Savings Attribution Between MTIs and C&S

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# Purpose

This proposal describes recommendations from the MTWG to avoid double counting of market transformation initiative (MTI) savings and codes and standards (C&S) savings when MTI and C&S activities are operating in the same market

# Background

Since both MT and C&S administrators have C&S adoption as part of their goals, it’s important to specify how to allocate savings between MT work and C&S adoption work. While both administrators have code adoption as a goal, MT will focus on increasing and/or accelerating energy savings over the current situation, and it is envisioned that the teams will conduct complementary activities in a collaborative fashion

# Proposal

The following represent consensus recommendations of the MTWG unless otherwise noted

1. The MTWG supports “close cooperation and collaboration between the MT portfolio and the existing rolling portfolio”[[1]](#footnote-1), including between the MT and the C&S teams.
2. MTA and C&S are individually responsible to their own regulatory requirements, oversight and process rules.
3. The MTA (at the administrator level) will likely have performance criteria in addition to attributed savings.
4. The MTA will create an initial forecast[[2]](#footnote-2) of total MTI/C&S savings for planning purposes in collaboration with C&S Program Administrator. Savings are incremental to a naturally occurring baseline.
	1. For planning purposes, the MTA will also forecast initial savings for individual MTIs separate from savings achieved by the C&S Administrator. This will be done in collaboration with C&S Program Administrator and will de facto result in relative forecasted shares[[3]](#footnote-3)
5. There will be one or more mid-course updates[[4]](#footnote-4) (joint between C&S Program Administrator and MTA) to re-evaluate forecasted savings and update baselines as necessary, likely associated with new data becoming available.
6. There will be an ex-post evaluation to determine total savings and attribution of savings to C&S and MTA when C&S are included in individual MTI logic models.
	1. Assuming a Delphi process is used during the ex-post evaluation, the scope of the Delphi will include all ratepayer funded activities that intentionally target a C&S adoption
	2. MTI Strategic Market Plans, MTI logic models, MTI program interventions, MTI market progress evaluation reports etc. will all be part of the Delphi panel materials along with code change theory reports, CASE reports, and other documentation of influence
	3. **Attribution “Factors**:” [*Note this is currently a non-consensus issue with two options*]
		1. **Option A:** The following MTWG Members (CodeCycle, Jay Luboff Consulting LLC…) recommend that the following 6 attribution factor be used in the evaluation.[[5]](#footnote-5) [See Appendix A for a fuller description of the factors not included in current C&S evaluations (4, 5, and 6)]
			1. The development of compliance determination methods and other special analytical techniques
			2. The development of code language and technical, scientific, and economic information in support of the standard
			3. Demonstrating the feasibility or market acceptance of code adoption
			4. Accelerating the rate of market adoption to meet market acceptance requirements
			5. Reducing the cost of a measure to meet the cost-effectiveness thresholds for regulatory adoption
			6. Completion of market transformation objectives in accordance with the MTI logic model
		2. **Option B:** The following MTWG members (PG&E, SCE…) recommend that revising existing and/or adding more attribution “factors” should be considered in the Commission’s development of updated Ex Post EM&V protocols covering C&S and MTI attribution to ensure that MTI and C&S impacts are accurately assessed [See Appendix D for additional explanation.]
	4. **Weighting of Factors**: [*Note this is currently a non-consensus issue with two options]*
		1. **Option A** The following MTWG Members (CodeCycle , Jay Luboff Consulting LLC…) recommend that the process of weighting the factors to determine their relative impact on eventual code adoption shall include the following and shall follow the process outlined in Appendix B.
			1. What were the relative levels of resources applied to each Factor?
			2. What was the relative level of risk associated with each Factor? (i.e. a higher risk would result in a higher weighting)
			3. To what degree did the Factor accelerate the adoption of the code measure as compared to an assumed base case with no ratepayer funded activities?
			4. An effort should be made to avoid bias in the weighting of Factors that might unduly give a higher weight to events more recent in time merely because they are more vividly remembered.
		2. **Option B**: The following MTWG Members (PG&E, SCE …)recommend any changes to the weighting system of factors should be considered in the Commission’s development of updated Ex Post EM&V protocols covering C&S and MTI attribution to ensure that MTI and C&S impacts are accurately assessed. [See Appendix D for additional explanation.]
7. **Pre-Allocation of Savings**: [*Note this is currently a non-consensus issue with two options]*
	* 1. **Option A**: **Pre-allocate a portion of savings and the rest allocated ex post** (CodeCycle, Jay Luboff Consulting LLC…). [Note: see separate write-up on this option in Appendix C for the time being; will be integrated into this document in the draft final report]
		2. **Option B: No pre-allocation of savings—entirely ex post** (PG&E, SCE …).
		[Note: see separate write-up on this option in Appendix D for the time being; will be integrated into this document in the draft final report]

