2022 Annual Report NW Natural Washington

ENERGY TRUST OF OREGON
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I. Introduction, background, oversight and goals

A. Introduction

This annual report covers all of NW Natural's energy efficiency activities in Washington for 2022. The completion of the program year marks the 13th year that Energy Trust of Oregon has provided services and incentives to residential and commercial customers of NW Natural in Washington. This report addresses progress toward annual and biennial goals, information on expenditures, gas savings, projects completed, incentives paid during the year and highlights of program activity.

B. Background

At the request of NW Natural and following approval granted by the Washington Utilities and Transportation Commission (WUTC), Energy Trust began implementing NW Natural's demand-side management programs in Southwest Washington on October 1, 2009. The first year was viewed as a pilot. In 2011, the WUTC approved NW Natural's use of Energy Trust as implementer of Commercial and Residential conservation programs for NW Natural in Washington. With the passage of HB1257, reporting has shifted to biennial planning. This annual report marks the progress made within the first year of the 2022-2023 Biennial Energy Efficiency Plan.

C. Oversight

The Energy Efficiency Advisory Group (EEAG) was created at the direction of the WUTC to provide advice and oversight for NW Natural and Energy Trust energy-efficiency offerings in Washington. The advisory group is comprised of representatives from NW Natural, Energy Trust, WUTC, Washington Public Counsel, Energy Project, Association of Western Energy Consumers and the Northwest Energy Coalition.

D. Goals

In 2021, NW Natural, in accordance with HB1257, conducted a Conservation Potential Assessment with a third-party to establish conservation goals for the 2022-2023 biennium. NW Natural in collaboration with the EEAG, established performance metrics for 2022. This report presents Energy Trust's performance against those goals, and progress made toward the biennial plan. The total savings goal for the incentive program was 318,722 therms. This goal is comprised of 133,073 therms for residential and 185,649 therms for commercial.

E. Portfolio summary

Program Track	2022 Savings Goal (therms)	2022 Actuals (therms)	Percentage of Goal Achieved
Commercial Incentive Program	185,649	244,841	132%
Residential Incentive Program	133,073	150,873	113%
Low-Income Weatherization	5,425	3,164	58%
NEEA Market Transformation	TBD	32,175	N/A
RTF Regional Collaboration	N/A	N/A	N/A
Pilot & Trial Programs	N/A	N/A	N/A
Evaluation	N/A	N/A	N/A
Savings Total	324,147	431,053	133%
Biennial Goal (therms)	620,915	Percentage to Biennial Goal	69%

II. Annual report highlights

A. General

- In 2022, Energy Trust achieved 118% of the annual portfolio goal.
- Gas efficiency projects installed in 2022 by NW Natural's Washington customers saved 395,714 annual therms of natural gas— 244,841 therms in the commercial sector and 150,873 in the residential sector.

B. Commercial sector highlights

- The commercial sector achieved 132% of its annual goal.
- The top performing measures were refrigeration case doors, custom building controls, custom chillers, boilers, fryers, and custom operations and maintenance.
 - Refrigeration case doors from 10 projects at grocery stores in Vancouver recognized 89,857 therms, while a large project at the Vancouver Innovation Center that saved 46,685 therms rolled over from 2021, contributing to the program surpassing savings goals.
- The program offered bonus incentives for boilers and recognized 12 boiler projects, including seven in educational facilities. Boiler participation doubled compared with 2021.
- In-person outreach picked up to near pre-pandemic levels. Events included the Association of Professional Energy Managers forums, the Asian American Hotel Owner Association conference and HVAC contractor meetings.
- Equipment cost increases, equipment delays and contractor availability pushed several projects into 2023. Additionally, several customers delayed projects slated for 2022 due to staffing challenges.

C. Residential sector highlights

- The residential sector achieved 113% of its annual goal.
- The top performing measures were gas furnaces, smart thermostats, EPS[™] New Construction and windows.
- Smart thermostats and thermostat optimization made up 43% of home retrofit savings in 2022, up from 30% in 2021, and contributed a larger portion of all Residential savings in 2022 than in previous years. This increase was driven by the launch of new online marketplace that makes it easier for customers to buy discounted smart thermostats, leading customers to buy nearly twice as many smart thermostats as purchased through the old platform in 2021.
- Contractor capacity was a challenge throughout the year as many started 2022 with a full schedule of
 projects and labor shortages that made it difficult to hire and retain staff to keep up with demand.
 Additionally, equipment shortages related to supply chain disruptions challenged contractors and
 customers.
- Fewer rental property owners took advantage of a \$1,000 gas furnace bonus for single-family rentals. This is despite the offer running for all of 2022 and being advertised at the same rate and through the same channels.
- Savings from EPS New Construction decreased due to Washington's new residential energy code, from 31% of all residential saving in 2021 to 14% in 2022. Savings are expected to continue to decrease in 2023 and 2024, when the offering will end.

