



Evaluation of Electric Distribution
Utilities compliance with Tier III
Obligations

RES Tier III Verification Report - 2019

Public Service Department

June 1, 2020

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Introduction

30 V.S.A. § 8005 requires Vermont electric Distribution Utilities (“DUs”) to acquire specified amounts of renewable energy, in the form of renewable attributes or Renewable Energy Credits (“RECs”), and to achieve fossil-fuel savings from energy transformation projects.

The structure of the RES is divided into three categories, or tiers. The first tier (“Tier I”) requires DUs to procure an amount of renewable energy equivalent to 55% of their annual retail electric sales for the year 2017. This amount increases by 4% every third January 1 thereafter, eventually reaching 75% in 2032.¹

The second tier (“Tier II”) requires DUs to procure an amount of renewable energy equivalent to 1% of their annual retail sales from distributed generation resources starting in 2017. This amount increases by three-fifths of a percent each year, eventually reaching 10% in 2032.² Tier II resources are also counted as part of a DU’s Tier I requirement.³

The third tier of the RES (“Tier III”) requires that DUs either procure additional renewable distributed generation eligible for Tier II or acquire fossil-fuel savings from energy transformation projects. Energy transformation projects are those that reduce fossil fuel consumed by DU customers. For Tier III, the RES establishes a required amount of 2% of a DU’s annual retail sales in 2017, increasing by two-thirds of a percent each year of each year’s sales until reaching 12% in 2032.⁴ Energy Transformation projects implemented on or after January 1, 2015 are eligible to be counted towards a DUs Tier III obligation.⁵

The Vermont Public Utility Commission (“PUC” or “Commission”) issued a final order in docket 8550 titled “Order Implementing the Renewable Energy Standard” on 6/28/2016. This order directed the Public Service Department (“PSD” or “Department”) to carry out evaluations to determine whether a DU was meeting its RES obligations. On 4/1/2020, administrative rule 4.400⁶ became effective. This rule provides guidance on the implementation of the Renewable Energy Standard (“RES”).

¹ 30 V.S.A. § 8005(a)(1).

² 30 V.S.A. § 8005(a)(2)(C).

³ 30 V.S.A. § 8005(a)(1)(C).

⁴ For municipal electric utilities serving less than 6,000 customers, the required amount is 2% of the providers’ annual retail sales beginning January 1, 2019 increasing by two-thirds of a percent each year until reaching 10½% in 2032.

⁵ 30 V.S.A. § 8005(a)(3).

⁶ Vermont Public Utility Commission Rule 4.400, RENEWABLE ENERGY STANDARD RULE, *available at* https://puc.vermont.gov/sites/psbnew/files/doc_library/4400-renewable-energy-standard.pdf

This report provides the PSD's verification of each of the DU's that offered Tier III programs⁷ and submitted 2019 Tier III claims. This report includes recommendations regarding the DUs Tier III programs and reporting.

Scope of Evaluation

The PSD's evaluation activities consist of a thorough review of the DUs Tier III programs. For custom measures, this includes reviewing customer specific energy usage data and operational information to verify the assumptions on which the engineering analysis was based. Once these assumptions are confirmed, the engineering analysis is reviewed for reasonableness, accuracy, and compliance with statute. For prescriptive measures, the PSD reviews documentation that could be used to verify that prescribed savings values and calculations have been applied correctly, and to calculate evaluated savings that incorporate any necessary corrections. The evaluation did not include site visits to verify installations, operation of products, or to verify baseline conditions.

Prescriptive Measure Development

As originally established by PUC order 8550 (and continued in administrative rule 4.400), a Technical Advisory Group ("TAG") was created with representatives from all the DUs impacted by Tier III requirements. The TAG creates a common approach to estimate savings for specific measures to create a unified and verifiable savings construct for all DUs to follow. The claim of prescriptive measure savings was verified as described below.

Evaluation Methodology

The majority of savings for most DUs come from large custom commercial projects which were reviewed on an individual basis. Most residential related savings are based upon a prescriptive methodology created in the TAG. The approach used for evaluating prescriptive savings is consistent with the verification process used to verify the Energy Efficiency Utilities ("EEUs") savings claim. The savings claimed for these measures were compared to values generated through a proper application of the Tier III Technical Resource Manual ("TRM") measure characterizations. To avoid double counting, for those measures or services for which Efficiency Vermont participates, savings were adjusted, prior to the Department's review, according to each DUs Memorandum of Understanding ("MOU") with Efficiency Vermont that dictates how savings will be shared. In addition, for measures that increase electricity consumption, the overall non-fossil fuel generation percentage of each DU electrical portfolio was applied to account for any fossil fuel consumed to supply that electricity. For example, if a

⁷ As stated in its March 27, 2020 filing, Hyde Park Electric did not offer Tier III programs in 2019. The Department expects that Hyde Park Electric will use banked Tier II credits to meet their obligations, which should be detailed in their REC compliance filings due August 31, 2020.

DU's power supply portfolio is considered 100% renewable there was deemed to be no penalty for increased electrical usage. If a utility's generation mix is considered 75% non-fossil fuel generation, then 25% of the additional electrical load is subtracted from the electrical savings generated by the Tier III measure.

Through the TAG process, the "Tier III Planning Tool" was created for prescriptive measures that could be adjusted to the non-fossil percentage of each DUs specific power supply portfolio. Any sharing of savings with Efficiency Vermont through an MOU was then applied to determine the Tier III savings value of each measure installed. This tool was also used by the PSD to confirm the accuracy of the calculations.

The PSD was usually included early in the development of custom measures to determine if the project could appropriately be considered a Tier III project, and to establish reasonable assumptions for determining the Tier III savings attributable to that measure. This allowed the PSD to recommend improvements to the approaches and refinements of the datasets used to calculate savings that were ultimately claimed for their 2019 Tier III activities. It also increased the efficacy and speed of the evaluation and reduced the need for adjustments to savings claims.