**Appendix A**

**Additional Factors to Use in Ex Post Evaluations**

This attachment describes the additional factors that we propose will be added to the existing set in ex-post evaluations to assess the relative contributions of MTIs and C&S advocacy where savings overlap.

“Accelerating the Rate of Market Saturation to Meet Market Acceptance Requirements”: This Factor evaluates the work that increases the uptake of an efficiency measure, thereby helping the CEC to demonstrate market readiness. For example, if the measure would be unlikely to ever reach market readiness without the MTI, the Attribution Factor attributed to the MTI would be comparatively large. If the MTI accelerates adoption of a measure that might otherwise be adopted in later code updates, then the Attribution Factor attributed to the MTI would be more balanced.

“Reducing the Cost of a Measure to Help the Measure Meet Cost-Effectiveness Thresholds for Regulatory Adoption”:   If activities help a given efficiency measure increase its market saturation in California, the overall cost of the measure is likely to decrease. The performance level of the measure -- in terms of overall efficiency -- might also increase. Both of these factors will cause a steady improvement in the cost-effectiveness of the measure. This improved cost-effectiveness will help the Energy Commission show that adoption of the measure complies with the requirements of the Warren Alquist Act.

“Completion of Market Transformation Objectives in Accordance with the MTI Logic Model”: The means by which an MTI seeks to improve uptake of a given efficiency measure is represented in the MTI’s logic model. Assessing adherence to the MTI logic model and completion of progress toward the goals therein will provide an analysis of how the MTI impacted eventual code adoption.

Figure 1: Anticipated Activities Leading to Code Adoption



**Appendix B**

**Proposal to Fix the Weighting Values for C&S Attribution Factors soon after MTA Formation**

**Proposal:**

This proposal compliments the proposal to expand the Delphi process to ~6 Attribution Factors for use in determining C&S attribution.

As new Attribution Factors are added to the Delphi process, there is a need to weight the Attribution Factors in the final analysis. Under current evaluation protocols, those weightings are determined during the final impact evaluation, and the weightings are determined on a measure by measure basis.

This proposal recommends moving the weighting process forward to just after MTA formation. The CPUC would lead a process that is facilitated by an independent evaluator and uses a Delphi panel. Moving forward the weighting of Attribution Factors would also afford greater transparency to the weighting process.

This change in methodology would only apply to the evaluation of efficiency measures adopted into code where there was no overlapping MTI. For the majority of C&S measures that have no overlapping MTI, the attribution methodology would remain unchanged.

The revised process would set weighting factors for the six proposed Attribution Factors, with those weightings summing to 100%. The Weighting Values would be fixed across all MTIs, and if updated, only infrequently. Any given MTI would be subject to the weighting factors in effect at the time it commenced.

By way of example, the universal weightings might look like:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Factor: | **Compliance Methods** | **Code Language** | **Document Feasibility** | **Improve Saturation** | **Improve Cost-Effect** | **MTI Logic Model** | Total: |
|  | 10% | 10% | 10% | 40% | 20% | 10% | **100%** |

This proposal takes advantage of the premise that the relative importance of these six levers for driving final code adoption might be relatively steady across measures. These values would not define the final attribution, as the role of the MTI, the C&S Administrator, and other influencers would still be discerned for each Attribution Factor.

In practice, the final analysis might look like the following table. The green cells are the Weighting Values that are fixed in advance -- before an MTI even takes shape -- and the blue cells would be the values determined by the ex post evaluation. The cells in yellow are calculated by multiplying the value in the respective blue cell by the respective Weighting Value in the green cells, and then summing [i.e. =sumproduct(greenRow, blueRow) in Excel].

