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RECEIVED BY FAX

OCT 29 2012

LOUISIANA PUBLIC SERVICE COMMISSION

October 29, 2012

Via Facsimile and Overnight Delivery

Ms. Terri Lemoine  
Louisiana Public Service Commission  
Galvez Building  
602 N. Fifth Street, 12<sup>th</sup> floor  
Baton Rouge, Louisiana 70821-9154

Re: In re: Docket No. R-31106 - Rulemaking to study the possible development of financial incentives for the promotion of energy efficiency by jurisdictional electric and gas utilities

Dear Ms. Lemoine:

EnerNOC, Inc. hereby encloses for filing its comments regarding Docket No. R-31106, in re: *Rulemaking to study the possible development of financial incentives for the promotion of energy efficiency by jurisdictional electric and gas utilities*. We ask that you accept our Comments for filing in the above referenced docket.

As EnerNOC, Inc. filed these comments on Monday, October 29, 2012 in accordance with the Commission's facsimile filing procedures, EnerNOC, Inc. hereby encloses to the Records Division the original signed document, three copies, and a check for the facsimile transmission fee of \$25.00.

Thank you very much for your assistance in this matter. Should you have any questions, please contact my colleague, Greg Geller, at (617) 823-3615.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard H. Counihan'.

Richard H. Counihan  
Vice President, Government Affairs  
EnerNOC, Inc.  
101 Federal St., Suite 1100  
Boston, MA 02110

cc: Service List

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF LOUISIANA**

In the Matter of the Energy Efficiency  
and Conservation Quick Start Rule

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Docket No.: R-31106

**Comments of EnerNOC, Inc. on Staff Proposed Energy Efficiency Rules for Electric and Gas  
Utilities**

EnerNOC, Inc. (“EnerNOC”) respectfully submits the following comments in response to Staff’s request for final comments to the proposed Energy Efficiency and Conservation Quick Start Rule (“Quick Start Rule”).

**I. Introduction to EnerNOC**

EnerNOC is an energy management company that provides software and services to commercial, institutional, agricultural and industrial electric and natural gas customers. We are a leading provider of demand response (“DR”) programs and third-party energy efficiency (“EE”) programs on behalf of public agencies, electric and gas utilities, and ISOs/RTOs throughout the US.

EnerNOC manages over 8,300 MW of demand response capacity across a C&I customer base of approximately 5,600 accounts and approximately 13,000 sites throughout multiple electric power grids.<sup>1</sup> EnerNOC also provides EE turnkey solutions as a third-party contractor to public agencies and utilities that deliver building commissioning services for commercial and institutional facilities and customized EE projects for selected of manufacturing industries.

In 2011, EnerNOC augmented its capabilities through acquisitions of industry leaders M2M Communications and Global Energy Partners, whose standout turnkey industrial EE programs have achieved an average Total Resource Cost Test of 2.53. Our EE programs have produced more than 500

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<sup>1</sup> As of June 30, 2012

million kWh of savings for commercial, institutional and industrial customers throughout the United States. EnerNOC participates in utility building commissioning programs in eight states (Texas, New Mexico, Colorado, Illinois, California, Maryland, New York and Massachusetts). In addition, EnerNOC implements EE programs for manufacturing sectors in two states (California and Pennsylvania). We also support utility EE program planning efforts in a consulting capacity throughout North America, including currently providing EE program development support to the Southern Mississippi Electric Power Association.

EnerNOC does not currently provide DR or EE services to Louisiana utilities or directly bid DR resources into the Southwest Power Pool (SPP), but is interested in delivering its clean energy solutions to Louisiana customers and utilities.

