

State	Document	Referenced By	Date	Description/Cited Key Comments
OR	Docket No. UM 2197: In the Matter of Portland General Electric Company, Distribution System Plan	Portland General Electric Company	12/18/2024	Exemplifies the NSPM as a cost test that includes the benefits and costs of distributed energy resources, thus enabling the NSPM to be used for Virtual Power Plant (VPP) portfolios. Also includes a table outlining different NSPM utility system impact categories. (Distribution System Plan, pages 94-95)
CO	Proceeding 24A-0547E: Public Service Company - Electric - DSP 2025-2029	Public Service Company of Colorado	12/16/2024	States that the NSPM recommends that cost-effectiveness testing be performed using jurisdiction-specific testing, and that the NSPM outlines upwards of 30 potential impacts to be included within a cost-benefit test. (Hearing Exhibit 103, Attachment ZDP-1 (Appendix 2), pages 5-6)
MD	Case Number 9674: Utility Cost Analysis (BCA) Framework for Distributed Energy Resources	Maryland Public Utilities Commission	11/22/2024	In Order 91424, the Commission accepts the proposed Unified BCA framework that was recommended by the work group and developed using the NSPM for DERs. The Commission also ordered the establishment of Phase II proceedings to focus on identifying methodologies for quantifying impacts in the UBCA test, among other steps. See NESP's Maryland Case Study for more information (Order No. 91424, page 3).
MI	Case No. U-20898: In the matter, on the Commission's own motion, to commence a collaborative to consider issues related to new technologies and business models.	Michigan Public Service Commission	11/21/2024	References an Order issues on July 27, 2022, where the Commission directed the utilities to conduct cost effectiveness testing based on the provisions of the NSPM. (Order, pages 2-4)
VA	Case Number PUR-2023-00227: In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company pursuant to VA Code section 56-596.2 B 3, et al.	Virginia State Corporation Commission	11/12/2024	Cites Roger D. Colton's testimony in saying that the recent NSPM includes discussion of why resource cost testing should include other program impacts. Also includes a citation references the legislation directing the Commission to establish a cost effectiveness test based on the NSPM. (Report of D. Mathias Roussy, Jr., Hearing Examiner, pages 31 and 50)
ME	Case Number 2024-00310: Request for Approval of the Triennial Plan for Fiscal Years 2026-2028 Pertaining to Efficiency Maine Trust	Efficiency Maine Trust	11/8/2024	Cites the NSPM as an example of how to incorporate a social discount rate into a calculation of avoided costs. (Avoided Energy Supply Components in New England: 2024 Report, page 367)
MD	Case Number 9715: Maryland Energy Storage Program	Office of People's Counsel	11/7/2024	Includes a footnote that references a Commission Order in Case No. 9674 that established a workgroup to develop a cost effectiveness test for Maryland based on the principles of the NSPM. (Comments of the Office of People's Counsel on the Maryland Energy Storage Initiative Under PUA 7-216.1, page 19)

RI	Docket No. 24-39-EE: Rhode Island Energy's 2025 Annual Energy Efficiency Plan	Rhode Island Energy	11/7/2024	States that the costs of energy efficiency outlined within the NSPM are the same as the costs determined from the utility's perspective in their own cost effectiveness analysis. (2025 Annual Energy Efficiency Plan Responses to Division's Second Set of Data Requests, page 69)
KY	Case No. 2024-00197: Electronic 2024 Integrated Resource Plan of Duke Energy Kentucky, Inc.	Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Kentucky Resources Council	11/6/2024	Recommend that the utilities apply principles outlined within the NSPM to conduct a cost-effectiveness test of their proposed distributed energy resources programs. (Comments of Joint Intervenors on Duke Energy Kentucky's 2024 Integrated Resource Plan, pages 12-13)
VA	Case Number PUR-2024-00134: In the matter of establishing energy efficiency savings targets pursuant to VA Code section 56-596.2 B 9	Virginia State Corporation Commission	11/6/2024	States that pursuant to the SAVE Act of 2024, the Commission is overseeing a proceeding to create a benefit-cost test based on the NSPM and expresses concern of the timeline of the development of that benefit-cost test relative to the timeline of PUR-2024-00134, which seeks to establish energy efficiency savings targets. (Part 3: Transcript of Hearing Conducted on November 4, 2024, pages 215-216)
NV	Docket No. 24-05041: Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NC Energy for approval of their 2025-2044 Triennial Integrated Resource Plan and 2025-2027 Energy Supply Plan	Nevada Power Company and Sierra Pacific Power Company	11/5/2024	Lists the NSPM as an example of a guidebook that sets forth standards and specifications for measurement and verification activities. (Prepared Direct Testimony of Robert R. Oliver, pages 6-7)
NV	Docket No. 24-05041: Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NC Energy for approval of their 2025-2044 Triennial Integrated Resource Plan and 2025-2027 Energy Supply Plan	Nevada Power Company and Sierra Pacific Power Company	11/5/2024	Notes that part 1 of the demand side management rate impact analysis was done using the framework of the NSPM. (Prepared Direct Testimony of Dr. Sanem Sergici, page 5)

MN	Case No. 23-452: In the Matter of Xcel Energy's 2023 Integrated Distribution Plan	Xcel Energy	11/1/2024	Xcel Energy states that in Phase 2 of their non-wires alternatives screening, they used a set of discrete stacked values listed in the NSPM. (Integrated Distribution Plan - Annual Update - Attachment A, page 35)
CT	Docket Number 23-08-07: Innovative Energy Solutions Program Cycle 02	Community Battery	10/28/2024	Cites the NSPM as an example for how to highlight soft benefits in a cost-effectiveness test. (Question[s] Answered 40 thru 40 [Community Battery], page 4)
NM	Case No. 24-00154-UT: In the Matter of El Paso Electric Company's Application for Approval of its 2025-2027 Energy Efficiency and Load Management Plan, Utility Incentive and Revised Rate No. 17-Efficient Use of Energy Recovery Factor	Coalition for Clean Affordable Energy	10/24/2024	States that a utility cost test includes the benefits and costs experienced by a utility system, with a footnote to the NSPM. (Corrected Direct Testimony of Ramón Alatorre, page 5)

VA	Case Number PUR-2024-00134: In the matter of establishing energy efficiency savings targets pursuant to VA Code section 56-596.2 B 5	Appalachian Power Company	10/21/2024 and 11/4/2024	Discusses plans to transition to a new cost-effectiveness test based on the framework presented in the NSPM and states that this new NSPM-based test may result in different evaluations for existing programs (Rebuttal Testimony of David S. Diebel for Appalachian Power Company in Virginia S.C.C. Case No. PUR-2024-00134, pages 9-10)
OR	Docket No. UM 2141 PGE Flexible Load Plan	Portland General Electric	10/18/2024	States that PGE's 2022-2023 Flex Load Multi-Year Plan contained a comprehensive discussion of benefit-cost analysis testing, including a review of NSPM standards. (Flexible Load Multi-Year Plan 2025-2026, page 74)
WA	Filing U-240281: Commission rulemaking required to implement ESHB 1589 (Chapter 351, Laws of 2024) pertaining to the consolidation of a Large Combination Utilities gas and electric operations planning requirements into an integrated system plan	Chris Schaefer on behalf of Puget Sound Energy	10/18/2024	References previous comments submitted by PSE, which cite the NSPM as a cost benefit analysis that evaluates the avoided costs of implementing demand side resources. (Comments of Puget Sound Energy in Docket U-240281 - Commission rulemaking required to implement Engrossed Substitute House Bill 1589 [Chapter 351, Laws of 2024] - Cost Test, page 2)
VA	Case Number PUR-2023-00227: In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company pursuant to VA Code section 56-596.2 B 3, et al.	Virginia State Corporation Commission	10/17/2024	States that the NSPM is a benefit-cost test framework that incorporates the positive externalities, and the avoidance of negative externalities associated with energy efficiency programs. (Part 3: Transcript of Hearing Conducted on October 15, 2024, page 68)