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Factor: | **Compliance Methods** | **Code Language** | **Document Feasibility** | **Improve Saturation** | **Improve Cost-Effect** | **MTI Logic Model** | Total: | Split: |
| Weight: | 10% | 10% | 10% | 40% | 20% | 10% | **= 100%** |  |
| C&S Admin | 60% | 70% | 50% | 10% | 10% | 0% | ***24%******(sumproduct)*** | **41%****(24/58)** |
| MTI | 0% | 0% | 20% | 50% | 30% | 60% | ***34%******(sumproduct)*** | **59%****(34/58)** |
| Other | 40% | 30% | 30% | 40% | 60% | 40% | ***NA*** |  |

By fixing the Weighting Values in advance, little accuracy is lost in the final analysis, but significant certainty is gained for the MTA in evaluating and comparing the cost-effectiveness of potential MTIs. The early determination of Weighting Values will also dampen the inevitable jockeying for position between an MTA and the C&S Administrator in the C&S attribution analysis. In doing so, fixing the Weighting Values in advance would improve the ability of the MTA and the C&S Administrator to collaborate

**Appendix C**

**Proposal for C&S Attribution with Minimum Shared Savings**

Working group members supporting this proposal: CodeCycle, Jay Luboff Consulting…

**Purpose of Proposal:**

This proposal -- when layered upon a modified Delphi process -- seeks to solve three key challenges:

1. The attribution process should be structured to foster collaboration between the MTA and a C&S Administrator to maximize overall ratepayer benefits.
2. For the portion of attribution that must be determined by an independent evaluator – using a Delphi panel of industry experts – the existing evaluation protocols should be expanded to fully credit the changes in market readiness that are fostered by an MTI.
3. This proposal allows a promising MTI to move forward with a reasonable forecast of C&S savings even when the MTA and C&S Administrator cannot come to agreement during the early forecasting period on the likely long-term attribution.

Experience from the Northwest also drives this proposal. Specifically:

* A considerable portion of the expected energy savings from many MTIs will come from the planned benefits of helping to move a measure into codes or standards. Making the final savings allocation more predictable will afford the eventual MTA much needed certainty as to when the MTA should move forward with a given MTI.[[6]](#footnote-6)
* Second, the success or failure of an MTI -- and the MTA in general -- in maximizing ratepayer benefits is highly dependent on the likely level of collaboration between interrelated efficiency programs. Developing an attribution mechanism that directly links existing programs with MTI efforts in terms of shared rewards will foster collaboration and be critical to increasing overall ratepayer benefits.

Establishing a transparent attribution process for the C&S savings that result from an MTI is critical to implement many aspects of Decision 19-12-01. For example, Conclusions of Law #30 states, “It is appropriate to set savings goals and other metrics for individual MTIs at the time they are initially approved by the Commission.” In order to set reasonable goals for the MTI, the MTA must have a clear understanding of how a given MTI will be evaluated in the C&S impact evaluation process.

1. **Minimum Shared Savings will Foster Collaboration and Increase Ratepayers Benefits**

**Rationale:**

Collaboration between the MTA and the C&S Advocacy entity (collectively, “the Parties”) will be best promoted by pre-distributing a significant percentage of the final evaluated C&S energy savings. This proposal builds off of a central piece of guidance in Decision 19-12-01:

“*. . . we would like to avoid disputes over which initiative or program created the energy savings,* ***preferring to celebrate the victory without arguing over attribution****.*” (Decision pg. 73)

Using the classic “pie splitting” metaphor, this approach to allocation seeks to focus the efforts of the Parties on working together to expand the overall pie rather than focusing their efforts on making their individual portion of the pie as large as possible.

Leaving the whole of the attribution decision to the end-state discretion of the independent evaluators virtually invites “zero sum game” optimization by the Parties. This competition for attribution will occur from the commencement of an MTI until the final impact evaluation is completed.

Given that an MTI cannot even commence until there is a reasonable forecast of the likely energy savings, and that forecast will depend on the MTA and C&S Administrator agreeing upon the likely attribution split, the “zero sum game” competition between the parties will start before the MTI is even launched. This will be counterproductive for ratepayers, and it runs contrary to the Commission’s desire to “celebrate the victory without arguing over attribution.”

The proposed Minimum Shared Savings can be viewed, in a way, as a conscious decision to possibly sacrifice precision in the attribution process in order to achieve greater collaboration and greater savings along the way. But it may not be a tradeoff at all, as the Delphi attribution methodology – while conducted by experts – encompasses attribution steps that are highly subjective. Leaving the full attribution process until after code adoption also creates significant risk of over-valuing the final actions that move a measure into code (i.e. code advocacy) when compared to MTI efforts that were perhaps more influential but occurred years earlier in time.