D. Trade Ally Network highlights

• By the end of 2022, 390 trade allies served Washington, up from 370 in 2021. This includes 176 trade allies based in Washington.

E. Program evaluations

- In quarter one, Energy Trust finalized the Analysis of Energy Trust Residential Insulation Impacts 2013-2018. The report can be found online at https://www.energytrust.org/wp-content/uploads/2022/03/Summary-Memo-of-Recurve-Insulation-Impacts-Final.pdf
- **In quarter two**, Energy Trust finalized the 2021 Fast Feedback Annual Report. The report can be found online at https://www.energytrust.org/wp-content/uploads/2022/04/Energy-Trust-2021-Fast-Feedback-End-of-Year-Report-FINAL.pdf
- In quarter three, Energy Trust finalized the Process Evaluation of the Residential Program. The report
 can be found online at https://www.energytrust.org/wp-content/uploads/2022/08/Residential-Process-Evaluation-Final_wSR.pdf
- In quarter four, Energy Trust finalized the 2020 Existing Buildings Impact Evaluation. The report can be found online at https://www.energytrust.org/wp-content/uploads/2023/01/EB2020Impact_Final_wSR.pdf

F. Washington Utilities and Transportation Commission performance metrics

The tables below compare quarterly results to 2022 goals, as established in NW Natural's Energy Efficiency Plan for Washington.

2022 Results compared to goals

Metric	Goal	Annual	(Q1 results	Q	2 results	Q3	results	(Q4 results
Therms Saved	318,722	395,714		37,505		39,986		77,433		240,789
Total Program Expenditures	\$ 2,979,668	\$ 3,315,452	\$	551,364	\$	608,195	\$8	93,594	\$1	1,262,298
Average Levelized Cost Per Therm	Less than \$0.65	\$ 0.64	\$	0.83	\$	1.04	\$	0.88	\$	0.43
Utility Cost at Portfolio Level	Greater than 1.00	\$ 2.31		Reported annually		Reported annually		eported annually		Reported annually

2021 Results compared to goals (for reference)

Metric Therms Saved	Goal 386,680	2021 Total Amount 345,322	Q1 results 52.172	Q2 results 122,960	Q3 results 62.964	Q4 results
Total Program Expenditures	\$3,322,80	\$3,069,312	\$682,019	\$941,612	\$606,543	\$839,138
Average Levelized Cost Per Therm	Less than \$0.65	\$0.63	\$0.86	\$0.61	\$0.65	\$0.53
Energy Trust Programs Utility Cost	Greater than 1.00	2.84	Reported annually	Reported annually	Reported annually	Reported annually

2022 Utility Cost Test and Total Resource Cost Test benefit/cost ratios by program

Program	Utility Cost Test Benefit/Cost Ratio	Total Resource Cost Test Benefit/Cost Ratio
Commercial Programs	3.35	2.00
Residential Programs	3.02	2.23
Total NW Natural Washington Energy Trust Programs*	3.17	2.09
NW Natural Low Income Program (only)	1.96	1.83
Total NW Natural Washington Programs	3.15	2.09
Total Washington Portfolio**	3.58	2.34

2021 Utility Cost Test and Total Resource Cost Test benefit/cost ratios by program (for reference)

Program	Utility Cost Test Benefit/Cost Ratio	Total Resource Cost Test Benefit/Cost Ratio
Commercial Programs	2.96	2.71
Residential Programs	2.78	1.59
Total NW Natural Washington Energy Trust Programs*	2.84	1.85
NW Natural Low Income Program (only)	1.88	1.72
Total NW Natural Washington Programs	2.82	1.85
Total Washington Portfolio**	2.88	1.90

^{*} Does not include NEEA or WALIEE expenses.
** Includes costs associated with NEEA's gas market transformation efforts. NEEA results reflect one-year savings and costs only.

