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| **From:** | Bill Palmer, M/O Kamson |
| **To:** | OCE |
| **Cc:** | Bill Murphy, M/O Kamson |
| **Subject:** | "NJCEP Protocols to Measure Resource Savings." |
| **Date:** | Thursday, November 09, 2017 3:43:50 PM |

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Good Afternoon,
On behalf of the Kamson Corporation, we formally request the postponement of the comment period for this initiative to perform sweeping changes to the Protocols to Measure Resource Savings at this time.

Some of the proposed changes to the Protocols have the potential to significantly impact our ability to actively participate by lengthening our ROI on the energy efficiency measures we've embraced. For instance, about two years ago our organization submitted scientific evidence that spray foam insulation had a useful life of at least 30 years. At the time, the Protocols had spray foam insulation at 15 years. Subsequently, the Protocols were updated to 30 years at the first regulatory opportunity.

These proposed Protocols have gone backward again and are proposing a 20 year useful life for spray foam insulation. In the interest of brevity, this is just one example of why we have concerns.

As such, we respectfully request that the submission of comments be postponed so that the Protocols be considered as part of a more comprehensive effort with broader stakeholder input.

Thank you very much for your time and attention and we look forward to hearing from you in the near future.

Regards,
Bill

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