State	Document	Referenced By	Date	Description/Cited Key Comments
CO	Docket 22A-0189E Public Service of Colorado - DSP	Multiple Intervenors	9/28/2022	Regarding the proposed Distribution System Plan for Public Service of Colorado, the Solar Energy Industries Association (SEIA), Advanced Energy Economy (AEE), Southwest Energy Efficiency Project (SWEEP), and Western Resource Advocates (WRA) provided comments that are generally supportive of the proposed BCA methodology for non-wires alternatives as consistent with the NSPM principles, with concerns regarding the choice of discount rate.
IN	MEEA Testimony to Indiana 21st Century Energy Task Force	Midwest Energy Efficiency Alliance (MEEA)	9/13/2022	In their presentation to the 21st Century Energy Task Force, MEEA recommends modernizing cost-effectiveness testing by developing a jurisdiction specific test to measure impacts that are relevant to policy goals. This jurisdiction specific test should be used for energy efficiency and all other DERs. MEEA promotes the NSPM as a guide for developing such a test (slide 19).
MI	Case No. 20147 Michigan Public Service Commission Order	Michigan Public Service Commission (MPSC)	9/8/2022	The MPSC orders the creation of a new distribution system planning division within the MPSC that will develop a new jurisdictional-specific test based on the guidance of the NSPM. The MPSC will provide additional detail in a future order launching phase 2 of the BCA effort when the new distribution system planning division is adequately staffed (pgs. 71-72).
CO	Docket 21R-0449G Comments of AEE on Commission Interim Decision C22-0427-I	Advanced Energy Economy (AEE)	9/8/2022	In their comments regarding Commission Interim Decision No. C22-0427-I on proposed amendments to rules regulating CO gas utilities, AEE recommends the use of the NSPM as an appropriate starting point for developing a robust BCA methodology for non-pipe alternatives. AEE goes on to outline and recommend the eight NSPM principles and notes they provide a balance between flexibility and consistency and support the goals of the planning process (pgs. 11-12).
MI	Case No. 20898, Commission Order	Michigan Public Service Commission (MPSC)	8/23/2022	On 7/27/22 the MPSC ordered the utilities to file proposed Michigan-specific BCA requirements that may be used in multiple types of dockets including pilot proposals, distribution planning, and rate cases, by September 1, 2022, where the proposed BCAs should be informed by the NSPM and tailored to Michigan's regulatory structure and requirements (pg. 20). Since then, the MPSC issued a subsequent order that directs the utilities to file BCA requirements for evaluating pilot proposals no later than February 1, 2023. These BCAs should still be informed by the NSPM and be tailored to Michigan's regulatory structure and requirements (pgs. 3-4).
CT	Docket 22-08-03 Annual Non-Residential Energy Solutions Program Review	Office of Consumer Counsel (OCC)	8/17/2022	Public Act No. 22-14 allows Non-residential Renewable Energy Solution (NRES) program participants to utilize the entire roof space of a promise for solar and allows them to provide power to the grid over and above their load requirements. OCC believes fair compensation for excess generation is best achieved through a Buy-All tarrif. OCC recommends the NSPM framework to thoroughly assess the benefits and costs of NRES solar generation (pg 3).
CT	Docket 21-05-15 PURA Investigation into a PBR Framework	Office of Consumer Counsel (OCC)	8/17/2022	The Public Utilities Regulatory Authority's (PURA) issued a Request for Written Comments regarding a Performance-Based Regulation Framework. In their Regulatory Assessment Comments, OCC focuses on a handful of outcomes of the existing regulatory mechanism, one of which being affordability. OCC notes the existing Equitable Modern Grid framework may be improved in relation to affordability through a more comprehensive BCA methodology to evaluate whether proposed expenditures in individual dockets are genuinely net

				beneficial. They note their recommendation of the NSPM in Docket 17-12-RE04 (regarding zero emission vehicles) and suggest it could be useful in this case to help ensure uneconomical expenditures are identified before they are approved (pg 18).
KS	Docket 22-EKME-254-TAR Non-Unanimous Partial Settlement Agreement on DSM Programs	James Owen on behalf of Climate + Energy Project	8/3/2022	In testimony regarding the Non-Unanimous Partial Settlement Agreement on DSM Programs filed on August 1, Climate + Energy Project recommends Evergy implement additional non-energy benefits and utilize the NSPM in its analysis of effectiveness for determining an appropriate budget (pgs. 2-3).
TX	Austin Energy 2022 Base Rate Review – Initial Brief of Sierra Club, Public Citizen, and Solar United Neighbors	Sierra Club, Public Citizen, and Solar United Neighbors	7/28/2022	In their proposed rate design and revenue requirement changes, Austin Energy proposes to reduce the Value of Solar rate for rooftop solar owners. Sierra Club, Public Citizen, and Solar United Neighbors (the "Organizations") note in their brief on the matter that this reduction unreasonably ignores the full range of avoided costs and benefits of consumer-sited generation. The Organizations recommend a Value of Solar study with a BCA developed in accordance with the industry best practices outlined in the NSPM (pg. 27).
WI	Docket 5-FE-104 Focus on Energy Quadrennial Planning Process IV – Phase II	Clean Wisconsin	7/28/2022	In response to the Public Service Commission of Wisconsin's request for comments on Phase II of the Quadrennial Planning Process, Clean Wisconsin recommends the development of a new cost-effectiveness test based on the NSPM. Clean Wisconsin also recommends, per NSPM and MTR handbook guidance, that macroeconomic impacts be presented separately from BCA results to avoid double counting (pg. 12).
WI	Docket 5-FE-104 Focus on Energy Quadrennial Planning Process IV - Phase 2	Midwest Energy Efficiency Alliance (MEEA)	7/28/2022	In response to the Public Service Commission of Wisconsin's request for comments on Phase II of the Quadrennial Planning Process, MEEA points to the NSPM as an example of modern BCA best practices. MEEA summarizes the ongoing process in Minnesota to apply the NSPM to develop a jurisdiction specific test, and indicates Wisconsin has an opportunity to follow Minnesota's lead to break away from the traditional cost-effectiveness paradigm by conducting their own NSPM process (pgs. 7-8). MEEA also recommends the use of the Methods, Tools, and Resources handbook throughout their comments as a resource to quantify certain impacts.
CT	Docket 17-12-RE02 PURA Investigation into DSP of the Electric Distribution Companies -AMI	Office of Consumer Counsel (OCC)	7/20/2022	In their response to Public Utilities Regulatory Authority's (PURA) Notice of Request for Written Comments on June 23, OCC notes they have advocated for standardized cost-benefit analyses throughout this and other grid modernization dockets. OCC recommends the NSPM for DERs as well as the Methods, Tools, and Resources handbook be used in the electric distribution companies' BCA of their advanced metering infrastructure (AMI) deployment plans (pgs. 2-5).
MD	Docket Number RM56 Community Solar Energy Generation Systems - Report on the Community Solar Pilot Program	Maryland Public Service Commission (PSC)	7/5/2022	In their Report on the Community Solar Energy Generating Systems (CSEGS) Pilot Program, the PSC recommends a full benefit-cost analysis be performed at the end of the Pilot using a method endorsed by the NSPM and akin to the tests performed for other state programs like EmPOWER Maryland (pg. 12).
CT	Docket 22-06-05, PURA Implementation of Public Act 22-55	Office of Consumer Counsel (OCC)	6/30/2022	A Request for Written Comments issued by the Public Utilities Regulatory Authority (PURA) in June included a prompt regarding rules to ensure ratepayer benefits are identified in proposals for energy storage pilot programs. In their response,

				OCC recommends the use of the NSPM to provide consistent analysis of DERs and other grid modernization proposals (pg. 4). OCC further recommends that BCAs should be consistent across proposals and should adhere to standards adopted in other grid modernization initiatives, including the NSPM (pg. 6).
ME	Request for Proposals, Distributed Generation Analysis, Program Design, and Stakeholder Engagement	State of Maine, Governor's Energy Office	6/25/2022	The State of Maine is seeking proposals for analysis, program design, and stakeholder engagement services to support the work of the Distributed Generation Stakeholder Group, including development of a cost-effectiveness test. In their Request for Proposals, the State notes that the cost-effectiveness test should be based on best practices, such as those outlined in the NSPM (pg. 8).
CT	Docket 17-12-RE02 PURA Investigation into DSP of the Electric Distribution Companies -AMI Notice of Written Comments	Public Utilities Regulatory Authority (PURA)	6/23/2022	In accordance with the interim decision in Docket 17-12-03, PURA opened this proceeding to investigate the topic of advanced metering infrastructure (AMI). PURA issued a Notice of Request for Briefs in March 2022 and received briefs from six Participants. In their briefs, participants raised several topics that warrant further discovery and discussion. PURA requests written comments from docket participants and interested stakeholders addressing several topics, including whether the NSPM should be more fully integrated into BCA of AMI deployment plans (pg. 2).
KS	Docket 22-EKME-254-TAR Direct Testimony on Behalf of The Citizens' Utility Ratepayer Board	Synapse Energy Economics on behalf of the Citizens Utility Ratepayer Board (CURB)	6/17/2022	In testimony regarding how Every Kansas can better align their 2023-2026 DSM portfolio filing with industry best practices, Synapse Energy Economics suggests Evergy conduct a rate and bill impact analysis (RBIA) alongside the RIM test to indicate the direction and magnitude of rate and bill impacts. They recommend Every review the NSPM for more information on RBIA (pgs 8-9). Synapse also points the Company to the MTR handbook for information on how best to calculate non-electric fuel benefits and other costs and benefits (pg. 8).
MD	Case No. 9648 2021-2023 EmPower Maryland Program	Maryland Public Service Commission	6/15/2022	In their order regarding the 2021-2023 EmPower Maryland Energy Efficiency Programs, the Commission adopts the modified cost-effectiveness test developed by the Future Programming Work Group (FPWG) (pgs 32-33). The FPWG used the NSPM to develop a Maryland Jurisdiction-specific test (MJST) and outlined specific inputs and parameters in Attachment D of their April 15 Report.
TX	Case 51603-3 Review of Distributed Energy Resources	Solar United Neighbors (SUN), Environment Texas Research and Policy Center, and Public Citizen	6/14/2022	Commission staff issued a request for written comment in Project No. 51603 – Review of Distributed Energy Resources. In their response to Staff's question concerning quantification of T&D costs and cost recuperation, the joint parties recommended the Commission acknowledge and account for the full value that DERs provide to the grid and society at large. The joint parties recommend the NSPM as a helpful resource for assessing DER value (pg. 4).
CT	Docket 17-12-03RE07 PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Non-Wires Alternatives	Northeast Clean Energy Council (NECEC) and RENEW Northeast (RENEW)	6/10/2022	The Public Utilities Regulatory Authority (PURA) Issued a Notice of Request for Written Comments regarding the Proposed Non-Wires Alternatives Program Mechanics. In their reply, NECEC and RENEW encourage PURA to incorporate the principles and cost/benefit categories of the NSPM into each NWA solicitation (pg. 4).

OR	Docket UM 2225 Staff HB 2021 Investigation Into Clean Energy Plans	Lawrence Berkeley National Laboratory (LBNL)	6/2/2022	At the June 2 Introduction to Community benefits workshop, LBNL presented on Considering Non-Energy Impacts in Clean Energy Plans and provided an overview of the NSPM and other NESP products. The presentation also covers how NEIs can be considered in Clean Energy Plans, how to quantify these impacts, and how to account for energy equity in BCAs.
CT	Docket 21-09-17, PURA Investigation Into Medium and Heavy-Duty Electric Vehicle Charging	Office of Consumer Counsel (OCC)	6/1/2022	The Public Utilities Regulatory Authority (PURA) Issued a Notice of Request for Written Comments regarding Medium and Heavy-Duty EV Charging in May 2022. In their reply, OCC notes they have been consistently advocating for PURA to use BCAs that focus on ratepayer impacts and benefits, and have recently been specifically advocating for the use of the NSPM across all grid modernization dockets. As the NSPM applies to EV deployment, it could be instructive here for evaluating the benefits and costs to ratepayers (pg. 2).
CT	Final Determination: Approval with Conditions of the 2022-2024 Conservation and Load Management Plan	Department of Energy and Environmental Protection (DEEP)	6/1/2022	DEEP's approval of the utility 2022-24 energy plan sets forth a new Connecticut Efficiency Test (CTET). DEEP reviewed and reevaluated the primary test used to assess the Conservation and Load Management programs using the NSPM BCA framework to ensure consistency and integrity in state efficiency programs. A description of the CTET is provided in Attachment B at pg.3
MI	Case No. U-20147 Public Service Commission Staff's Comments	Michigan Public Service Commission Staff	5/27/2022	Staff recommends the Commission issue guidance on BCA, including on expected processes and transparency using a BCA process, such as the NSPM. This would allow stakeholders to understand the BCA process and results more easily, allow for clear comparison of utility solutions across service territories, and allow stakeholders to have a better understanding of the value of the proposed solutions (pgs 30-31).
MD	Commission Order 90212 Order Establishing Workgroup to Develop a Unified BCA Framework – Case No. 9674	Maryland Public Service Commission	5/13/2022	The Commission accepts the recommendation made by the leader of the EV work group to develop a unified BCA framework for all DERs in Maryland. The order directs the establishment of a work group to address the development of a unified BCA framework and directs this group to consider the principles and steps outlined in the NSPM (pg. 11).
NC	Docket E-100 Sub180 Joint Reply Comments of 350 Triangle, 350 Charlotte, and The North Carolina Alliance to Protect Our People and the Places We Live	350 Triangle, 350 Charlotte, and The North Carolina Alliance to Protect Our People and the Places We Live	5/12/2022	In their reply comments in The Matter of Investigation of Proposed Net Metering Policy Changes, which investigates the net-metering tariffs proposed by Duke Energy Carolinas and Duke Energy Progress, the Joint Intervenors assert the investigation of the costs and benefits of customer-sited generation required by HB 589 should be conducted in compliance with the standard of care set forth by the NSPM (pg. 6). The Joint Intervenors also urge the Commission to require a study based on NSPM guidance be completed which examines low-income customers' non-energy impacts, greenhouse gas emissions, economic development and job impacts, health impacts, energy importance, and energy independence (pg. 7).
NC	Docket E-100 Sub180 Reply Comments of NC WARN, NCCSC and Sunrise Durham	NC WARN, North Carolina Climate Solutions Coalition (NCCSC), and Sunrise	5/12/2022	In their reply comments in The Matter of Investigation of Proposed Net Metering Policy Changes, which investigates the net-metering tariffs proposed by Duke Energy Carolinas and Duke Energy Progress, NC WARN et al. notes HB 589 requires an investigation of the costs and benefits of customer-sited generation. NC WARN et al. established in their initial comments that the Companies failed to meaningfully analyze the benefits of distributed solar in accordance with the