MI	Case No. U-21482: In the matter of the Application of DTE Electric Company for approval of Interconnection Procedures and Waivers from Interconnection and Distributed Generation Standards R 460.901a et. seq.	DTE Electric Company	10/15/2024	States that the NSPM summarizes the broad range of utility system benefits that can be offered by distributed energy resources. (DTE Electric Company's Motion to Strike, page 25)
NM	Case No. 24-00154-UT: In the Matter of El Paso Electric Company's Application for Approval of its 2025-2027 Energy Efficiency and Load Management Plan, Utility Incentive and Revised Rate No. 17-Efficient Use of Energy Recovery Factor	Coalition for Clean Affordable Energy	10/11/2024	States that a utility cost test includes the benefits and costs experienced by a utility system, with a footnote to the NSPM. Also states that the NSPM includes a breakdown of when different discount rates are appropriate in a cost-effectiveness test. (Direct Testimony of Ramón Alatorre, pages 6 and 43)
WA	Filing U-240281: Commission rulemaking required to implement ESHB 1589 (Chapter 351, Laws of 2024) pertaining to the consolidation of a Large Combination Utilities gas and electric operations planning requirements into an integrated system plan	Washington Utilities and Transportation Commission	10/10/2024	Overview of the NSPM included in a PowerPoint on the development of cost test rules to support decarbonization. (Development of Cost Test Rules to Support Implementation of Decarbonization Act, pages 10-20)

MN	Case No. 20-800: In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display of Access to Electric Distribution Grid Data	Public Utilities Commission of Minnesota	10/9/2024	References the NARUC Grid Data Sharing Playbook, which names the NSPM as a guide that can be used to design jurisdiction-specific cost-effectiveness testing for distributed energy resources. (Workgroup Report Attachment 1, page 24)
NV	Docket No. 24-05041: Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NC Energy for approval of their 2025-2044 Triennial Integrated Resource Plan and 2025-2027 Energy Supply Plan	Southwest Energy Efficiency Project	10/8/2024	Cites the NSPM in highlighting the importance of discount rates in assessing the benefits of an energy efficiency program. (Direct Testimony of Justin Brant on behalf of Southwest Energy Efficiency Project, page 32)
NV	Docket No. 24-05041: Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NC Energy for approval of their 2025-2044 Triennial Integrated Resource Plan and 2025-2027 Energy Supply Plan	Public Utilities Commission of Nevada Staff	10/4/2024	Notes E3's review of how many states use distributed energy resources cost and benefits in their cost-effectiveness tests references the NSPM. (Attachment GS-2, page 1)
CO	Proceeding 24M-0261G: Inaugural Gas Infrastructure Plan of Public Service Company	Colorado Public Utilities Commission	10/1/2024	States that in an August 2024 workshop, E4TheFuture and Energy Futures Group presented on how to improve Xcel's cost-benefit analysis testing, including the framework offered in the NSPM. (Interim Decision of Hearing Commissioner Ordering the Filing of Certain Responsive Information by Public Service Company of Colorado, page 28)

RI	Docket No. 24-39-EE: Rhode Island Energy's 2025 Annual Energy Efficiency Plan	Rhode Island Energy	10/1/2024	Cites the NSPM as an influence in the decision to no longer allow participant costs to be negative when conducting a benefit cost analysis, in alignment with best practices. (2025 Energy Efficiency Annual Plan, page 74)
VA	Case Number PUR-2024-00134: In the matter of establishing energy efficiency savings targets pursuant to VA Code section 56-596.2 B 4	Virginia Energy Efficiency Council	9/30/2024 and 11/4/2024	States that the VAEEC has participated as a stakeholder in a proceeding to establish a new cost-benefit test using the guiding principles of the NSPM, then cites said principles. (Direct Testimony of Chelsea Harnish on behalf of the Virginia Energy Efficiency Council, pages 5, 13-14)
VA	Case Number PUR-2024-00134: In the matter of establishing energy efficiency savings targets pursuant to VA Code section 56-596.2 B 3	Sierra Club	9/30/2024 and 11/4/2024	Cites the NSPM in saying that if a utility uses the total resource cost test, the test must include other program impacts and include both participant costs and benefits. (Direct Testimony of Roger D. Colton on behalf of the Sierra Club, page 37)
WA	Filing U-240281: Commission rulemaking required to implement ESHB 1589 (Chapter 351, Laws of 2024) pertaining to the consolidation of a Large Combination Utilities gas and electric operations planning requirements into an integrated system plan	Washington Utilities and Transportation Commission	9/27/2024	States that the Commission will follow the process and principles outlined in the NSPM. (Notice of Opportunity to File Written Comments, page 2)
WI	Case No. 6690-UR-128: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates	Megan Wachspress (Staff Attorney at Sierra Club)	9/24/2024	Describes the NSPM as a comprehensive framework for developing a cost-effectiveness test for energy efficiency measures and distributed energy resources. (State Energy and Environment Guide to Action, page 16)

MI	Case No. U-21534: In the Matter fo DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority	Penn Reporting, LLC	9/24/2024	Reinforces that the Commission directed utility benefit cost analyses to be informed by the provisions of the NSPM. (Cross-Examination - Part 3 - Revised, page 591)
MI	Case No. U-21534: In the Matter fo DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority	The Ecology Center, the Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar	9/18/2024	Cited as a footnote supporting that regulators perform cost-benefit testing on efficiency plans to asses whether the ratepayer investment advances public interests. (Exhibit List of the Ecology Center, the Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar, page 67)
MI	Case No. U-21482: In the matter of the Application of DTE Electric Company for approval of Interconnection Procedures and Waivers from Interconnection and Distributed Generation Standards R 460.901a et. seq.	Environmental Law & Policy Center	9/16/2024	States that the NSPM summarizes the broad range of utility system benefits that can be offered by distributed energy resources. (Direct Testimony of Lee Shaver, page 13)
VA	Case Number PUR-2023-00227: In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company pursuant	Sierra Club	9/16/2024	Cites the NSPM in saying that if a utility uses the total resource cost test, the test must include other program impacts and include both participant costs and benefits. (Direct Testimony of Roger D. Colton on behalf of the Sierra Club, page 25)

	to VA Code section 56-596.2 B 3, et al.			
PA	Docket Number M-2024-3048998: 2026 Act 129 Total Resource Cost Test	Northeast Energy Efficiency Partnership	9/6/2024	References the NSPM's guidance to align benefit-cost analysis testing with policy goals to ensure symmetry and account for material impacts. (Comments - NEEP, page 1)
CO	Proceeding 24M-0261G: Inaugural Gas Infrastructure Plan of Public Service Company	Advanced Energy United and Western Resource Advocates	9/5/2024	States that the NSPM notes that lost revenues are not appropriate for inclusion in a cost-effectiveness test. Also highlights that the NSPM warns against potential adverse impacts of utilities seeking to minimize rate impacts through the adoption of additional utility system costs. (Joint Comments of Advanced Energy United and Western Resource Advocates in the Inaugural Gas Infrastructure Plan of the Public Service Company, page 4)

NM	Case Number 23-00071: Recommended Decision of the Hearing Examiner	Public Utility Regulation Commission	8/30/2024	PNM asserts that it does not oppose the use of the NSPM to develop a cost-effectiveness methodology for determining whether a subsidy exists for a community solar proposal (page 95).
MN	Docket Number 23-117: Briefing Papers - September 12, 2024 Agenda	Minnesota Public Utilities Commission	8/29/2024	Cites the NSPM as a guide for Minnesota's "secondary" cost test, which includes the ability of a measure or program to meet a specific state goal (pages 32-33).
MN	Docket Number 21-565: Briefing Papers - September 12, 2024 Agenda	Minnesota Public Utilities Commission	8/29/2024	Cites the NSPM as a guide for Minnesota's "secondary" cost test, which includes the ability of a measure or program to meet a specific state goal (pages 32-33).
IN	Docket Number 46113-NONE: Attachment EKM-3	Indianapolis Power & Light Company	8/29/2024	States that the utility's cost effectiveness test for evaluating demand response measures follows the framework established in the NSPM (2022 AES INDIANA Demand Side Management Market Potential Study, page 40).
MA	Docket No. 24-10: ORDER. By Chair Van Nostrand, Commissioners Fraser and Rubin. D.P.U. 24-10, D.P.U. 24-11, D.P.U. 24-12	Commonwealth of Massachusetts Department of Public Utilities	8/29/2024	Cites the NSPM as one of the documents used to calculate benefits and net benefits of the electric sector modernization plan. Specifically, the NSPM's "regulatory perspective" was adopted, such that net benefits accounted for regulatory and policy goals, relevant costs, and full-lifecycle data (page 388)
CT	Docket No. 21-05-15RE03: Corres. 08/23/2024 [21-05-15RE03] (OCC) - OCC recommendations on IDSP reporting requirements	OCC and Office of Consumer Council	8/23/2024	Comments recommend that PURA design a jurisdiction-specific cost effectiveness analysis using the NSPM as a framework (page 20).
MI	Case No. U-21534: Public Version of the Revised Direct Testimony of Joshua W. Denzler on behalf of CUB, MEC & NRDC, the Revised Direct Testimony of Douglas B. Jester on behalf of CUB, SC, MEC & NRDC, and Corrected Exhibit MEC-11	Citizens Utility Board of Michigan	8/23/2024	Recommends that the NSPM should be included in DTE's benefit-cost analysis of its transportation electrification plan (Revised Direct Testimony of Douglas B. Jester, page 30).

