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# MEMORANDUM

**To:** New York State Department of Public Service (DPS)  
**From:** New York State Technical Reference Manual (NYS TRM) Management Committee (MC)  
**Re:** **NYS TRM – Codes & Standards Review Process**

## SUMMARY OF INTENT

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As the New York Standard Approach for Estimating Energy Savings from Energy Efficiency Programs - Residential, Multi-Family, and Commercial/Industrial Measures (NYS TRM) and related energy efficiency standards continue to expand and evolve, the MC has become increasingly aware of a need to refine and formalize the process for reviewing prescribed measure methodologies for alignment with codes and standards and baseline policy. While historically, the quarterly batch and annual consolidated filing review and revisions processes have entailed a codes and standards review component, which was formally added to the TRM Technical Editor scope in late 2023, the details and key deliverables associated with this process were not previously codified. The purpose of this memo is to document the details, benefits, timelines, and roles and responsibilities of this effort and establish a formal process for conducting review, documenting results, and implementing relevant changes to the NYS TRM.

An established, documented codes and standards review and revision process confers several benefits to the NYS TRM and its various stakeholders, as well as the MC, TRM Technical Editor and DPS. These benefits include:

- Ensuring a consistent, robust review and revision process pertaining to codes and standards compliance
- Providing a comprehensive overview to the MC, DPS, and TRM stakeholders of all relevant baseline and efficient codes and standards referenced by the current version of the NYS TRM
- Improving the MC's ability to track current and future developments to equipment rating and testing standards and regulatory requirements impacting TRM-prescribed methods
- Mitigating the risk of non-compliance with applicable codes, standards, and CE-08 Gross Saving Verification Guidance.<sup>1</sup>
- Increased transparency of ongoing MC review and revision efforts to stakeholders
- Facilitation of workplan development via prioritization of measures in future quarterly and annual review batches based on codes and standards impacts
- Enabling the MC to anticipate upcoming codes and standards changes that impact measure baseline and minimum compliance requirements
- Ensuring timely application of TRM revisions to maintain the accuracy of prescribed methods and uphold compliance with baseline policy.

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<sup>1</sup> <https://dps.ny.gov/system/files/documents/2022/11/ce-08-gross-savings-verification-guidance.pdf>

- Equipping program administrators and other stakeholders with critical detail to inform codes and standards impact assessments for program planning

Concurrent with the formal adoption of this process by the MC, enhancements to the TRM will be implemented and report documentation will be developed as described in the sections below. This process is tentatively scheduled to commence with the annual consolidated filing cycle immediately following publication of the V12 ROR.

## DETAILS OF C&S REVIEW

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On an annual basis, the MC and TRM Technical Editor will undertake a comprehensive review of all applicable federal, state, and local codes and standards for use as baseline and compliance efficiencies referenced in the current effective version of the NYS TRM. Additionally, this review will investigate regulatory proceedings related to equipment minimum efficiency and rating/testing standards (e.g., DOE Rulemaking procedures), future adoption of new or revised codes and standards (e.g., adoption of new state energy conservation code), and high-efficiency standards or guidelines that may be used to inform compliance efficiency requirements for energy efficiency measures (e.g., ENERGY STAR® Program Requirements).

This process will be conducted as part of the consolidated filing process that commences coincident with the 2<sup>nd</sup> quarter ROR review cycle each year. At the conclusion of this annual review, the MC will produce a report of its findings pertaining to current and future applicable codes and standards, details of anticipated measure revisions, and an implementation schedule for future TRM edits to ensure codes and standards and regulatory compliance. See the C&S Review Report section below for details of the contents of this report. This report will be published to the NYS TRM website<sup>2</sup> prior to circulation of consolidated annual filing redlines and updated on an as needed basis (at minimum, refreshed once annually).