		Movement Durham		guidance of the NSPM. Several other intervenors have acknowledged this failure and similarly recommend compliance with the NSPM (pg. 8).
NC	Docket E-100 Sub180 Reply Comments of the Environmental Working Group	Environmental Working Group (EWG)	5/12/2022	In their reply comments in The Matter of Investigation of Proposed Net Metering Policy Changes, which investigates the net-metering tariffs proposed by Duke Energy Carolinas and Duke Energy Progress, EWG asserts there should be a Commission-led investigation into the costs and benefits of customer sited generation that is consistent with the national standard of care set out in the NSPM (pgs. 6-7). EWG further recommends the Commission should direct the appropriate stakeholders to develop a BCA frameowrk for net metered generation in accordance with the guidance in the NSPM (pg. 25).
WA	Docket UE-210804 Staff investigation developing a UTC jurisdictional specific cost-effectiveness test for distributed energy resources incorporating CETA policies – Workshop #1	UTC Staff and NSPM Co-Authors	5/10/2022	The UTC held the first of a series of workshops to develop a JST for evaluating DERs incorporating the policy goals of the Clean Energy Transformation Act (CETA). The workshop presentation provides an overview of the NSPM framework and principles. The goal of the first workshop was to kick off the stakeholder process by providing an overview of the NSPM, consider comments from the UTC's Notice of Opportunity for Written Comments, conduct a preliminary inventory of WA policies including CETA, and to map out the remainder of the workshop series to apply the NSPM framework and 5-step process.
GA	Docket Nos. 44160 and 44161 In the Matter of Georgia Power's 2022 Integrated Resource Plan	Greenlink Analytics on behalf of Georgia Interfaith Power and Light (GIPL) and the Partnership for Southern Equity (PSE)	5/6/2022	In testimony regarding the treatment of demand side management (DSM) in Georgia Power's 2022 IRP, Greenlink Analytics recommends the Commission initiate a study of the application of the NSPM to DSM programming (pg. 7). When asked if the use of the RIM Test is consistent with DSM best practices, Greenlink Analytics testifies that the NSPM explicitly rejects the RIM Test and instead recommends the development of a jurisdiction specific test based on applicable policy goals. Greenlink Analytics again recommends the Commission study the application of the NSPM to Georgia DSM programming and cites the NSPM application process Arkansas completed (pgs 29-30).
CO	Docket 22A-0189E Public Service of Colorado - DSP Cost-Benefit Analysis of Non-Wires Alternatives	Public Service Company of Colorado	5/1/2022	The Public Service Company of Colorado is required by Commission rules to develop a methodology for evaluating the cost-effectiveness of proposed non-wires alternatives (NWA) projects that considers the principles outlined in the NSPM. The report outlines the methodology used to assess the costs and benefits of the proposed NWAs using the NSPM guidance as compared to the traditional infrastructure solution.
CT	Docket 17-12-03RE02 PURA Investigation into the Distribution System Planning of the Electric Companies – Advanced Metering Infrastructure	CT Office Of Consumer Counsel (OCC)	4/29/2022	The Public Utilities Regulator Authority's (PURA) issued a Notice of Hearing and Request for Briefs to solicit broad feedback from stakeholders regarding advanced metering infrastructure. In their Brief, OCC notes they strongly support the use of a standardized BCA in the assessment of AMI implementation. They further note that OCC has supported the adoption of a uniform BCA for all grid modernization investments utilizing the NSPM and PURA has likewise referenced and/or adopted these guidelines for application of benefit-cost analysis in other grid modernization dockets (pg. 3).

NH	Docket DE 20-092 2021-2023 Triennial Energy Efficiency Plan – Direct Testimony of Courtney Lane and Danielle Goldberg	Synapse Energy Economics	4/19/2022	In testimony on behalf of the NH Office of the Consumer Advocate (OCA) Synapse Energy Economics explains OCA's position on the 2022-2023 NHSaves plan and the policy implications of the November 2021 PUC Order regarding the plan, which struck down the use of the Granite State Test (GST). Synapse testifies that the GST is not and was created using the guidance and principles outlined in the NSPM, which represents best industry practices for determining cost-effectiveness tests that are tailored to the specific interests of each state. Synapse goes on to testify that the GST reflects the positions of multiple New Hampshire stakeholders (through the Benefit-Cost Working Group process) and is not overly complex, as was stated in the November PUC Order (pgs. 29-32).
IL	Multi-Year Integrated Grid Plan Workshops	Synapse Energy Economics	4/19/2022	Public Act 201-0662 directs the Commission to convene a workshop process to establish an open forum regarding distribution system investments. During the tenth workshop, on cost-effectiveness evaluations for non-traditional & 3rd party-owned investments, Synapse Energy Economics presented on the Role of Benefit-Cost Analysis in Integrated Grid Planning and provided an overview of the NSPM and BCA best practices.
MD	Case No. 9648 2021-2023 EmPower Maryland Program	Future Program Working Group	4/15/2022	The Future Program Working Group report outlines changes to the evaluation protocols and cost-effectiveness test used to evaluate the EmPower Maryland energy efficiency programs. The Working Group used the NSPM principles to develop a Maryland Jurisdiction-Specific Test (MJST) based on the societal cost test (SCT) for use as the primary BCA test in Maryland (pg 49).
IL	Docket 22-0067 Petition for the Establishment of Performance Metrics under Section 16-108.18(e) of the Public Utilities Act	Rábago Energy LLC on behalf of the Joint Solar Parties	4/06/2022	This testimony reviews the proposal from Commonwealth Edison Company (ComEd) for approval of performance and tracking metrics pursuant to the performance-based ratemaking (PBR) section of the Climate and Equitable Jobs Act (CEJA). Regarding BCA, Rábago Energy recommends that both ComEd and the Commission should reference the NSPM, which outlines best practices and guidance to establish a jurisdictionally specific BCA framework for all DERs (pg. 31).
IL	Docket 22-0063 Petition for Approval of Performance and Tracking Metrics pursuant to 220 ILCS 5/16-108.18(e) - Direct Testimony on behalf of Joint Solar Parties	Rábago Energy LLC on behalf of the Joint Solar Parties	3/30/2022	This testimony reviews the proposal from Ameren Illinois for approval of performance and tracking metrics pursuant to the performance-based ratemaking (PBR) section of the Climate and Equitable Jobs Act (CEJA). Regarding BCA, Rábago Energy recommends that both Ameren Illinois and the Commission should reference the NSPM, which outlines best practices and guidance to establish a jurisdictionally specific BCA framework for all DERs (pg. 33).
NC	Docket E-100 Sub 180 Initial Comments of the Environmental Working Group	Rábago Energy LLC on behalf of Environmental Working Group (EWG)	3/29/2022	In response to the Commission's order requesting comments on the Duke Energy Progress and Duke Energy Carolinas net energy metering proposal, Rábago Energy on behalf of EWG indicates the Companies' BCA proposals fail to align with the best practices outlined in the NSPM. Rábago Energy recommends the Commission use the NSPM to develop a BCA framework for net-metered generation and recommends the Companies take advantage of the guidance and best practices outlined in the NSPM (pgs. 25-28). The NSPM for DERs summary document is included as Appendix C.

NC	Docket E-100 Sub 180 Joint Initial Comments of NC WARN, NCCSC and Sunrise Durham	NC WARN, North Carolina Climate Solutions Coalition (NCCSC), and Sunrise Movement Durham	3/29/2022	In response to the Commission's order requesting comments on the Duke Energy Progress and Duke Energy Carolinas net energy metering proposal, NC WARN, NCCSC, and Sunrise Durham note the applicable standard of care for conducting BCA of DERs is set by the NSPM and should be used by the Commission to evaluate the costs and benefits of NEM solar (pg 12). Separately, in the attached report, they indicate the NSPM provides a standard format for value of solar evaluations and should be used by the Commission (pg 62).
MN	Docket 21-566 Reply Comments of Center for Energy and Environment	Center for Energy and Environment (CEE)	3/18/2022	In their reply comments on the proposed greenhouse gas accounting frameworks and cost-benefit analysis framework, CEE notes that CenterPoint Energy's proposed societal discount rate is consistent with NSPM guidance, reflecting the long-term nature of utility investments, and aligns with the time preference of the policy goals of the NGIA (pg 29).
LA	Docket R-31106 Rulemaking to study the possible development of financial incentives for the promotion of energy efficiency by jurisdictional electric and gas utilities	Louisiana Public Service Commission (LPSC) Staff	3/07/2022	In the Notice of Filing Third Draft of Proposed Phase 11 Rules and Request for Comments, LPSC Staff indicate Program Administrators may use the NSPM for performing energy efficiency screening tests. If Program Administrators wish to include cost and benefit components not included in the California Standard Practice Manual, justification for these components must be included in Program Administrator's energy efficiency plans and must be approved by the Commission.
NH	H.B. 549 AN ACT relative to the system benefits charge and the energy efficiency and sustainable energy board	NH Legislature	2/24/2022	Governor Sununu signed H.B. 594 into law, which restores funding for ratepayer funded energy efficiency programs as well as restores the use of the Granite State Test, developed in 2019 using the NSPM framework, as the state's primary cost effectiveness test.
CT	Docket 17-12-03RE06 Pura Investigation Into Distribution System Planning Of The Electric Distribution Companies –OCC Position on Residential Application Cost Sharing	CT Office of Consumer Counsel (OCC)	2/22/2022	Over the course of several months, the Distributed Generation Policy Working Group has met to discuss whether CT should implement a policy of cost-sharing for residential upgrade proposals. The Work Group was not able to come to a consensus and agreed the issue should be presented to the CT Public Utilities Regulatory Authority (PURA). In their response to request for comment on the matter (beginning on pg 7), OCC requests PURA examine the cost and benefit equations for the residential solar cost-sharing proposal based on a complete evidentiary record. The OCC notes the NSPM for DERs addresses host customer and utility system impacts of interconnection fees among other DERs and recommends the use of the NSPM in this docket. NSPM guidance could provide helpful guidance on the type of evidence that should be documented and factors that should be evaluated to accurately estimate the costs and benefits of DERs in CT.
MN	Docket 21-837 In the Matter of Technical Guidance for the Inclusion of Efficient Fuel-Switching and Load Management Programs in the	MN Department of Commerce, Division of Energy Resources Staff	2/18/2022	The Staff's proposal includes technical guidance to determine if a fuel switching improvement meets statutory criteria and to calculate energy savings resulting from the improvement. The proposal also provides technical guidance for the implementation of cost-effective load management programs. Staff recommend utilities follow the electrification cost-effectiveness guidance described in the NSPM when submitting a proposed custom efficient fuel switching improvement or when proposing custom cost-effectiveness methodologies for load management programs (pg 22 and 25).

	Conservation Improvement Program - Proposal			
CT	Docket 17-12-03RE08 PURA Investigation Into Distribution System Planning of the Electric Distribution Companies – Resilience and Reliability Standards and Programs	CT Office of Consumer Counsel (OCC)	2/18/2022	The Public Utilities Regulatory Authority (PURA) seeks to develop a framework to evaluate resilience programs and to develop metrics to guide reliability and resilience planning. In their response to the Notice of Request for Written Comments on the matter, OCC encourages PURA to evaluate the impact of each initiative under 17-12-03 upon each other and recommend the NSPM as a tool for doing so to ensure uniform evaluation of the programs and provide an accurate understanding of customer and non-customer impacts. The OCC further recommends the use of the NSPM in this docket throughout their comments.
MD	Case Number 9674 United BCA Framework for DERs – PSC Staff Comments	MD Public Service Commission (PSC) Staff	2/16/2022	Staff agrees with the recommendation by the Leader EV Workgroup to use the NSPM to develop a unified BCA framework for DERs in MD. Staff recommends building on the efforts of workgroups to develop cost effectiveness tests for EVs and energy efficiency using the NSPM, as well as work by the PC44 Energy Storage workgroup to successfully develop a BCA framework for energy storage.
MD	Case Number 9674 United BCA Framework for DERs – NEEP Comments	Northeast Energy Efficiency Partnerships (NEEP)	2/16/2022	NEEP encourages the Commission to use the NSPM to develop a unified BCA framework for all DERs in MD that reflects the priorities and responsibilities of regulators and other stakeholders as well as balance the interests of customers and utilities.
MD	Case Number 9674 United BCA Framework for DERs – Building Performance Association Comments	Building Performance Association (BPA)	2/16/2022	BPA recommends the Commission use the process and guidance outlined in the NSPM to develop a unified BCA framework for all DERs in Maryland. This unified process should build directly on the work of the EVWG and the active FPWG to develop cost effectiveness tests for electric vehicles and energy efficiency, respectively, using the guidance of the NSPM.
MD	Case Number 9674 United BCA Framework for DERs – Office of People's Counsel Comments	Maryland Office of People's Counsel (OPC)	2/16/2022	OPC recommends following the guidance outlined in the NSPM to develop a unified BCA framework for all DERs. They further recommend the Commission initiate a workgroup to review current BCA practices for DERs in Maryland and develop a MD Test applicable to all DERs. OPC also emphasizes the need for a more uniform approach to evaluate the equitable distribution of DER benefits and costs, possibly through the use of a complementary rate impact analysis.
MD	Case Number 9674 United BCA Framework for DERs – Ceres EO Workgroup Comments	Ceres Energy Optimization Workgroup	2/16/2022	Ceres and the Ceres Energy Optimization Workgroup support the development of a unified BCA framework for all DERs in Maryland. They note that while different DERs deliver different benefits and costs, their valuations should remain consistent across working groups and proceedings to align with the State's policy goals. They also support the use of the NSPM to develop a unified BCA, noting they relied on the NSPM while updating the BCA for energy efficiency through the Future Program Workgroup and it would be useful to continue to rely upon NSPM guidance.
MN	Docket 21-814 Petition for Approval Of 2021-2022	The MN Department of Commerce, Division of	2/9/2022	The MN Department of Commerce, Division of Energy Resources filed a letter and a report entitled *Review and Assessment of Grid Modernization Plans: Guidance for Regulators, Utilities, and Other* Stakeholders prepared for the Department by Synapse Energy Economics. The Synapse

