

# Discussion

- Are valuation methods sufficiently rigorous to pass muster with regulators?
- Is it preferable to adopt cost tests that include NEBs or to use other criteria for the “non-quantifiable” benefits?
- What about economic and environmental externalities?

# Issues relating to valuing GHG credits from energy efficiency programs

- Evaluation Certification or oversight
- Dispatched Based retrospective
- Dispatched Based adjusted
- Additionality requirement (
- EPA emissions output per plant database
- Evaluation / documentation rigor levels
- IPMVP requirements at the building level
- IPMVP at the program level
- Sampling requirements for programs
- Non-overlapping credit counting
- Certification registry and accounting
- State-specific approaches and protocols
- Process for implementing an approach (international, national, regional)