

March 3, 2011

## **Element IV – Gap Analysis**

-- Preliminary Guidance --

It is likely that the “Gap Analysis” will differ from what the EPA envisioned in the Phase I WIP. This is because the EPA’s concept of the gap analysis driving the strategy development did not evolve as they envisioned during Phase I. Instead, the process was more fluid and iterative as strategy ideas were raised, modified, dropped, and so on. However, throughout the strategy development process (Element V), it is natural to maintain estimates of the load reductions predicted to be achieved by proposed strategies, which reveals a remaining gap in reductions needed.

Where it makes sense, we will begin the gap analysis process by identifying the difference between the revised Phase I WIP allocations<sup>1</sup> and reductions predicted to be achieved with the current pace of implementation for each major sector. The gap analyses should also evaluate the barriers to implementation including funding, staffing, regulation changes needed, etc. Thus, where appropriate, the information collected on barriers during capacity analyses conducted earlier in the process can be used to motivate and support the gap analyses.

The technical methods of conducting gap analyses will depend on the load reduction analysis tool(s) available. The State is developing a tool for this purpose and more technical guidance on the tool will be made available in late spring 2011.

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<sup>1</sup> These will be based on the revised EPA modeling to be completed in early summer 2011.