	Transmission Cost Recovery Rider	Energy Resources		report notes in section 2.5.1 the Department is currently holding discussions to update the energy efficiency cost-effectiveness test using the NSPM. One goal of these discussions is to develop a BCA test that addresses applicable MN energy policies and ideally be used for all utility investments. The report recommends that as MN updates its energy efficiency cost-effectiveness test, it applies those same practices to other utility investments, including grid modernization investments.
MN	Docket 21-566 Materials from Stakeholder Meetings 5-7	ICF	2/4/2022	In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emissions Intensities of Various Resources, and to Measure Cost-Effectiveness of Individual Resources and of Overall Innovation Plans. During a Dec. 17 stakeholder meeting to complement Docket 21-566, ICF provided an overview of the NSPM (pg 16) to build understanding of the NSPM principles as a foundation for developing a cost-effectiveness framework for innovative resources. ICF promoted the use of the NSPM as a tool to develop a cost-effectiveness test that aligns with a jurisdiction's policy goals and that can be used for multiple different DERs.
NH	Docket DE 20-092 2021-2023 Triennial Energy Efficiency Plan – DOE Motion for Rehearing and/or Clarification of Order 26553	NH Department of Energy (DOE)	2/4/2022	In their Motion for Rehearing and/or Clarification of the Commission Order denying the Triennial Plan (pg 663), the DOE notes several aspects of the 2021 Order require clarification and may provide good reason for rehearing, including those related to the appropriate benefit-cost test. In 2019, the Commission adopted the Granite State Test (GST), a New Hampshire specific cost-effectiveness test developed using the framework established in the NSPM. In their 2021 Order, the Commission found the GST to be inadequate and directed programs be screened using both the GST and the TRC. The DOE requests the Commission clarify the GST be used as the primary cost-effectiveness test while the TRC be used as the secondary test. If the Commission intended the TRC be used as the primary test, the DOE requests reconsideration of that decision.
KY	Docket 2021-00393 Joint IRP of Louisville Gas and Electric and Kentucky Utilities-Initial Data Requests	Kentucky Resources Council	1/21/2022	Regarding Joint Integrated Resource Plan of Louisville Gas & Electric and Kentucky Utilities Company, the Kentucky Resources Council (on behalf of Joint Intervenors) notes that the NSPM provides a framework for BCA for DERs as well as guidance on addressing multiple DERs and rate impacts (at page 5). In their order in case 2020-00174 concerning net metering, the Kentucky Public Service Commission adopted principles for establishing new net metering rates that align with the NSPM. In their data request, the Kentucky Resources Council asks the Companies if they are aware of the NSPM and if they have utilized the NSPM within their IRP processes.
AL	Docket 33182 Direct Testimony of Karl Rábago	Rábago Energy	1/20/2022	Direct testimony of Rábago Energy on behalf of Energy Alabama and the Greater-Birmingham Alliance to Stop Pollution (at page 29) recommends the Commission order Alabama Power Company to procure all cost-effective DSM and DER resources that pass an Alabama specific cost effectiveness test established using the guidance of the NSPM.
OR	Docket UM-2141 – Staff Report for the January 25, 2022 Public Meeting	Oregon Public Utility Commission Staff	1/19/2022	In the OPUC Staff report on Portland General Electric's (PGE) flexible load plan, OPUC Staff note they are encouraged by PGE's work on developing a cost-effectiveness tool based on NSPM guidance to analyze non-wires solutions in distribution system planning (at page 15). This work is discussed further in chapter 7 of PGE's Flexible Load Multi-Year Plan. Staff does not recommend changes to the cost-effectiveness methodology, however, they invite PGE to share their findings

				and recommendations as soon as practicable. The OPUC adopted Staff's recommendation in Order 22-023.
WA	Docket UE-210878 2022 DER RFP	Puget Sound Energy	1/14/2022	Draft 2022 DER RFP (Attachment D, Exhibit A) outlines how Puget Sound Energy will evaluate DER proposals. Page A-2 indicates PSE will conduct BCA of Category A "turnkey" proposals using a BCA model based on the best practices outlined in the NSPM to analyze both the utility's and customer's economic perspectives. To align with existing PSE modeling practices, the BCA utilizes the same modeling assumptions used to develop the 2021 IRP. The model was constructed to quantify all impacts and apply cost tests consistent with the NSPM.
MD	Case No. 9478 Commission Letter Approving EV-BCA Framework	MD Public Utilities Commission	1/12/2022	The Commission reviewed the Summary Report submitted in December by the PC-44 EV BCA Work Group that outlined the methodology used to develop the MD EV BCA framework, including a primary test, known as the MD-EV Jurisdiction Specific Test (MD-EV JST), developed using the NSPM. The commission accepted the Work Group's recommendation and moved to approve the EV-BCA Framework.
MN	Docket 21-101 Petition Load Flexibility Pilot Programs And Financial Incentive Mechanism – Staff Briefing Papers	MN Public Utilities Commission	12/23/2021	Commission staff summarize Xcel Energy's proposed cost effectiveness methodology on page 78 and summarize stakeholder responses to the methodology on pages 80-82. Clean Energy Economy Minnesota and R Street Institute assert the methodology falls short of the best practices outlined in the NSPM as it is based on the RIM test. R Street Institute recommended the commission convene a workshop to develop a jurisdictional specific test utilizing the NSPM framework.
MI	Docket U-20147 Electric Distribution Planning Reconvened Workgroup Benefit Cost Analysis Report	Michigan Public Service Commission	12/22/2021	The report provides a summary of the presentations made during the November 3rd workgroup session to address the parameters of BCA in relation to electric distribution grid investments. E4TheFuture presented on the NSPM to inform utility investment decisions and participated in a panel discussion along with Synapse Energy Economics and the Regulatory Assistance Project. A summary of the panel discussion can be found in section 2.4 and E4TheFuture's presentation may be found on page 57.
WA	Docket 210795 2021 Draft Clean Energy Implementation Plan	Puget Sound Energy (PSE)	12/17/2021	As indicated on page 36 of their final 2021 Clean Energy Implementation Plan, PSE followed NSPM guidance to evaluate different suites of DERs to create a portfolio that promotes equity, diverse offerings, and minimizes costs. PSE notes the NSPM recommends any BCA should align with the policy goals of the jurisdiction, and thus chose the Societal Cost Test and Participant Cost Test for their primary and secondary cost tests, respectively.
MD	Docket Number 9674 Notice Initiating A New Docket, Notice of Hearing and Request for Comments.	MD Public Utilities Commission	12/16/2021	In response to the proceeding filed by the Leader of the EV WG on December 1st, the commission created Case No. 9674 to explore the process for developing a proposed unified BCA framework for DERs in Maryland using the NSPM.
OR	Docket UM 2165 Transportation Electrification Investment Framework Presentation	OR Public Utility Commission	12/14/2021	The presentation provides an overview of the transportation electrification investment framework outlined in UM 2165 and includes a staff recommendation to develop a jurisdictional specific societal cost-effectiveness test for transportation electrification investments.

MI	Docket U-21090 Consumers Energy Integrated Resource Plan Public Cross Examination	Energy Futures Group (EFG)	12/13/2021	In their direct testimony on page 164, EFG cites NSPM guidance that energy efficiency impacts on transmission and distribution losses should be valued using marginal loss rates, as opposed to average loss rates. Further, EFG includes a quotation from the NSPM for EE to further explain this concept.
WA	Docket UE-210804 Staff investigation developing a JST for DERs incorporating CETA policies - Initial Comments of Public Council	Washington Public Counsel	12/13/2021	In response to the Utilities & Transportation Commission (UTC) Notice of Opportunity to Comment in docket EU-210804 (dated 11/4/21) on applying the NSPM to value all DERs to support implementation of the Clean Energy Transformation Act and UTC Clean Energy Rules, stakeholders in the docket submitted comments on or around 12/14/21. For example, the Public Counsel provided initial comments regarding the use of the NSPM in developing a JST for DERs, referenced the NSPM application process used in New Hampshire and Arkansas, and noted that all five steps of the NSPM are crucial to establishing a primary cost effectiveness test. See the full range of comments here.
NV	Docket 21-05002 Investigation Regarding Long-Term Planning For Natural Gas Utility Service In Nevada	Advanced Energy Economy	12/10/2021	AEE notes on pages three and four of their reply comments to the Public Utilities Commission of Nevada that the NSPM provides methodological approaches that can help the Commission and staff develop BCA tests that fully consider the costs and benefits of electrification.
MI	Docket U-20898 New Technologies and Business Models Workgroup Staff Recommendations	Michigan Public Service Commission	12/01/2021	In Section 12.2.4 on page 104 of the report, staff recommends the commission require utilities conduct BCA as outlined in the NSPM for proposing and evaluating future pilot programs for new technologies and business/ownership model pilots.
MD	Maillog Number 238014 Recommendation for New Unified Benefit Cost Analysis (BCA) Proceeding	MD Electric Vehicles Work Group (EV WG)	12/01/2021	As a result of the PC-44 EV Working Group process to develop an EV BCA framework (see below), the Leader of the EV WG further recommends the Commission consider opening a new proceeding that utilizes the MD EV BCA framework along with the NSPM and the EmPOWER EM&V methodology to create a unified BCA methodology across all DERs.
MD	Maillog Number 238013 MD Joint Utilities Electric Vehicle Benefit Cost Analysis Methodology White Paper	Maryland Joint Utilities	11/30/2021	In December 2020, the Commission directed the Electric Vehicles Work Group (PC-44 EV WG) to develop a consensus Electric Vehicle BCA framework utilizing the NSPM and the EmPOWER Maryland EM&V methodology. After nearly a year of meetings, the EV WG submitted a consensus EV BCA Methodology White Paper and Summary Report to the Commission for approval. The report describes the consensus methodology used to develop the MD EV BCA framework, including a primary test, known as the MD-EV Jurisdiction Specific Test (MD-EV JST), developed using the NSPM.
AR	Docket 21-099-U Direct Testimony of Wes Coleman on Behalf of the City of Batesville In The Matter Of The Application Of The City Of Batesville To Install A Net-Metering Facility	Entegrity Energy Partners	11/23/2021	Entegrity provided testimony to explain how the proposed net metering facility in the City of Batesville will result in distribution system benefits. On page 6 of their testimony, Entegrity cited the NSPM to explain how the locational impacts of DERs can vary depending on where they are located in a distribution system. Since the proposed facility will be close to Batesville, the facility would avoid line losses that would occur for power from further locations.

AR	Docket 21-043-U In The Matter Of The Application Of El Dorado School District To Install A Net Metering Facility With A Generating Capacity In Excess Of One Thousand Kilowatts In El Dorado, Union County, Arkansas	Entegrity Energy Partners	11/18/2021	In the Direct Exhibit of Marty D. Risner, Entegrity responds to Commission question distribution system benefits from net metering facility proposed by El Dorado School District (at page 5). Entegrity cites the NSPM to explain how the locational impacts of DERs can vary depending on where they are located in a distribution system.
DC	Docket GD-2019-04-M-55 The Clean Energy Act Implementation Working Group Report regarding Framework for Compliance with the Clean Energy Omnibus Amendment Act of 2018.	DC Public Service Commission Staff	11/16/2021	After nearly a year of working group meetings, the Clean Energy Act Implementation Working Group submitted a report to the Commission in the matter of the implementation of the 2019 Clean Energy DC Omnibus Act compliance requirements. Facilitated by commission staff, the Working Group Majority recommends the Commission should adopt a BCA framework based in the guidance of the NSPM that can "evolve in a systematic and economically sound manner to assimilate technology, policy, and market/customer changes, as well as to address multi-sited DERs and their interactive effects; multi-sectoral applications; dynamic utility system optimization planning; and coordinated end-to-end utility planning." (B.1.1 on page 48). The report lays out a broad range of recommendations on key BCA inputs, proposes a phase two process to identify methodologies and values for impact parameters, and presents stakeholder consensus and non-consensus positions.
WA	Docket UE-210878 2022 Draft Distributed Energy Resources Request for Proposals	Puget Sound Energy (PSE)	11/15/2021	Exhibit A of the 2022 DER RFP concerns evaluation criteria and scoring. On page A-2, PSE states they selected their BCA model (developed for the 2021 Clean Energy Implementation Plan) as the primary modeling tool for this RFP for tits ability to model both customer and utility economic impact as well as calculate cost tests aligned with practices outlined in the NSPM. The BCA includes customer benefits, utility benefits, and societal benefits to output the SCT and PCT.
WA	Docket 210804 Staff Investigation Developing a UTC Jurisdictional specific Cost Effectiveness Test for DERs Incorporating CETA Policies	Washington Utilities and Transportation Commission	11/08/2021	In the Notice of Opportunity to Comment, the Commission notes they will investigate how the 2019 Clean Energy Transformation Act (CETA) necessitates changes to current cost-effectiveness screening practices. This investigation will follow the process and principles outlined in the NSPM for DERs to develop a jurisdictional specific test that incorporates the goals of CETA and other applicable policies. Stakeholders are invited to comment on a range of issues regarding BCA application for DERs and other cross-cutting issues.
MI	MI Power Grid Electric Distribution Planning Workgroup Meeting: Distribution Planning Benefit Cost Analysis Presentation	E4TheFuture, Synapse Energy Economics, Regulatory Assistance Project (RAP)	11/03/2021	E4TheFuture, Synapse Energy Economics, and RAP were invited to speak to the Electric Distribution Planning workgroup, see meeting agenda here and recording here. The presentation provided an overview of the NSPM and the applicability of BCA for distribution system planning.

MI	Docket U-20960 Report - Smart Rate Design for Distributed Energy Resources	Regulatory Assistance Project (RAP)	11/01/2021	On page 34 of the Smart Rate Design for DERs report, RAP notes that jurisdictional specific tests, originally described in the NSPM, reflect a new approach to BCA. The report goes on to describe the principles outlined in the NSPM and the process for developing a jurisdictional specific test.
MN	Docket M-21-694 Integrated Distribution Plan 2022-2031	Xcel Energy	11/01/2021	In Appendix F of their 2021 Integrated Distribution Plan, Xcel discusses the methodology they developed to conduct non-wires alternatives analysis. Xcel conducted a comprehensive BCA in which they analyzed market inputs and developed stacked values with the resulting data. Xcel used the NSPM to identify impacts to include in this stage of analysis.
MI	Case U-21090 In The Matter Of The Application Of Consumers Energy Company For Approval Of An Integrated Resource Plan Under Mcl 460.6T, Certain Accounting Approvals, And For Other Relief.	Energy Futures Group (EFG)	10/28/2021	EFG states the NSPM for EE explains that line losses grow exponentially with load, and as a result, the marginal loss rate associated with the last increment of load added to or removed from the T&D system is greater than the average loss rate for all load. Therefore, the magnitude of line loss reductions associated with efficiency savings should be based on marginal, not average, line loss rates.
NV	Docket 21-06001 2022-2041 Triennial Integrated Resource Plan	Advanced Energy Economy (AEE)	10/19/2021	AEE suggests NV Energy should develop a regulatory structure to properly value and source services from DERs. AEE recommends NV Energy consult the NSPM for DERs, which provides a comprehensive framework to help policymakers design cost-effectiveness tests that fully consider the costs and benefits of various DERs.
IN	Docket Number 43955-DSM 8: Petition of Duke Energy for Approval of its Proposed Plan for Demand Side Management and Energy Efficiency Programs for 2020-2023	Duke Energy	10/15/2021	Duke Energy stated that while the NSPM includes shareholder incentives as a cost, Indiana does not require the use of the NSPM framework for primary cost effectiveness calculations. Duke Energy used the costs and benefits required and detailed in the California Standard Practice Manual, which the Indiana Utility Regulatory Commission found acceptable.
OR	Docket Number UM 2197: PGE Distribution System Planning Report	Portland General Electric (PGE)	10/15/2021	PGE has started developing a new cost-effectiveness tool for DERs that is aligned with the NSPM and regional best practices. This new tool will ensure DERs can be valued through multiple perspectives, accounting for energy system, host customer and societal impacts.
WA	Docket Number 210795: 2021 Draft Clean Energy Implementation Plan pursuant to WAC 480-100-640.	Puget Sound Energy (PSE)	10/15/2021	PSE followed NSPM guidance to evaluate different suites of DERs to create a portfolio that promotes equity, diverse offerings, and minimizes costs. PSE notes the NSPM recommends any BCA should align with the policy goals of the jurisdiction, and thus chose the Societal Cost Test and Participant Cost Test for their primary and secondary cost tests, respectively.
MO	Docket EO-2022-0100 In The Matter Of Union Electric Company	Ameren Missouri	10/01/2021	The Commission directed Ameren Missouri to conduct a Value of Solar Study (Appendix A of the 2021 IRP Annual Update) and to specifically consider the NSPM for DERs as well as