CO	Proceeding 23A-0633G: Hearing Exhibit 400, Attachment JPD-1, Rev. 1	Colorado Energy Office	8/21/2024	States that the NSPM represents the "regulatory perspective" by using cost-effectiveness screenings to determine whether a given measure or portfolio is the most cost-effective way to meet a policy goal (page 22).
IL	Docket Number 24-0578: Errata on behalf of Ameren Illinois Company d/b/a Ameren Illinois to its Direct Testimony	Ameren Illinois Company	8/20/2024	Notes that the beneficial electrification plan was assessed using a cost effectiveness model consistent with the industry best practices of the NSPM (page 6).
IL	Docket Number 24-0494: Errata on behalf of Ameren Illinois Company d/b/a Ameren Illinois to its Direct Testimony - Ameren Exhibit 2.1 (Rev)	Ameren Illinois Company	8/20/2024	States that the beneficial electrification plan was assessed with a cost-effectiveness model consistent with NSPM guidance (page 6).
MI	Case No. U-21492: Reply Comments of the Ecology Center and Vote Solar on the Commission's Proposed TEP Filing Requirements	The Ecology Center and Vote Solar	8/12/2024	States that the NSPM recommends a consideration of both utility system impacts and non-electric energy system impacts (such as avoided costs and societal impacts) in their benefit-cost analysis (page 3).
IN	Docket 46100-NONE: Direct Testimony of Jeffrey R. Huber	Southern Indiana Gas and Electric Company	7/30/2024	States that the utility's cost-effectiveness test is based, in part, on the framework established by the NSPM (Attachment JRH-1, page 29).
IA	Docket Number RPU-2023-0002: Post-Hearing Brief - 4693278	CEDI Coalition	7/29/2024	States that the NSPM codifies 40 years of best practices in the benefit cost analysis process (page 24).
MI	Case No. U-21534: Qualifications and Direct Testimony of Becker, DeCooman, Doherty, and Freeman.	Michigan Public Service Commission Staff	7/26/2024	Confirms that the Pole Top Maintenance and Modernization plan benefit-cost analysis is informed by the provisions of the NSPM (page 8).
MI	Case No. U-21534: Public Redacted Direct Testimony of Dr. Laura S. Sherman and	Michigan Energy Innovation Business Council	7/26/2024	States that the NSPM accounts for non-electric energy system impacts such as avoided cost of fuel supply and societal impacts, elements neglected by the utility within their benefit-cost analysis (page 35).

	Direct Testimony of Justin R. Barnes on behalf of Michigan Energy Innovation Business Council, Institute for Energy Innovation, and Advanced Energy United			
MI	Case No. U-21534: Direct Testimony and Exhibits Douglas B. Jester on behalf of Citizens Utility Board of Michigan, Sierra Club, Michigan Environmental Council, and Natural Resources Defense Council (Exhibits CUB-17 through CUB-19)	Citizens Utility Board of Michigan	7/25/2024	Recommends that the NSPM should be included in DTE's benefit-cost analysis of its transportation electrification plan (page 41).
VA	Case Number PUR-2024-00120: Ex Parte: in the matter of promulgating regulations establishing a single, consistent cost-effectiveness test for use in evaluating proposed energy efficiency programs - Staff's Proof of Notice	Virginia State Corporation Commission	7/24/2024	Cites Chapter 794 of the 2024 Virginia Acts of Assembly, which direct the State Corporation Commission to establish a cost-effectiveness test using the framework established in the NSPM (pages 11-12).
WA	Docket Number U-240281: Comments, on behalf of Washington Hospitality Association, from Julia Gorton.	The Washington Hospitality Association	7/24/2024	Offers support for Washington's proposed cost effectiveness test for distributed energy resources, as it mirrors the NSPM (page 2).
CO	Proceeding 24M-0060G: Attachment CEO-1	Colorado Energy Office	7/23/2024	Recommends use of NSPM for utilities to apply in their Colorado Natural Gas Infrastructure Plan, whereby the NSPM represents the "regulatory perspective" by using cost-effectiveness screenings to determine whether a given measure

				or portfolio is the most cost-effective way to meet a policy goal (page 22).
MI	Case No. U-21492: Comments from Michigan EIBC/United	Michigan Energy Innovation Business Council and Advanced Energy Unites	7/22/2024	States that the NSPM recommends a consideration of both utility system impacts and non-electric energy system impacts (such as avoided costs and societal impacts) in their benefit-cost analysis (page 4).
MI	Case No. U-21567: Comments of the Natural Resources Defense Council, Michigan Environmental Council, Sierra Club, Earthjustice, Ecology Center, Oxfam America, and Environmental Law and Policy Center	National Resources Defense Council, Michigan Environmental Council, Sierra Club, Earth Justice, Ecology Center, Oxfam America, and the Environmental Law and Policy Center	7/17/2024	Cites the NSPM as an example of a cost effectiveness test that includes societal impacts in their analysis (page 7).
VA	Case Number PUR-2024-00120: Ex Parte: in the matter of promulgating regulations establishing a single, consistent cost-effectiveness test for use in evaluating proposed energy efficiency programs - Order Initiating Stakeholder Process - 7/17/2024	Virginia State Corporation Commission	7/17/2024	Cites Chapters 794 and 818 of the 2024 Virginia Acts of Assembly, which direct the State Corporation Commission to establish a cost-effectiveness test using the framework established in the NSPM (page 1).
ME	Case Number 2022-00322: Order - Order	Maine Public Utilities Commission	7/12/2024	Notes that commentors within the docket recommend that utilities perform a benefit-cost analysis aligning with the NSPM framework for their proposed distributed energy resource plans (page 28).
CA	Docket A2205023: Opening Comments on Administrative Law Judges Ruling Directing Responses to	Coalition for Community Solar Access	7/10/2024	Cites the NSPM as an example of a cost effectiveness test that weighs cost reduction impacts such as deferred transmission and distribution investments and the reduction of transmission energy losses (page 22).

	Questions Regarding Implementation of Decision 24-05-065			
CA	Docket A2205023: Application for Rehearing of Decision 24-05-065	Center for Biological Diversity	7/8/2024	Cites the NSPM as a comprehensive framework for identifying the benefits and costs to be accounted for when assessing the cost effectiveness of distributed energy resources (page 13).
IL	Docket Number 24-0494: Petition for Approval of Beneficial Electrification Plan 2 Pursuant to Section 45 of the Electric Vehicle Act - Ameren Exhibits 2.1 & 2.2	Ameren Illinois Company	7/1/2024	States that the beneficial electrification plan was assessed with a cost-effectiveness model consistent with NSPM guidance (page 6).
AZ	Docket Number AHD-00000J-23-0273: Miscellaneous Comments	Emma Searson, on behalf of Solar United Neighbors of Arizona	7/1/2024	Identifies the NSPM as including best practices for completing a comprehensive value study (page 10). States that the NSPM notes that societal impacts should be accounted for in a benefit-cost analysis to the extent that they contribute to a jurisdiction's energy goals (Attachment B, page 24). Also includes a report on the NSPM (Attachment F).
OK	Case Number PUD2024-000048: Direct Testimony of Ian Metzger filed on behalf of Oklahoma Gas & Electric Company	Oklahoma Gas & Electric Company	7/1/2024	States that Oklahoma Gas & Electric Company's energy efficiency and demand response plans adopt the cost effectiveness calculations used within the NSPM (Direct Testimony of Ian Metzger, pages 2 and 4; Direct Exhibit IM-1, page 14).
OR	Docket No. UE 433: Community Energy Project, Coalition of Communities of Color, and VERDE's Opening Testimony of Charity Fain, Anahi Segovia Rodriguez, and Nikita Daryanani.	Community Energy Project, Coalition of Communities of Color, and VERDE	6/28/2024	Uses the NSPM to exemplify how low-income program benefits can be analyzed at the societal level (How High Are Household Energy Burdens?, page 68).
SC	Docket Number 2024-192-E: Dominion Energy South Carolina, Inc.'s Request for	Dominion Energy South Carolina, Inc.	6/28/2024	States that the total resource cost test for their demand side management portfolio was defined, in part, by the NSPM (page 10).

