAIN” votes from all TRM MC member companies, then the change has officially been adopted by the TRM MC. Adopted additions or revisions will formally be documented in the quarterly Record of Revision filing and with effective dates in the detailed work plan.

It is important to note that submittals to the TRM MC require a specific form and format, which includes among other things: supporting references, resource documentation, calculation, and input variances. A template for the specific form and format will be made available on the DPS website²⁰ and is included in Appendix D to this filing. Any entity²¹ wishing to prepare a new or revised measure submittal is encouraged to contact member companies of the TRM MC, the TRM MC co-chairs, or a designee (such as the Secretary designee described earlier) directly with questions or completed submittals. The TRM MC should be able to address any questions that arise when a submittal is in the process of being prepared and the TRM MC will determine when a submittal is ultimately deemed complete and is ready for TRM MC membership voting. Submittals to change existing content within the TRM must be accomplished by redlining the existing page or pages in the currently effective TRM. Supporting information, if available, for the redlined changes being made must accompany the redlined document. Once the redlined document is prepared it can be submitted to any member company within the TRM MC or the TRM MC co-chairs, Secretary designee, or other designee of the TRM MC co-chairs. During TRM MC meetings, any input (either verbal during meetings or written between meetings) received from TRM MC member companies, Staff, NYSERDA, or other external stakeholders is welcomed and will be considered by the TRM MC.

C. TRM MC Activities

The following work activities are conducted by the TRM MC to support its on-going, primary purpose of maintaining and updating the TRM:

²⁰ See <http://www3.dps.ny.gov/W/PSCWeb.nsf/All/72C23DECFF52920A85257F1100671BDD?OpenDocument>.

²¹ *Supra* note 15

1. Meetings

The TRM MC will schedule meetings which will be communicated to all TRM MC participants. The purpose of these meetings is to discuss progress on current work, planning for future work, and to discuss any outstanding items.

2. Detailed Work Plan

The TRM Administrators will follow and manage a detailed work plan which will include a recap of work completed, and an on-going workload prioritization list. A representative example of a current, detailed work plan is included as Appendix B to this filing. The TRM Administrators will include a copy of the most up-to-date version of the detailed work plan within quarterly record of revision filings, for transparency purposes. A list of approved measures for the quarter and a brief explanation for measures not approved will be included in the detailed work plan each quarter. The detailed work plan will focus on codes, standards, demand savings updates, new measures, emerging technologies, as well as results from on-going EM&V studies.

a) Codes, Standards, and Demand Savings

The TRM Administrators will continue to assess current TRM assumptions such as: codes/standards, baselines, input variables, and components of savings algorithms. The TRM MC obtained contractor support (“TRM Administrative Vendor”) in late 2016, and immediately initiated a thorough review of energy codes, industry standards and demand savings assumptions. The progress of the review will be tracked within the detailed work plan described above. The TRM MC initiated a global update process to review all existing measures to update codes, standards, and demand savings. A measure priority list was developed for the global update process, with measures most frequently included in member company programs receiving the highest priority. Once the global update process is complete, the TRM Administrators will work with the TRM Administrative Vendor to develop an ongoing process for updating these items prospectively, where applicable, in order to maintain an accurate and reliable TRM. The approach and plan for updating codes, standards and demand savings assumptions will be documented within the detailed work plan described above.

b) New Measures

The TRM Administrators will incorporate new measures into the TRM as submittals are developed and provided to the TRM MC. The TRM Administrators require that submittals adhere to the Addition/Change process described above, and that each submission follow the standardized format. The most up to date version of the standardized format template is located on the DPSwebsite.²²

c) EM&V

Results from filed EM&V and M&V studies should be presented to the TRM MC by the utility or 3rd party entity that managed the study following the Addition/Revision process defined in this plan. The TRM MC expects that the party filing completed EM&V results, where an update to the TRM is necessary (e.g., these changes are typically found in impact evaluation studies), present such updates to the TRM MC within 60 days of completion for their review and consideration. This may be in the form of a redline submittal or the identification of items to be added to the detailed work plan (when items are identified requiring further research, analysis or investigation). It should be noted that submittals resulting from completed evaluation studies may be presented at any time during the calendar year. EM&V revisions will be included in the above detailed work plan with the corresponding effective dates. To the extent that the TRM MC is facing a significant workload with respect to pending submittals under review, member companies will prioritize the workload during discussions at TRM MC meetings.

3. Vendor Support

The TRM Administrators have contracted with a vendor that will provide administrative and technical support to the TRM MC. The scope of work outlining the role of this vendor is included as Appendix E to this filing.

4. Outstanding Revisions

Outstanding revisions to the TRM will continue to be identified, discussed and prioritized during TRM MC meetings. Other potential items (i.e., form and format, consistency of reference citations, and the relevancy of appendices) will also be prioritized during TRM MC meetings.

²² <http://www3.dps.ny.gov/W/PSCWeb.nsf/All/72C23DECF52920A85257F1100671BDD?OpenDocument>

5. Emerging Technologies

Depending on the volume of emerging technology and/or market innovation submittals received, or the volume of requests received from technology providers or market actors, the TRM MC may elect to deploy a form and fold subcommittee. This subcommittee would work with technology providers and other market actors, advising: (1) how to prepare submittals for the TRM MC's consideration, and (2) on what documentation should be provided. The TRM MC is ready to deploy such a subcommittee immediately.

D. Transparency

One of the primary goals of the TRM MC is to ensure transparency with respect to past and current versions of the TRM, and the functional processes employed by the TRM MC. To that end, stakeholders are encouraged to contact TRM MC Administrators, or the TRM co-chairs directly, to the extent they have questions or wish to prepare a submittal for the TRM MC's consideration.

The contact information for the current TRM MC co-chairs and secretary are located on the DPS website.²³

If a non-TRM MC entity²⁴ wishes to prepare a submittal for the TRM MC's consideration, the process to do so (as well as the timing of the process) is described above in the "Addition/Revision Process" section of the TRM Management Plan. The TRM MC will include non-TRM MC entities in TRM MC meetings, as needed, to: (1) review or move forward a submittal, or (2) identify if outside technical expertise is necessary.²⁵ The TRM MC co-chairs, or a designee named by the co-chairs, will be in contact with non-TRM MC entities to discuss the status of their submittal(s), as well as "next steps" in the functional workflow. Although different utilities may sponsor the cover letters of filings, each TRM MC member company will have a

²³ See <http://www3.dps.ny.gov/W/PSCWeb.nsf/All/72C23DECFF52920A85257F1100671BDD?Open Document>

²⁴ *Supra* note 17.

²⁵ The TRM Administrators reserve the right to caucus, when necessary, and will provide follow up from those discussions (e.g., this may be necessary for the TRM Administrators to make a group decision, about the need for and cost of outside technical expertise).

signee on the filing, unless an alternative arrangement has been made by the TRM MC (*i.e.*, one utility filing on behalf of TRM MC member companies, or a majority of TRM MC member companies sponsoring a filing). TRM filings will be made through the Commission’s Document and Matter Management (“DMM”) system, in Matter 15-01319.²⁶ When quarterly record of revisions, or annual TRM filings are completed, the information filed becomes a public document, thus ensuring stakeholder transparency.

The TRM MC will continue to work with Staff to coordinate website updates and to post relevant information that pertains to the TRM or the TRM MC. The opportunity to collaborate and coordinate with Staff in this regard is greatly appreciated by the TRM MC and will help expand the reach of TRM information to stakeholders and members of the general public contemporaneously.

²⁶ Matter 15-01319 – *In the Matter of the New York State Technical Resource Manual*.