	D/B/A Ameren Missouri's 2021 Integrated Resource Plan Annual Update			NARUC's DER Rate Design and Compensation manual and NREL's Value of Solar: Program Design and Implementation Considerations. Ameren Missouri summarized the NSPM in their literature review and noted the NSPM promotes treating DERs as a utility resource as well as provides a broad perspective on potential benefits and costs.
MN	Docket Number G999/CI-21-566 Initial Comments - Center for Energy and Environment	Center for Energy and Environment (CEE)	9/30/2021	CEE recommends the Minnesota Public Utilities Commission adopt and apply the framework outlined in the NSPM to develop a jurisdiction specific test to evaluate innovative resource investments and plans through the Natural Gas Innovation Act (NGIA).
CO	Proceeding 21A-0096E Public Service Company of Colo - CPCN Power Pathway; Hearing Exhibit 1500 Attachment GLC-3	Colorado Public Utilities Commission	9/24/2021	The Commission cites the NSPM as an appropriate starting place to develop a definition of "net beneficial" regarding whether a transition to performance-based regulation (PBR) would be net beneficial and notes several states that have utilized the NSPM framework. The Commission also indicates it will be helpful to review the NSPM as they consider PBR for DERs.
AZ	Docket RU-00000A-18-0284 In The Matter Of Possible Modifications To The Arizona Corporation Commission's Energy Rules.	Advanced Energy Economy (AEE)	9/20/2021	AEE recommends the Arizona Public Utilities Commission utilize the framework laid out in the NSPM to develop a BCA approach to meet the jurisdiction's needs.
NV	Docket 19-06008 Rulemaking To Amend, Adopt, And/Or Repeal Regulations In Accordance With Senate Bill 300 (2019).	Advanced Energy Economy (AEE)	9/13/2021	AEE recommends initiating a stakeholder discussion of appropriate BCA methodologies and cites the NSPM as a resource that provides "a comprehensive framework for assessing the cost-effectiveness of various distributed energy resources."
CO	Decision C21-0549 Decision Addressing Exceptions to Decision R21-0287 and Adopting Rules	Colorado Public Utilities Commission	9/7/2021	Rule 3535(a) (page 30) directs the utilities to provide an assessment of the proposed non-wires alternatives solution using the BCA methodology in the NSPM and specifically includes certain costs and benefits.
MI	U-20960 Smart Rate Design for Distributed Energy Resources Report - Draft for Public Comment	Regulatory Assistance Project for the Michigan Public Service Commission	9/02/2021	RAP describes the Jurisdiction Specific test outlined in the NSPM. RAP notes the JST "seeks to answer whether the cost of meeting utility system needs, while achieving the applicable policy goals of the jurisdiction in question, will be reduced by the program or measure being analyzed."
CO	Proceeding 21A-0166E Black Hills Colorado Electric, LLC - DSM	Southwest Energy Efficiency Project (SWEEP)	9/1/2021	SWEEP cites a graph from the NSPM to demonstrate the importance of discount rates in assessing the benefits of energy efficiency programs.
AR	Docket NO. 21-069-U In The Matter Of The Application Of	White River Health System	8/26/2021	The Arkansas Public Utilities Commission asked the White River Healthcare System (the Applicant) to explain how the proximity of their proposed net metering facility to industrial loads will result in distribution benefits. The Applicant cites the

	White River Health System To Construct A Net Metering Facility			NSPM to explain how the locational impacts of DERs "can vary depending on where they are located on the distribution system." The Applicant notes that due to the proposed location of the facility, it will provide avoided generation capacity, reduce line losses, and help replace generation capacity.
CT	Docket 17-12-03RE05 on Innovation Pilots Framework- Final Straw Proposal	CT PURA	7/23/2021	The Commission states that proposed future projects will be evaluated by a Resource Value Test developed in accordance with NSPM principles. It will resemble the current TRC already in place, with new additions for environmental impacts. They will also use the PCT, PACT and RIM tests and secondary tests.
CO	No. 20r-0516e Recommended Decision Of Hearing Commissioner Megan Gilman Amending And Adopting Rules	Colorado Public Utilities Commission	7/8/2021	The Commission is required to submit BCA methodology. While the NSPM will be used as a process and the test will be aligned with the principles, they believe that the current test is too broad and should apply not just to Non-Wires Alternatives, but other investments as well. The NSPM is not just an exhaustive list of impacts, but rather a process to be applied.
OR	UM-2165 on the Investigation Of Transportation Electrification Investment Framework	Presentation for Public Workshop (Oregon PUC)	6/30/2021	Synapse Energy Economics provided an overview of the NSPM for BCA of DERs in application to transportation electrification in Oregon.
VA	PUR 2021-00127 on the Approval of Virginia Electric and Power Company Plan for Electric Distribution Grid Transformation Projects	Testimony on Behalf of Virginia Electric and Power Company	6/21/2021	The NSPM is described as a resource for typical benefit-cost analysis principles used by the industry, along with DOE's Modern Distribution Grid and NYPS Commission's Order Establishing the Benefit Cost Analysis Framework.
FL	No. 20210015-EI-Petition for Rate Increase by Florida Power & Light Company	Rabago Consulting Testimony on behalf of Earthjustice	6/21/2021	Rabago Consulting LLC states that proposed compensation reduction is unreasonable because of Florida's current use of the RIM test as a cost-effectiveness analysis solution. They also point out the TRC does include all utility costs, a point previously incorrectly denied by the Commission. The NSPM is cited as a source for this statement.
MN	M-21-101 Xcel Energy's Petition for Approval of Load Flexibility Programs and Financial Incentive Mechanisms	Comments of R Street Institute	6/18/2021	R Street comments that Xcel's "Price Signal Test" is a modified version of the RIM Test. They point to the NSPM explanation of the RIM Test shortfalls and need for a Jurisdiction Specific Test to be forward-looking, incremental analysis (an NSPM principle).
MN	M-21-101 Xcel Energy's Petition for Approval of Load Flexibility Programs and Financial Incentive Mechanisms	Comments of Clean Energy Economy Minnesota	6/18/2021	Clean Energy Economy MN says that the current cost-benefit methodology applied to the portfolio "falls short of best practices". The NSPM is described as guidance for developing a cost-benefit methodology. They also bring up the shortfalls of the RIM test in an effective method for evaluating DER performance.
IN	Case No. 45564 on the Petition of Southern Indiana Gas & Electric	Vectren Energy of Indiana 2020-2025 Integrated	6/17/2021	In Appendix G (Demand Response Methodology), GDS reviewed the NSPM for EE to define "avoided ancillary services" and "energy and/or capacity price suppression benefits" in their cost-effectiveness. GDS used a Utility Cost

	Company to Construct Two Natural Gas Turbines (etc…) Direct Testimony Exhibit of Matthew A. Rice	Electric DSM Market Potential Study & Action Plan (Volume II)		Test (UCT) as their primary test for determining the cost-effectiveness of demand response programs.
WA	UG- 210450 on Cascade Natural Gas Corporation's 2021 Annual Conservation Potential Assessment Final Report	Cascade Natural Gas Corporation	6/15/2021	When discussing the Company's definition of "energy efficiency potential", Cascade discusses the "Proxy RVT Achievable Economic Potential". Economic potential is assessed in cost-effectiveness using a proxy in their Resource Value Test. Their RVT frames analysis around policy goals (an NSPM principle) and includes hard-to-quantify impacts, such as economic development. They cite the NSPM as a resource for investigating this approach, and that the UTC is currently considering adopting an RVT.
MI	U-20147 on Consumer Energy's 2021 Electric Distribution Infrastructure Investment Plan (EDIIP) Reply Comments	MI Energy Innovation Business Council & AEE	6/1/2021	The commentors recommend the Consumers review NSPM and apply the process to fully cover the range of benefits and costs associated with their grid modernization efforts. Customer benefits described in the Plan may not fully capture the participant benefits from DERs, specifically benefits from DER integration, resilience, and demand charge avoidance when it comes to EVs.
WA	UE- 190908 on Pacific Power & Light Company 2021 Electric Annual Conservation Plan Final Report	Pacific Power & Light Company	6/1/2021	In the "cost-effectiveness" section, Pacific Power describes NSPM as a tool to provide guidance on cost-effectiveness testing based on policy goals, and as a neutral + objective "Resource Value Framework" to define a jurisdiction-specific primary test. They go on to explain that the NSPM definition of a TRC is modified and used as the "PTRC" or the current Resource Value Test for WA investor-owned utilities.
ME	No. 2019-00309 on the Approval of Section 31 Rebuild Pertaining to Central Main Power Company	Synapse Energy Economics Memo	5/28/2021	The memo states that the utility perspective should be used in cost-effectiveness testing, and participant and societal benefits and costs should not be included. Benefits under the utility cost test were informed by the NSPM (Page 2).
MD	No. 9655 on Potomac Electric Power Company's Application for an Electric Multi-Year Plan	Office of People's Council Post-Hearing Brief	5/21/2021	OPC highlights Synapse Energy Economics' previous testimony to show concerns over Mark Warner's initial straw proposal. They cite the NSPM to show concern over the use of the RIM test in the primary test and advocate for a JST to be established using commission policy goals.
OH	No. 20-585-EL In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates	Energy Futures Group (EFG) testimony on behalf of Ohio Power Company	5/20/2021	When asked if they were familiar with the 'resource value test', EFG indicated they were, citing the AEP Ohio effort to establish such a test in alignment with NSPM principles. They also expressed concerns about the Commission understating benefits to the portfolio of a program.
KY	No. 2020-00174 Electronic Application Of Kentucky Power Company For (1) A General	PSC Order	5/14/2021	The Commission directly mentions the NSPM principles and various impacts outlined in the NSPM and that they should be expressed in BCA for Kentucky.

	Adjustment Of Its Rates For Electric Service; (2) Approval Of Tariffs And Riders; (3) Approval Of Accounting Practices To Establish Regulatory Assets And Liabilities			
WI	No. 5-EI-158 on Roadmap to Zero-Carbon Investigation	MEEA comments	5/13/2021	MEEA submitted comments recommending the PSC establish a common BCA framework to "compare both supply- and demand-side distributed resources" and use the NSPM framework.
MS	No.2019-AD-19 on Reviewing Fairness of Net Metering Rules	Reply Comments of Posigen	5/10/2021	Reply comments of Posigen state that MPC and EML are wrong in their conclusion that net-metering is a subsidy. They say that neither have "undertaken a cost-benefit analysis using national best practices in the 2020 NSPM for DERs".
MN	No. E002/M-19-666 on Integrated Resource Planning	Xcel Energy Planning Workshops	5/6/2021	Xcel Energy held IRP planning workshops on 4/23 and 4/30 to create a jurisdiction specific BCA framework. They highlighted the NSPM principles directed attendees to share the DERs to which the NSPM should be applied.
NY	No. 20-G-0131 on Natural Gas Planning Procedures	Comments of NRDC, Sierra Club, Regional Planning Association, Association for Energy Affordability, New Yorkers for Clean Power	5/4/2021	The parties did not agree with the PSC order excluding 'Wholesale Price Suppression Effects' in the SCT and cite the NSPM in that these impacts are 'Utility System Impacts' and it would be inconsistent to consider the "wholesale profits as an offsetting impact, and therefore exclude them from the BCA, when the profits of other entities that provide energy resources are included in BCA". The parties also disagree with the requirement to use the WACC as a discount rate and cite the NSPM and its view that discount rate should be consistent with the goal of the analysis.
MA	Order Approving Revised Energy Efficiency Guidelines	Massachusetts Department of Public Utilities	5/3/2021	DPU highlighted NEEP's comments recommending the application of the NSPM and decided to include GHG emissions reductions from program measures in their BCA framework.
MN	Docket E002 Order Establishing Methodologies And Reporting Schedules	Xcel Energy Annual Report	4/30/2021	Xcel Energy is considering updating their CE testing practices to follow the RIM test guidelines. They say that they have not considered the NSPM, but "certainly" will look at it. Further, the report states that "the NSPM recommends" a RIM test include bill credits and any incentive the company is receiving.
MO	EO-2021-0035 In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2021 Triennial Compliance Filing Pursuant to 20 CSR 4240-22	Evergy Solar Valuation Study	4/30/2021	As an appendix to Evergy's IRP (CSR 240-22.080), they conducted a Solar Valuation Study. There is a table in the study which points to different impacts accounted for in BCA from various resources, including NESP. According to the findings of the report, the inclusion of societal impacts, while having a great benefit to the value of solar, is not agreed upon across resources.
AR	Docket No. 07-082-TF Arkansas	SWEPCO 2020 Annual Report	4/30/2021	"The PWC also addressed concerns raised in prior Commission orders regarding the clarification of the National Standard Practice Manual (NSPM), the SARP Workbooks, and

	Energy Efficiency Program			the discussion of the Carbon Calculator approaches." In summary of their virtual PWC meetings. No indication of next steps in document.
OH	Docket 20-585 In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates	Testimony of Energy Futures Group (EFG)	4/20/2021	EFG testified that cost-effectiveness testing should reflect state policy goals, as outlined in the NSPM. This testimony is part of three proceedings to change electric tariffs, distribution rates, and accounting practices.
OR	PGE Flexible Load Plan Comments Docket 2141	Portland General Electric (PGE)	4/16/2021	PGE replied to comments submitted by stakeholders in Docket 2141 on PGE's Flexible Load Plan on April 16th. Many of the comments, including those from OSSIA (pg.1) and NWEC (pg. 8), include a note about cost-effectiveness testing and the utilities' need to increase transparency in methodologies and modify the current framework. While none of the comments include the NSPM, PGE's reply acknowledges the WA UTC use of the NSPM and says they are looking to using "new methodologies" for their test (pg. 4-5).
KS	Docket 21-EKME-088-GIE Investigating the Sustainability Plan of Energy Kansas	Climate and Energy Project	4/16/2021	The Climate and Energy Project mentioned the Value of Solar study being conducted in Missouri in comments in Docket 21-EKME-088-GIE (Investigating the sustainability plans of various KS utilities) on April 16. They suggested that Kansas 1) use those results to analyze their value of solar and 2) conduct a similar study for the state of Kansas. The NSPM is mentioned as a resource for finding the Value of Solar.
CO	Docket 20R-0516E Proposed Rules for Distribution System Planning	DSP Consensus Rules	4/16/2021	In an Attachment titled "DSP Consensus Rules" (attached), the commission says that a new benefit-cost analysis framework will be proposed in Phase I of the DSP. The test will align with the NSPM principles.
MS	Comments on MS 2021-AD-19 on Net Metering Rules	Entegrity Energy and Audubon Society	4/5/2021	Recommends the NSPM be used to plan for future DER investments. Framework based on the guidance and best practices set out in the National Standard Practice Manual for Benefit-Cost Assessment of Distributed Energy Resources ("NSPM-DER") for the purposes of informing the setting of compensation rates for DGF production that is fair and reasonable. See attached NSPM-DER overview (Appendix A). Fair and reasonable compensation to DGF investors and operators is essential for optimizing economic efficiency and to prevent forcing these customers and businesses to subsidize the utilities or other customers.
MO	In the Matter of Union Electric Company D/B/A Ameren Missouri 2020 Utility Resource Filing (No. EO-2021-0021)	Renew Missouri and Renew Missouri Advocates Comments	3/31/2021	Renew Missouri suggests their new Value of Solar study should consider the NSPM for industry guidance on development and implementation.
MO	2021 Annual Update by the Empire District	Liberty-Empire's 2021 IRP	3/22/2021	Liberty-Empire will conduct a Value of Solar study and consider the NSPM for industry guidance on solar development and implementation.