The first stage of this process, performed by the TRM Technical Editor, will entail review of all measure methods prescribed in the current effective version of the NYS TRM and documentation of all codes and standards references dictating baseline and compliance requirements. Once compiled, the TRM Technical Editor will proceed with investigation into regulatory proceedings, planned adoption of new or revised codes and standards, and potential sources to inform measure compliance efficiency requirements. These findings will be documented alongside the details of current references to demonstrate anticipated changes and corresponding revision and effectuation schedules.

Although this effort will be led by the TRM Technical Editor, the MC and various stakeholder groups are considered critical contributors and will be consulted for insight into current and future codes and standards developments for the duration of the process to ensure comprehensiveness of review.

Once details of current and future codes and standards have been documented, the TRM Technical Editor will draft anticipated impacts of NYS TRM adoption of future provisions, details of requisite revisions to each NYS TRM measure methodology, and a suggested implementation schedule to uphold NYS TRM compliance with codes and standards effectuation dates.

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<sup>2</sup> [Technical Resource Manual \(TRM\) | Department of Public Service \(ny.gov\)](#)

The compiled report will then be distributed to the MC and DPS for review in anticipation of a discussion to refine and finalize the report. This review period and subsequent discussion will afford the MC and DPS an opportunity to provide feedback on details of reviewed codes and standards, inform the TRM Technical Editor of additional references to be included that were not identified in the initial review, and verify the proposed schedule and details of changes. Following MC/DPS review and discussion, the TRM Technical Editor will incorporate proposed changes and finalize the report for publication. The final report will be filed to DMM and published on the NYS TRM website by the MC and DPS.

While the annual process is anticipated to span mid-March through mid-May (see C&S Review Schedule section below), the report will be refreshed as needed to reflect critical updates identified throughout the year. These updates may include augmentation of existing report content based on newly published reference material, identified codes and standards changes with effectuation dates preceding the next review cycle, and modifications to implementation schedules based on reprioritization of measure revisions, among others.

## C&S REVIEW SCHEDULE

The process detailed in the section above will be conducted annually in accordance with the schedule presented in the table below.

| Review Process Schedule - Annual Cycle |               |   |                           |
|--|---------------|---|---------------------------|
| Start Date                             | Business Days | Task  | Responsible Party         |
| March 15 <sup>th</sup>                 | 20            | Review and document codes and standards references cited in all Residential and Commercial & Industrial Measures in the current effective version of the NYS TRM                    | TRM Technical Editor      |
|  |               | Investigate and document regulatory proceedings, planned adoption of new or revised codes and standards, and potential sources to inform measure compliance efficiency requirements | TRM Technical Editor      |
|  |               | Develop impact, detail, and schedule of requisite TRM revisions   | TRM Technical Editor      |
| April 15 <sup>th</sup>                 | N/A           | Distribute codes and standards review report to MC/DPS for review (see C&S Review Report section for details)   | TRM Technical Editor      |
| April 15 <sup>th</sup>                 | 10            | Review codes and standards report, provide feedback, and prepare for discussion of detailed action items and implementation schedule  | MC                        |
| May 1 <sup>st</sup>                    | N/A           | Discuss codes and standards report findings and feedback, action items, and implementation schedule   | TRM Technical Editor & MC |
| May 1 <sup>st</sup>                    | 10            | Incorporate consensus edits to codes and standards report, finalize action items and implementation schedule  | TRM Technical Editor      |
| May 15 <sup>th</sup>                   | N/A           | Circulate final report, including action items and implementation schedule to MC/DPS  | TRM Technical Editor      |
| May 15 <sup>th</sup>                   | N/A           | File final report on DMM and publish to NYS TRM website   | MC                        |

## C&S REVIEW REPORT

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At the conclusion of each codes and standards review cycle, an Excel-based report presenting the results of the review and details, impacts, and schedule of planned TRM revisions will be published to DMM and the NYS TRM website. This report will be used by the MC and TRM Technical Editor to inform future NYS TRM quarterly and annual workplans and as a primary reference for application of measure revisions.