III. Annual results

A. Activity highlights—sites served

	Q1	Q2	Q3	Q4	Total
Commercial					
Food Service	7	9	4	-	20
HVAC	1	2	4	14	21
Operations & Maintenance	-	4	-	7	11
Process cooling	-	-	-	1	1
Process heating	-	-	-	1	1
Refrigeration	-	-	-	10	10
Study	2	-	3	1	6
Water Heating	-	2	2	4	8
Weatherization	-	-	-	-	-

	Q1	Q2	Q3	Q4	Total
Residential					
EPS new construction	131	65	81	46	323
HVAC	130	147	154	202	633
HVAC Controls	10	67	161	871	1,109
Water Heating	4	4	4	4	16
Weatherization	55	68	50	104	277

B. Revenue

Source	Annual actual revenue	Annual budgeted revenue
NW Natural	\$ 3,150,874	\$ 3,150,874

C. Expenditures

		Annual actual	A	nnual budgeted	Budget
		expenditures		expenditures	variance
Commercial	Commercial	\$ 1,438,468	\$	1,316,716	\$ 121,752
Commercial	Commercial administration	\$ 92,068	\$	73,274	\$ 18,794
	Commercial Total	\$ 1,530,537	\$	1,389,990	\$ 140,546
Residential	Residential	\$ 1,677,556	\$	1,505,877	\$ 171,678
Nesidefiliai	Residential administration	\$ 107,371	\$	83,801	\$ 23,570
	Residential Total	\$ 1,784,927	\$	1,589,678	\$ 195,249
	Total expenditures	\$ 3,315,463	\$	2,979,668	\$ 335,795

D. Incentives paid

					Percent incentives/
	Annual actu	al incentives	Annı	ıal actual expenditures	expenditures
Commercial	\$	888,718	\$	1,530,537	58%
Residential	\$	1,068,221	\$	1,784,927	60%
Total Incentives	\$	1,956,939	\$	3,315,463	59%

Incentives paid account for approximately 69% of annual program expenses when total program expenses
are adjusted down by 15% to account for costs that a utility-delivered program would recover through
rates.

E. Savings

		Annual savings	Annual goal	Percent	Levelized
		therms	therms	achieved	cost/therm
Commercial	Existing Buildings - custom	82,872	124,155	67%	
	Existing Buildings - standard	137,241	29,722	462%	
	New Buildings - custom	-	-	N/A	
	New Buildings - standard	4,257	12,177	35%	
	Strategic Energy Management	20,471	19,595	104%	
	Commercial total	244,841	185,649	132%	\$ 0.53
Residential	Home retrofit	120,718	103,486	117%	
	Midstream and retail	7,299	12,525	58%	
	Small multifamily	1,237	3,113	40%	
	EPS new construction	21,619	13,949	155%	
	Residential total	150,873	133,073	113%	\$ 0.78
	Total	395,714	318,722	118%	\$ 0.64

Appendix 1: Energy efficiency measure counts and savings

Table 1: Residential sector measures³

		Measures	Total therms
Category	Measure	installed	saved
EPS new construction		323	21,619
	EPS new construction total	323	21,619
HVAC	Furnace	593	54,443
IIVAO	Gas fireplace	1,030	9,543
	HVAC total	1,623	63,986
HVAC controls	Thermostat	1,107	43,948
TIVAO COITI OIS	Thermostat Optimization	7	8,103
	HVAC controls total	1,114	52,051
Water heating	Tank water heater	-	-
Water neating	Tankless water heater	16	986
	Other total	16	986
	Ceiling insulation	20	1,572
Weatherization	Floor Insulation	12	481
Weatherization	Wall insulation	2	25
	Windows	387	8,930
	Weatherization total	421	11,007
Grand total		3,498	150,873

³ Totals may not match Table E due to rounding.