	Electric Company D/B/A Liberty EO-2021-0289			
DC	Implementation of the 2019 Clean Energy DC Omnibus Act Compliance Requirements-BCA Committee Meeting Minutes (No. GD-2019-04-M)	DC PSC	3/9/2021	Includes an attachment of a presentation on the NSPM given by Julie Michals in March.
MD	Potomac Electric Company Application for Electric Multi-Year Plan No. 9655	Synapse Energy Economics	3/4/2021	Synapse Energy Economics cited the NSPM as "technology- and policy-neutral" and indicated the current proposed CE testing practices do not align with MD policy goals and is not separate from Rate Impact Analysis.
AZ	Utilities Division Memorandum-Modification to ACC's Energy Rules No. RU-00000A-18-0284	Advanced Energy Economy (AEE)	2/26/2021	AEE recommended that electric efficiency programs be evaluated at the portfolio/program level as opposed to at the individual resource level and recommended the use of the NSPM to create a standard BCA framework.
CT	Testimony in Regard to Incentives and Capacity Blocks in Docket 17-12-03RE03 on Energy Storage	Northeast Clean Energy Council (NECEC)	2/19/2021	NECEC testified that current incentive benefits are not captured in the CT BCA framework for EE programs. They recommended using the NSPM to revise their BCA framework.
PA	Policy Proceeding on Utilizing Storage as an Asset in Docket M-2020-3022877	Office of Consumer Advocates	2/18/2021	The Office of Consumer Advocates suggested reviewing the NSPM for DERs in order to determine the cost-effectiveness of DERs (including storage). An attached Rakon Energy Report also mentions the NSPM to guide stakeholders and regulators on conducting BCA for DERs.
FL	Letter to Commission Staff-Docket 20200181 on Amendment to F.A.C. goals for Utilities	American Council for an Energy-Efficient Economy (ACEEE)	2/15/2021	ACEEE filed a letter to Commission staff providing comments regarding proposed changes to FEECA rules. The comments include a white paper examining the performance of Florida's utilities and their EE programs. The paper suggests the Florida PSC hold a stakeholder process to update their CE testing practices following the principles of the NSPM (pg. 10).
FL	Docket 20200181 Proposed Amendment of 25-17.0021, F.A.C., Goals for Electric Utilities	Southeast Energy Efficiency Alliance (SEEA)	2/15/2021	SEEA filed a letter to Commission staff providing comments regarding proposed changes to FEECA rules. SEEA recommends the Commission build a Florida specific cost-effectiveness test using the NSPM. They note that technical assistance and consulting are available to Commission staff (pgs. 4-6).
CA	Rulemaking to Revisit Net Energy Metering Tariff Rates	Small Business Utility Advocates	2/4/2021	In a response to a final ruling from a Verdant Study, the Small Business Utility Advocates group recommended including participant benefits to the Cost-Effectiveness Analysis of EE programs. The current test accounts for participant costs, but not benefits. They say that omitting these participant impacts violate the principle of symmetry from the NSPM.

AZ	"Path to 100% Clean Energy" Report highlighted during Stakeholder Meeting	Arizona Public Service and Guidehouse	2/4/2021	"The National Energy Screening Project works to standardize and modernize value frameworks and the enumeration of which values apply to which technologies that are a good starting point to rethink APS's value framework. The following tables organize impacts into three categories: electric utility system, host customers, and society. These impacts are further organized by DER technology category. This value framework helps us understand how each DER category is either a cost, benefit, or not applicable to each stakeholder"
MA	Investigation into Role of Gas Local Distribution (Docket 20-80) Letter	Synapse Energy Economics	2/1/2021	In a Synapse letter to the Commission, they suggest analyses of programs should "utilize a well-defined and explained benefit-cost framework". They recommend the NSPM be used to further consider benefits and costs beyond the current TRC framework.
KY	Response to Questions posed in Docket 2020-00349 on Adjustment of Electric Rates and AMI Infra.	Kentucky Utilities Company	1/22/2021	Kentucky Utilities Company responded to the questions posed at the beginning of the month by Mountain Association, Kentuckians for the Commonwealth, and Kentucky Solar Society. They are not aware of the NSPM and did not rely on it when developing their net metering tariff. They used Rider SQF avoided cost rates.
CT	Docket 17-12-03RE07: Non-Wires Alternatives	Energize CT	1/11/2021	Energize CT submitted a presentation "Three-Year Plan Opportunities and Challenges" citing the NSPM as a way to advance and evaluate state energy and environmental policy goals.
KY	Docket 2020-00349: Application of KY Utilities for an Adjustment of Electric Rates and Deployment of AMI Infrastructure	Data Request Submitted by Kentucky Solar Energy Society, Mountain Association, and Kentuckians for the Commonwealth to Kentucky Utilities Company	1/8/2021	Question 1-9 explains the NSPM as a comprehensive framework for cost-effectiveness assessment for DERs and provides guidance on addressing multiple DERs, rate impacts, and cost shifts. They then ask if the company is aware of the NSPM for DERs and if they used it when developing the latest net-metering proposal.
MA	Docket 20-150: A Motion to Update Energy Efficiency Guidelines	NEEP Comments	1/8/2021	NEEP brings attention to the lack of societal impacts accounted for in the current MA TRC. They cite the NSPM as a way to correct this and brings attention to its use in NH, RI, CT, and NJ.
HI	Instituting a Proceeding to Investigate DER Policies; Status Update	Hawaii Electric	12/4/2020	Hawaii Electric is using the NSPM to contribute to the Final Proposal Filing in May 2021. The NSPM is being used to value energy produced from Grid Services.
CO	Notice of Proposed Rulemaking-Decision C20-0837	Colorado Public Utilities Commission	12/3/2020	Colorado requires the commission to develop a cost-effectiveness test for new Non-Wires Alternatives. The NSPM is cited as a "comprehensive framework for cost-effectiveness assessment of DERs".
WA	2021 Annual Energy Efficiency Plan, on behalf of Northwest Natural Gas Company,	Northwest Natural Gas Company	12/1/2020	"The Company may investigate the opportunities provided by the National Standard Practice Manual ("NSPM") methodology, such as the Resource Value Test (RVT), which is "intended to provide a comprehensive framework for assessing the cost-effectiveness of energy efficiency resources." Any change to

	from Rebecca Brown. (via web portal):			Cost Effectiveness test will be vetted through the EEAG process."
CO	Report to Investigate 'Performance-Based Regulation' in Response to Senate Bill 19-236	Colorado PUC	11/30/2020	"As the Commission considers PBR for DERs, it will be helpful to review the National Standard Practice Manual (NSPM) for Benefit Cost Analysis of Distributed Energy Resources published in August 2020 by the NESP."
ON, CAN	EB-2020-0091 EGI IRP Proposal – GEC/ED Evidence	Green Energy Coalition and Environmental Defense	11/23/2020	The report "Best Practices for Gas IRP and Consideration of 'Non-Pipe' Alternatives to Traditional Infrastructure Investments" describes how the NSPM can guide Commissions on developing CE practices that align with policies and outlines the core principles of the manual.
MO	Order Establishing Special Contemporary Resource Planning Issues	Missouri Public Service Commission	11/4/2020	"The utility's Value of Solar study should consider the National Association of Regulatory Utility Commission's Distributed Energy Resources Rate Design and Compensation manual, National Renewable Energy Laboratory's Value of Solar: Program Design and Implementation Considerations, and the National Energy Screening Project's National Standard Practice Manual for Distributed Energy Resources among any other industry guidance on value of solar study development and implementation."
CO	Investigation into Performance Based Regulation in Colorado S. 40-3-117 C.R.S.	CO Public Utilities Commission	11/3/2020	The recently published *"National Standard Practice Manual (NSPM)"* was created by the National Energy Screening Project (NESP) as a costs-benefits test document for DERs. The concept is similar to energy efficiency tests, which have experienced many nuances over the years, but provide a solid base from which to start. The NSPM test is named "jurisdiction-specific test" (JST). Such a test serves the role of a cost-benefit analysis in utility regulation with three tests: 1. Utility; 2. Utility + customer; 3. To all of society.
MN	proposed demand response incentive mechanism summary - stakeholder meeting no. 2 docket no. e002/ci-17-401	Xcel Energy	10/26/2020	"Will the RIM test include bill credit plus any incentive the Company is receiving? Response: We may consider that. The National Standards & Practices Manual updated in 2020 does recommend this."
MD	Building Performance Association-Comments. Case No. 9648 (ML232193)	Building Performance Association	10/15/2020	"We also appreciate BGE's recognition of the National Standard Practice Manual (NSPM) as a valuable resource that states and jurisdictions use to identify which costs and benefits are appropriate for assessing programs, and to align cost-effectiveness with policy and society objectives."
KY	Testimony in Case No. 2020-00174	Testimony of Apogee Climate & Energy Transitions	10/7/2020	"Adapt the best-practices principles, set forth in Table 1, below, of the National Standard Practice Manual SPM for Assessing Cost-Effectiveness of Energy Efficiency Resources published by the National Efficiency Screening Project ("NSPM-EE"), and the soon-to-be published NSPM for Distributed Energy Resources. These can help guide the Commission and stakeholders in their review of relevant impacts and the options for accounting for them. While the current NSPM Edition

				focuses on energy efficiency, the principles and framework are generally applicable to all DERs."
CT	Docket 20-10-02: A forecast of Natural Gas Demand and Supply 2021-2025	Eversource	10/1/2020	"In May 2017, the National Efficiency Screening Project (NESP) released the National Standards Practice Manual for Cost-Effectiveness (NSPM). The NSPM builds upon the existing California Standards Practice Manual that has been used throughout the United States for decades. The NSPM expands B/C testing beyond traditional tests and allows jurisdictions more flexibility to adjust current tests to better align with local policies. Recently, DEEP has initiated discussions with the Electric and Natural Gas Companies on the development of a Resource Value Test (RVT) consistent with the NSPM to reflect State policy goals outlined in Connecticut's 2018 Comprehensive Energy Strategy (CES)."
CT	Docket No. 19-06-29 Comments	CFE, E4TheFuture, NECEC, NEEP, Acadia Center	9/18/20	Specifically, we recommend that DEEP/PURA use the National Standard Practice Manual for Assessing Cost-Effectiveness of Efficiency Resources (NSPM-EE), which provides a set of high-level valuation principles for cost-effectiveness analysis, including ensuring alignment with state policies and symmetry in the treatment of relevant costs and benefits (see Table 1).
GA	GA 4882	Rábago Energy LLC	9/18/20	Rábago Energy recommended the NSPM as "a useful resource that provides guidance on best practices in assessing the value of distributed renewable energy resources, such as DSG".
NM	Recommended Decision Case No. 20-00087-UT	New Mexico Public Utilities Commission	9/17/20	In their recommended decision, the commission notes the Coalition for Clean Affordable Energy objection to including profit incentive as a program cost in calculating the UCT. Quoting the NSPM for DERs, the CCAE states the costs included in the denominator of the UCT ratio are "utility system costs," and that the incentive is not a utility cost. They also argue that including the profit incentive as a program cost is inconsistent with the Efficient Use of Energy Act's (EUEA) definition of the UCT. The commission concludes that the profit incentive should not be included as a program cost in calculating the UCT.
MD	Case No. 9648: In the Matter of The 2021-2023 EMPOWER Maryland	Baltimore Gas and Electric (BGE)	9/1/20	BGE recommends using the NSPM for the cost-effectiveness testing of EE programs. BGE encourages a stakeholder work group to determine the goals of EmPOWER beyond 2023 as well as consider cost-effectiveness testing and how it shapes the future of EmPOWER.
MI	Commission Order Case No. U-20147	Michigan Public Service Commission	8/20/20	"The Commission is aware of a large amount of work nationally around BCA frameworks, including the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources… highlighted by the joint commenters to guide the Commission's evaluation of BCA. As with the criteria for considering NWAs, the Commission directs the Staff to continue to work with utilities and other stakeholders in continuing to explore the appropriate framework for evaluating BCA… The Commission expects these additional details to inform and be integrated into future utility distribution plans."
MD	Office of People's Counsel - Direct Testimony. Case No. 9645 (ML 231484)	Office of People's Council	8/14/2020	Testimony from Courtney Lane (Synapse Energy Economics) on behalf of the Office of People's Council submission in the Application of Baltimore Gas and Electric Company for an Electric and Gas Multi-Year Plan. Her testimony recommends "any future BCA of a utility EV program to reflect the full benefits and 3 costs applicable to that program and adhere to

				the principles of the NSPM". She also goes into detail on how the NSPM should be used and background on what it is. ** Courtney's testimony starts on page 85.
OH	Docket Comments 20-585-EL-AIR	AEP Ohio	6/15/20	"The DSM plan is designed to be cost-effective on a portfolio basis using the Utility Cost Test and Resource Value Test. In general, each program proposed within the plan should also be cost-effective using the Utility Cost Test and Resource Value Test. The portfolio may include programs that are not cost-effective when those programs provides substantial non-energy benefits."
NJ	Order directing the utilities to establish energy efficiency and peak demand reduction programs	New Jersey Board of Public Utilities (BPU)	6/10/20	"Board ADOPTS Staff's recommendations to (1) work toward development of a New Jersey Cost Test that will be the primary cost-effectiveness test used to evaluate utility- and State-led EE and PDR programs and (2) propose a modified TRC as the primary cost test while continuing to use the CSPM tests for information purposes for the first three-year program cycle. The Board DIRECTS Staff to ensure that the EM&V WG do the following: Evaluate non-energy impacts for inclusion in the New Jersey Cost Test, recommend third party studies to further evaluate and quantify non-energy impacts as needed, and recommend on an ongoing basis additional non-energy impacts for inclusion in future updates to the New Jersey Cost Test; Develop and recommend an approach to estimating avoided costs on a statewide basis, utility-specific inputs where appropriate; Develop and recommend the timeline for EM&V studies for each three-year program cycle, including updates to non-energy impacts and avoided costs methodologies, updates to New Jersey's Protocols, impact evaluations, process evaluations, methods to account for strategic electrification and any additional studies and evaluations; Share associated data as appropriate and track best practices from other jurisdictions; and Facilitate the necessary stakeholder processes related to the State's EM&V policies. The Board further DIRECTS Staff to develop an RFP to procure an ongoing contract with a statewide evaluator to facilitate the EM&V Working Group, review utility and state EM&V methods and assumptions, and perform other activities, as defined by Staff and the EM&V Working Group."
Gen-eral	Developing a Comprehensive BCA Framework: The RI Experience	Smart Electric Power Alliance (SEPA)	6/1/2020	Refers to the NSPM for EE and NSPM for DERs frameworks, as well as the NSPM Case Study on RI.
OR	Presentation: Quantifying and Maximizing the Value of DERs (OR PUC Investigation into DSP Docket UM 2005)	Regulatory Assistance Project (RAP)	5/8/2020	NSPM for EE and NSPM for DERs cited as key resources for CE Test Methods. Graphics from NSPM for DERs used throughout presentation.
Gen-eral	Applying NEIs from Other Jurisdictions in CBA of EE Programs: Resources for States for Utility Customer-Funded Programs	Lawrence Berkeley National Laboratory (LBL)	5/1/2020	Applies the NSPM categorizations of NEIs and approaches to account for relevant EE impacts, including hard-to-monetize impacts. Uses data from 30 states in the DSESP as source material for impact quantification studies.

