

Norcross, Frank

From: Justin Schott [justin@youthenergysquad.org]
Sent: Thursday, January 28, 2010 6:54 PM
To: Norcross, Frank
Subject: comments on draft Recovery Act Reporting Program Guidance

Dear Mr. Norcross,

Thank you for taking my comments. I run a program that trains youth in Detroit to provide basic energy education and energy-efficient retrofits for low-income households, and am familiar with many of the issues around weatherization. Here are my thoughts:

- 1) I do not see any performance measures (e.g. energy savings, items installed) for WAP, although they are required for SEP and EECBG? Although some measures may not be relevant to WAP, there needs to be reporting beyond just number and type of units to ensure high quality and cost-effective work.
- 2) I appreciate that trainings and workshops have been included. Behavior change is an important part of saving energy and I am glad there is a space to report on this. An independent audit of our own program determined CCF savings of 14%, primarily through teaching residents no-cost strategies (i.e. behaviors) to reduce gas use. Ideally, those conducting trainings or workshops would also report on changes in energy use by the attendees.
- 3) I am concerned about how energy savings and emissions reductions are determined. Because of behavioral changes mentioned above, interactions between energy conservation measures, and real-world conditions, the projected savings from weatherization is often inflated and not backed by real data from energy bills. Agencies performing weatherization should be required to provide a random sample of bills for 3rd party analysis to determine actual, not projected energy and emissions reductions. In Michigan, the utilities got away with highway robbery by using "deemed" savings, which is likely to mean overestimates for installations and underestimates for changes in behavior, which of course are not recognized as having any "deemed" savings, but even actual data proving the effectiveness of education and behavior strategies are excluded. In short, reporting should hold to the gold standard -- actual changes in energy use (with weather adjustments) as determined by utility bills.
- 4) Finally, I think it is important to know what audits lead to, what percent of people and companies follow through with recommendations and what percent do nothing.

I appreciate your consideration.

Sincerely,
 Justin Schott

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D-YES empowers young people to make homes more energy-efficient and pursue successful,

sustainable careers.

D-YES is a program of WARM Training Center, a leader in energy efficiency and sustainability programs since 1981, and Voices for Earth Justice, an interfaith non-profit dedicated to fostering healthier, more sustainable human and ecological communities. www.voices4earth.org
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