After the first year of the Tier III program, documentation and reporting standards varied greatly. The PSD continues to work with the DU's to make aspects of the reporting more uniform in nature to simplify reviews and improve comprehension of the measures implemented by the DU's. This includes development of common formatting of reporting tables and creating a common lexicon of definitions to avoid any confusion. These improvements have also increased efficiency of the evaluation process.

Summary of Results

The table below provides a summary of the DUs claimed MWh equivalent (MWhe) savings and the recommended adjustments made by the PSD after the verification process.

Table 1 - Summary of Results

	Lifetime MWhe*	Percentage of Goal	Verified Lifetime MWhe	Verified Percentage of Goal
GMP	242,369	176.3%	242,252	176.2%
BED	11,316 [^]	100.0%	11,316 [^]	100.0%
WEC	2,683 [^]	100.0%	2,683 [^]	100.0%
VEC	23,361	155.3%	23,361	155.3%
VPPSA	8,552	121.2%	8,552	121.2%
Stowe	1,499 ⁺	100.0%	1,499 ⁺	100.0%

*MWhe = Megawatt hour equivalent

[^] Utilized banked Tier III RECs

+ Utilized banked Tier II RECs

The following DU-specific sub-reports contain information about the DU's Tier III programs and savings claims as well as details of any savings claim adjustments recommended by the PSD.

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Green Mountain Power
2019 Tier III Savings Verification Report

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GMP 2019 RES Tier III Savings Claim

In the Green Mountain Power (“GMP”) Annual Plan, filed November 1, 2018, the Tier III savings target for 2019 was estimated at 138,174 MWh based on projected retail sales of 4,149,377 kWh. In its Tier III claim, GMP’s 2019 Tier III goal was set at 137,476 MWh, which is 3.33% of actual 2019 retail sales of 4,128,426 MWh.

GMP’s Tier III Report claims to have met and exceeded this goal through a range of Energy Transformation Program offerings and custom Commercial & Industrial (“C&I”) projects. Most of the program offerings rely on the measure characterizations developed for the Tier III Technical Resource Manual (“TRM”). These measure characteristics were developed with the full input of the DUs and the Department. Such prescriptive measures use average values from empirical data to determine the expected average savings for common measures. A significant portion of the GMP claimed savings for 2019 result from the completion of 24 large custom C&I projects that were pre-screened through the PSD prior to being implemented.

Table 1, below, lists the components GMP used to meet its 2019 Tier III MWh target.

Table 2: GMP 2019 Tier III Savings Claim and Verified Savings

	Lifetime MWh Claimed	Percentage of Target	Verified Lifetime MWh	Verified Percentage of Target
2019 Tier III Energy Transformation Programs	154,199	112.2%	154,239	112.2%
2019 Tier III C&I Custom Projects	88,170	64.1%	88,013	64.02%
Total 2019 Tier III Savings	242,369	176.3%	242,252	176.05%
GMP 2019 Tier III Target	137,476	100.0%	137,476	100.0%
Carryover to 2020	104,893		104,776	

Tables 2 and 3 provide a more detailed breakdown of GMPs Tier III Savings claim and all subsequent adjustments. Table 2, below, summarizes the various Residential sector and other prescriptive measures implemented by GMP through either a shared savings memorandum of understanding or through measures implemented by GMP directly.

Table 2. GMP Residential and Prescriptive Tier III Energy Transformation Programs

Measure	Units	Lifetime MWH Claimed	Percentage of Goal	Verified Lifetime MWH	Verified Percentage of Goal
Cold Climate Heat Pumps					
Heat Pumps (shared)	4,671	112,804	82.05%	112,804	82.05%
Heat Pump Water Heaters					
Heat Pump Water Heater (Shared)	5	94	0.07%	94	0.07%
eWater Program					
Smart Thermostats	44	208	0.15%	208	0.15%
Transportation Programs					
Electric Vehicles Program					
New All Electric Vehicles	392	14,586	10.61%	14,586	10.61%
Used All Electric Vehicles	43	800	0.58%	800	0.58%
New Plug-in Hybrid EV	151	4,201	3.06%	4,201	3.06%
Used Plug-in Hybrid EV	40	556	0.40%	556	0.40%
Electric Bikes	226	1,205	0.88%	1,205	0.88%
Residential Lawnmowers	9	17	0.01%	17	0.01%
Commercial Lawnmowers	1	81	0.06%	81	0.06%
Fork Lifts (C&I)	1	117	0.08%	117	0.08%
Electric Vehicles Total	863	21,563	15.69%	21,563	15.69%
Public & Workplace EV Charging Stations					
Level 2 - Public	9	150	0.11%	150	0.11%
Level 2 - Workplace	6	73	0.05%	73	0.05%
Public & Workplace EVSE Totals	15	223	0.16%	223	0.16%
Charging Network Infrastructure					
	(kWH)				
Level 2 - 90 ports	109,623	142	0.10%	142	0.10%
DC Fast Chargers - 14 ports	81,439	123	0.09%	123	0.09%
Charging Network Infrastructure Totals	191,062	264	0.19%	264	0.19%
Transportation Programs Overall Total		22,051	16.04%	22,051	16.04%
Residential Battery Storage					
Tesla Powerwall 2019 Installations	1,303	12,639	9.19%	12,639	9.19%
Tesla Powerwall 2018 True-up ¹	999	6,404	4.66%	6,444	4.69%
Battery Storage Totals	2,302	19,043	13.85%	19,083	13.88%
Residential and Prescriptive Totals	8,004	154,199	112.00%	154,239	112.03%

1. GMP claimed 999 batteries at 2.36 MWh per system in 2018. In 2019 the Tier III TAG developed a new TRM algorithm for battery storage. This true-up represents the new algorithm applied to the 2018 battery installs using GMP's 2018 generation fuel mix, less the savings already claimed for 2018 (8.81 prescriptive savings for 2018 – 2.36 claimed in 2018 = 6.45 MWh/battery).