**Minimum Shared Savings Methodology:**

We are outlining two different methods for pre-allocating the attribution percentages. One is simpler, and the other more refined. **They both have merit, but the first, simpler method is preferred.** Other methods might be proposed that achieve the same purpose.

These methods do not guarantee that a minimum level of energy savings will be granted to an MTI. The level of overall savings is dependent, first, on the measure being adopted into code. Second, it is dependent on the “Net Standards Savings”, as determined by the independent evaluator (see flow chart below). The Minimum Attribution Percentage will impact some combination of “Program Attribution” and “Allocation” in the traditional C&S evaluation process.



*i. Sub-Option 1 - Minimum Shared Savings of 25% for MTI and 25% for C&S Advocacy*

The first option would allocate 50% of the overall savings between an MTI and the team that conducted the related code advocacy. That 50% would, in turn, be divided in half, such that each party received a minimum 25% share. The remaining allocation would be based on the attribution assessment performed by the independent evaluator and its Delphi panel. If the independent evaluator decided that the C&S advocacy team deserved 15% of the energy savings, and the MTI deserved 85%, the Minimum Shared Savings would shift those values to be 25% and 75% respectively. (The Minimum Shared Savings might also be thought of as an “attribution backstop”.)



We believe that a Minimum Shared Savings value of 25% for both entities is prudent, but it could be higher or lower.

This method provides a number of benefits:

* It creates an inherent framework of shared benefits. Both parties benefit when either party increases overall energy savings. This will incentivize the parties to help each other increase the overall size of the energy saving pie.
* It provides greater certainty for the MTA as it seeks to forecast the savings for an MTI during the go / no-go phases of analysis. The MTA can ultimately launch more MTIs with Minimum Shared Savings, as the attribution boundary will minimize the number of MTIs that are halted due to uncertainties in the savings forecast.

*ii. Sub-Option 2 - A Two Variable Approach to Minimum Shared Savings*

If the 25% bounds proposed in Sub-Option 1 are too generalized, a matrix of attribution bounds could be developed that is based on two of the most important influence variables. The following example proposes the two variables of: 1) starting market saturation for a measure, and 2) total MTI investment in that measure.

These minimum bounds would be developed during MTA formation, with input from the MTA, code advocacy experts, and other stakeholders. Given that these variables will likely be central to a final attribution analysis, this path may require no additional work, merely moving the analysis to the front of the process instead of the end. The matrix approach would also provide far greater certainty during MTI planning and would minimize biases that are likely to occur in analyzing impacts only after completion of the code advocacy process.

*Sample Minimum Shared Savings Table (values for illustration purposes only)*

|  |  |
| --- | --- |
|  | **Overall MTI Investment before Code Adoption** |
| **Starting Market Saturation** | *$0-2 million* | *$2-6 million* | *$6-12 million* | *$12 million+* |
|  | C&S % / MTI % *Shared Minimum Saving* |
| **under 1%** | 20% / 30% | 15% / 40% | 10% / 60% | 10% / 60% |
| **1% - 4%** | 25% / 25% | 20% / 35% | 15% / 55% | 10% / 50% |
| **4% - 10%** | 30% / 20% | 25% / 30% | 20% / 50% | 15% / 55% |
| **10% - 20%** | 40% / 15% | 30% / 25% | 25% / 40% | 20% / 45% |
| **over 20%** | 50% / 10% | 40% / 25% | 30% / 30% | 25% / 35% |

Appendix D

Working group members supporting this proposal: PG&E, SCE,…

**Attributing ex-post evaluated savings from C&S adoptions** **to overlapping MTIs**

Background

Commission Decision 19-12-021 (December 5, 2019) directs that market transformation programs may include in their cost-effectiveness assessments savings delivered by codes or standards outcomes to which they contribute.[[7]](#footnote-7) Beyond determining cost-effectiveness, these energy savings contributions are also expected to be counted toward overall Market Transformation Administrator (MTA) energy savings goals. The Commission established rigorous impact evaluation protocols for codes and standards (C&S) program activities in 2005. These protocols have since been implemented in numerous C&S program evaluation cycles during which time the Commission’s assigned C&S evaluation contractors have further updated these protocols. We recommend that these rigorous C&S impact evaluation protocols be reviewed and revised as necessary to comprehensively and fairly assess market transformation initiatives’ (MTI) contributions to their associated C&S outcomes.

