

NSPM References 2017-2020

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.”
General	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.

General	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.”
General	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”.”
General	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.”
General	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 League, NC Sustainable Energy Association	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 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	London Economics International LLC for the Legislative	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,

	Electric Public Utilities	Coordinating Counsel, submitted by the State Corporation Commission		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	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

	Distribution System Planning of the Electric Distribution Companies			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.”
General	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.”
General	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.
General	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.”
General	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”
General	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 – Senate	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.	Southern Alliance for	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”.

	20190016-EG , 20190018-EG , 20190019-EG , 20190020 , 20190021-EG	Clean Energy (SACE)		
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.
General	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."
General	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.
General	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."
General	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.

General	Energy Efficiency Over Time: Measuring and Valuing Lifetime Energy Savings in Policy and Planning	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 of costs and benefits included in the resource value tests chosen by a given jurisdiction (Woolf et al. 2017)."
General	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 Coalition, Natural Resources Defense Council, and Southern Alliance for Clean Energy	9/4/18	NSPM-based assessment of approach of Duke Energy Progress (DEP) to assessing cost-effectiveness of programs.
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 Energy, and Vote Solar	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.

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.
General	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	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,

	for ComEd's 2018-2021 Programs			"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 2018/2019 Rate Case Application	Synapse Energy Economics, inc. for the New Brunswick Energy and Utilities Board Staff	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 (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.