Table 2: Commercial sector measures^{4,5}

		Measures	Total therms
Category	Measure	installed	saved
Foodservice	Fryer	30	11,639
1 3 3 4 5 1 1 1 5 1	Oven	8	1,060
	Foodservice total	38	12,698
	Boiler	17	26,969
	Building controls	4	48,271
HVAC	Demand Control Ventilation	3	1,468
	Gas furnace	9	620
	Radiant heating	2	684
	HVAC total	35	78,011
Operations & maintenance	Building Operator Certification	4	6,681
operations & maintenance	Custom Operations & Maintenance	7	20,471
	Operations & maintenance total	11	27,152
Process cooling	Custom chiller	1	29,677
	Process cooling total	1	29,677
Process heating	Custom heat recovery	1	4,924
	Process heating total	1	4,924
Refrigeration	Refrigeration	10	89,856
	Refrigeration total	10	89,856
Study	Study	6	-
	Study total	6	-
	Aerator	-	-
Water heating	Tank water heater	6	1,589
	Tankless water heater	8	933
	Water heating total	14	2,522
Weatherization	Ceiling insulation	-	-
vv eatrier ization	Wall insulation	-	-
	Weatherization total	-	-
Grand Total		116	244,841

 ⁴ Totals may not match Table E due to rounding.
 ⁵ Since a single fryer may have multiple vats, the fryer figure is the number of vats installed.

Appendix 2: Customer satisfaction

Energy Trust conducted short web and phone surveys of NW Natural customers in Washington who participated in Energy Trust programs in 2022 to determine their satisfaction with Energy Trust. Results from 181 residential customers and 17 commercial customers indicate a generally high level of customer satisfaction. Most residential customers in Washington were satisfied with their overall program experience, but a small proportion were neutral or dissatisfied with regard to the turnaround time to receive their incentive and the incentive application form. These numbers are consistent with previous program years.

Table 1: NW Natural Washington residential customer satisfaction 2022

Residential (n=181)	Dissatisfied	Neutral	Satisfied
Overall experience	3%	4%	93%
Incentive application form	2%	7%	91%
Turnaround time to receive incentive	12%	4%	84%

Most commercial customers in Washington were satisfied with their overall program experience, incentive amount, ease of applying for the incentive, interaction with program representatives, performance of their project or system and turnaround time to receive the incentive.

Table 2: NW Natural Washington commercial customer satisfaction 2022

Commercial (n=17)	Dissatisfied	Neutral	Satisfied
Overall experience	0%	6%	94%
Incentive amount	0%	6%	94%
Ease of applying for incentive	0%	0%	100%
Interaction with program representative	0%	0%	100%
Performance of project or system	0%	6%	94%
Turnaround time to receive incentive	0%	0%	100%

Washington Market Transformation 2022 Program Results

In 2022 NW Natural participated in the Northwest Energy Efficiency Alliance's (NEEA) Gas Collaborative to support regional Market Transformation. NEEA is in its fourth year of reporting natural gas savings, and annual savings will continue to increase over time as programs in the portfolio advance into full-scale market development. Funding is on a regional basis and invoiced based on actuals spent for work on the 5-year plan. There were no activities specific to NW Natural in 2022, all reported savings based on funder share attributed to building codes and state standards. A summary of the NEEA funder memo can be found on the following pages.

Table 1: 2022 Market Transformation Expenditures

Market Transformation		Budget	Actual
NEEA	Total	\$ 88,148	\$88,148

Table 2: 2022 Market Transformation Savings Summary

Market Transformation	Reported Therm Savings
Building Codes	31,465
Standards	710
Programs	TBD
Total Savings	32,175

2022 Savings Estimate Summary

NEEA estimates NW Natural's 2022 annual natural gas energy savings associated with its initiatives is 32,175 annual therms⁶ (Table 2). These savings are above the NEEA baseline⁷ and exclude an estimate of savings that NW Natural and local utilities claim through locally run programs. NEEA allocates energy savings based on funder share for voluntary programs and an estimate of service area shares for codes and state standards.

Table 3: 2022 Annual Report Net Market Effects Savings Estimates (annual therms)

Drogram	Gas Program Measures
Program	(Net Market Effects)
Residential Codes (2018 WSEC)	29,605
Commercial Codes (WSEC-C)	1,860
Standards (Commercial Packaged	710
Boilers & Cooking Equipment)	710
Efficient Rooftop Units	TBD
Total Savings	32,175

Net Market Effects = Total Regional Savings - Local Program Savings - Baseline Savings

Building Codes

Commercial Codes

The 2022 savings come from work on the 2018 Washington State Energy Code, which went into effect in February 2021. The share of new construction floor area permitted under the code begins to ramp up from the code effective date. The savings analysis uses energy use intensity (EUI) values resulting from whole-building energy simulations conducted by NORESCO⁸.

