

To: James McNulty, Secretary  
PUC, Bureau Director's Office  
From: Stephen L. Cowell, Conservation Services Group  
Date: March 30, 2009 (Refiled on April 6, 2009)

Re: PUC proposed Technical Resource Manual Update, Docket Number M000051865

Thank you for the opportunity to file these comments on the TRM Update. Since a significant portion of the utility programs that are likely to be proposed under Act 129 will affect the residential sector, Conservation Services Group, a KEEA member, believes it is important to clarify some of the guidelines.

In particular, it has come to our attention that HOME CHECK software, a proprietary product of Conservation Services Group, has been written into the draft version of the Pennsylvania Technical Resource Manual in such a way that it appears to be required to participate in energy efficiency services in the state. While we appreciate the positive evaluation of our software, there are certainly others that are similarly capable of the necessary functions of Home Performance with ENERGY STAR programs. CSG is not primarily a software company -- we provide Home Check software as part of a larger package of services to manage the implementation of Home Energy Retrofit programs (as in NY and NJ). If Home Check were required, there could be circumstances where we would not be in a position to provide this service to a program sponsor.

We would encourage the PUC to consider language that explicitly refers to HOME CHECK only as an example of recommended software but not a required product. You could say something like: "HOME CHECK or comparable software products that meet national standards for retrofit savings estimation."

Thank you for your prompt attention to this matter.

Regards,

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