Shared Savings

Beginning on June 1, 2019, GMP partnered with Efficiency Vermont (“EVT”) to offer customers a \$100 mid-stream rebate to augment EVT’s existing mid-stream cold climate heat pump (“CCHP”) rebate program. GMP also provided a \$400 down-stream rebate directly to customers. GMP claimed all MMBtu savings for installations of single and multi-zone CCHPs sized 24,000 Btu/hour or smaller while EVT claimed all electric savings. EVT and GMP shared the thermal savings 50%/50% for CCHPs larger than 24,000 Btu/hour, and for residential air to water heat pumps.

Cold Climate Heat Pumps

GMP continued its program offering technical assistance with sizing and installation of qualifying CCHPs as well as a 7-year service contract and on-bill financing. In 2019, GMP continued to offer low interest loans through the Vermont State Employees Credit Union (“VSECU”) along with the 7-year service contract. The GMP program leveraged the incentives from EVT’s CCHP program after EVT revived its CCHP program in mid-2019. The savings claim for this measure is prescriptive based on the size of the outdoor unit, as characterized in the Tier III TRM. GMP claims 4,671 CCHPs installed through the program in 2019, including 19 ASHPs 36,000 Btu/hour or larger and three air to water heat pumps.

Heat Pump Water Heaters

Between January 1, 2019 and the end of May, GMP continued to work with VSECU to arrange financing and service contracts for heat pump water heaters through the same arrangement as was used for the CCHPs. GMP leverages EVT HPWH incentives in the program to reduce the cost to participating customers. GMP claimed prescriptive Tier III savings for 5 HPWHs under this program in 2019. The HPWH program was discontinued on June 1st, 2019.

Transportation Programs

Electric Vehicles

In 2019, GMP offered increased incentives to GMP customers for purchasing new and used all-electric (“EV”) and plug-in hybrid electric vehicles (“PHEV”), and all purchasers of new and used EVs and PHEVs were eligible for a free Level 2 charger. Most of the EV and PHEV incentives were coordinated through partner dealerships. A total of 626 EVs and PHEVs were purchased through this program, 543 of them new vehicles. Over two thirds of those participants purchased all-electric vehicles.

The TAG group has established a savings value for all-electric and plug-in electric vehicles and the numbers presented by GMP are consistent with these values.

eBikes

GMP began offering incentives for electric bicycles in 2019 through participating bike shops and claimed Tier III savings according to the newly developed Tier III TRM measure characterization at 5.33 MWh per bike.

Electric Lawnmowers

GMP also offered incentives for both residential and commercial electric lawnmowers in 2019. Customers can receive a \$50 incentive for residential electric lawnmower, and \$700 for a commercial lawnmower. Savings are based on a prescriptive algorithm developed by the Tier III TAG.

Electric Forklift Program

In 2019, GMP continued to offer incentives for the purchase of electric forklifts. GMP offers a \$1,000 incentive for each electric forklift and claims savings based on an algorithm approved by Tier III TAG. Just one electric forklift was incentivized in 2019.

Public and Workplace EV Charging Stations

In 2019 GMP provided incentives for the installation of 9 public and 6 workplace Level 2 EV charging stations. The Tier III savings for these charging stations is prescriptive as characterized in the Tier III TRM.

Charging Network Infrastructure

GMP manages a network of 90 ports of Level 2 public and workplace chargers at 44 locations, and 14 ports of Level 3 DC Fast Chargers at customer locations throughout the service territory. GMP claimed Tier III credits based on the metered kWh output of each charging station. The Level 2 Charging stations averaged around 1.22 MWh usage for 2019, and the Level 3 DC Fast chargers averaged around 5.8 MWh for the year.

eWater Program

GMP continued offering the eWater program in 2019. Under this program, customers add GMP-provided control modules to their electric resistance water heaters, enabling them to remotely manage the temperature setpoint, view the water heater consumption data on an app, and potentially save money as the device is designed to increase efficiency of tank operation. The water heater control also allows GMP to curtail the loads associated with participating water heaters during peak events. The program is free for participating customers and includes the control module, installation of the module, and a NEST Thermostat. The Tier III savings claimed results from the installation of the smart thermostat, which is a measure that was characterized through the Tier III TAG process. GMP installed 44 of these units and claimed the prescribed 4.72 MWhe of savings as characterized in the Tier III TRM.

Battery Storage

In 2019, GMP continued to offer Tesla Powerwalls as a resiliency improvement in customer homes. Under this program, participating customers have a Tesla Powerwall installed that provides backup power during outages. The Powerwall is an intelligent device which GMP can control to reduce demand during peak events by controlling the charging/discharging patterns of an aggregated group of Powerwalls. The PSD has verified that 1,303 residential batteries were installed in 2019 as claimed.

Early in 2019, the RES Tier III TAG settled on a methodology for quantifying the fossil fuel savings from residential battery storage. For GMP that algorithm results in a prescriptive Tier III savings of 9.7 MWh per battery. GMP claimed 999 batteries at 2.36 MWh per system under its 2018 program. However, the new TRM algorithm applied to those batteries using GMP's 2018 generation fuel mix results in 8.81 MWh Tier III savings per system. To true-up the 2018 savings claim, under its 2019 Tier III report, GMP has claimed an additional 6.45 MWh for each of the 999 batteries installed in 2018 ($8.81 - 2.36 = 6.45$ MWh).⁸

Custom Projects

GMP undertook 24 custom C&I projects in 2019. GMP involved PSD staff from the inception of these projects and the PSD reviewed all relevant information, including savings calculations, and suggested changes to the assumptions and methodologies that were implemented where appropriate. These changes were negotiated to achieve what both parties deemed to be a reasonable and conservative estimation of the overall project savings. The Custom C&I projects are summarized in Table 3, below.