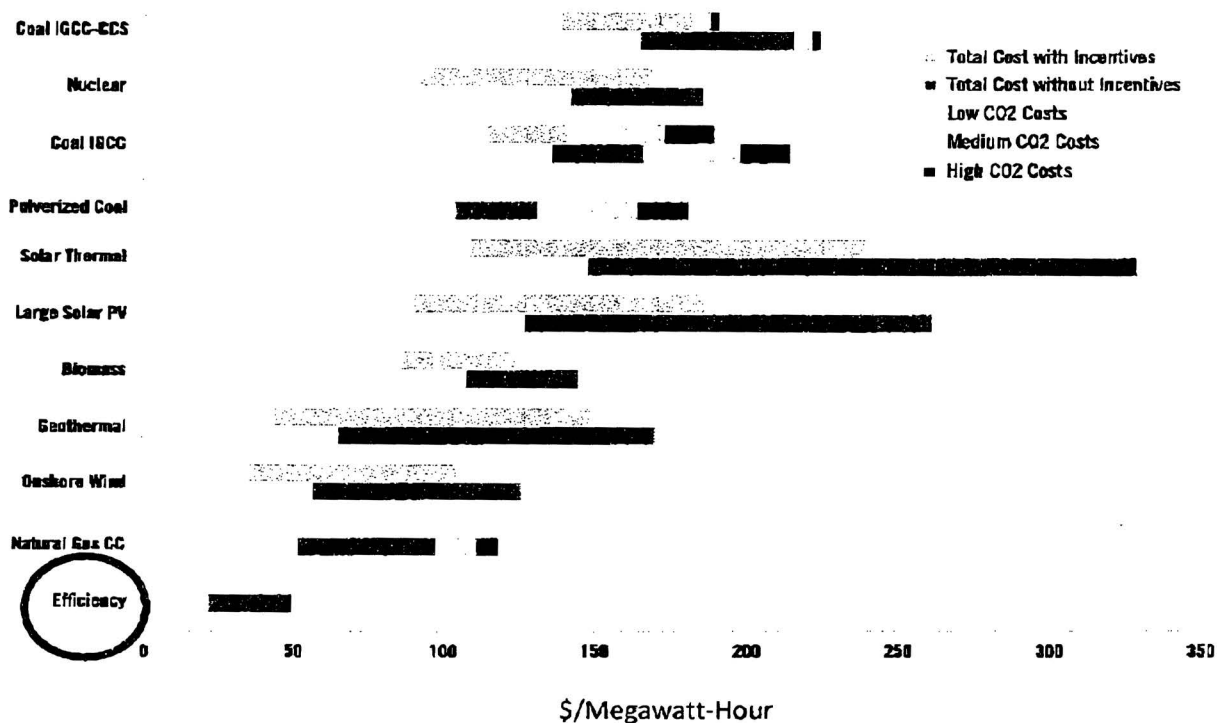
## **II. Brief Statement of Position**

EnerNOC commends the diligent efforts of all stakeholders, especially LPSC staff and consultants, in drafting the Quick Start Rule. We are grateful to Staff and consultants for their serious consideration of previous stakeholder comments. In addition to being comprehensive and highly sensible, the Quick Start Rule puts Louisiana customers on a path toward realizing the immense benefits of demand-side management. Indeed, as drafted, the Quick Start Rule sends a clear signal to private stakeholders such as EnerNOC that they should be investing in Louisiana.

Therefore, EnerNOC respectfully requests that the Commission approve the proposed Quick Start Rule as drafted. Although the rule is designed to have limited impact by nature of its quick start status, it will lower short and long-term costs for customers, allowing households and businesses more discretionary income for spending and hiring. As Figure 1 suggests, energy efficiency is far cheaper than any other resource that may be used to meet Louisiana's electrical demand and requires no incentives.

**Figure 1: Energy Efficiency as Least Cost Resource<sup>2</sup>**

Levelized Cost of Electricity for Various Generation Technologies in 2015 (2010\$)\*

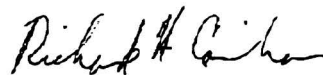


Not only will the economy benefit from businesses saving money on energy that can be redeployed into hiring more workers, but local, well-paying jobs will be created to install and implement the energy efficiency measures outlined in the Quick Start Rule. Finally, the Quick Start Rule will deliver environmental benefits and enhance Louisiana's energy security.

EnerNOC looks forward to working with the Commission and stakeholders on a successful Quick Start implementation, and to building on the success of Phase I by designing a robust long-term program that will deliver permanent and meaningful benefits to all Louisiana customers.

<sup>2</sup> Practicing Risk-Aware Electricity Regulation: What Every State Regulator Needs to Know. A Ceres Report. April 2012. Page 28.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Richard H. Counihan". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard H. Counihan  
Vice President, Government Affairs  
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