Residential New Construction Codes

WSEC 2018 code went into effect in February 2021 and saves on average 16% more energy than WSEC 2015. NEEA started counting savings in August 2021 to allow time to build under the new code. NEEA completed a post code adoption market research report in May 2022 to assess the early effects of the credits on building practices. The assessment showed a major shift in fuel selection for primary heat where natural gas had previously been the common selection. NEEA has since conducted a follow-up study to allow more time for builders to adjust to the new code; the new study estimates that 18% of new homes are using gas as the primary source for space heating. NEEA is using these results for 2022 savings estimates.

Standards

NEEA is reporting Net Market Effects savings from the Washington commercial equipment appliance standard based in draft evaluation results from Michaels Energy. The company determined that NEEA and its partners had a primary role in providing regional data and generating alignment among stakeholders on the commercial kitchen equipment standards.

⁶ The term annual therms refers to the fact that NEEA reports first-year savings only in order to represent a sustained reduction in load. ⁷ NEEA estimates Baseline as the savings that would have occurred without NEEA, utility, the Bonneville Power Administration, and the

Energy Trust of Oregon's market intervention.

⁸ NORESCO. 2022. 2018 Washington State Energy Code Energy Savings Analysis for Nonresidential Buildings.

Efficient Rooftop Units

The Efficient Rooftop Units program advanced to Market Development⁹ in late 2022. The program's goal is to accelerate the adoption of efficient gas rooftop units in the like-for-like replacement market while working to influence the adoption of improved test procedures and more stringent federal standards.

To measure savings, NEEA collects sales data annually from HVAC distributors and manufacturers in addition to data from the annual local utility program survey. The HVAC sales data for 2022 will not be available until summer 2023 which is why savings are still to be determined.

Allocation Methodology

NEEA allocates code savings for gas measures using a service area approach. The approach uses EIA residential consumer sales for Residential Codes and nonresidential volume for Commercial Codes (Table 2).

For voluntary programs, NEEA allocates regional savings (Idaho, Montana, Oregon and Washington) using shares of investment by funder. These shares vary by funding cycle. Savings from previous investments receive the previous funder share. Savings from current investments receive the current funder share. Table 5 shows the funder shares.

Table 4: State Code Savings Allocation Share

Sector	WA	OR	ID
Residential	6.62%	0.00%	0.00%
Commercial	4.15%	0.00%	0.00%

Table 5: NW Natural Funder Share

Business Plan	Gas Funding Share
2019	2.73%
2020-2024	3.11%

⁹ The purpose of this phase is to create lasting market change through direct market interventions designed to remove barriers, leverage market opportunities, and tap influencers and existing channels for diffusion. Interventions are strategic, planned and adaptively managed as market dynamics change and more information is gained. During annual planning, NEEA staff look for the most impactful market levers and activities that could bolster or accelerate the achievement of alliance MT goals.

Gas Measure Analysis

2022 Regional Engagement

The Regional Technical Forum (RTF) is an advisory committee to the Northwest Power and Conservation Council that meets monthly to review analysis and make decisions on methodologies for estimating energy efficiency savings. The energy saving estimates generated are vital to creating an accurate snapshot of the region's efficiency potential. With funding and support from gas utilities, including NW Natural, the RTF began considering gas measures in 2020. 2022 marks the third year that the RTF has been adding gas measures to their portfolio. NW Natural participated by providing relevant input for the development of the RTF's gas measures. The list of active measures and analysis can be found on the RTF website: https://rtf.nwcouncil.org/measures/

Regional Engagement		Budget	Actual
RTF	Total	\$ 10,600	\$10,600

Washington Low Income Energy Efficiency Program 2022 Program Results

NW Natural partners with Clark County's Community Development Office to serve Clark County customers and Washington Gorge Action Programs (WAGAP) serving Skamania and Klickitat counties to administer its Washington Low Income Energy Efficiency (WALIEE) program. While offerings are available in Skamania and Klickitat counties, the agency that serves these counties did not provide services to any customers through WALIEE during 2022. Results below are specific to Clark County's Department of Community Services.

Program year 2022 saw changes in personnel from both our partner Clark County and NW Natural and continued slow recovery from COVID-19 related impacts to operations. Homes served was down from preshutdown numbers, and our goal outlined in the 2022 EE plan was not met. Increased outreach methods will take place in 2023 with bill inserts targeting customers in Clark County to increase the visibility of the program. We continue to work with Clark County to identify outreach opportunities in the community. In addition to the whole weatherization projects completed by Clark County they also provided 6 furnace tune-ups that helped clients maintain their equipment to the highest efficiency levels.