The PSD reviewed the files provided with GMP's Tier III filing for consistency with what had previously been reviewed and found no need to alter savings from these projects, with two exceptions. For the Boiler Replacement and Efficiency project in Table 3, below, the measure life was reduced from 30 years to 25 years to be consistent with existing TRM characterization in the EEU TRM. The ground source heat pump ("GSHP") project was determined to be an air source heat pump, so the measure life was reduced from 25 to 15 years. Overall, the verified savings is 157 MWh less than the claimed savings for custom C&I projects.

⁸ The Commission has concluded that GMP's battery storage as a program meets the eligibility requirements of RES Tier III as an energy transformation measure and recommended "that the Department and GMP work together through the Technical Advisory Group process to determine an agreed-upon process for measuring and verifying the savings of the battery storage program." *Continuing issues related to the implementation of the Renewable Energy Standard*, Case No. 17-4632-INV, Order of 04/12/2019 at 8. The "true-up" of the 2018 Tier III savings claim for battery storage, proposed by GMP in this matter, is consistent with the Department's 2018 Tier III Verification report, in which the Department recommended that the Commission take the following approach to quantifying these savings:

- Allow the [claimed] savings to be provisionally counted toward GMP's 2018 obligation.
- Require the Department and GMP to make a supplemental filing as to the appropriate approach for claiming credits from battery storage
- If the approach determined to be reasonable by the PUC results in downward changes the savings claimed toward the 2018 obligation, then GMP should be required to secure these savings in 2019, in addition to its 2019 obligation.

Renewable Energy Standard compliance for program year 2018, Case No. 19-0716-INV, Department of Public Service, RES TIER III VERIFICATION REPORT – REVISED, at 14 (filed 07/16/2019).

Table 3. GMP Custom 2019 Commercial and Industrial Tier III Projects

Commercial and Industrial Projects					
Custom Projects	Units	Lifetime MWh Claimed	Percentage of Goal	Verified Lifetime MWh	Verified Percentage of Goal
Heat Pumps 1	1	183	0.13%	183	0.13%
Heat Pumps 2	1	464	0.34%	464	0.34%
GSHP (verified as ASHP)	1	124	0.09%	74	0.05%
Multifamily Heat Pumps	1	2,041	1.48%	2,041	1.48%
HVAC RTU 1	1	1,717	1.25%	1,717	1.25%
GSHP Simultaneous Heat/Cool	1	565	0.41%	565	0.41%
Generator Line Extension 1	1	8,586	6.25%	8,586	6.25%
HVAC RTU 2	1	193	0.14%	193	0.14%
HVAC RTU 3	1	234	0.17%	234	0.17%
HVAC RTU 4	1	1,640	1.19%	1,640	1.19%
Commercial Oven	1	1,898	1.38%	1,898	1.38%
Boiler Replacement and Efficiency	1	643	0.47%	536	0.39%
Industrial CNG burners	1	33,097	24.07%	33,097	24.07%
Pipe insulation	1	14,688	10.68%	14,668	10.68%
Smoke Eliminator	1	1,428	1.04%	1,428	1.04%
Water Heating	1	529	0.38%	529	0.38%
Window Replacement	1	1,207	0.88%	1,207	0.88%
Heat Pumps 3	1	226	0.16%	226	0.16%
Heat Pumps 4	1	614	0.45%	614	0.45%
HVAC RTU 5	1	451	0.33%	451	0.33%
Generator Line Extension 2	1	9,510	6.92%	9,510	6.92%
Electric Boilers	1	7,393	5.38%	7,393	5.38%
Heat Pumps 5	1	464	0.34%	464	0.34%
HVAC RTU 6	1	276	0.20%	276	0.20%
Custom Project Totals	24	88,170	64.13%	88,013	64.02%
Total All Sectors		242,369	176.14%	242,252	176.05%

Burlington Electric Department
2019 Tier III Savings Verification Report

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Burlington Electric Department 2019 Tier III Savings Claim

30 V.S.A §8005 (a)(3)(B) stipulates that each distribution utility shall achieve Tier III credits equal to or greater than 3.33 percent of their annual retail electric load in 2019. The PSD is charged with verifying the Tier III savings claims. This report represents the Department's verification of the Burlington Electric Department ("BED") Tier III savings claim.

The BED Tier III Annual Plan, filed November 1, 2018, estimated the 3.33% RES Tier III savings target for 2019 at 11,316 MWh, based on projected sales of 339,514 MWh. The Savings Claim report uses the same Tier III target, pending the finalization of the actual retail sales numbers for 2019. BED has claimed 3,311 MWh equivalent savings through its Tier III programs as detailed below. The Department has verified these savings by reviewing project documentation, confirming the correct application of TRM savings algorithms, and spot-checking installations of EV charging stations and EV proofs of purchase. As a utility with 100% renewable generation, there is no penalty applied to BED's savings because of active measures that electrify fossil fuel loads.

BED has also applied 3,973 MWhe in Tier II renewable energy production from one BED-owned solar array and one solar power purchase agreement. Although the verified Tier III savings combined with the Tier II renewable energy production reported for 2019 fall short of the target, BED will satisfy its Tier III obligations by retiring Tier II RECs. These REC retirements will be documented within BED's RES report due in August 2020.

Table 1 shows the various Tier III programs and measures implemented by BED for 2019. None of the savings claimed by BED in 2019 received adjustments.