	Approval to Continue its Portfolio of Demand Side Management Programs to Include Approval of a New Residential Demand Response Program and Reaffirmation of its Demand Side Management Rate Rider			
CT	Docket No. 22-03-12RE02: Compliance Filings, 06/27/2024 [22-03-16RE02] Order No.Procedural Order / Office of Consumer Counsel / OCC Working Group Report - OCC Wage Garnishment Working Group Report	OCC and Office of Consumer Counsel	6/27/2024	Cites the NSPM as an example of a cost effectiveness test that includes societal impacts in their analysis (page 26).
WA	Docket Number U-240281: Comments, on behalf of Puget Sound Energy, from Lori Traore.	Puget Sound Energy	6/24/2024	States that cost effectiveness tests such as the NSPM that utilize the concept of avoided costs may not adequately address the underlying challenge for integrated system planning (page 4).
WA	Docket Number U-240281: Comments, on behalf of NW Energy Coalition, from Lauren McCloy and Mike Goetz.	NW Energy Coalition	6/24/2024	States the importance of NSPM Principle 5 in requiring that cost-effectiveness analyses are forward-looking, long-term, and incremental to what would have occurred without the proposed distributed energy resource (page 6).
PA	Docket No. M-2023-3044491: Comments - KEEA	Keystone Energy Efficiency Alliance	6/24/2024	Recommends that the PA Commission review the NSPM in their development of a total resource cost test (page 5).
NM	Docket Number 22-00058: Joint Response Bried of	New Mexico Attorney General	6/24/2024	Asserts that the NSPM is a valid resource for developing a consistent set of principles to be used in benefit-cost analysis testing (pages 3-5).

	the New Mexico Department of Justice and Bernalillo County			
CA	Docket R2211013: Opening Comments on Proposed Decision	California Efficiency and Demand Management Council	6/13/2024	Recommends that the NSPM be used as a primary source when considering updates or changes to the societal cost test (page 4).
NM	Docket Number 22-00058: Public Service Company of New Mexico's Phase Two Post-Hearing Initial Brief	Public Service Company of New Mexico	6/11/2024	Argues that intervenor issues with benefit-cost analysis testing should be rejected because their primary reliance on the NSPM is incorrect (pages 24-36).
MA	Docket No. 24-11: Joint Initial Brief of NSTAR Electric Company d/b/a Eversource Energy, Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and Fitchburg Gas and Electric Light Company d/b/a Unitil. D.P.U. 24-10; D.P.U. 24-11; D.P.U. 24-12	Commonwealth of Massachusetts Department of Public Utilities	5/31/2024	Cites the NSPM as one of the documents used to calculate benefits and net benefits of the electric sector modernization plan (page 77)
MA	Docket No. 24-10: Joint Initial Brief of NSTAR Electric Company d/b/a Eversource Energy, Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and Fitchburg Gas and Electric Light Company d/b/a Unitil. D.P.U. 24-10; D.P.U. 24-11; D.P.U. 24-12	Commonwealth of Massachusetts Department of Public Utilities	5/31/2024	Cites the NSPM as one of the documents used to calculate benefits and net benefits of the electric sector modernization plan, as the NSPM states that benefits should account for state goals, apply full life-cycle analysis, and assess investments as bundles/portfolios (page 77).

CT	Docket No. 24-08-08: Corres. 05/28/2024 [24-08-08] (Eversource Energy) - NWS BCA Joint Comments	Connecticut Light and Power Company d/b/a Eversource Energy and United Illuminating Company	5/28/2024	States that Eversource and Avangrid will run their benefit-cost analysis for the benefits of proposed non-wire solution projects using the framework of the NSPM (page 2).
TX	Case 56517: Recurve Analytics, Inc. Reponds to Questions on Review of Energy Efficiency Planning	Recurve Analytics, Inc	5/23/2024	Recommends that the PUC of TX use NSPM guidance to develop a benefit-cost test that includes the value of load reductions, load shifting, and energy waste removal at any hour of the day (page 5).
TX	Case 56517: The Flex Coalition Responses to Questions on Review of Energy Efficiency Planning	Flex Coalition	5/23/2024	Recommends that the PUC of TX use NSPM guidance to develop a benefit-cost test that includes avoided transmission and distribution costs (page 2).
TX	Case 56517: SPEER reponds to energy efficiency planning questions	South-central Partnership for Energy Efficiency as a Resource	5/22/2024	Uses the NSPM as an example of a benefit-cost test framework that captures the value of demand-side resources not currently included in the Total Resource Cost test (page 8).
WA	Docket Number UE-230172: LM-3	PacifiCorp	5/21/2024	Cites the NSPM as a document that addresses issues surrounding traditional benefit-cost testing strategies (page 7)
VA	PUR-2023-00217: Virginia Electric and Power Company - Exhibit 3 - Direct Testimony of David F. Walker, on behalf of Virginia Electric and Power Company	Dominion Energy Virginia	5/21/2024	Recommends Dominion Energy support the adoption of the NSPM to factor in non-energy benefits (DEV DSM Final Order Recommendations [Appendix B], pages 13-14)
TX	Case 56517: Comments Regarding Energy Efficiency Planning	City of Houston	5/20/2024	Affirms that certain hours of the day should be considered more valuable within the design of utility market transformation programs as outlined by the NSPM (pages 1-2). Also cites the NSPM to advise amendments that would include avoided T&D infrastructure costs within avoided capacity costs (pages 4-5), and that would include line losses in the avoided cost of energy (page 5).
MD	Case Number 9674: Framework for Distributed Energy Resources Final Report. Case No. 9674 (ML 309737)	Maryland Unified Benefit Cost Analysis Work Group Leader Cover Letter and Report	5/17/2024	Unified Benefit-Cost Analysis (UBCA) Work Group report and Commission staff leader cover letter recommending a Maryland-specific UBCA test developed via a work group process using the NSPM BCA framework and principles.