NJ	Comments re: Energy Efficiency Transition – Full Straw Proposal	BPA	4/13/2020	"BPA applauds the recommendation in this Straw Proposal that the Resource Value Framework outlined in the (NSPM) be considered to develop a single primary test that meets the needs of New Jersey for the benefit-cost testing of energy efficiency and peak demand reduction programs. In previous comments we have urged the NJBPU to use the NSPM to develop a New Jersey Test. We thank the NJBPU for its decision to begin this process to ensure that cost-effectiveness testing is balanced, transparent, replicable, and prioritizes the policy objectives of the State… Importantly, while the NJBPU Straw Proposal appropriately references the (NSPM for EE), note that the NSPM is actively being expanded to address BCA for other distributed energy resources (DERs). This forthcoming summer 2020 publication, the (NSPM for DERs), incorporates the fundamental elements and concepts from Page 4 the NSPM for EE. The NSPM for DERs will provide guidance on various single DER types (efficiency, demand response, distribution generation, distributed storage and electrification), as well as BCA for multiple DERs (e.g., grid-efficient interactive buildings and non-wires solutions). To the extent useful and applicable for NJBPU in the context of BCA for other DERs, or as integration of efficiency with other DERs evolves (see comments below on Smart Technology and AMI), BPA is prepared to provide more specific information on the NSPM for DERs."
NJ	Straw Proposal for New Jersey's Energy Efficiency and Peak Demand Reduction Programs	BPU Staff	3/20/20	"Staff recommends that a Resource Value Test or similar approach be considered for the benefit-cost testing of New Jersey's energy efficiency and peak demand reduction programs. Over the spring, summer and early fall of 2020, Staff will coordinate with the EM&V WG and stakeholders to consider development of a primary test. For the purposes of program development, the CSPM tests will be used, unless and until a RVT or other primary test has been developed. During the first cycle of programs and after possible institution of the RVT or other primary test, the five CSPM tests will continue to be used for information-only reporting. Adopting a primary test while utilizing the CSPM tests as a secondary check will ensure that all perspectives are represented and that stakeholders and program administrators have the full scope of information for decision making."
CO	Docket Comments 19M-0670E	Vote Solar	3/13/20	"The establishment and utilization of CBA with the involvement of a diverse set of stakeholders should assure a beneficial outcome. The NESP is currently developing a NSPM for DERs… this manual should provide a helpful framework and guidance for the Commission's DSP rules."
Gen-eral	2020 Utility EE Scorecard	ACEEE	2/20/20	"The National Efficiency Screening Project released a standard practice manual for screening tests in 2017. It offers guidance for states to tailor cost tests to their state policies."
MI	MPSC draft Staff Report: Electric Distribution Planning Stakeholder Process	MI PSC	2/19/20	"The (NSPM), developed to update and replace the CaSPM, describes the benefit and cost differences across four categories: energy efficiency, demand response, distributed generation, and distributed storage. Though the "NSPM should serve as a foundation for assessing the cost-effectiveness of DERS", there are DER specific considerations that are "beyond the scope of this NSPM, [that] should be addressed by each jurisdiction as they develop cost-effectiveness practices for DER." Currently, a NSPM for BCA of DER is under development for release in June 2020. Commission guidance regarding BCA is needed at this point. However, future information on the best approaches to BCA, such as the

				forthcoming NSPM guide, may help inform future revisions to Commission BCA guidance."
MN	Decision Docket G999/CIP-18-782, E999/CIP-18-783	MN Dept of Commerce Deputy Commissioner	2/11/20	"The Department will adopt the NSPM definition of the UCT… The Deputy Commissioner approves the following initial scope of CE issues that the Department will explore in coordination with a CE advisory committee [including the stakeholder NSPM application process report] recommendations: establishing the "Minnesota Test"."
Gen-eral	Beneficial Electrification Test to Assess Benefits and Costs to Achieve Widespread Decarbonization	Cadmus Group	2/10/20	"Policymakers are turning to the NSPM to realign BCA test assumptions with their policy priorities… the RVF provides the kind of flexibility and transparency that are needed for a BCA specific for beneficial electrification."
CO	Docket Comments 19M-0670E	SWEEP	2/3/20	"Once complete, [the NSPM for DERs] framework could be adopted to consider all resources under an NWA."
CO	Docket Comments 19M-0670E	CO Solar and Storage Assoc. and SEIA	2/3/20	"CBA should be carried out in a consistent manner for all NWAs This analysis should evaluate benefits to both the grid and the state by using broad cost-benefit analysis consistent with the analysis described in the NSPM."
Gen-eral	Measuring Three Rs of Electric Energy Efficiency: Risk, Reliability, and Resilience	ACEEE	2/1/2020	"To deliver energy efficiency using ratepayer funds, utilities and program administrators must demonstrate to regulators that the expenses are prudent and the benefits outweigh the costs. The National Standard Practice Manual (NSPM) for Assessing the Cost-Effectiveness of Energy Efficiency sets forth the following key principles… Quantifying all the relevant benefits of efficiency—including the full range of utility-system benefits and nonutility impacts that align with state policies—is critical to demonstrating the value of the resource to a state in its cost-effectiveness analysis"
MN	Dockets E-017/M-19-693, E-017/CI-18-253 and E-111/M-19-674, E-111/CI-18-255	Clean Energy Economy MN	1/22/20, 1/29/20	"CEEM thinks that IDPs should improve discussion of costs and benefits of potential system designs and associated investments. Further, the Commission, the DOC, and stakeholders can work with utilities to provide cost-benefit quantification and analysis related to important policy outcomes. Also, other states and industry players are considering cost-benefit frameworks. For example, E4TheFuture, published the NSPM in 2017, which provides a framework to evaluate energy efficiency resources. A NSPM for Benefit—Cost Analysis of Distributed Energy Resources is expected in 2020…We encourage the Commission to continue to refine expectations related to NWA assessment for future IDPs."
NV	Docket Comments 19-06008	WRA, SWEEP, Sierra Club, NV Chapter of the American Institute of Architects, and Defend our Desert	1/24/20	"To implement a NV-specific test, the Conservation Advocates recommend that the Commission implement the RVF described in the NSPM for EE. This approach provides an assessment of costs and benefits tailored to the public policy objectives of each state and can be more robust than the TRC test."
NC	Docket Comments no. E-2 Sub 931, E-7 Sub 1032	NRDC, SACE, Sierra Club, SC Coastal Conservation	1/15/20	"The NSPM offers a stepwise framework to assist regulatory bodies and jurisdictions in making the discount rate determination. Commenters suggest that this framework would serve as a useful guide for the Commission in determining

		League, NC Sustainable Energy Association		whether to require the use of a discount rate different from the utility's WACC."
DC	GD2019-04-M	Washington Gas Light Company	1/13/20	"Instead of, or in addition to, the RIM, a possible complementary approach is a combination of a rate-impact assessment, a bill impact assessment and a participation rate assessment as recommended by the NSPM."
VA	House Bill No. 206 and No. 1677	VA General Assembly (Sponsors: Patron, Ware)	1/8/20, 1/17/20	"Cost-effective energy efficiency potential" means the energy efficiency program potential that is cost-effective using methodologies consistent with the National Standard Practice Manual developed by the National Efficiency Screening Project. The costs and benefits used to determine the cost-effective potential shall consist of (i) the costs and benefits to the utility system and (ii) the costs and benefits to energy efficiency program participants."
KS	Docket No. 20-GIME-068-GIE Study of Retail Rates of KS Electric Public Utilities	London Economics International LLC for the Legislative Coordinating Counsel, submitted by the State Corporation Commission	1/8/20	"Under the described NSPM for screening energy efficiency programs, a framework for estimating the range of utility and non-utility energy efficiency system impacts can be identified. A broader discussion on implementing a Kansas-specific screening mechanism that incorporates existing KCC policy, broader Kansas policy objectives, as well as regional best practice measures that have been proven to be effective will be useful. Considerations might include reliability benefits and other non-energy impacts such as health and economic development benefits that are considered more difficult to quantify. While evaluation of the existing efficiency assessment framework is beyond the scope of this paper, an analysis of existing practice through the lens of regional best practice would be a positive next step."
NH	DE 17-136, Order No. 26,322 Approving B/C WG Recommendations	NH PUC	12/30/19	"…adopts a new cost-effectiveness screening framework for New Hampshire's ratepayer-funded energy efficiency programs. The framework consists of a primary test, known as the Granite State Test, and two secondary tests: Utility Cost Test, and the Secondary Granite State Test" which resulted from the NSPM process in NH.
PA	Final order M-2019-3006868	PA PUC	12/19/19	"Following the release of the NSPM in 2017, the Commission tasked the Phase III SWE with a detailed review of the NSPM and an inventory of how the 2016 TRC Test Order compared with the principles outlined in the NSPM. Many of the issues identified by the Phase III SWE as part of the NSPM review were instrumental in guiding our proposals in the 2021 TRC Test Tentative Order. The 2017 NSPM review did not include a comprehensive review of Commonwealth policies, laws, and regulations. We reject the suggestion to "pause" the 2021 TRC Test Order for an additional NSPM review. We do, however, agree that such a review could be considered an initial step in the preparation of future Act 129 TRC Test Orders"
MN	Proposed Staff Decision Docket G999/CIP-18-782, E999/CIP-18-783	MN Dept of Commerce – Energy Resources	12/18/19	Staff recommended Discount Rate Mechanisms: 2) Adopt the NSPM definition of the UCT for the purposes of CIP only… Definition – "The purpose of the UCT is to indicate whether the benefits of an EE resource will exceed its costs from the perspective of only the utility system. The UCT includes all costs and benefits that affect the operation of the utility system and the provision of electric and gas services to customers" "Long-Term Cost-Effectiveness Issues to Explore Leading Up to the 2024-2026 CIP Triennials: a. Staff recommend that the Deputy Commissioner approve the initial scope of cost-effectiveness issues outlined in Section IV of this Proposed

				Decision that the Department will explore in coordination with a Cost-Effectiveness Advisory Committee leading up to the 2024-2026 CIP Triennials" using the 2018 Synapse report following NSPM process.
MI	Docket Comments U-20147	ELPC and Vote Solar	12/16/19	"readers will find a thorough and up-to-date treatment of cost-effectiveness issues for EE in a 2017 NSPM. An NSPM for other DERs is slated for publication in 2020."
CT	Docket No. 17-12-13RE05: PURA Investigation into Distribution System Planning of the Electric Distribution Companies	CT Green Bank	12/4/19	"NESP has issued a NSPM, including a RVF to provide states and jurisdictions with guidance regarding best practices for creating and implementing cost-effectiveness analysis for all DERs. As noted in the EEP program, the use of the UCT, a CE test for PAs, could be further strengthened with the addition of other CE tests…, including a TBD RVF that reflects the public policy objectives of CT. It should be noted that in Docket 19-06-29, the RVF has received a number of supportive public comments from stakeholders as a standardized way to value DERs in various use cases."
Gen-eral	Research Report: Does Integrated Resource Planning Effectively Integrate Demand-Side Resources?	Resources for the Future (RFF)	12/1/2019	"The RVF … guides jurisdictions in establishing the RVT as a primary test or complement to the CUPC's tests, purposely designed to reflect costs and benefits, as well as the jurisdiction's own policy goals."
NJ	Independent Review of RECO's AMI Business Case and Recommendations for NJ BPU	Navigant	11/13/19	"states are exploring the use of the resource value test (RVT) as described in the National Standard Practice Manual for Energy Efficiency, which claims that the five standard cost tests may be insufficient to align with the policy goals of a particular jurisdiction. The RVT allows for flexibility in the treatment of specific cost and benefit streams to steer investments that align with applicable policy objectives."
Gen-eral	End Use Profiles for the US Building Stock	US DOE EERE	11/1/2019	"experts in this field formed the NESP and developed the NSPM with the intention to replace state use of the CaSPM. The NSPM provides a comprehensive framework for assessing the cost-effectiveness of energy efficiency resources. The NSPM is intended to create a state-specific test that represents the regulatory perspective based on the state's applicable policy objectives."
PA	Tentative Order of September 19, 2019 at Docket No. M-2019-3006868	BPA, PennFuture, Sierra Club, Clean Air Council, Philadelphia Solar Energy Association, NRDC	11/1/19	"A full NSPM analysis of the TRC is certainly allowed by Act 129. In fact, as Act 129 places "caps" or limits on the amount of funding that may be applied towards energy efficiency programs, getting the TRC cost effectiveness test "right" in the Commonwealth is even more critical. Act 129's "caps" on spending requires the PA PUC to make sure that spending is being deployed in the most cost-effective manner that reflects Commonwealth policy priorities… We respectfully request that the PA PUC consider working through the NSPM process to "test its test" and revise the PA TRC to better reflect Commonwealth policies and goals. Case studies of other states that have already taken the NSPM approach to cost effectiveness testing reforms appear at: https://nationalefficiencyscreening.org/resources/case-studies/"
PA	Tentative Order M-2019-3006868	KEEA	11/1/19	"As the Commission notes in its TRC Tentative Order, the (NSPM) proposes a methodology to adjust for these missing benefits by adjusting costs for measures that exceed a 15-year lifetime. This methodology specifically does not circumvent the legislative directive to limit benefits to 15 years by adjusting

				only the cost calculation and allows for equitable accounting methods for both costs and benefits in the TRC. Through the TRC, the Commission should strive for an accurate accounting of costs and benefits within the bounds of the law, and the NSPM provides a tool with which to do so."
NH	DE 17-136 B/C Working Group Recommendations Regarding NH CE Review	Benefit Cost Working Group (PUC – led)	10/31/19	"In reviewing the New Hampshire cost-effectiveness screening framework, as provided for in the 2019 Update Settlement, the B/C Working Group was guided by the National Standard Practice Manual ("NSPM")'s Resource Value Framework."
KY	Comments – KY GA SB 100, Case 2019-00256	Kentuckians for the Commonwealth (KFTC) and Mountain Association for Community Economic Development (MACED)	10/15/19	Cites the NSPM principles for impact quantification and categories of impacts to consider when developing CE test for DERs.
RI	Annual EE Plan for 2020 – Docket 4979	National Grid	10/15/19	Cites the NSPM principles as principles to apply when developing the RI Test.
LA	Docket No. R-31106 – Phase II EE Draft Rule Version 2	LAPSC	10/8/19	"while the guidelines published in the California Standard Practice Manual shall continue to be used in performing EE screening tests, a "National Standard Practice Manual" ("NSPM") has been published by the National Efficiency Screening Project and it may be considered for use in performing the EE screening tests."
NC	Clean Energy Plan	NC DEQ State Energy Office	10/1/2019	Cites NSPM as a resource for revision to benefit-cost methodologies. References review and revision process in NSPM case study state, RI.
Gen-eral	Residential Grid-Interactive Efficient Building Technology and Policy: Harnessing the Power of Homes for a Clean, Affordable, Resilient Grid of the Future	NASEO and AnnDyl	10/1/2019	"The NSPM provides a framework for how jurisdictions can update their CE screening practices based on the following principles: treating EE as a resource, accounting for relevant policy goals, accounting for all relevant impacts, ensuring symmetry in the inclusion of different costs and benefits, using forward-looking analysis, and ensuring transparency. While the NSPM, published in 2017, focuses on EE resources, the core concepts can be applied to supply-side resources and DERs, including DR, DG, DS, EVs, and strategic electrification technologies. A NSPM for DERs is forthcoming in 2020. Regulators and policymakers can use both manuals for 'guidance on how to develop a jurisdiction's primary CE test that meets the applicable policy goals of the jurisdiction.'"
PA	Tentative Order M-2019-3006868	PA Public Utility Commission	9/19/19	"In preparation of this Tentative Order, the Commission and the SWE have reviewed new industry literature on benefit cost analysis, such as the National Standard Practice Manual, to refine the TRC Test to meet Pennsylvania policy objectives"
NM	Docket comments 19-00248-VT	New Mexico Gas Company	8/30/19	"NMGC spent the better part of the last 18 months studying the issue to determine an appropriate discount rate for NMGC's energy efficiency programs [and] examined a number of sources, including the National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources ("NSPM")" – cites the NSPM as a source in determining discount rate recommendation.