Table 1- Detailed BED Program Results

Measure	Count	Lifetime MWHe* Claimed	Percentage of Goal	Verified Lifetime MWHe*	Verified Percentage of Goal
All Electric Vehicles	30	1,133.1	10.01%	1,133.1	10.01%
Plug-in Hybrid Vehicles	19	535.3	4.73%	535.3	4.73%
Pre-owned AEV	1	18.9	0.17%	18.9	0.17%
Pre-owned PHEV	4	70.4	0.62%	70.4	0.62%
Custom Projects	1	54.9	0.49%	54.9	0.49%
Electric Bikes	64	347.6	3.07%	347.6	3.07%
Residential Electric Lawnmower	142	348.4	3.08%	348.4	3.08%
HPWH	4	75.2	0.66%	75.2	0.66%
Public EVSE	8	50	0.44%	50	0.44%
Workplace EVSE	1	17	0.15%	17	0.15%
Total Tier III Claimed Savings		3,311.3	29.26%	3,311.3	29.26%
Tier II Production (585 Pine&SO40)		3,973.1	35.11%	3,973.1	35.11%
Total Tier II and Tier III Credits		7,284.4	64.37%	7,284.4	64.37%
2019 Target		11,316	100.00%	11,316	100.00%
Shortfall		8,004.7	70.74%	8,004.7	70.74%

*MWhe = Megawatt hour equivalent

BED utilized social media promotions, e-newsletters, and press releases with links to its website to promote its Tier III offerings, particularly its EV and Electric Bike programs.

BED Tier III Program and Measure Descriptions

Electric Bikes

The electric bicycle program is implemented for BED by Local Motion, a Burlington-based non-profit that advocates for walkable and bikeable communities. A \$200 rebate is offered to BED customers who purchase an electric bike through one of five local retailers. An additional \$50 fee is paid to Local Motion for each rebate processed. BED paid incentives for 64 electric bikes in 2019, as verified by invoices from Local Motion.

Cold Climate Heat Pumps

BED provided an incentive for the installation of 26 cold climate heat pumps in 2019, 22 single zone heat pumps and four multizone units. Incentive levels vary based on the size of the units. Six of the single zone heat pumps received an additional \$200 rebate offered to low-income and moderate-income households.

Electric Vehicle (“EV”) Charging Stations

BED paid the full cost to install one additional Level 2 public EV charging station, for a total of eight now in service at various locations around the city. There was no cost data included in the BED Tier III claim report, so the new installation cannot be evaluated for cost-effectiveness. BED contracts with Chargepoint to manage the administrative details of the charging stations’ operation including billing of EV customers. A prescriptive MWh savings value for these EV charging stations was established through the Tier III TRM process. However, since each electric vehicle supply equipment (“EVSE”) is monitored and metered through Chargepoint, BED claimed Tier III credits based on the actual metered kWh output of each charging station and converted that amount to MWh based on the TRM algorithm.

Electric Vehicles and Plugin Hybrid Electric Vehicles

BED offered incentives for the purchase or lease of new or pre-owned (EVs) and \ in 2019. Self-identified low-income and moderate-income customers could also claim an additional \$600 incentive; however, this incentive is not tracked in the program database. In 2019, BED paid incentives on a total of 54 electric vehicles, 49 new and 5 pre-owned. Thirty were all-electric vehicles (one of which was pre-owned) and 23 were PHEVs (four pre-owned). The savings claims for these vehicles were determined using the Tier III TRM algorithm.

Residential Electric Lawnmowers

BED offered incentives for residential electric lawnmowers for the first time in 2019, and response was greater than had been expected in the 2019 Tier III Plan (BED offered incentives for commercial lawnmowers as well, but there was no uptake during 2019). BED expected to provide incentives for 25 lawnmowers but ended 2019 having provided rebates for 142.

Heat Pump Water Heaters

BED provided incentives for four heat pump water heaters (“HPWH”) in 2019. The savings for these water heaters were determined using the Tier III TRM algorithm.

Custom VRF Heat Pump Project

With the input of PSD staff, BED provided an incentive for one variable refrigerant flow (“VRF”) heat pump installation in 2019. VRF systems allow simultaneous heating and cooling (also known as heat recovery) for customers that have a wide diversity of HVAC loads within one building. The savings claim was reduced compared to the original estimate based on analysis of the post-installation energy usage data for the building. BED is exploring ways to make this type of installation “semi-prescriptive” and replicable for future projects.

Tier II Solar Renewable Energy Production

BED credited 3,973 MWh of solar energy production from its two solar arrays toward its Tier III requirement as is allowed in 30 V.S.A. § 8005 (a)(3)(A).

Tier II Renewable Energy Credits (RECs)

As in 2018, BED will rely on the retirement of additional Tier II RECs to fulfill its Tier III requirements. Pending the final accounting of actual 2019 electricity sales on which the Tier III target is based, this should amount to roughly 4,000 MWh in Tier II RECs.

Washington Electric Cooperative
2019 Tier III Savings Verification Report

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Washington Electric Cooperative 2019 Tier III Savings Verification Report

The Washington Electric Cooperative (“WEC”) Tier III Annual Plan, filed November 15, 2018 estimated the 3.34% savings requirement for 2019 at 2,292 MWhe. Actual retail sales for 2019 resulted in a target of 2,683 MWhe. As detailed below, WEC claimed Tier III savings of 2,656 MWhe for 2019, which is less than the target by 27 MWhe. The PSD has verified 2,656 MWhe savings from their program in 2019, as well as WEC’s application of previously banked Tier III credits to achieve 100% of their goal. These REC retirements will be documented within WEC’s RES report due in August 2020.

As a utility that is considered 100% renewable, there is no penalty applied to their savings because of additional electrical loads resulting from active measures that electrify what were previously thermal loads.

Table 6 - Detailed WEC Tier III Results

Measure	Count	Lifetime MWhe* Claimed	Percentage of Goal	Verified Lifetime MWhe	Verified Percentage of Goal
Prescriptive Measures					
Weatherization (shared)	20	90	3.4%	90	3.4%
Pellet Boiler/Furnace (shared)	6	180	6.7%	180	6.7%
Pellet/wood Stoves (shared)	26	372	13.9%	372	13.9%
Heat Pump Water Heater	16	222	8.3%	222	8.3%
CCHP	46	921	34.3%	921	34.3%
EV/PHEV	15	410	15.3%	410	15.3%
e-Bike	12	63	2.3%	63	2.3%
e-Mower	15	15	0.6%	15	0.6%
Custom Measures					
CAPSTONE (LI Weatherization)	10	383	14.3%	383	14.3%
2019 Total Savings		2655⁹	98.9%	2656	99.0%
2019 Target		2683		2683	
MWhe carryover from 2018		114		114	
Remaining MWhe carryover		86		87	

*MWhe = Megawatt hour equivalent

The above table shows the various measures implemented by WEC through either a shared savings memorandum of understanding with Efficiency Vermont (“EVT”) or through measures implemented by WEC directly or through partner organizations. WEC utilized its “Button Up”

⁹ Minor rounding error discovered in submitted claim tables.

program along with reaching out to its members through its newsletter in order to promote its Tier III offerings.