WA	Filing U-240013: Policy Statement Addressing The Federal Inflation Reduction Act and the Infrastructure Investment and Jobs Act in Utility Planning	Washington Utilities and Transportation Commission	5/3/2024	Summarizes utility comments regarding NSPM guidance which recommended inclusion of savings from tax credits and rebates in Total Resource Cost testing but not Utility Cost Testing. (page 6)
IN	Docket 46058- NONE: Attachment MAR-2 Part 4	Southern Indiana Gas and Electric Company	5/1/2024	Cites the NSPM as a guide to define "avoided ancillary services and energy and/or capacity price suppression benefits (Volume I: 2022 CenterPoint Energy Market Potential Study, page 29).
ME	Docket 2024-00015: Motion of ReVision Energy Inc. to Admit the Commission's 2023 Net Energy Billing Net Benefits Report into the Record	ReVision Energy	4/30/2024	Introduces into the record an April 2024 report from Sustainable Energy Advantage, LLC, titled "Analysis of 2023 Net Benefits of Net Energy Billing Program," which cites the NSPM in stating that "societal impacts should be accounted for to the extent that they contribute to a jurisdiction's energy policy goals." (Page 27)
CT	Docket No. 21-05-15RE02: Comments	Vote Solar, Conservation Law Foundation, Save the Sound, Acadia Center, Neighborhood Housing Services of New Haven	4/24/2024	Cites the NSPM in stating that "DERs deployed in geographically strategic locations can help to defer and/or avoid transmission and distribution upgrades" (Page 1)
VA	Case No. PUR-2023-00217, Direct Testimony of Chelsea Harnish	Virginia Energy Efficiency Council (VAEEC)	3/26/2024	Cites recent legislation in Virginia requiring establishment of a cost test consistent with the NSPM and expresses support for the legislation and the NSPM in general.
MN	Docket E002/M-23-452: 2023 Integrated Distribution Plan, Reply Comments	Xcel Energy	3/22/2024	States that "The process has improved dramatically since 2018. Our 2023 analysis incorporates a series of additional considerations that the Company applies to perform a more comprehensive assessment of NWAs. These additional considerations include integrating the National Standards Practice Manual as an NWA framework" (Page 3)
WI	Docket 5-EI-157: Staff memo: Issues Related to Net Metering	Staff of the Public Service Commission of Wisconsin	3/20/2024	Cites the existence of the NSPM as a resource for conducting BCA of DERs (specifically solar). (Page 11)
PA	R-2024-3046523: Direct Testimony of John C. Hilderbrand, II	Duquesne Light Company	3/20/2024	Includes attachment "Evaluation and Assessment Plan for Behavioral Load Management Pilot," which states that "Cost-effectiveness will be assessed consistent with the National Standard Practice Manual for DERs applying protocols applicable to Demand Response programs." (Page 4)
IL	24-0181: ComEd Refined Grid Plan - Chapter 4	Commonwealth Edison	3/15/2024	Cites NSPM guidance regarding Societal Cost Test (SCT) as a standalone test, rather than the California Standard Practice manual use of the SCT as a variant of the TRC, in explaining the inclusion of a SCT in the BCA tool. (Page 18)

MA	Docket DPU 24-10 and DPU 24-11: Direct Testimony of Larry Chretien	Green Energy Consumers Alliance	3/5/2024	Includes as an attachment the "Consultant Comments on the 2024 Massachusetts Electric Sector Modernization Plans," which cites the NSPM regarding inclusion of all utility system impacts, policy direction whether to include host customer impacts, and symmetry principles regarding macroeconomic effects. (Page 71-73)
NM	Supplemental testimony of Courtney Lane	Office of the Attorney General of New Mexico	3/1/2024	Cites the NSPM as the principal guidance used in assessing the BCA of Public Service of New Mexico (PNM), including in highlighting concerns regarding NSPM Principle 3 regarding symmetry and Principle 8 regarding assessing rate impacts separate from cost tests. (Page 8-17)
CT	Docket 23-11-02: Prefiled testimony of Brad T. Cebulko	Sierra Club and Conservation Law Foundation	2/8/2024	Includes as an attachment (BC-3) a November 2023 report from Strategen titled "Non-Pipeline Alternatives to Natural Gas Utility Infrastructure: An Examination of Existing Regulatory Approaches" which cites the NSPM in defining benefit cost analysis. (Page 16)
MN	24-67: 2024-2040 integrated Resource Plan	Xcel Energy	2/2/2024	Cites NSPM in justifying treating rate impact assessments as separate from the cost test. (Appendix J, page 26)
ME	Docket No. 2022-00322, Proceeding to Identify Priorities for Grid Plan Filings	Acadia Center, Conservation Law Foundation, Maine Climate Action Now, Maine Conservation Voters, Natural Resources Council of Maine, Sierra Club, and the Union of Concerned Scientists	1/31/2024	Recommends that "The Commission should require the utilities to perform a Benefit-Cost Analysis (BCA) as part of their planning efforts that fully accounts for relevant costs and benefits to aid in evaluating proposed solutions and alternative investments. The Commission should use the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources (NSPM) to develop a distribution BCA that builds on existing methodologies in use by Maine's utilities, Efficiency Maine Trust, and others." (page 3)
MA	Docket DPU 23-80: Electric Sector Modernization Plan	Unitil	1/30/2024	Cites compliance with the NSPM in the development of the proposed ESMP BCA practices. (Page 194)
MA	DPU 24-10, Electric Sector Modernization Plan	Eversource Energy	1/29/2024	Cites the NSPM in describing their process for calculating net benefits of the ESMP, specifically stating that "net benefits should account for state regulatory and policy goals, account for all relevant costs and benefits (including hard-to-quantify), apply full life-cycle analysis, and assess investments as bundles and portfolios instead of separate measures. Accordingly, the EDCs developed a net benefits framework for the ESMP incremental investments using a 'regulatory perspective,' as suggested in the NSPM." (Page 452)
CA	Rulemaking 22-11-013: Order Instituting Rulemaking to Consider DER Program Cost-Effectiveness Issues, Data Access and Use, and Equipment Performance Standards;	Center for Biological Diversity (Transcript from CPUC)	1/25/2024	Hearing transcript of discussion; Roger Lin (Center for Biological Diversity) questions Lonnie Manse (San Diego Gas & Electric) regarding prior testimony which referenced the NSPM and asked Mr. Manse if he is familiar with the NSPM (responds in the affirmative) and the Methods, Tools, and Resources handbook (responds in the negative). (Page 414)

	Evidentiary Hearing			
CT	Docket 24-08-08: Response to Motion No.: 002, NWS BCA Framework Filing	Eversource and The United Illuminating Company	1/24/2024	States that 'On January 10, 2024, the Process Monitor, NV5, released the Memo_ NWS Process Monitor Task 2_Jurisdictional Scan_Clean_2024-01-02 ("Memo"), which outlines the findings of the jurisdictional scan and recommended approach for Connecticut completed by NV5's subcontractor, Dunsky Energy + Climate Advisors ("Dunsky"). The Memo was developed using various resources including the regional Avoided Energy Supply Cost study, the National Standard Practice Manual, and state specific resources. The objective of the jurisdictional scan was to establish a common understanding of the approaches used in other jurisdictions and key lessons learned.' (Page 1)
NM	Case No. 23-00138-UT: In the Matter of the Application of Public Service Company of NM for Approval of its 2024 Electric Energy Efficiency Program Plan etc.	Office of the Attorney General of New Mexico	12/29/2023	Summarizes previous testimony from the Office which recommends "that PNM update its UCT calculation to include costs and benefits listed in the National Standard Practice Manual for Assessing Cost Effectiveness of Energy Efficiency Resources ("NSPM for DERs")" citing concerns that "it appears PNM includes all costs except for utility performance incentives—payments the Company receives for achieving its energy efficiency targets." The office also states "This critique is not new. Staff raised the same issue in Case No. 20-00087-UT." (Page 4-6)
MO	Docket EA-2023-0286: Surrebuttal Testimony and Schedules of Matt Michels - Part 2	Ameren Missouri - Union Electric Company	12/15/2023	Includes as an attachment with portions of "AMEREN MISSOURI 2023 DSM Market Potential Study," which states that GDS Associates reviewed the NSPM to define avoided ancillary services and energy and/or capacity price suppression benefits of DR programs. (Page 51)
MD	Case No. 9702, Potomac Electric Power Company's Application for Adjustments to its Retail Rates for Distribution of Electric Energy, Direct Testimony of Eric Borden	Office of People's Counsel	12/15/2023	Cites NSPM best practices in expressing concern with proposed BCA from Pepco. (Page 23)
DC	General Docket No. 2019-04-M, in the Matter of the Implementation of the 2019 Clean Energy DC Omnibus Act Compliance Requirements, Order No. 21938	Public Service Commission of DC	12/8/2023	The Commission approved key recommendations from the Clean Energy Act Implementation Working Group's ("CEAIWG") Report recommending adoption of a BCA framework and cost tests based on NSPM guidance (see CEAIWG report filed 11/16/2021); the Commission's order included direction that an RFP will be issued to develop a BCA model consistent with the adopted BCA framework [in 2024].
MN	Docket E015/CIP-23-93:	Minnesota Department of Commerce	12/1/2023	States that "When submitting a proposed custom [efficient fuel-switching] improvement that has an electric ending fuel, it is recommended that utilities follow the electrification cost-effectiveness guidance described in Chapter 10 of the National Standard Practice Manual (NSPM)." (Page 121)
MN	G,E002/CIP-23-92, E7030/CIP-23-99,G7033,E7031/CIP-23-100, G7034,E7032/CIP	Minnesota Department of Commerce	12/1/2023	States that "When submitting a proposed custom [efficient fuel-switching] improvement that has an electric ending fuel, it is recommended that utilities follow the electrification cost-effectiveness guidance described in Chapter 10 of the National Standard Practice Manual (NSPM)." (Page 222, 227)

