



Consideration of the Firm Service Level at LMTF

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FSL Should Be Considered Alongside GLD

- In response to concerns about the accuracy of its various incarnations, the LMTF has been charged with examining improvements to the Guaranteed Load Drop (GLD) approach to M&V for the ELRP
- EnerNOC believes that there are at least as many and significant problems with the Firm Service Level (FSL) approach to M&V that the group should consider
- Adding rigor to the GLD approach, without also considering the issues associated with FSL, could have the effect of exacerbating the problems we see with FSL
- Accordingly, EnerNOC recommends and requests that the LMTF also consider the potential problems and concerns associated with FSL as it addresses GLD.
- In short, all ELRP baseline approaches should be examined for improvement simultaneously



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