WEC Tier III Program and Measure Descriptions

Pellet Boilers/Furnaces, Pellet /Wood Stoves and Market Rate Weatherization

Through a Memorandum of Understanding MOU, WEC and EVT reached an agreement on how to share MMBtu savings for programs already in existence and operated by EVT. The goal of the MOU was to create an agreed upon methodology that would determine the savings split relative to the number of additional or incremental units that enter the program through WEC's involvement. The measures were (as shown in the table above): Weatherization, Pellet Boilers/Furnaces and Pellet/Wood Stoves.

Heat Pump Water Heaters

WEC only incentivized units installed in WEC territory that were displacing fossil fuels and claimed 100% of these savings as per their MOU with EVT.

The Tier III savings for this measure represents the fossil fuel heating load that is displaced by the Heat Pump Water Heater ("HPWH"). The calculation of savings for HPWHs relies on the measure characterization developed for the Tier III Technical Resource Manual ("TRM"). These measure characteristics were developed with the input of the Distribution Utilities ("DUs"). These measures are considered prescriptive and verified through the review of the appropriate records provided by the DU.

Cold Climate Heat Pumps

As in previous years, WEC only provided additional incentive to homes that already met or had participated in a weatherization program to meet the weatherization standards to claim the additional savings allowed for within the prescriptive measure for weatherized homes. These measures are considered prescriptive and verified through the review of the appropriate records provided by the DU.

EV/PHEV

The Tier III savings for this measure represents the fossil fuel heating load that is displaced by the EV/PHEV. The calculation of savings relies on the measure characterization developed for the Tier III Technical Resource Manual TRM. These measure characteristics were developed with the input of the DUs. These measures are considered prescriptive and verified through the review of the appropriate records provided by the DU.

e-Bikes and e-Mowers

The Tier III savings for this measure represents the fossil fuel heating load that is displaced by the e-Bikes and e-Mowers. Incentives of \$200 for e-Bikes and \$100 for e-Mowers was offered to WEC members. The calculation of the derived savings relies on the measure characterization

developed for the Tier III TRM. These measure characteristics were developed with the input of the DUs. These measures are considered prescriptive and verified through the review of the appropriate records provided by the DU.

Low-Income Weatherization

The Department reviewed the savings claimed by WEC for their low-income weatherization program per PUC Rule 4.416:

If proposing a low-income weatherization energy transformation project, a retail electricity provider may:

(1) purchase previously created verifiable energy savings from a low-income weatherization provider, authorized under Vermont statute, so long as the energy savings were created during the compliance year within the retail electricity provider's service territory and the retail electricity provider advertised the low-income weatherization provider's services to its customers or members. For purposes of 30 V.S.A. § 8005(a)(3)(E), the previously created savings shall be treated as the incremental energy savings and the additional revenue paid for the savings should be used by the low-income weatherization provider, like any other grant funds it receives from the Office of Economic Opportunity, to complete low-income weatherization work in any Retail Electricity Provider's service territory.

The Department finds that the WEC offering is consistent with the PUC rule for low-income weatherization eligibility as a Tier III energy transformation project.

WEC's partner for their low-income weatherization program, CAPSTONE, uses Hancock Software and DOE approved values and lifetimes to determine the overall depth of savings for a project. The PSD accepted the values developed by the software model as a proxy for determining the value of the lifetime MWH being claimed by WEC. CAPSTONE can provide limited data as it is required to shield the identities of the low-income clients they serve. The Department met remotely with CAPSTONE and reviewed the details of the 10 projects included in the WEC Tier III claim. These projects included a variety of weatherization services including air sealing, weather stripping, and insulation of basements, walls, and attic spaces. Pre and post blower door testing was carried out on all projects. The projects reviewed in detail by the Department showed a wide variance in blower door results, from less than 1%¹⁰ to 51%. Additional project review was also carried out that included the review of before and after pictures to substantiate the work done.

¹⁰ Photographic evidence showed the homeowner had already done substantial air sealing prior to CAPSTONE'S involvement.

Vermont Electric Cooperative
2019 Tier III Savings Verification Report

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Vermont Electric Cooperative 2019 Tier III Savings Verification Report

The Vermont Electric Cooperative (“VEC” Tier III Annual Plan, filed November 15, 2018) estimated the 3.34% savings requirement for 2019 at 14,806 MWh. Actual retail sales of 451,380,521 kWh for 2019 resulted in a target of 15,046 MWh. As detailed below, VEC claimed Tier III savings of 23,361 MWh for 2019, which surpasses the target by 8,315 MWh. The PSD has verified 23,361 MWh savings from their program with a total carryover of Tier III credits of 17,059 MWh into 2020.