ME	Home Energy Savings Program Impact Evaluation – Years 2014-2016	Efficiency Maine Trust	8/23/19	The National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources was used as the primary reference for typical cost and benefit accounting practices.
CT	Docket No. 19-06-29 Comments	Northeast Clean Energy Council (NECEC)	8/21/19	NECEC "note[s] that there are a number of existing resources that can aid DEEP and PURA in this proceeding. Of particular note… the National Standard Practice Manual."
CT	Docket No. 19-06-29 Comments	Connecticut Fund for the Environment (CFE)	8/21/19	"reviewing relevant cost and benefits of DERs should follow a set of core principles, such as those provided in the NSPM (see Table 1). These can help guide DEEP, PURA, and stakeholders in their review of relevant impacts and the options for accounting for them. While the current NSPM Edition focuses on energy efficiency, the principles and framework are generally applicable to all DERs." Reviews NSPM principles and application.
WV	Docket Comments 19-0396-E-P	BPA and ACEEE	8/20/19	"BPA and ACEEE encourage the Commission to consider use of the NSPM framework and its step-by-step approach as a basis for determining the extent to which and whether the state's current cost-effectiveness testing reflects West Virginia's energy goals and policies. BPA, ACEEE, and other members of the National Efficiency Screening Project (NESP) would be pleased to work with a West Virginia stakeholder group and/or relevant state Agencies on cost effectiveness testing reforms."
Gen-eral	Next-Generation Energy Efficiency Resource Standards	ACEEE	8/1/2019	"cost–benefit analysis in potential studies and in program design should reflect the state's policy priorities, which may require updates to traditional cost-effectiveness tests. The National Standard Practice Manual (NSPM) is a comprehensive framework for cost-effectiveness assessment of energy efficiency and offers principles and methodologies for developing balanced assessments of resource cost effectiveness that address state policy priorities"
Gen-eral	Capturing More Value from Combinations of PV and Other DERs	RAP	8/1/2019	National Standard Practice Manual proposes a sixth test, one that considers societal costs more widely. Although these tests were developed to evaluate energy efficiency programs, they are often also used to evaluate DER programs and resources.
QC, CAN	Decision D-2019-088 R-4043-2018	QC Regie de L'energie	7/30/19	Translated and abbreviated from original French: The regulator ordered that the utilities cost-effectiveness calculations follow the NSPM for EE, in particular (or including) treatment of free-riders and spillover effects.
US – Sena te	2288: American Energy Efficiency Act of 2019	Tina Smith (MN)	7/25/19	"(d)Evaluation, measurement, and verification of savings: The regulations promulgated pursuant to subsection (b) shall be based on—…(ii) the National Standard Practice Manual for Assessing the Cost-Effectiveness of Energy Efficiency Resources, developed by the National Efficiency Screening Project"
IN	Recommendations Letter for new 21st Century Energy Policy Development Task Force	MEEA	7/15/19	The NSPM "provides a framework for understanding the value of energy efficiency in relation to current jurisdictional policies and goals... Indiana could create a test that screens for energy efficiency programs that reflects the needs of Hoosiers… the NSPM for Distributed Energy Resources, which includes both energy efficiency and distributed supply-side resources, is expected in Fall 2019 and could expand that analysis even further. Case studies from the Midwest and round the country are available…"

NY	Case 18-M-0084 Comments	AEA, BPA, Building Performance Contractors Association of NYS, BPI, E4	7/1/19	"The BCA also needs revision in its application and increased transparency on its calculations. The current approach in the BCA fails to account for other fuel impacts, such as the oil or gas savings from insulation and air sealing. These types of impacts are clearly quantifiable and should immediately be included in the BCA, as this would ensure compliance with the Governor's and Legislature's requirements. We further recommend that the BCA: 1) account for the full range of utility system impacts; 2) account for non-utility system impacts that are relevant to the state's applicable policy goals; and 3) ensure symmetry in the treatment of relevant costs and benefits, even where difficult to quantify, including non-energy benefits. More on these key principles can be found in the National Standard Practice Manual."
LA	Comments on PSC Docket R-31106	SEEA	6/14/19	Commends Commission for discussing potential future NSPM application. "CE testing and the NSPM… are two additional issues that would be well suited to evaluation by the EEWG."
NJ	NJCEP Comprehensive Energy Efficiency and Renewable Energy Resource Analysis for Fiscal Year 2020, Comments	Building Performance Association	6/11/19	"The Building Performance Association believes the NSPM framework and its step-by-step approach would provide NJ BPU an opportunity to determine whether its current cost-effectiveness testing reflects New Jersey's own energy goals and policies. The Association and other members of the National Efficiency Screening Project would be pleased to brief the NJ BPU or other state Agencies on how a "New Jersey" test could be developed to best meet the needs of the policymakers and ratepayers in New Jersey. "
FL	Comments: Docket Nos. 20190015-EG, 20190016-EG, 20190018-EG, 20190019-EG, 20190020, 20190021-EG	Southern Alliance for Clean Energy (SACE)	6/10/19	Cites the ACEEE Summer Study on EE in buildings, that the NSPM "is a helpful resource for regulatory staff designing a primary cost-effectiveness test to meet their needs".
WA	Report on 2018 WA State Investor Owned Utility Energy Efficiency Joint Advisory Group Activities and Outcomes	WA Statewide Advisory Group (SWAG)	6/7/19	"The SWAG spent several days working through the elements of the (RVF) over the course of 2018. The (NSPM) was used as a guide to begin the collaborative process and walk through the RVF and corresponding (RVT). The group reviewed current TRC practices and compiled methodologies in order to outline areas of consistency. To kick-off the steps of the RVF, Commission Staff compiled a list of applicable policy goals based on their review of WA statutes implemented by the UTC for the group's review and discussion. The group then reviewed the utility system costs and benefits. Lastly, the SWAG has progressed to discussions of non-utility costs and benefits and worked collaboratively to determine which additional non-utility system costs and benefits to potentially include in the RVT."
IA	Docket Comments RUM-2016-0018	Institute for Policy Integrity (NYU Law)	6/5/19	Refers to the DSESP for examples of leading state testing practices and cites NSPM as a resource for considering impacts in IA tests.
IA	Docket Comments RMU-2016-0018	BPA and ACEEE	6/4/19	ACEEE and BPA recommend applying the NSPM framework to assess the benefits of energy efficiency in IA.
AR	13-002-U Order No. 48 10-100-R Order No. 31	Arkansas Public Service Commission	5/10/19	"The Commission accepts the NSPM Case Study and supporting appendices and rules"

MO	Comments File No. EO-2018-0038	Alliance for Transportation Electrification	4/29/19	The Commission could find the NSPM and forthcoming NSPM for DERs a helpful framework for EV CE screening.
Gen-eral	Quantifiable Resource Cost Framework	NW Council Regional Technical Forum	4/23/19	To consistently treat costs and benefits across resources, the NW Council should follow the steps of the RVF.
MN	Proposed Decision Comments Docket G000/CIP-18-782 and Docket E999/CIP-18-783	ACEEE	4/19/19	"I would urge the Department to take the opportunity to … utilize the process for developing a state-specific cost-effectiveness assessment that is described in the [NSPM]".
LA	Comments on PSC Docket R-31106	Kathryn Bowman, Staff Attorney for LAPSC	4/16/19	LA currently follows the CSPM guidelines but may consider the NSPM for EE screening tests.
CA	Docket Comments 14-10-003	AEE	4/15/19	The commission should consider the principles of the NSPM's RVF for resource valuation that aligns with CA's policy objectives.
MN	Proposed Decision Comments Docket G000/CIP-18-782 and Docket E999/CIP-18-783	Center for Energy and Environment	4/12/19	Reviews Synapse case study and recommends "MN draw upon recent national work in the area of efficiency cost-effectiveness-the NSPM and the Synapse Report, which applied the principles and framework of the NSPM to MN's CE framework – to redefine MN's UCTs purpose and make revisions to the structure of MN's UCT, specifically the discount rate."
Gen-eral	The Value of Resilience for Distributed Energy Resources: An Overview of Current Analytical Practices	NARUC	4/1/2019	Discusses differences across state cost-benefit analyses, citing the NSPM.
Gen-eral	Evaluating the Need for a Regional Energy Efficiency Technical Resource Manual for Small Utilities in the Midwest	MEEA	4/1/2019	Suggests using NSPM for developing 'small utility tests'.
MN	Docket Comments G999/CIP-18-782, E999/CIP-18-783	ACEEE	3/28/19	The NSPM provides a comprehensive framework for assessing cost-effectiveness of utility energy efficiency resources. The primary objective of this assessment is to identify utility resources that will best serve customers over the long term, while also achieving applicable policy goals of the jurisdiction.
HI	Docket Comments 2018-0088	Division of Consumer Advocacy	3/25/19	"the National Standard Practice Manual (NSPM), referenced above by the Companies, should provide the framework and the rationale for developing the PIM BCA parameters in Hawaii. The NSPM was designed to update, expand, and improve upon the California Standard Practice Manual, also referenced above by the Companies. The NSPM is focused on energy efficiency BCAs but was designed to apply to other types of utility BCAs, such as those applied to PIMs. The NSPM offers a set of fundamental principles for BCA parameters and a framework for developing parameters that are tailored to the regulatory goals of each state."

VA	Case No. PUR-2018099168	Rachel Gold on behalf of VAEEC	3/5/19	"The National Standard Practice Manual offers a comprehensive framework for the group to use as it considers how to apply these new requirements. It describes the principles, concepts, and methodologies for sound assessment of resource cost-effectiveness, and is intended for use by those involved in identifying the full range of efficiency resources whose benefits exceed their costs, to inform which resources to acquire to meet a jurisdiction's specific goals, standards, and/or targets."
Gen-eral	Guidance on Measuring the Economic Development Benefits of Energy Efficiency	ACEEE	3/1/2019	Description of the NSPM and overview of case studies.
CT	2019-2021 Plan Conservation & Load Management Plan Update, CT Gen. Statutes – 16-245m(d)	Eversource Energy, United Illuminating, CT Natural Gas Corporation, and Southern CT Gas	3/1/19	"The Companies plan to evaluate the consistency of the current Cost-Effectiveness Tool with the NSPM framework during the 2019-2021 Plan period. Additionally, the Companies plan to work collaboratively with DEEP and the Energy Efficiency Board to propose a Resource Value Test that screens cost-effective energy efficiency measures for both energy savings and environmental attributes."
MN	Docket Comments G999/CIP-18-782, E999/CIP-18-783	Center for Energy and Environment	2/19/19	Synapse's "report provided an in-depth review of MN's existing CIP cost-effectiveness framework using guidance from the NSPM… we commend the Department for commissioning this report and draw upon the report significantly in our discussion."
MS	Docket Comments 2018-AD-64	Southern Alliance for Clean Energy	2/15/19	"Adoption of the principles outlined in the National Standard Practice Manual, published in 2017, would provide even better alignment between these IRP rules and Mississippi specific policy considerations"
NJ	Docket Comments QO19010040	HPC	2/15/19	Overview of the NSPM and case studies/current state applications. Recommendation that NJ reflect on policy goals for cost-effectiveness testing and offer from NESP to brief NJ state Agencies on 'New Jersey' test development.
NJ	Docket Comments QO19010040	ACEEE	2/15/19	ACEEE recommends updating CE testing to adhere to best practice principles found in the NSPM. They describe the NSPM and its core principles, discuss the importance of symmetrical CE testing, and direct NJ to NESP's NSPM template tables.
CT	Presentation: Cost-Effectiveness for C&LM: EEB Recommendations and Board Discussion	CT Energy Efficiency Board	2/13/19	Reviews NSPM guiding principles
VA	Case No. PUR-2018-00168	Tim Woolf and Erin Malone on behalf of the Sierra Club	2/6/19	"The RIM test does not provide useful information, is inconsistent with economic theory, is inconsistent with fundamental principles of the NSPM, is misleading, and conflates cost-effectiveness with cost-shifting. Long-term RBP analyses offer a much better way to analyze rate impacts than the RIM test." Includes a full copy of the NSPM as a reference for the state.
Gen-eral	Energy Efficiency Over Time: Measuring and Valuing Lifetime Energy Savings in	ACEEE	2/1/2019	"States can look to the National Standard Practice Manual, which offers a comprehensive framework for assessing the cost effectiveness of energy efficiency resources, including the elements that could make up the range

	Policy and Planning			of costs and benefits included in the resource value tests chosen by a given jurisdiction (Woolf et al. 2017)."
Gen-eral	Northeast Regional Energy Efficiency Database, Program and Measure Data: Report on Results of Investigations	EIA	2/1/2019	"Guidance published in 2017 by the National Efficiency Screening Project, the National Standard Practice Manual, recommends that each state develop and use a resource value cost-effectiveness approach aligned with the various energy-related policies set forth in the state".
KY	DSM Tariff Filing	East Kentucky Power Cooperative, Inc.	1/30/19	"GDS reviewed the May 2017 National Standard Practice Manual published by the National Efficiency Screening Project. GDS utilized this guide to define avoided ancillary services and energy and/or capacity price suppression benefits."
OH	Application for Rehearing Cases No. 12-2156-EL-ORD, 13-651-EL-ORD, 13-652-EL-ORD	ELPC, EDF, NRDC, Ohio Environmental Council	1/18/19	Cites the NSPM as a standard industry practice to advocate for symmetrical treatment of costs and benefits.
CT	Memo: Progress report on the CT Green Bank Residential Solar Investment Program	CT Green Bank	1/11/19	"The Green Bank supports DEEP's reforms of energy efficiency "cost effectiveness" screening using the Resource Value Framework, which seeks to value both energy and non-energy costs and benefits with respect to public policy in CT"
NY	Petition Comments Case 17-G-0606	EDF	1/7/19	EDF recommends NY consider the NSPM RVF to revise the BCA framework with attention to relevant policies and symmetry between costs and benefits.
NH	DE 17-136, Order No. 26207, 2019 Update to NH Statewide Energy Efficiency Plan	NH Public Utilities Commission	12/31/18	The NH PUC's EM&V Working Group will evaluate use of the NSPM for screening EE programs.
NY	Case 18-M-0084 Order Adopting Accelerated Energy Efficiency Targets	State of New York Public Service Commission	12/13/18	Several stakeholders recommended improvements to energy efficiency cost-effectiveness assessment based on the NSPM.
OK	Docket Comments 2018100010	ACEEE	12/3/18	ACEEE recommends the OCC use the NSPM to design OK-specific CE testing methodology and refers the Commission to the DSESP to see how other states CE test and apply the NSPM.
OK	Docket Comments 201800010, 201800012	Oklahoma Sustainability Network (OSN)	12/3/18	"OSN recommends that the National Standard Practice Manual (NSPM) should be added as an alternative or supplement to the California Standard Practice Manual. The NSPM, released in 2017, provides updated, comprehensive guidance on evaluation of cost-effectiveness." The Commission is also directed to review the MN case study and the AR TRM.
WA	NW Natural 2019 Energy Efficiency Plan	NW Natural	11/30/18	The company may investigate the NSPM methodology as a framework for CE testing.
MA	Direct Testimony on DPU 18-110—18-119	David Gard on Behalf of CLF	11/16/18	Recommends MA lead in EE standards by basing CE test framework on the NSPM.