	-23-101_G7036, E7035/CIP-23-102: Decision			
LA	Docket No. R-31106: comments in response to Staff's "Final Proposed Phase II Energy Efficiency Rule - Statewide Commission Led Program".	Alliance for Affordable Energy	11/20/2023	Recommends as part of Phase II Rules that "the Commission, its EE consultants, and the EEWG should consider updating its primary cost effectiveness test using the NSPM model." (Page 10)
MN	Docket 23-98 Proposed Decision for Minnesota Energy Resources Corporation's 2024-2026 Energy Conservation and Optimization Triennial Plan Analysis	Staff of the Minnesota Department of Commerce, Division of Energy Resources	10/23/2023	In response to the Minnesota Investor-Owned Utility 2024-2026 ECO Triennial Plans submitted for approval, the Staff of the Minnesota Department of Commerce, Division of Energy published a letter with guidance on how to structure their proposed decisions. One of their recommendations on cost-effectiveness testing was that utilities evaluate electrification using the NSPM. (Page 151)
MI	Docket U-20898-0040 Commission order on new BCA test for all DERs and development of transparent BCA model	Michigan Public Service Commission (MPSC)	10/12/2023	After considering intervenor comments on the joint BCA proposal of DTE Electric Company and Consumers Energy Company , that used the NSPM 5-step process, the MPSC issued an order requiring MI utilities to use a jurisdiction specific test (comparable to a societal cost test) based on applying the NSPM BCA framework. The Commission order also launches a collaborative effort to develop a spreadsheet -based tool for utilities to use to conduct a cost benefit analysis.
IN	Docket 45911 Petition Of Indianapolis Power & Light Company For Authority To Increase Rates And Charges For Electric Utility Service, And For Approval Of Related Relief	Citizens Action Coalition of Indiana inc.	10/12/2023	A representative from Citizens Action Coalition of Indiana Inc. cited the NSPM as a source for the benefits Distributed Generation Systems can provide to customers who do not install the distributed generation systems. (Page 100)
SD	Docket EL23-019 Otter Tail Power Company's Letter re: Responses to Staff's First Data Request, Response to DR 1-2	Otter Tail Power Company	9/20/2023	Otter Tail Power Company developed a new discount rate for their TRC tests in South Dakota based on an average of the Weighted Average Cost of Capital (7.09%) and the discount rate that they had helped develop in Minnesota through the NSPM process (3.3%).
IA	Docket NOI-2023-0001 Pre-comments for Policy Charette #2	Midwest Energy Efficiency Alliance (MEEA)	9/19/2023	MEEA recommends that if the state were to adopt Integrated Resource Planning (IRP) for the state's electric utilities, they should develop an Iowa specific test for energy efficiency and all DERs based on the NSPM (Page 6)
NM	Docket 23-00138-UT Direct Testimony on Behalf of Attorney	NM Attorney General's Office	9/18/2023	The NM Attorney General's office retained Synapse Energy Economics to file testimony in regard to Public Service of New Mexico's energy efficiency plan. The AG recommends that the New Mexico Public Regulation Commission undertake an

	General Kenji Takahashi			investigation using the NSPM to develop a New Mexico specific cost-effectiveness test. (Page 25)
IL	Docket 23-0055 Initial Brief of the Environmental Defense Fund	Environmental Defense Fund	9/12/2023	The Environmental Defense Fund supports Commonwealth Edison Company developing a new Non-Wire Alternatives BCA framework, and further suggests that the Illinois Commerce Commission incorporate a jurisdiction-specific test framework introduced by the NSPM (Pages 94-95)
ME	Docket 2022-00322: eNGO Joint Responsive Comments	NGO Joint Comments	9/1/2023	The joint comments of Acadia Center, Conservation Law Foundation, Maine Conservation Voters, Natural Resources Council of Maine, and the Union of Concerned Scientists comments suggest using an NSPM process to modify existing BCA practices for Electric Transmission and Distribution plans in Maine. (Pages 7-8)
WI	Docket 4220-UR-126 Low Income Energy and Solutions	Office of State and Community Energy Programs	9/1/2023	Appendix D of this Exhibit recommends using the NSPM to consider low-income energy efficiency program benefits on the societal level. (Page 83)
WI	WI: 3270-UR-125 Direct Testimony of Karl Rábago on behalf of the City of Madison	City of Madison	8/28/2023	In response to the Application Of Madison Gas And Electric Company For Authority To Adjust Electric And Natural Gas Rates , the principal of Rábago Energy LLC argues that the Public Service Commission of Wisconsin should reject MGE's proposed rate changes as they do not align with the NSPM principles (Pages 38-39), and that Wisconsin should develop a state specific BCA Framework and Test based on the NSPM. (Page 40)
HI	Docket 2019-0323 Hawai'i PV Coalition's and Hawai'i Solar Energy Association's Statement of Position on DPS Phase 3 Remaining Issues;	Hawai'i PV Coalition, Hawai'i Solar Energy Association, Keyes and Fox LLP, Earthjustice	8/23/2023	Previously the HI Public Utilities Commission had ordered the Utilities to consider the NSPM when determining their export rates (see below). However, the DER organizations here argue that when the utilities submitted their analysis of Bring-Your-Own-Device (BYOD) rates, they did not properly use the NSPM process, resulting in the BCA for the DERs being less cost-effective (Page 19) based on the parties' own analysis using the NSPM. (Pages 32-33)
CO	Docket 23A-0216G Hearing Exhibit 500 Answer Testimony of Southwest Energy Efficiency Project	Southwest Energy Efficiency Project	8/18/2023	SWEEP cites a graph from the NSPM to demonstrate the importance of discount rates in assessing the benefits of energy efficiency programs. (Page 26)
RI	Docket 5000 Joint Comments by Advanced Energy United and Northeast Clean Energy Council (NECEC)	Advanced Energy United and Northeast Clean Energy Council (NECEC)	8/4/2023	When commenting on the Rhode Island Public Utilities Commission "Examination of the Value of and Need for Energy Storage Resources in Rhode Island" ("Draft Report"), United and NECEC recommended in a footnote that staff review the NSPM, which its foundational principles were used to develop a Rhode Island specific test. (Page 2)
MI	Docket U-21323 Indiana Michigan Power Company's Application, Testimonies and Exhibits	GDS Associates	8/1/2023	GDS Associates used the NSPM to analyze cost-effectiveness demand response programs for Indiana Michigan Power (Page 150)
IL	Docket 22-0486 Rebuttal Testimony of Environmental	Energy Futures Group Inc.	7/26/2023	Energy Futures Group, Inc. says that the NSPM would be a good guide for jurisdictional specific test for Illinois, and comments on ComEd's statement that they're using the NSPM to develop NWA tests. (Page 8)