Table 7 - Detailed VEC Program Results

Measure	Count	Lifetime MWh* Claimed	Percentage of Goal	Verified Lifetime MWh*	Verified Percentage of Goal
Prescriptive Measures					
Cold Climate Heat Pump	302	6,218	41.33%	6,218	41.33%
Charging Stations	11	21	0.14%	21	0.14%
Electric Vehicles	34	1,046	6.95%	1,046	6.95%
Plugin Hybrid Electric Vehicles	15	342	2.27%	342	2.27%
Heat Pump Water Heater	37	120	0.8%	120	0.8%
Pellet Stoves	40	1,313	8.73%	1,313	8.73%
e-Mower	46	75	0.50%	75	0.50%
Forklift	1	47	0.31%	47	0.31%
Custom Measures					
Clean Air Program	4	14,180	94.25%	14,180	94.25%
Total Savings					
		23,361	155.26%	23,361	155.26%
2019 Target					
		15,046		15,046	
Savings in Excess of Goal					
		8,315		8,315	
Carryover from 2018					
		8,744		8,744	
Total MWh Carryover					
		17,059		17,059	

*MWh = Megawatt hour equivalent

The above table shows the various measures implemented by VEC through either a shared savings Memorandum of Understanding with Efficiency Vermont (“EVT”), or through measures implemented by VEC directly or through partner organizations.

VEC Tier III Program and Measure Descriptions

Cold Climate Heat Pumps

VEC offered its customers a \$150 incentive in addition to the thermal and electric incentives already offered by EVT for the purchase and installation of cold climate heat pumps (“cCHPs”).

The Tier III savings for this measure represents the fossil fuel heating load that is displaced by the cCHP. The calculation of savings for cCHPs relies on the measure characterization

developed for the Tier III Technical Resource Manual (“TRM”). These measure characteristics were developed with the input of the Distribution Utilities (“DUs”). These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Electric Vehicles

VEC offered incentives for the purchase or lease of 34 all-electric vehicles (“EVs”) and 15 plug-in hybrid electric vehicles (“PHEVs”). These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

EV Charging Stations

VEC offered an incentive of \$500 for the installation of 2 charging stations. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Heat Pump Water Heater

VEC offered incentives for the purchase or lease of 34 all-electric vehicles EVs and 15 plug-in hybrid electric vehicles PHEVs. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Pellet Stoves

VEC offered incentives for the purchase of 40 pellet stoves. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

e-Mower

VEC offered incentives for the purchase of 46 residential use electric mowers. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Forklift

VEC offered incentives for 1 electric forklift. This was a used forklift for which the TRM had a reduced lifetime associated with it. This measure is considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Custom Projects

Clean Air Program

VEC undertook 4 custom projects under its Clean Air Program in 2019. The PSD reviewed all relevant information and savings assumptions to ensure the savings estimates were reasonable and met statutory requirements. The PSD found these project savings to be reasonable and overall a conservative estimate of potential project savings.

Vermont Public Power Supply Authority
2019 Tier III Savings Verification Report

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VPPSA 2019 Tier III Savings Verification Report

because the Vermont Public Power Supply (“VPPSA”)¹¹ is a consortium of municipal electric utilities that individually do not serve more than 6,000 customers, their requirements for Tier III began on January 1, 2019.¹² Requirements are 2% of the provider’s annual retail sales beginning on January 1, 2019, increasing by an additional two-thirds of a percent each subsequent January 1 until reaching 10 and two-thirds percent after January 1, 2032.

The VPPSA Tier III Annual Plan, filed November 15, 2018 estimated the 2% savings requirement for 2019 at 6,917 MWh. The actual target for 2019 was 7,059 MWh. As detailed below, VPPSA claimed Tier III savings of 8,552 MWh for 2019, which surpasses the target by 7,059 MWh. The PSD has verified 8,552 MWh savings from their program with a carryover of Tier III credits of 1,493 MWh. These results include measures from 2017 and 2018 Tier III programs offered by VPPSA.

Table 8 - Detailed VPPSA Program Results

Measure	Count	Lifetime MWh* Claimed	Percentage of Goal	Verified Lifetime MWh*	Verified Percentage of Goal
<u>Prescriptive Measures</u>					
Cold Climate Heat Pump (Partially Shared)	44	801	11.35%	801	11.35%
Electric Vehicles	18	472	6.68%	472	6.68%
Plugin Hybrid Electric Vehicles	24	373	5.29%	373	5.29%
Heat Pump Water Heater (Shared)	21	257	3.65%	257	3.65%
<u>Custom Measures</u>					
Commercial e-Mower	1	74	1.05%	74	1.05%
Line Extensions	1	6,576	93.16%	6,576	93.16%
Total Savings		8,552	121.2%	8,552	121.2%
2019 Target		7,059		7,059	
Savings in Excess of Goal		1,493		1,493	
Total MWh Carryover		1,493		1,493	

*MWh = Megawatt hour equivalent

¹¹ As of November 17, 2019 VPPSA, is made up of 11 utilities that participated in their Tier III programs.

¹² 30 V.S.A. § 8005(a)(3)(B).

The above table shows the various measures implemented by VPPSA through either a shared savings Memorandum of Understanding (“MOU”) with Efficiency Vermont (“EVT”), or through measures implemented by VEC directly or through partner organizations.

VPPSA Tier III Program and Measure Descriptions

Cold Climate Heat Pumps

VPPSA offered its customers a \$300 incentive in addition to the electric incentives already offered by EVT for the purchase and installation of cold climate heat pumps (“ccHPs”). An additional \$100 was offered to homeowners whose buildings met the requirements for the enhanced incentive. In total 46 ccHPs were incentivized in VPPSA members territory with 6 of those qualifying for the enhanced incentive.

The Tier III savings for this measure represents the fossil fuel heating load that is displaced by the ccHP. The calculation of savings for ccHPs relies on the measure characterization developed for the Tier III Technical Resource Manual (“TRM”). These measure characteristics were developed with the input of the Distribution Utilities (“DU”). These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Electric Vehicles

VPPSA offered incentives for the purchase or lease of 18 all-electric vehicles (“EVs”) and 24 plug-in hybrid electric vehicles (“PHEVs”). These numbers include vehicles incentivized from the 2017 through to the end of 2019. In 2019 7 EVs and 5 PHEVs were incentivized. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Heat Pump Water Heaters

As per the VPPSA MOU with EVT, VPPSA provided one third of the total rebates to customers that installed heat pump water heaters (“HPWH”) to replace fossil-fuel fired water heaters through EVT’s mid-stream program. This allowed VPPSA to claim one third of the resulting MWh savings. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Custom Projects

Commercial e-Mower

This was a custom measure offered by VPPSA to one customer and should not be confused with the prescriptive e-Mower measure. This measure was discussed and reviewed in advance with the Department and the savings determined to be appropriate.