Each record in the published report will represent a single code/standard provision (e.g., federal standard establishing baseline CADR/W efficiency rating for Residential Air Purifiers). The report will consist of the following fields, organized into four (4) sections as outlined below:

1. General Information
  - a. TRM Version Number
    - i. The version number of the NYS TRM that is the subject of the C&S Review Report
  - b. Measure Section (RES/C&I)
    - i. The section of the reviewed NYS TRM (Residential vs. Commercial & Industrial) in which the measure appears
  - c. Measure Category
    - i. The category in the reviewed NYS TRM under which the measure appears
  - d. Measure Name
    - i. The name of the measure as specified in the reviewed NYS TRM
  - e. Last Revision (ROR Filing)
    - i. The most recent quarterly or annual filing in which the measure was revised
  - f. Last Measure Review / Revision Date
    - i. The issue date of the last applied revision to the measure
  - g. Last C&S Review / Revision Date
    - i. The date of the last review of or revision to the specified baseline or compliance code provision in the C&S Review Report (primarily used to track mid-year changes)
2. Applicable Codes & Standards (Current)
  - a. Baseline / Compliance
    - i. Indication of whether the specified code or standard dictates baseline or compliance specifications for the measure
  - b. Current Code / Standard
    - i. Name and version number of the current applicable code or standard
  - c. Current Code / Standard URL
    - i. Link to the current applicable code or standard
  - d. Current Code / Standard Effective Date
    - i. Date on which the current applicable code or standard went into effect
  - e. Current Code / Standard Expiration Date
    - i. Date on which the current applicable code or standard is set to expire, if specified

3. Applicable Codes & Standards (Future)
  - a. Future Code / Standard
    - i. Name and version number of the future code or standard that will supersede the current requirement
  - b. Future Code / Standard URL
    - i. Link to the future code or standard
  - c. Future Code / Standard Effective Date
    - i. Date on which the future code or standard will take effect, if specified
  - d. Future Code / Standard Expiration Date
    - i. Date on which the future code or standard will expire, if specified
4. Revision Detail, Schedule, Notes
  - a. Impact of Change
    - i. Description of the effects of adoption of the new code or standard on measure baseline or compliance specifications
  - b. TRM Revision Detail
    - i. Description of anticipated revisions to measure content to reflect adoption of the new code or standard (synonymous with Description of Change column in ROR Table of Revisions/Changes)
  - c. Revision Schedule (ROR)
    - i. Quarterly or annual filing in which anticipated changes are to be applied
  - d. Notes
    - i. Additional detail pertaining to development of codes and standards related to measure baseline and compliance specifications (e.g., used to highlight potential conflicts associated with adoption of new baseline or compliance requirements)

Examples of the contents of the report, separated by each of the four (4) sections identified above for readability, are presented below:

#### General Information

| REF ID       | General Information |                           |                  |              |                            |                                     |                                 |
|--------------|---------------------|---------------------------|------------------|--------------|----------------------------|-------------------------------------|---------------------------------|
|              | TRM Version Number  | Measure Section (RES/C&I) | Measure Category | Measure Name | Last Revision (ROR Filing) | Last Measure Review / Revision Date | Last C&S Review / Revision Date |
| V11_R001_B01 | V11                 | RES                       | Appliance        | Air Purifier | V11 - 2023 Annual Filing   | 10/10/2023                          | 10/10/2023                      |
| V11_R001_C01 | V11                 | RES                       | Appliance        | Air Purifier | V11 - 2023 Annual Filing   | 10/10/2023                          | 10/10/2023                      |