In WAGAP's territory, staffing and limited customers have been the historical challenge for the program's gas efforts. In 2019 Community Action Council of Lewis, Mason & Thurston Counties (CACLMT) was selected to provide services in WAGAP's territory. NW Natural continued engagement with the Energy Project and CACLMT, to help address these issues and support gas customers and projects.

The agencies are allotted 25% of reimbursable job costs for administrative costs and allowed an average of \$1,000 per home for Health, Safety, and Repairs (HSR), which are not subject to cost effectiveness tests. A WALIEE job could cost the program no more than the base \$7,992 plus the Low-Income Program Adjustment of \$5,508 for a total of \$13,500. Projects in 2022 averaged \$10,813.66 per home.

Measure Analysis

The figure below provides a breakdown of weatherization occurrences by measure, as well as the associated annual therm savings.

Figure 1: Measure Occurrence and Savings

2016-2021 Efficiency Results

Efficiency Metric	2022	2021	2020	2019	2018	2017	2016
Homes served	5	11	3	22	16	13	16
Average Reimbursement per home ¹⁰	\$10,813.66	\$4,996	\$4,436	\$8,657	\$5,739	\$5,305	\$4,807
Total Reimbursed	\$54,068	\$54,960	\$13,308	\$190,457	\$91,828	\$68,965	\$76,918
Average estimated	633	324	377	918	474	472	378

¹⁰ Note reimbursed costs only reflect NWN's contribution for home weatherization. HSR and Admin are excluded.

therms saved per home ¹¹							
Total estimated therms saved	3,164	3,568	1,132	20,170	7,578	6,132	6,048
Estimated Cost per therm	\$17.08	\$15.40	\$11.76	\$9.44	\$12.12	\$11.25	\$12.72

Figure 2: Efficiency Metrics

2021 Performance Metric	Goal	Actual
Homes served	10	5
Max reimbursement per home (Actual figure = avg per home)	\$7,992	\$10,813.66
Adjustment Program Max (Actual figure =avg per home)	\$5,508	\$0
Average estimated therms saved per home ¹²	341	633
Total estimated therms saved	6,480	3,164
Total expenditure	\$157,624	\$54,068

Figure 3: Performance and Goal Metrics

NW Natural recognizes that with the rise of inflation the cost per weatherization project has increased. As a result of these challenges, we engaged our Clark County partners are well as our EEAG stakeholders to increase funding for each weatherization job. A \$4,000 increase in flexible funds per project to help address health and safety measures as well as energy efficiency measures will be rolled out in 2023. NW Natural is confident that the increase in funding paired with targeted outreach efforts will lead to more homes weatherized in our Washington territory. NW Natural continues to be optimistic that the work with stakeholders and better utilization of data will result in future growth of the WALIEE program. The progress has led to additional pilots and programs, which are anticipated to help development of the program which continues to be positive.

¹¹ An impact evaluation has not been conducted on these homes so the actual per therm savings has not been verified. The therm estimates are based on modeling software estimates which convert financial savings to therm savings.

¹² See footnote 2.

Washington Pilot & Trials 2022

Industrial Audits

Subsequent to the conclusion of NW Natural's 2021 Conservation Potential Assessment (CPA), NW Natural began scoping a pilot for Industrial rate customers. The Industrial rate class has not historically had access to NW Natural's energy efficiency programs in Washington. To better understand the potential within this customer class NW Natural conducted an RFP in 2022 to find a vendor to deliver high-level audits to customers on industrial and transport rates in Washington.

Energy 350 was selected as the vendor for the audits which became available to customers late in Q3 of 2022. The work surrounding the pilot in 2022 focused primarily on outreach development. To keep costs low, NW Natural is leveraging internal Key Account Managers (KAMs) to recruit participants for the program. Findings from the audits will be used to inform the development of an incentive program and provide a pipeline of leads for the launch of a program.

Development of this pilot was laid out in the 2022-2023 Biennial Energy Efficiency Plan, but there are no savings associated with this pilot as it is an intelligence gathering effort. The pilot may be credited with savings earned once an incentive program is launched.

Industrial Audit Pilot	2022 Expenditure
	\$378