Line Extension

This was a custom measure offered by VPPSA to one customer and provide three phase power to an industrial customer replacing on site diesel power generation. This measure was discussed and reviewed in advance with the Department and the savings determined to be appropriate.

Stowe Electric
2019 Tier III Savings Verification Report

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Stowe Electric 2019 Tier III Savings Verification Report

Because Stowe Electric is a municipal electric utility serving not more than 6,000 Customers, their requirement for Tier III began on January 1, 2019.¹³ Requirements are 2% of the provider’s annual retail sales beginning on January 1, 2019, increasing by an additional two-thirds of a percent each subsequent January 1 until reaching 10 and two-thirds percent after January 1, 2032.

The Stowe Electric Tier III Annual Plan, filed on November 15, 2018, estimated the 2% savings requirement for 2019 at 1,530 MWhe. Actual retail sales for 2019 resulted in a target of 1,499 MWhe. As detailed below, Stowe claimed Tier III savings of 1,344 MWhe for 2019, which is less than the target of 1,499 MWhe by 155 MWhe. Stowe proposes utilizing 155 banked Tier II RECs to make up the difference to achieve 100% of their goal. The PSD has verified 1,344 MWh savings from their program for Tier III but the reallocation of the 155 Tier II RECs will need to be documented within Stowe’s RES report due in August 2020.

Table 9 - Detailed Stowe Electric Program Results

Measure	Count	Lifetime MWhe* Claimed	Percentage of Goal	Adjusted Lifetime MWhe*	Adjusted Percentage of Goal
Cold Climate Heat Pump	43	1,096	73.12%	1,096	73.12%
EV Charging Stations	13	154	10.29%	154	10.29%
Electric Vehicles	2	68	4.52%	68	4.52%
Plugin Hybrid Electric Vehicles	1	26	1.72%	26	1.72%
Total Savings		1,344	89.65%	1,344	89.65%
2019 Target		1,499		1,499	
2018 Banked Tier II RECs		155		155	
Total		1,499	100.00%	1,499	100.00%

*MWhe = Megawatt hour equivalent

The above table shows the various measures implemented by Stowe Electric through either a shared savings Memorandum of Understanding (“MOU”) with Efficiency Vermont (“EVT”), or through measures implemented by Stowe Electric directly or through partner organizations.

Stowe Electric Tier III Program and Measure Descriptions

Cold Climate Heat Pumps

Stowe Electric offered its customers a \$575 mid-stream incentive in addition to the electric incentives already offered by EVT for the purchase and installation of cold climate heat pumps (“ccHPs”). The Tier III savings for this measure represents the fossil fuel heating load that is

¹³ 30 V.S.A. § 8005(a)(3)(B).

displaced by the ccHP. The calculation of savings for ccHPs relies on the measure characterization developed for the Tier III Technical Resource Manual (“TRM”). These measure characteristics were developed with the input of the Distribution Utilities (“DUs”). These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

Electric Vehicles

Stowe Electric offered incentives for the purchase or lease of 2 all-electric vehicles (“EVs”)¹⁴ and 1 plug-in hybrid electric vehicles (“PHEVs”). These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

EV Charging Stations

Stowe incentivized a total of 13 charging stations, 2 workplace chargers, 10 public chargers and 1 DC fast charger. All of these were funded through grants obtained by Stowe Electric for this purpose. These measures are considered prescriptive and verified through the review of the appropriate records and claim forms provided by the DU.

¹⁴ Three EVs qualified for this incentive but all relevant forms not completed at time for one of them.

General RES Tier III Program Recommendations

During the verification, the PSD identified issues that have broad applicability. The PSD has the following general RES Tier III program recommendations for consideration by the PUC and stakeholders.

Electric Vehicles

Incentive Cap

The PSD recommends that DUs that do not already have a cap on the eligibility of electric vehicles based upon its MSRP consider instituting one or develop a tiered incentive level based upon the MSRP of the vehicle. A cap or tiered incentive based on vehicle MSRP for qualifying for an EV/PHEV incentive could reduce the free-rider rate associated with this program by ensuring that ratepayer dollars are utilized by participants who would benefit from the incentives the most. This issue will be discussed with the TAG.

Lease vehicles

DUs should consider a lease specific Tier III incentive program rather than a flat rate incentive that does not differentiate between the purchase of an EV/PHEV and the lease of the vehicle. Offering a leased vehicle the full incentive based upon an eight-year measure life, when the benefit to Vermont is the lease term which is less than eight years, results in overpaying for the savings generated. Information presented during the development of the EV/PHEV measure suggested that at the end of a lease period most vehicles are resold outside of Vermont. This issue will be discussed with the TAG.

Low-Income Qualification

Based upon observation of the invoices presented to the Department during its review, it appears that self-identification of low-income qualification may not be the best way to reach this population. Given some of the information presented, it appears that while incomes may be low for some, assets appear to be significant enough for major purchases beyond the means of the traditionally identified low-income population. While the Department has no suggestions on how to address this issue at this time, it seems this issue should be addressed in the 2020 program review.

Reporting

The PSD requests that the following be included in future reports:

- Evidence to substantiate a DU's actual annual sales, for the PSD to verify the correct annual obligation has been stated in their savings claim.
- Adding to the summary table required in Rule 4.400 a high-level breakdown of savings by measure and participation by class and low-income participation rates (see attached).

- Reports should include description of how a given DU's Tier III programs are promoted to customers with representative examples.

Other

Where there is an MOU in place for the division of savings between parties, this agreement should be detailed in a simple table included in the savings claim. This will ensure the Department can verify that there is no potential double counting of savings between the EEU and DU for the same measure.