	Defense Fund, Citizens Utility Board, Community Development Corporation of Pembroke-Hopkins Park and People for Community Recovery			
LA	Docket R-31106 Original Comments for the Alliance for Affordable Energy	Alliance for Affordable Energy	7/14/2023	In their comments in response to the proposed "Phase II Energy Efficiency Rule - Statewide Commission Led Program" (See below) The Alliance for Affordable Energy recommends that the EM&V contractor for the energy efficiency program use either a Total Recourse Cost Test or a Test developed using the NSPM. (Page 17)
NH	Docket DE 23-068 2024-2026 New Hampshire Statewide Energy Efficiency Plan	Liberty Utilities, New Hampshire Electric Cooperative, Northern Utilities, Public Service Company of New Hampshire, Unil Energy Systems	6/30/2023	The energy efficiency plan was developed using the Granite State Test, which was developed through the NSPM. See former NH PUC order adoption the Granite State Test
NJ	Docket QO19010040-Order 5-24-23-8B	Building Performance Association (BPA), Energy Efficiency Trade Association of New Jersey, MaGrann, Board of Public Utilities Staff	6/5/2023	In their comments responding to the Board of Public Utilities Staff's Straw Proposal for a Triennium 2 EE framework, BPA Energy Efficiency Trade Association of New Jersey and MaGrann praised aspects of the proposal for being consistent with NSPM principles. BPA also recommended undergoing a formal NSPM process and suggested using the forthcoming DEA guidance currently being developed by E4TheFuture and LBNL (Page 88). The Board responded saying that they will not go through a formal NSPM process, but they are deliberately incorporating NSPM principles. (Page 89)
HI	Docket No. 2019-0323 Instituting a Proceeding to Investigate Distributed Energy Resource Policies Pertaining to The Hawaiian Electric Companies.	Public Utilities Commission's Order	6/1/2023	The Public Utilities Commission added to their requirements for the final modeling results that utilities were submitting on DER export rates that they use the NSPM as a framework for the discussion of how DER value streams and avoided costs are reflected in their rates or which value streams and avoided costs aren't accounted for but should be on pages 23 and 24.
VA	Case PUR-2022-00210 Pre-filed Direct Testimony on behalf of Virginia Energy Efficiency Council	Virginia Energy Efficiency Council testimony	5/17/2023	While explaining how Virginia's cost-effectiveness tests should be improved, a representative from the Virginia Energy Efficiency Council reiterated a recommendation that the state use the NSPM to modify their existing cost-effectiveness tests to better align with the state policy, on page 20.
ME	Case # 2022-00322 Proceeding to Identify Priorities for Grid Plan Filings	Representative from Portland General Electric (PGE) Presentation	5/4/2023	In a Maine conference on grid plan priorities, a representative from Portland General Electric described how they had made their distribution system plan, and recommended using the NSPM for guidance on pages 60 and 61.
CA	Docket CA R2211013 Opening	California Efficiency and Demand	4/28/2023	In their comments in response to whether the Commission should use the Societal Cost Test when evaluating the cost-effectiveness of DERs, the California Efficiency and Demand

	Comments of the California Efficiency and Demand Management Council on Administrative Law Judge's Ruling Seeking Comments from Parties on the Societal Cost Test and Air Quality Research Results	Management Council Comments		Management Council recommended using the NSPM as a recourse for the California Public Utilities Commission to update their Societal Cost Test to reflect more modern DER benefits on page 9.
HI	Docket No. 2019-0323 Instituting a Proceeding to Investigate Distributed Energy Resources Pertaining to the Hawaiian Electric Companies	Public Utilities Commission's Information Request	4/26/2023	The Commission sent an information request to Hawaiian Electric, the Division of Consumer Advocacy, and Hawai'i Solar. Among their questions, they asked them to describe whether the 35 potential impacts described in the NSPM are reflected in their incentives.
MI	Filing U-20645-0019 MI Power Grid Final Status Report	Michigan Public Service Commission Report	4/25/2023	This status report describes the MI Power Grid initiative, a project that was launched in October 2019 to plan a transition to clean DERs. On page 16, the report describes how the commission ordered 7 major power companies to file proposed Michigan specific benefit-cost analysis requirements, including a societal cost test, based on the NSPM.
MI	Case No. U-20898 Public Service Commission Order establishing a period for the filing of comments on the February 1, 2023 benefit cost analysis proposal	Michigan Public Service Commission Order	4/24/2023	As part of the MI Power Grid initiative, a project that was launched in October 2019 to plan a transition to clean DERs, the Commission ordered 7 major power companies to file proposed Michigan specific benefit-cost analysis requirements, including a societal cost test. In response, DTE Electric and Consumers, in cooperation with some of the other companies, filed a proposal on February 1, 2023. The commission then ordered that a period for submitting comments on this proposal should be established with a deadline of June 23, 2023.
MN	Docket No. E,G999/CIP-23-46 In the Matter of 2024-2026 CIP Issue Date: March 31, 2023 Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities	Deputy Commissioner Decision	3/31/2023	In this decision, the Deputy Commissioner approved the DOC's Proposed Decision filed 2/16/2023, implementing the Minnesota Cost Test (MCT) for the 2024-2026 triennial based on the process outlined in the NSPM.
NM	NM 22-00232-UT In The Matter Of The Application Of New Mexico Gas Company, Inc For Approval Of Its 2023-2025 Energy Efficiency Program Pursuant To The New	New Mexico Public Regulation Commission Decision	3/22/2023	After New Mexico Gas Company (NMGC) filed their plan for an energy efficiency program, a witness from the Office of Attorney General argued that though the programs all passed the Utility Cost Test (UCT), the UCT that they used did not account for all relevant impacts and suggested using other tests like the Participant Cost Test (PCT) and Total Recourse Cost Test (TRCT), using the NSPM to support their argument. However, NMGC argued that New Mexico Law dictated they should use the UCT, and the commission accepted their proposal despite these objections.

	Mexico Public Utility And Efficient Use Of Energy Acts			
OR	Docket UM 2197 Acceptance of Distribution System Plan – Part Two	OR Public Utility Commission Staff	2/21/2023	In their report regarding Portland General Electric's Distribution System Plan, PUC Staff notes the Plan presents ongoing work to improve accounting of costs and benefits for DERs and aims for a consistent BCA test for use across planning activities. Staff reiterate a recommendation made by Renewable Northwest to use the principles of the NSPM and agree on the need for a stakeholder process to consider DER valuation.
MN	Docket E,G999/CIP-23-46 Proposed Decision for 2024-2026 CIP Cost-Effectiveness Methodologies	MN Department of Commerce Staff	2/16/2023	DOC Staff filed a Proposed Decision with a summary of the Cost-effectiveness Advisory Committee's activities related to applying the NSPM and includes a Staff recommendation to adopt the Minnesota Cost Test. Comments on the Proposed Decision are due March 6, and the Deputy Commissioner's Decision is expected by March 31, 2023.
MI	Docket No. U-20898 DTE Electric Company's Proposed Requirements and Further Guidance on BCA for Pilot Initiatives	DTE Electric Company	2/1/2023	In response to the Commission's August 23, 2022 Order requiring Michigan utilities to propose a Michigan-specific BCA test informed by the NSPM to evaluate pilot proposals, DTE Energy filed their proposed BCA requirements and guidance. DTE proposed a jurisdiction-specific test that incorporates utility system, host customer, and societal impacts. An overview of the impacts included in the proposed JST can be found on page 20.
ME	Final Report of the Distributed Generation Stakeholder Group	Joint Standing Committee on Energy, Utilities and Technology, final report	1/6/2023	The Distributed Generation Stakeholder Group gave this report on potential Distributed Generation (DG) projects for 2024-2028. As part of the report, Synapse and Sustainable Energy Advantage (SEA) did an economic analysis on potential Distributed Generation (DG) projects for the Distributed Generation Stakeholder Group. To measure the cost effectiveness of these projects, Synapse led a workshop to develop a "Maine Test" based on the NSPM. The full Synapse Report and analysis, also conducted by Sustainable Energy Advantage (S.E.A.), can be found here .
NC	Docket NO. E-100 Sub 180 In the Matter of Investigation of Proposed Net Metering Policy Changes	Intervenors' comments	12/16/2022	In their Brief to the Commission, the Environmental Working Group, NC WARN, North Carolina Climate Solutions Coalition, Sunrise Movement Durham Hub, 350 Triangle, 350 Charlotte, and the North Carolina Alliance to Protect Our People and the Places We Live (Joint Intervenors) reiterate their recommendation for the use of the NSPM as it represents the standard of care for conducting BCA of DERs, including net energy metering. The joint intervenors note the NSPM has been adopted by eleven public utilities commissions and has been recommended for adoption in 31 additional states (pgs 19-24).
FL	Docket No. 20200181 Proposed Amendment of Rule 25-17.0021, F.A.C., Goals for Electric Utilities	Southface Energy Institute	12/16/2022	In their comments on the proposed amendments to Goals for Electric Utilities, Southface Energy Institute (Southface) recommends the Commission replace the current cost-effectiveness manual with the NSPM as it is a more modern and flexible guide to properly evaluate the costs and benefits of DERs (pg 12).
KY	Docket No. 2022-00370 Investigation of	Kentuckians for the Commonwealth,	12/16/2022	The Commission opened this proceeding in their Order issued November 7 to permit consideration of the amendments to the Public Utility Regulatory Policies Act of 1978. The Commission