Recommendation

We recommend **that the process, assessment, and updates of the C&S/MTI evaluation protocols be handled by the Commission-assigned C&S and market transformation evaluation consultants in a forum that allows all stakeholders an opportunity for input, rather than in working groups under the purview of parties that have a financial interest in the outcome.**

The Energy Division is interested in recommendations from the CAEECC MTWG regarding how ex-post evaluation could be modified to address overlapping savings between C&S programs and MTIs. To this end, we provide some perspectives below regarding the development of updated C&S/MTI evaluation protocols, including reactions to other non-consensus Options presented. We encourage the Commission to consider these perspectives but we refrain from recommending specific evaluation methods and procedures because the MTWG and its sub-groups participants lack the required C&S evaluation expertise and because these working groups are not the appropriate venues for the actual work of assessing and developing technical methods and procedures for the ex-post C&S/MTI evaluation protocols.

Perspectives

*Rigorous MTI definition process****.*** While we expect that the MTIs will have a number of types of performance metrics beyond energy savings and peak demand reductions, it is likely that energy and demand impacts will be included as primary performance metrics of the MTIs and possibly the MTA. For that reason, rigorous ex-post evaluations are needed to accurately assess MTIs’ performance against their energy and demand goals, especially where attribution is being allocated between the MTA and C&S Program Administrator. A rigorous ex-post evaluation starts with a rigorous initial MTI vetting and definition process. This early focus is not only critical for managing the risks associated with the large, publicly funded investments in the MTIs but is crucial to laying the groundwork for successful ex-post evaluation.

The Commission has presented a robust stage-gate framework for developing, screening, and adopting MTIs in “Attachment A – Adopted Market Transformation Framework” (Framework) in Decision 19-12-021 (December 5, 2019). Following the detailed MTI definition process (which must include market and code change theory) stipulated in the Framework, there needs to be a thorough, ongoing process for documentation of activities and outcomes associated with the MTI that can later be considered during the C&S ex-post evaluation stage.

It is our understanding that the Commission expects MTIs to fill gaps not already being addressed by C&S program and other programs. As MTIs are defined, their logic models should, therefore, not include activity that is redundant on C&S program activity or directly competing with it. Thus, the Statewide C&S program will handle the C&S advocacy activities once an MTI has moved to the C&S advocacy stage. Among other benefits, avoiding activity redundancies will support more straightforward ex-post evaluations.

***Program Administrators should have a voice in MTI selection and in ex-post evaluation processes****.* Regardless of the final details on how the C&S evaluation protocol is revised, as key stakeholders the C&S and other PA leads should have a seat at the table along with the MTA during ex-post evaluation of MTIs. We recommend that the CPUC require a resource acquisition coordination plan, first suggested in the Aug 28, 2018 “Energy Efficiency Market Transformation: A Staff Proposal” and reiterated in the April 10, 2019 ALJ Ruling seeking comment on the MTWG Report. As the Staff Proposal stated: “To be eligible for approval, Market Transformation Accords must present evidence of support and coordination with PAs running resource acquisition programs that affect measures or markets that are targeted by the proposed Market Transformation Initiative.” Furthermore, the Statewide C&S Administrator should be part of the MTI proposal review process to prevent potential MTI overlap with current and planned C&S advocacy efforts and to ensure that MTI efforts will result in savings incremental to those expected from C&S advocacy efforts.

***Additional attribution factors and weighting factors****.* Certain MTWG Members have proposed specific changes and additions to the C&S evaluation protocols that they believe would better address MTI savings. In particular they have proposed three specific, new attribution factors together with approaches to weighting the attribution factors. We do not yet agree with their specific proposals. As reasonable as those proposals may sound to those not familiar with the C&S evaluation protocols, we believe there may be technical challenges to implementing their approach. It may be more effective to adjust the existing Attribution factors to properly accommodate MTI attribution rather than creating three separate MTI attribution factors. We are not certain yet about the correct approach because the process is complicated and we haven’t had time to properly consider options with EM&V professionals who specialize in these areas. We believe that Energy Division, given their lead role in impact evaluation, should propose any modifications to the savings attribution process and that their proposal should be vetted in a broader public process.

