#### Energy Efficiency and Renewable Energy in State Implementation Plans

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### **Current Approach**

- Goal:
  - Include EERE in SIPs for the metropolitan Washington region.
- Success:
  - 1-Hour Ozone, 8-Hour Ozone and PM<sub>2.5</sub> SIPs
  - Local Voluntary Initiatives
  - Weight of Evidence
- More will be needed to meet new lower standards and climate change goals.







## EERE Local Initiatives ("Bundle")

- Programs Included:
  - Wind Energy Purchases
  - Clean Energy Rewards
    Programs
  - LED Traffic Signal Retrofits
  - Renewable Portfolio Standards
  - Building Efficiency/Green Buildings
  - High Electricity Demand Day
  - (HEDD) Initiative





# **Success Factors**

- State and Local Leadership
- Enabling Regulations and Guidance
  - NOx SIP Call
  - Clean Air Interstate Rule (CAIR)
  - EPA Voluntary Measures Guidance
- Commitment to Tracking and Reporting



- DOE/NREL: Funding and Technical Assistance
- NOx Calculator



Inclusion of Voluntary Bundle in the SIP

- Emission Benefits (2009)
   0.30 tpd NOx
- Annual Reporting Requirement
- Periodic True-up Evaluation





# Moving Beyond the Voluntary Bundle



New State Energy and Climate Plans Involve Significant New Energy Efficiency Initiatives



#### Maryland

- EmPower Maryland
- Maryland Climate Action Plan
- RGGI

#### Virginia

- Virginia Energy Plan
- Virginia Electric Utility
  Integrated Resource
  Planning Law
- Virginia Climate Plan

#### The District

- District Sustainable Energy Utility
- DC Climate Action Plan



# The Importance of the PSC, Utilities, and State Energy Office

- State Mandates Impact PSC and Utility Actions
  - New EE Plans Required
  - Renewable Portfolio Standards (RPS)
    Targets Rising
- Public Service Commission Review and Approval of Utility EE Plans
  - Plans Include EM&V and Reporting Components
  - Data Tracking and Reporting





#### **Key Players**

- Maryland
  - Public Service Commission (PSC), Maryland Energy Administration (MEA), Maryland Department of the Environment (MDE)
  - Pepco, Baltimore Gas and Electric (BGE)
- District
  - Public Service Commission (PSC),
    Department of Environment (Energy and Air Offices)
  - Рерсо
- Virginia
  - Department of Mines Minerals and Energy (DMME), State Corporation Commission (SCC), Department of Environmental Quality (DEQ)











Mid-Atlantic Regional Air Management Association



### Potential Emission Benefit

New State Energy and Climate Plans Involve Significant New Energy Efficiency Initiatives

**Total Electric Consumption** 

**Total Energy Savings** 

**Emission Reductions** 

NOx

#### CO<sub>2</sub>

181,290,808 MWh (2006)

27,193,621 MWh

33 tons/day

>14 million MT CO2e/year

Assumes:

- Assume 15% Reduction
- 8-hour ozone SIP NOx emission factor
- DOE CO2 regional emission factor





# How it Could Work

- Utilities Implement Programs and Conduct Evaluation/Measurement/Verification (EM&V)
- Utilities Report Program Impact Data (kWh saved) Annually to Public Service Commissions
- States Report Emission Benefits in Upcoming SIPs. Options:
  - Baseline Projections
  - Mandatory Control Measure
  - Voluntary Bundle Measure
  - Weight of Evidence





# Steps in Protocol Development

- Ad-hoc Workgroup
  - State and local air and energy officials (MD-DC-VA)
  - Reviewed EM&V Options
  - Developed Emission Calculation Tool
  - Researched Baseline Emission Projection Approach
  - Compiled Information on Procedures and Authority
  - Assessed needs and interests of stakeholders
- Coordination with Regulatory Agencies
  - EPA OAQPS, EPA Region III, EPA State and Local Branch, Ozone Transport Commission, State Air Agencies
    - Overview of Recommendations
    - Determination of Acceptability



# Criteria to Screen Options

- Technical adequacy
- Can be accomplished within existing resources
- Is an approved option within the relevant regulatory context
- Does not create problems for future planners and regulators



#### Stakeholder Needs and Interests

- Local Governments
  - Willing to share information on energy efficiency and renewable energy programs
  - No resources to conduct rigorous EM&V
  - No urgency in seeking emission credits
- State Energy Offices/PUCs/Utilities
  - Willing to collect data and track progress
  - No established formal reporting relationship between SEOs/PUCs and State Air Agencies
- State Air Agencies
  - High value of EERE with particular emphasis on high electric demand day initiatives
  - Importance of EERE for short term climate and energy action plans
  - Uneasy about taking credit for programs not within their regulatory control





#### **Protocol Recommendation**

- Local Government Energy Efficiency Programs
  - Include in Voluntary Bundle with or without credit
  - Include in Weight of Evidence
- State/Utility Energy Efficiency Programs
  - Include in Weight of Evidence
  - Do not establish formal reporting process for SIPs at this time
  - Develop voluntary reporting program to assist with tracking progress on regional climate and energy action plans
- State Air Agencies
  - Understand which EERE programs are reflected in the ROP/Attainment Year baseline emission projections
  - Attainment modeling sensitivity results to assess possible range of impacts for use in weight of evidence
  - Method to incorporate high electric demand day measures in weight of evidence





#### **SIP Creditable Reductions**

- All Require NOx Allowance Retirement
- What is Basis?
  - Renewable Energy = RECs
- Basis for Energy Efficiency?
  - Is Rigorous EM&V and Adjusting for weather and occupancy sufficient?
  - Possible Solution = Cleared Contract in PJM EE Capacity Market



#### **Contents of Protocol**

- Program List
- EM&V Standard
- Overview of SIP Options/EPA Guidance
- Emission Calculator plus Fact Sheet
- Documentation on Authority and Process for Allowance Retirement
- Regional Database of Energy Efficiency Benefits
- Resource List

Adopt as a living document, modify and update over time.