	Amendments to the Public Utility Regulatory Policies Act of 1978 and Demand Side Practices	Mountain Association, Metropolitan Housing Coalition, and Earth Tools, Inc.		requested comments from interested stakeholders on existing programs as well as measures to promote greater use of demand response practices to reduce electricity consumption. In their comments, Kentuckians for the Commonwealth, Mountain Association, Metropolitan Housing Coalition and Earth Tools, Inc. (Joint Commenters) recommend the Commission and utilities apply the principles from the NSPM. The Joint Commenters note the Commission applied several NSPM principles to Kentucky Power Company's net metering tariff in 2020 (pg 7).
CT	Docket 22-08-05 NECEC Letter Brief: Annual Energy Storage Solutions Program Review – Year 2	Northeast Clean Energy Council (NECEC)	11/09/2022	In their response to the Public Utilities Regulatory Authority's (PURA) Notice of Request for Briefs regarding the Annual Energy Storage Solutions Program Review, the Northeast Clean Energy Council (NECEC) expresses concern about the risk of counting the costs from charging and not the benefits from discharging. They recommend PURA work with stakeholders to create a rate design that reflects the benefits and costs of energy storage systems on the distribution system and to consider the BCA principles laid out in the NSPM for distributed storage (pg. 2).
AZ	Docket E-01345A-22-0143 Modifications to APS DDSR Aggregation Tariff	Arizona Technology Council	11/07/2022	The Arizona Technology Council provided recommendations to the Commission regarding the proposed distributed demand side resource aggregation tariff from Arizona Public Service. They reference Advanced Energy Economy's endorsement of the NSPM to develop a modified BCA framework and echo their recommendation for its use in this case (pg. 2).
AZ	Docket E-01345A-22-0143 Modifications to APS DDSR Aggregation Tariff	Advanced Energy Economy (AEE)	11/03/2022	In their comments regarding the distributed demand side resource aggregation tariff proposed by Arizona Public Service, Advanced Energy Economy (AEE) recommends the Commission explore the NSPM to develop a jurisdiction specific test. AEE indicates a modified BCA framework for evaluating the cross-cutting impacts of a new program or tariff to appropriately address benefits that may be undervalued in other BCAs. Further, they point to the NSPM processes in MI, MN, and WA as examples (pgs. 5-6).
KY	Docket 2022-00098 2022 IRP of East Kentucky Power Cooperative – Initial Comments of Joint Intervenors	Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association (Joint Intervenors)	10/11/2022	In their initial comments in East Kentucky Power Cooperative's (EPKC) 2022 IRP, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association (Joint Intervenors) recommend EPKC should conduct a comprehensive BCA to identify the value that DERs provide to their customers. The Joint Intervenors suggest this BCA be conducted following the principles and methodology outlined in the NSPM for DERs (pg. 37).
WA	Docket UE-210795 Puget Sound Energy CEIP PSE Response to UTC Staff Data Request No. 9	Puget Sound Energy (PSE)	10/10/2022	In their response to Commission Staff's data request, PSE indicates they consider the principles of the NSPM in the evaluation and selection of DERs. In their 2021 CEIP, they use NSPM Principle 1 across DER solar and storage resources. PSE also intends to apply a consistent BCA methodology in the evaluation and selection of all resource investment decisions (pg. 3).
OR	Docket UM 2005 Investigation into Distribution System Planning – RNW's Comments	Renewable Northwest (RNW)	10/07/2022	Renewable Northwest provided comments on the DSP Part 2 plans for Portland General Electric (PGE), Pacific Power (PAC), and Idaho Power (IPCo). In their comments, they encourage Commission Staff to review PGE's BCA methodology using the principles of the NSPM and the recently released MTR handbook to consider the best path forward given the state's policy goals (pg. 9).
CO	Docket 22A-0189E Public	Multiple Intervenors	9/28/2022	Regarding the proposed Distribution System Plan for Public Service of Colorado, the Solar Energy Industries Association

	Service of Colorado - DSP			(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 21 st 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 tariff. 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).

PR	Case Number: NEPR-MI-2021-0009. Puerto Rico Test for Demand Response and Energy Efficiency	The Energy Bureau of the Puerto Rico Public Service Regulatory Board Final Order	8/12/2022	The Energy Bureau issued a resolution and order adopting the Puerto Rico Benefit-Cost Test, which was developed through comments by stakeholders over the course of 4 workshops as outlined by the NSPM.
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 Every 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	Lawrence Berkeley	6/2/2022	At the June 2 Introduction to Community benefits workshop, LBNL presented on Considering Non-Energy Impacts in Clean

	Investigation Into Clean Energy Plans	National Laboratory (LBNL)		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 Movement Durham	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 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 framework 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	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 NH Saves 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

	and Danielle Goldberg			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).
NS	Matter No. M10473, E-ENS-R-22 EfficiencyOne 2023-2025 DSM Plan Application	Guidehouse	3/11/2022	In EfficiencyOne's 2023-2025 DSM Plan, the application (E-1) includes testimony of Scott Robinson, Guidehouse, (pg. 8 of Appendix F) where he comments on EfficiencyOne's TRC and consistency with NSPM.
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 II 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.
MA	Massachusetts Offers Rebates for Electric Vehicles (MOR-EV) Cost-Effectiveness Study	MA Department of Energy Resources (DOER) and Synapse Energy Economics	2/25/2022	The authors of the report note the BCAs conducted for the MOR-EV program use the principles outlined in the NSPM, such as including impacts related to applicable policy goals (pg. 30). They also indicate that rate impacts should be assessed outside a BCA but rate benefits should be considered in performance of the program (pg. 33).
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	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

	Management Programs in the Conservation Improvement Program - Proposal			methodologies for load management programs (pg. 22 and 25).
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 <i>Review and Assessment of Grid Modernization Plans: Guidance for Regulators, Utilities, and Other Stakeholders</i> 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 Intervenor) 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 3 rd 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 1 st , 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	Entegriy Energy Partners	11/23/2021	Entegriy 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, Entegriy 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	Entegriy Energy Partners	11/18/2021	In the Direct Exhibit of Marty D. Risner, Entegriy responds to Commission question distribution system benefits from net

	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			metering facility proposed by El Dorado School District (at page 5). Entegry 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 its 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	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

	Distributed Energy Resources			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 D/B/A Ameren Missouri's 2021 Integrated Resource Plan Annual Update	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 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 (SWEET)	9/1/2021	SWEET 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 To Construct A Net Metering Facility	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 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 Company to Construct Two Natural Gas Turbines (etc...) Direct Testimony Exhibit of Matthew A. Rice	Vectren Energy of Indiana 2020-2025 Integrated Electric DSM Market Potential Study & Action Plan (Volume II)	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 Test (UCT) as their primary test for determining the cost-effectiveness of demand response programs.

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 Adjustment Of Its Rates For Electric Service; (2) Approval Of Tariffs And Riders; (3) Approval Of Accounting Practices To Establish Regulatory Assets And Liabilities	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.
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	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

	Fairness of Net Metering Rules			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 Energy Efficiency Program	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 the discussion of the Carbon Calculator approaches.” In summary of their virtual PWC meetings. No indication of next steps in document.
SC	Docket 2019-224-E Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Duke Energy Carolinas, LLC	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.
OH	Docket 20-585 In the Matter of the Application of Ohio Power Company for an Increase in	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.

	Electric Distribution Rates			
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 Electric Company D/B/A Liberty EO-2021-0289	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.
DC	Implementation of the 2019 Clean Energy DC Omnibus Act Compliance Requirements-BCA Committee Meeting Minutes	DC PSC	3/9/2021	Includes an attachment of a presentation on the NSPM given by Julie Michals in March.

	(No. GD-2019-04-M)			
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”.
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 " <i>National Standard Practice Manual (NSPM)</i> " 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 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.

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