***Prescriptive (guaranteed minimum) ex-post savings attribution****.* We strongly oppose proposals that seek to establish pre-allocated minimum ex-post attribution factors between the C&S Administrator and MTA. We find many aspects of approach troubling, including arbitrary minimum ex-post attribution factors. These proposals go against Commission precedent for EM&V protocols and strike us as illogical in this context. We believe that MTI/MTA performance risk, one of the driving concerns behind the proposal, should be managed through more appropriate means. Any risk removed from the MTI/MTA essentially redirect that risk squarely upon ratepayers. We find the arguments relating guaranteed ex-post attribution to foster collaboration between C&S and MTI teams to be incomplete and unconvincing. The ex-post attribution of savings to C&S Administrator and the MTA should be based on rigorous ex-post evaluation of the influence actually delivered by the C&S program and the MTI. Introducing guaranteed minimum attribution into the process is unavoidably arbitrary, unnecessary, and militates against the rigor of the ex-post evaluation process and the ability to faithful report on program influence in the C&S/MTI outcome.

***Developing MTI Baselines***. Developing forecasts for the MTI baseline and the accomplishments is challenging. Guidance on what considerations need to be taken to develop these forecasts is required so that MTI proposals are commensurate with the level of rigor necessary to develop acceptable forecasts of the market and to develop an acceptable baseline over which to measure MTI accomplishments. Without this guidance, evaluating MTI accomplishments forecasts and evaluating MTI baseline would become a subjective and fraught exercise. Moreover, MTI, RA, and C&S initiatives need to apply consistent and aligned baseline assumptions. This means that when multiple intervention types are active at the same time, they should use the same baseline assumptions and when one intervention type follows another (e.g., an MTI or an RA sunset and a C&S takes over) then the baseline assumptions should be coordinated.

We concur with other participants that the issue of what baselines methodologies are used and how they may interact between C&S program and MTIs is important. We agree that,

*“There will be one or more mid-course updates (joint between C&S Program Administrator and MTA) to re-evaluate forecasted savings and update baselines as necessary, likely associated with new data becoming available.”*

The organizations supporting these comments recommend that the specific approach to aligning the definitions and applications of baselines in the determination of savings for overlapping C&S activities and MTIs be resolved in conjunction with a process led by a future working group or Commission-assigned evaluation consultants, perhaps following the establishment of the MTA.

1. CPUC Decision 19-12-021, Finding of Fact 27 [↑](#footnote-ref-1)
2. CPUC Decision 19-12-021 includes forecasting as part of the MTI Plan, bullet #3 on page 159. [↑](#footnote-ref-2)
3. MTIs may also exist that do not have a code or standard goal, and any savings for these will be developed independently by the MT administrator. [↑](#footnote-ref-3)
4. CPUC Decision 19-12-021, last bullet on page 158 [↑](#footnote-ref-4)
5. Existing Factors are pulled from the last finalized Impact Analysis of the IOU C&S Advocacy program: “California Statewide Codes and Standards Program Impact Evaluation Phase Two, Volume Two: 2013 Title 24, June 23, 2017” (CALMAC Study ID: CPU0170.01) [http://www.calmac.org/publications/CPUC\_CS\_Volume\_2\_Report\_FINAL\_R1\_06232017ES.pdf](https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.calmac.org%2Fpublications%2FCPUC_CS_Volume_2_Report_FINAL_R1_06232017ES.pdf&data=04%7C01%7Cmgardner%40resource-innovations.com%7C3dd8fa8bd35f41ca920c08d880494da5%7Cf47531636e054a32bf82acbc0efbc64d%7C0%7C1%7C637400399622312071%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=Iii0nGC1ABRVd4pLuaJ8TwM86ZbdCkahqKQuxgqM3L4%3D&reserved=0) [↑](#footnote-ref-5)
6. As will be discussed further, the energy savings that will result from a given code measure cannot be known for sure, as that is dependent on both eventual code adoption and the independent evaluation of the projected energy savings. But greater certainty can be established for the share (or percentage) of the overall code savings that are attributable to the MTI. [↑](#footnote-ref-6)
7. Conclusions of Law 28.The benefits and costs of activities related to codes and standards development and implementation should be included in the cost effectiveness calculations for MTIs where they are logically related. [↑](#footnote-ref-7)