### Applicable Codes & Standards (Current)

| Applicable Codes & Standards (Current) |  |   |  |   |
|--|--|---|--|---|
| Baseline / Compliance                  | Current Code / Standard  | Current Code / Standard URL   | Current Code / Standard Effective Date | Current Code / Standard Expiration Date |
| Baseline                               | NYSERDA NY State Appliance and Equipment Standards via 2021 ASAP Model Bill                          | <a href="https://www.nyserdera.ny.gov/All-Programs/New-York-State-Appliance-and-Equipment-Efficiency-Standards/Current-Standards">https://www.nyserdera.ny.gov/All-Programs/New-York-State-Appliance-and-Equipment-Efficiency-Standards/Current-Standards</a>   | 6/26/2023                              | 12/31/2025                              |
| Compliance                             | ENERGY STAR® Product Specification for Room Air Cleaners, Eligibility Criteria, V2.0, Rev. May 2022. | <a href="https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Version%202.0%20Room%20Air%20Cleaners%20Specification%20%28Rev.%20May%202022%29.pdf">https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Version%202.0%20Room%20Air%20Cleaners%20Specification%20%28Rev.%20May%202022%29.pdf</a> | 5/12/2022                              | N/A                                     |

### Applicable Codes & Standards (Future)

| Applicable Codes & Standards (Future) |   |                                       |  |
|---------------------------------------|---|---------------------------------------|--|
| Future Code / Standard                | Future Code / Standard URL  | Future Code / Standard Effective Date | Future Code / Standard Expiration Date |
| 10 CFR 430.32(ee)(2)                  | <a href="https://www.ecfr.gov/current/title-10/part-430#p-430.32(ee)(2)">https://www.ecfr.gov/current/title-10/part-430#p-430.32(ee)(2)</a> | 12/31/2025                            | N/A                                    |
| N/A                                   | N/A   | N/A                                   | N/A                                    |

### Revision Detail, Schedule, Notes

| Revision Detail, Schedule, Notes               |  |                         |   |
|--|--|-------------------------|---|
| Impact of Change                               | TRM Revision Detail  | Revision Schedule (ROR) | Notes   |
| Increase in applicable CADR/W baselines        | Update Baseline Efficiency section narrative to indicate new standard; update baseline CADR/W table to reflect new standard; update footnotes and references to reflect new standard | Q2 2025                 | New standard takes effect on final day of 2025 - request 1-day leniency to align with effectuation of 2026 consolidated TRM   |
| N/A - No future compliance standard identified | N/A - No future compliance standard identified   | Q2 2025                 | While no future compliance standard has been identified, future baseline efficiency standard ( <i>REF ID: V11R001B</i> ) is equal to current compliance standard. Will need to establish alternative compliance requirement and implement concurrent with baseline standard change. |

## NYS TRM ENHANCEMENTS

In addition to the review process and resultant report described above, the MC will implement the following changes/enhancements to the NYS TRM coincident with and related to the adoption of this process.

To improve TRM user experience, increase transparency, and safeguard against misalignment with codes and standards, as available, the expiration date of the current applicable standard, and the version number, effectuation date, expiration date, and URL to available reference material pertaining to any future codes and standards will be included in Baseline and Compliance Efficiency sections within each measure section of the NYS TRM. This will reinforce the findings of C&S review and anticipated changes to TRM methods and provide additional visibility to future codes and standards impacts. This enhancement will be implemented as a global revision during each annual consolidated filing and measures in quarterly review batches will be updated as necessary to reflect mid-year changes to the C&S Review Report. Any and all TRM content pertaining to codes and standards (e.g., references, links, excerpts, appendices, etc.) will be reviewed and maintained as part of this process.

Historically, revisions applied in annual consolidated filings have not been issued a distinct Record of Revision Number in Record of Revision tables at the end of each measure section and in the Table of Revisions/Changes at the top of each ROR filing document. Coincident with adoption of the formal codes and standards review process, substantive changes to measures applied as part of annual filings (including updates to baseline and compliance specifications related to codes and standards changes) will be identified with a unique revision number. This change will improve revision tracking, measure version control, and transparency to applied changes.

As an additional measure to improve transparency to forthcoming changes, the TRM Technical Editor will produce and distribute a draft Table of Revisions/Changes with initial revision documents circulated for review during each quarterly and annual review/revision cycle. This will facilitate MC, DPS, and TRM stakeholder review by providing detail on applied changes in each measure batch.