CT	Presentation: Benefit-Cost Testing of Conservation and Load Management Programs: Review of NSPM Steps 1-3 applied to CT	CT Dept of Energy and Environmental Protection	11/15/18	Reviews NSPM process and CT's application of NSPM steps 1-3 to develop CE test.
WA	2019 Annual Conservation Plan, on behalf of Pacific Power & Light Co.	Pacific Power & Light Co.	11/15/18	"Pacific Power is participating in the Statewide Advisory Group process which includes an action item to assess areas for CE improvements and to investigate the RVT."
ME	Proposed Triennial Plan for Fiscal Years 2020-2022	The Efficiency Maine Trust	10/22/18	The plan cites the NSPM for definitions of Free-ridership and Spillover rates.
NC	Docket No. E-2 Sub 1174	NC Justice Center et al	10/18/18	DEP exclusion of relevant benefits is inconsistent with best practices outlined in NSPM.
NY	New York White Paper and PSC Case 18-M-0084	ACE NY	10/9/18	"The National Standard Practice Manual offers important principles for robust and equitable cost-benefit analysis that could contribute to the ongoing EE valuation process in New York. The EE Organizations believe that EE Value should include … benefit categories … based on the National Standard Practice Manual."
MI	Docket Comments MPSC U-20147	Vote Solar, ELPC, NRDC, Plugged In Strategies	10/5/18	The Joint Commenters "urge the common cost-benefit should be consistent with the principles laid out in the NSPM".
AZ	Docket Comments E-01345A-17-0134	ACEEE	10/1/18	ACEEE recommends using Societal Cost Test and considering the NSPM for CE testing improvements.
CT	Public Comment Forum Proposed Review of Benefit-Cost Ratios Calculated for Energy Efficiency Measures	HPC	10/1/18	Outlines principles of NSPM and incorporation in other states.
CT	Presentation: Economic Analysis (Cost-Benefit Testing) of Conservation and Load Management Programs: Overview of DEEP's Framework for Review	CT DEEP	9/13/18	Review of NSPM process; DEEP plans to "follow the NSPM process to review and re-evaluate the primary test to be used for Conservation and Load Management Plan programs."
NC	Docket No. E-2, Sub 1174	Chris Neme on Behalf of North Carolina Justice Center, North Carolina Housing	9/4/18	NSPM-based assessment of approach of Duke Energy Progress (DEP) to assessing cost-effectiveness of programs.

		Coalition, Natural Resources Defense Council, and Southern Alliance for Clean Energy		
AZ	Docket Comments E-01345A-17-0134	HPC and Efficiency First	8/28/18	The primary test to evaluate energy efficiency programs should continue to be Societal Cost Test (SCT); references NSPM in recommendation for Arizona Corporation Commission to improve SCT implementation.
AZ	Docket Comments E-01933A17-0250	HPC and Efficiency First	8/28/18	HPC and EF advocate for increased transparency around cost effectiveness testing model, and encourage ACC to improve implementation of Societal Cost Test.
VA	Senate Bill 966; 2018 VA Energy Plan	HPC	8/24/18	"HPC respectfully requests that Virginia's State Energy Plan calls for a review of its cost effectiveness testing approaches, consistent with Senate Bill 966, by incorporating the fundamental principles of the May 2017 National Standard Practices Manual (NSPM). We believe the NSPM framework could allow Virginia an opportunity to "test its tests" for cost effectiveness testing to see whether it reflects Virginia's own energy efficiency policies and program goals. The NSPM framework can be applied to the individual tests required by Senate Bill 966 and/or used to evaluate the overall application of all four tests. One attractive feature of the NSPM is that it allows states to make all decisions on the best approach to 'test its tests'."
VA	2018 VA Energy Plan	VA AEE	8/24/18	AEE recommends the SCC adopt NSPM guidance to conduct cost-benefit testing of DSM proposals.
VA	2018 VA Energy Plan	ACEEE	8/24/18	"The SCC should approve more of Dominion and APCo's proposed programs to expand energy efficiency measures available to Virginians and should use the National Standard Practice Manual to more accurately measure all costs and benefits of efficiency programs in accordance with Virginia's policy goals."
ME	Draft Triennial Plan IV (Fiscal Years 2020-2022)	NEEP	8/8/18	Encourages Efficiency Maine to consider the NSPM in the application of the TRC test.
MN	Report, *Updating the Energy Efficiency Cost-Effectiveness Framework in Minnesota*	Synapse Energy Economics	8/8/18	Report funded by grant from MN Department of Commerce describes how the NSPM could be applied to cost-effectiveness analysis for energy efficiency in Minnesota and makes recommendations based on MN policy.
CT	Connecticut 2019-2021 Conservation and Load Management Plan Comments	NEEP	8/1/18	The principles in the NSPM would be of benefit to CT; NSPM can be applied to other programs as well. Reference also points to the process Rhode Island undertook in developing their cost-effectiveness test for energy efficiency to evaluate it according to their state's policies and goals.
MN	Docket Comments E000/CI-17-879	Alliance for Transportation Electrification	7/30/18	The Commission should consider the NSPM and forthcoming NSPM for DERs as a framework for CE testing.

NY	New York White Paper and PSC Case 18-M-0084	Energy Efficiency Advocates on the New York Energy Efficiency Initiative	7/16/18	Suggests New York reference NSPM in refining cost-effectiveness testing approaches for energy efficiency.
NY	New York White Paper and PSC Case 18-M-0084	Home Performance Coalition	7/16/18	HPC encourages refinements to New York's energy efficiency cost-effectiveness testing approaches and suggests reviewing the NSPM, outlines basic principles of NSPM, and offers to schedule an NSPM briefing with NYSERDA and DPS.
NY	New York White Paper and PSC Case 18-M-0084	Association for Energy Affordability, Building Performance Institute (BPI), Building Performance Contractors Association of New York State, Dick Kornbluth, LLC, E4TheFuture, Efficiency First, Home Performance Coalition, Performance Systems Development, Seek More LLC, True Energy Solutions	7/16/18	"We support the Public Service Commission's (PSC) recent decision to adopt a new cost effectiveness test construct that incorporates societal costs and benefits to evaluate all utility investments, including energy efficiency at the portfolio level. While this change of policy will help overcome artificial barriers introduced under EEPS when a Total Resource Cost test at the measure level was adopted, we encourage further refinements to New York's cost effectiveness testing approaches." Recommends use of the guidance offered by NSPM.
NY	CASE 18-M-0084 - In the Matter of a Comprehensive Energy Efficiency Initiative	NEEP	7/16/18	NSPM provides guidance on aligning cost-effectiveness testing with public policy goals, and NY could use NSPM as guidance to go through similar a process to Rhode Island.
NH	Docket Comments DE 16-576	Joint Stakeholders: Acadia Center, the Alliance for Solar Choice, Borrego Solar, the City of Lebanon, CLF, the Energy Freedom Coalition of America, Granite State Hydropower Association, NH Sustainable Energy Association, Revision	7/10/18	The NSPM explains that it is better to include best-available information to approximate hard-to-monetize impacts, and the Stakeholders concur that NH should follow the NSPM's principle.

		Energy, and Vote Solar		
CA	Reply Docket Comments 14-10-003	ACEEE on behalf of co-authors	5/7/18	The Commission could reference NSPM in this and future efficiency & DER related efforts and utilize NSPM's Resource Value Framework to further refine its cost-effectiveness framework.
CA	PUC Rulemaking 14-10-003	ACEEE on behalf of co-authors	5/7/18	1. ACEEE files for party status on behalf of co-authors of NSPM 2. ACEEE addresses studying and analyzing of improvements to DER cost-effectiveness framework; encourages Commission to reference NSPM in efficiency and DER related efforts and consider and use NSPM's Resource Value Framework as Commission updates its cost-effectiveness framework.
LA	Comments on New Orleans UD-08-02 and UD-17-03	Alliance for Affordable Energy	5/2/18	Alliance for Affordable Energy recommends that New Orleans consider the NSPM and the RVT when developing their Technical Resource Manual and in evaluation of DSM resources.
NJ	NJCEP FY 19-22 Strategic Plan Draft	TRC Energy Services for NJCEP Strategic Plan Draft	4/26/18	NSPM created to overcome some limitations of the California cost-effectiveness tests; referenced as part of discussion on cost-effectiveness screening methodologies.
CA	PUC Rulemaking 14-10-003	CEDMC	4/20/18	"The Amended SCT Proposal aligns with most of the National Standard Practice Manual and should strive for complete alignment with its common-sense principles."
WI	Docket Comments 5-FE-101 Quadrennial Planning Process III	HPC	4/12/18	HPC requests the WI PSC consider the NSPM to guide primary CE test selection and describes the NSPM and its case studies. HPC provides links to NSPM resources and offers to brief PSC employees on the NSPM.
IA	Senate File 2311 Comments	HPC	3/6/18	HPC suggests Iowa could 'test its test' using the NSPM and describes how adopting the NSPM principles would meet Iowa's state policy goals.
Gen-eral	Research Report: The Role of EE in a DER Future	ACEEE	2/28/18	NSPM provides an updated, comprehensive approach to benefit-cost testing. It provides a framework for a state to develop its own cost-effectiveness test for EE which may also be applied to other DERs.
MO	Comments File No. EO-2018-0038	MO Department of Economic Development – Division of Energy	2/28/18	The Commission could clarify CE testing rules in alignment with best practices included in the NSPM.
IL	Navigant's Response to HPC Letter Comments on Draft Evaluation Plan for ComEd's 2018-2021 Programs	HPC; Navigant	2/21/18	Navigant responds to HPC's request for the ComEd Evaluation Plans and the ICC to incorporate the fundamental principles of NSPM, which may provide direction around quantifying and understanding social benefits. Navigant asserts that their evaluations, including those in Illinois, "operate with continuous improvement principles, which includes reviewing the NSPM published in May 2017" (Navigant p. 4).
NB, CAN	Review of New Brunswick Power's	Synapse Energy Economics, inc. for the New	1/18/18	"We recommend that the DER guidelines address at least … Cost-effectiveness screening…This should also incorporate state-of-the-art practices, including the principles and methodologies in the National Standard Practice Manual

	2018/2019 Rate Case Application	Brunswick Energy and Utilities Board Staff		(NESP, 2017). This also includes specifying inputs and methodologies for assessing rate and bill impacts of DER programs."
NV	Docket Comments, No. 17-01011 and No. 17-08023	SWEEP, NRDC, and WRA	1/5/18	"The principles in the NSPM should be followed in conducting cost effectiveness analysis and selecting a primary test."
IL	EE Stakeholder Advisory Group Evaluation Plan	HPC	1/1/2018	Comments made by HPC on draft evaluation plan for each utility recommending they use NSPM to guide cost-effectiveness analysis (not public).
KS	Senate Bill 347	Committee on Utilities	1/1/2018	Bill directs the commission to use NSPM principles to determine the appropriate test of a demand-side program.
US DOE	EM&V Framework for States	SEE Action	1/1/18	States should draw on cost benefit ratios as described in the NSPM. The NSPM also provides guidance to create a jurisdiction specific test.
WA	Biennial Conservation Plan Comments UE-171087, PSE UE-171091, Avista UE-171092, Pacific Power	Utilities & Transportation Staff	12/1/17	Working through the NSPM framework could provide more certainty that the CE of EE is being properly evaluated.
SC	Bill H 4425	Sponsored by James E. Smith & Jimmy C. Bales	11/9/17	The SC PSC may establish a rule to develop an RVT following the guidelines in the NSPM. Specifically, the test will be applied at the portfolio level and no less than one test be applied at the program level to evaluate specific EE programs.
NV	Docket Comments 17-08023	Joint comments SWEEP-WRA-NRDC, Home Performance Coalition	11/8/17	Stakeholder comments call for use of the NSPM's principles, concepts, and methodologies in resource cost-effectiveness testing. NSPM highlighted as current best practice, able to better equip the Nevada PUC with implementation of Nevada's own energy security & program goals. The comments also list and provide a brief description of NSPM Principles.
AR	13-002-U Order No. 40 10-100-R Order No. 27	Arkansas Public Service Commission	11/2/17	The Commission directs the Parties Working Collaboratively (PWC) to consider the findings and recommendations of the NSPM as it resumes work on the next three-year cycle of planning.
NH	Docket Comments DE-17-136	Office of the Consumer Advocate and The Way Home	11/2/17	The NSPM is referenced as the most up to date guidance document for cost-effectiveness testing of energy efficiency. The NSPM principle of symmetry is highlighted and a quote from the NSPM illustrates that costs & benefits of energy efficiency programs must be included to ensure a balanced test.
ID	PUC Testimony IPC-E-17-13	Idaho Conservation League	11/1/17	NSPM updates cost-effectiveness tests and introduces a new variation, the Resource Value Test.
US DOE	Docket Comments EERE-2017-OT-0056	Sunrun, E4TheFuture, and joint comments by SEIA, Vote Solar, SELC, Sierra Club, & ELPC	10/30/17	Comments recommend use of the NSPM framework and principles to help guide benefit/cost considerations in net energy metering. The RFI was based on a request from Congress for DOE to report on the "state of the state" of net metering studies from across the country.

CA	IRP Docket Comments & Comments to PUC 15-02-007 14-10-003	Natural Resources Defense Council (NRDC) California Efficiency & Demand Management Council (CEDMC)	10/26/17	"NSPM is a good example of CE framework that aligns CE tests with jurisdictional priorities." NSPM can provide guidance on which non-energy impacts to include and how best to account for them.
WV	Docket Comments 17-0401-E-P	ACEEE	10/20/17	The NSPM outlines the types of costs and benefits that ought to be included in a cost-effectiveness test.
WV	Docket Comments 17-1401-E-P	HPC	10/16/17	HPC requests the WV PSC staff apply NSPM principles and describes the NSPM framework.
PA	Docket Comments M-2017-2596907	Philadelphia Gas Works	8/8/17	Details the NSPM and RVF as a more comprehensive, policy-responsive way to avoid the limitations of the CSPM. Recommends a more flexible and customizable CE test for PGW's service territory.
VA	Docket Comments PUR-2017-00047	ACEEE and SEEA	7/28/17	NSPM is a comprehensive framework for CE testing of energy efficiency resources.
CT	2017 Comprehensive Energy Strategy	CT Dept. of Energy & Environmental Protection	7/26/17	The NSPM outlines the newest CE framework and documents how to account for policy goals as well as identifies universal principles in CE testing.
DC	Comments: Formal Case No. 1130	Office of the People's Counsel for the District of Columbia	7/24/17	OPC notes that the NSPM may prove helpful in discussion of the choice of discount rates. "While the manual was developed to assess the cost-effectiveness of energy efficiency resources, the concepts in it can also be applied to other DERs"
LA	Comments – LA PSC Docket No. R-31106	ACEEE and SEEA	7/11/17	"We encourage the Commission to explore the use of the NSPM should it wish to quantify additional benefits in the future."
RI	Least Cost Procurement Standard	State of Rhode Island	7/1/2017	The distribution company shall apply the [NSPM] principles when developing the RI Test. "* The RI LCP Standards were adopted prior to NSPM publication, but incorporated the NSPM principles verbatim based on a pre-publication NSPM copy."
MI	Docket Comments 2010-AD-2	ACEEE	6/9/17	NSPM provides guidance for developing thoughtful CE tests via the RVF. The manual guides regulators towards a balanced test that incorporates state policy goals.
IA	Docket Comments RMU-2016-0018	Environmental Law & Policy Center (ELPC)	9/7/16	NSPM will provide the opportunity to evaluate which non-energy benefits to include in a CE test. The NSPM will also provide better clarity on which test to use and the inputs that ought to go into the test.
SC	Docket 2019-224-E Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans	ACEEE Analysis of Energy, Cost, and Greenhouse Gas Impacts in North Carolina	4/31/2021	This September 2020 report for North Carolina was presented to the PSC as an exhibit in a proceeding opened to determine the IRP for Duke Energy. The report suggests analysts should consider different perspectives when constructing a BCA framework. The NSPM is framed as a way to get around the use of traditional test structures in order to make a JST.

	for Duke Energy Carolinas, LLC			

Last Updated: 6/24/2021