



NY GEOTHERMAL ENERGY ORGANIZATION

Secretary Burgess
NYS Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

May 16, 2019

Re: NY-GEO request for transparency and an opportunity to participate in establishing energy savings data for the Governor's New Efficiency New York Initiative - matter 18-M-0084

Dear Secretary Burgess:

Please file the following letter in the docket for case 18-M-0084.

NY-GEO is developing comments due July 1, 2019 regarding the Joint Utilities filing in case 18-M-0084. In doing so, we have noted changes between the original JU filing and the revised filing of May 13th.

We write to express our concern regarding changes in calculations of energy savings for heat pump installations. Our industry is certainly an important source of data and perspective on energy savings from geothermal heat pumps. We understand that NYSERDA and the Joint Utilities have put forth numbers based on two different methodologies in this rate case. We are concerned that changes are being negotiated on this data without sufficient input from parties to this matter, and while we may have an opportunity to comment at a later point, we fear that comments at that point will either be too little, too late or will delay the process if they are taken seriously. New York's efforts to meet climate and energy efficiency goals could suffer as a result.

Specifically, on page 22 of the initial April 2, 2019 filing by the Joint Utilities the projections in tables 8 and 9 show a total of 43,493 heat pump installations producing 2,390 GBTUs of energy savings. This indicates a projected savings of 54.95 MMBTU per installation. The same tables in the May 13th filing have higher numbers both on installations and savings because NYSEG and RG&E have supplied estimates that were left TBD in the 4/2 filing. However, these tables in the May 13th filing show 62,912 installations saving 2,711 GBTUs - a 43.09 MMBTU average saving per installation. This represents a 21+% reduction in projected savings per installation.

The May 13th document includes the following statement on page 6 which we would presume to be the explanation for the reduction in projected energy savings per installation.

NYSERDA updated the heat pump savings methodology presented in its January 2019 "New Efficiency: New York Analysis of Residential Heat Pump Potential and Economics" report (the "Heat Pump Potential Study") and presented the updates to the NY Electric Utilities two weeks ago. NYSERDA explained that these updates were made to achieve better alignment with the heat pump savings methodology used in the New York State Technical Resource Manual ("TRM") by modifying assumptions related to the resources that heat pumps are replacing and reflecting more accurate heat pump load factors...

This opaque explanation offers no way to evaluate the methodologies used and no way to participate in helping New York find the most accurate energy savings numbers to use.

It is crucial that the Governor's New Efficiency New York initiative is based on accurate data. We ask that the Commission make available the assumptions and calculations from which both the 4/2 and 5/13 tables are derived and provide a forum to allow parties to contribute to establishing the most accurate possible estimates for heat pump energy savings.

Sincerely,

A handwritten signature in black ink that reads "Bill Nowak". The script is cursive and fluid.

Bill Nowak
Executive Director, NY-GEO
518-3136-GEO
nygeoinfo@gmail.com

The New York Geothermal Energy Organization (NY-GEO) is a non-profit trade association representing geothermal heat pump (GHP) installers, manufacturers, distributors, drillers, consultants and industry stakeholders from throughout New York State and beyond.

Cc: Commissioner Rhodes
Commissioner Burman
Commissioner Sayre
Commissioner Alesi
Alicia Barton, President and CEO, NYSERDA
Marly Calderon, Co-Chair, Joint Utilities Technical Resource Manual Management Committee
Marcin Polak, Co-Chair, Joint Utilities Technical Resource Manual Management Committee