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Sent: Friday, January 09, 2015 4:34 PM
To: Hopkins, Asa
Subject: conf priv

I think language here about energy savings exceed energy consumed could be problematic for the innovation tier. It is in current draft, but I'd like you to review and let me know if presents issues. For example, would this apply on BTU basis for heat pumps, pellets, etc? Would it overcomplicate PSB compliance process? To me fossil fuel savings and GHG benefit are main criteria, not BTU savings....

Thanks,
Darren

“Energy transformation project” means an undertaking that 4 provides energy-related goods or services but does not include or consist of the 5 generation of electricity; that results in a net reduction in fossil fuel 6 consumption by the customers of a retail electricity provider and in the 7 emission of greenhouse gases attributable to that consumption, whether or not 8 the fuel is supplied by the provider; and that results in energy savings that 9 exceed the energy consumed by any devices deployed or installed as part of the 10 project’s implementation.

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