

SEC INTERROGATORY #50

INTERROGATORY

[B/6/3, p. 31] Please describe in detail where, whether in the 2015 results or in any other year, attribution to non-utility programs has been double counted in attribution and in free ridership.

RESPONSE

Our argument does not depend on identifying specific instances of double-counting of savings attributed to non-utility programs. Our argument is a logical one, which depends on the definition of gross and net savings. It relied on the assumption that energy efficiency program evaluators understand net savings to refer to savings attributable to the program in question.

This is the assumption that underlies all survey approaches to assessing free-ridership with which we are familiar as such approaches seek to determine what the program participant would have done without the program's influence. In such approaches, "what the program participant would have done without the program's influence" (i.e., the free-ridership portion of the savings) would encompass the savings attributable to all influences other than the utility program, including any non-utility programs. Therefore, in such approaches, any savings attributed to those non-utility programs should come out of the free-ridership portion of the savings, not out of the net (i.e., program-attributable) portion of the savings.

If, however, the free-ridership assessment asked what the program participant would have done without the influence of the program or any of the identified non-utility programs, then the savings attributable to non-utility programs should come out of the net savings thus determined.

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