RTF PAC Comments: Fred Gordon 8/23/2011

The Power Council asked for feedback on the RTF guidelines.  Thanks for this opportunity to comment.  I’d like to summarize some points that I made in the policy committee meeting and add a couple of additional thoughts.

1.         I think having some set of consistent guidelines is essential to providing a reliable resource.  Energy Trust is pleased that the guidelines were developed and in most respects pleased with the guidelines, as a first effort.   We fully expect that they will evolve over time.

2.       These guidelines were the product of extensive cooperative staff work between RTF and program deliverers including the Energy Trust.  Our respect for the product comes from our engagement in its genesis.

3.       We have some concern that inflexible administration could lead to makework.  However, as revised, the guidelines provide enough flexibility that this is more or less in the hands of the RTF to decide.  The most difficult decisions come for measures which are important to a constituency but don’t save enough across the region to justify a serious effort at validation.  Science is expensive.  The guideline provide for some flex in rigor.  I look forward to seeing how the words on paper and the people in the room interact to make this work.  I recommend that what we have is a good start, and we should see how it works for many months or a year before evaluating its effectiveness in this regard.

4.       I don’t believe that any of the region’s program deliverers would be wise to rely on the RTF to validate all measures.   Energy Trust provisionally qualifies some measures for pilots and field tests, taking some risks along the way, so that we can learn.  There are other measures that are just plain not significant enough to warrant RTF attention but we can do simple analyses and move forward with confidence.  Still other measures are unique and site-specific and we subject them to custom studies.   If these alternative avenues are not available to a program deliverer, the RTF becomes a bottleneck.  It is a single deliberative body and cannot meet all needs for validation for funders running comprehensive and innovative programs.  To make the guidelines work, funders must put the appropriate burden on the RTF, and manage opportunities that won’t fit into a regional validation agenda through other means.   I wonder if some of the discomfort with the guidelines might come from relying on the RTF for more than it can do well.  This is said as a strong supporter of the RTF- I just don’t think it can do everything.

5.       I believe that part of the role of the RTF policy advisory group will be to make decisions about the speed at which measures “out of compliance” should be studied and validated.  There are important tradeoffs between time, money, and reliability of the resource.   It is too soon to anticipate or set further guidance for these tradeoffs.  When the next steps of inventorying measures and coming up with rough scopes for remediation are complete, we will have the information in hand to address this.

6.       I think there are tradeoffs between doing good evaluation and extensive studies to validate measures prior to program launch.   The guidelines provide for both approaches, and for provisional approval before evaluations are complete.   By relying more on evaluation, program deliverers may manage the costs of validation well.   There will still be a need to do engineering studies of individual measures, where evaluations can’t disaggregate these effects.   But with program evaluation, it may be possible to reduce the requirements for rigor for measure studies.   I don’t think the guidelines have clearly described these tradeoffs, and I certainly can’t do so at this time.  This may be an area for evolution of the guidelines as we gain experience with them.

We look forward to working with RTF to make the guidelines successful.

**Fred Gordon**

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