Production Efficiency

Kim Crossman/ JP Batmale/ Adam Bartini

Overview

Energy Trust's Industry and Agriculture Sector provides energy efficiency services and incentives to industrial and agricultural customers through a single program. Production Efficiency provides a robust set of custom and streamlined offerings that have been designed to help energy intensive and complex organizations achieve cost-effective savings on an ongoing basis. Through engaging with Energy Trust, industrial and agricultural businesses in Oregon invest in and manage their energy use, improving their profitability, productivity and sustainability.

The program is **designed and managed in-house, by Sector staff**, since 2008, and is delivered with the support of a large number of contractors.

- PE is brought to market by six teams of **Program Delivery Contractors (PDCs)** with deep technical and program expertise, who make it easy for customers and trade allies to participate.
- **Allied Technical Assistance Contractors (ATACs)** provide high quality technical studies to enable customers to make investment decisions on custom energy efficiency projects.
- **Industrial Technical Service Providers (ITSPs)** support the development of customer capacity to manage their own energy use and reduce energy waste in their operations with Strategic Energy Management.
- **Trade Allies** and other vendors act as an additional sales force for the program, speeding the implementation of more standard measures such as lighting and irrigation and streamlining the customer's experience of project development and working with the program.

The program volume has more than quadrupled over the past 5 years as we have expanded tracks and created new initiatives. The Trade Ally tracks in lighting and small industrial have been the major contributors to this growth. In 2013, the Industry & Ag sector completed just over a thousand projects, and we expect this volume to continue to grow in 2015.

2015 Sector Themes and Key Directions

- **Broaden Participation by Underserved Customers**
  - Increase PDC outreach and provide custom services to small industries in all areas of Energy Trust service territory.
  - Expand the Trade Ally and vendor network for effective delivery of irrigation, compressed air and other streamlined industrial measures, especially in rural areas.
- **Develop new measures and approaches to save energy**
  - Promote and support Trade Ally and vendor deployment of newer streamlined measures/ technologies including LEDs, Performance Plus Lighting, and direct install of small compressed air leak reduction.
  - Bring Industrial Strategic Energy Management (SEM) to scale in the market. Optimize and standardize offerings for all sizes of industries, expand the number of participants enrolled in SEM offerings, and develop approaches to help participants harvest even more savings from their SEM program, long term.
- **Continuously improve program design and services**
  - Leverage and cross-promote within all Production Efficiency delivery channels to increase savings, provide additional value to Trade Allies and create seamless customer experience.
  - Use peer to peer influence, spread best practices by promoting successful strategies and projects.
  - Work with PDCs to develop tools and approaches that reduce the cost of providing Custom services to small industries around the state.
  - Track spending on Large Customers for compliance with 838 funding restrictions and be prepared to implement changes in incentives or other interventions if needed

2015 Savings Goals

The PE program supports a diverse portfolio of measures and offerings which provide energy savings. Projections regarding where savings will come from are used to set PDC goals and develop incentive budgets. Analysis of 2014 projects, the pipeline of 2015 projects and previous years' historical run rates by source of savings inform these projections. In setting goals and developing the budget, the timing and expected near term effects of market or policy changes and planned new initiatives also have to be estimated and factored in. See the Assumptions section for more details.

Utility Territory	2014 Goals	2014 Forecast (October)	2015 Goals
PGE (kWh)	101,803,954	95,084,300	89,200,691
PAC (kWh)	51,235,447	43,864,562	45,219,287
All Electric (kWh)	**153,039,400**	**138,948,862**	**134,419,978 kWh** (15.3 aMW)
NWN (therms)	1,151,420	874,306	1,030,561
CNG (therms)	45,000	26,039	35,015
All Gas (therms)	**1,196,420**	**900,345**	**1,065,567**

The total 2015 electric savings goal is less than in 2014. However, this comparison is skewed by the 2014 Mega Project. When the Mega Project is factored out, 2015's total budgeted savings goals are actually 0.7 million kWh higher than 2014's budgeted goals. This is a slight increase of 0.5% in electric savings. PGE's 2015 budgeted electric savings goal includes a 9% increase in savings over 2014. The Program has a very robust PGE pipeline for next year. The 2015 decrease in savings goal in PAC territory is reflective of the Program's more conservative approach to budgeting savings, which seeks to better align budgeted savings goals with the most recent years' actual savings trends. This has resulted in a 2015 PAC budgeted savings goal 12% less than in 2014.

The 2015 gas savings goal is 11% lower than 2014's goal but is in line with 2014 Forecasted savings projections. For 2015, the recent 5% decrease in the Program's evaluation factor – from .82 to .77 – increases the difficulty in maintaining savings growth; more savings must be achieved just to stay even. While the program proposes a 10% decrease in goal in NWN territory, CNG goals are decreasing by 22%. The NWN territory of eligible sites is much larger, and the higher volume of projects has resulted in more stable floor of savings historically. Conversely, there are large fluctuations in savings in CNG year to year, due to just a small number of projects making up the total. While the 2015 CNG pipeline is more robust compared to last year, all of the currently identified projects have small savings. As in 2014, the program will retain some delivery and outreach effort to eligible CNG customers, but is setting lower goals and will tap into reserves for incentives if the opportunity for a larger project arises.

Objectives:

- Meet or exceed savings and cost-effectiveness goals
- Achieve high technical realization of savings for projects
- Maintain a high level of customer service and participant satisfaction.
- Maintain high quality, accurate and secure project data and program files

Strategies:

- **Keep what's working**. Minimize changes to current program core strategies, delivery channels, services and base incentive levels for custom, calculated and prescriptive measures.
- **Broaden Participation by Hard to Reach Customers.** Continue to increase outreach, service and incentives provided to small-medium industries and expand vendor networks in all areas of Energy Trust service territory. Develop tools and tune strategies to support cost-effective service to these customers.
- **Maximize the impact of current Delivery channels.** Leverage and cross-promote within all PE delivery channels to increase savings, provide additional value to Trade Allies and create seamless customer experience.

- **Develop new measures and approaches to save energy.** Continue to develop new prescriptive and calculated savings measures for delivery by Trade Allies in the streamlined tracks. Redesign Strategic Energy Management (SEM) offerings to better support customers who have completed introductory SEM programs.

- **Continuously improve program design and services.** Optimize and standardize introductory SEM offerings to enable expansion of SEM to a much larger number of sites per year. Clear internal capacity constraints for technical management of current project volume and proactively restructure internal technical management function to allow for the expected future growth in numbers of projects due to expanding services to smaller industries. Identify and act to reduce wasted effort in program operations.

- **Engage customers proactively to reinforce persistence and repeat participation.** Reinforce success and improve energy project management with better information about historical and current participation. Leverage peer to peer influence in marketing and outreach, spread best practices by promoting successful strategies and projects. Provide training and recognition that increases customer commitment and capacity to manage their own energy use.

Tactics:

Industrial Gas efficiency is fully integrated into both the Custom and Streamlined tracks of the program, which are described in sections below. The variety of gas measures continues to grow, with increasing process efficiency opportunities coming to light in the custom track especially as the program and its PDCs mature in this area. Greenhouse measures are expected to continue to be the largest contributor to Streamlined gas savings, and new prescriptive or calculated gas measures with potential for Trade Ally delivery will continue to be identified and developed. Incentives for natural gas savings will be retained at the current levels, and are addressed specifically in the Custom, Streamlined and SEM sections of the plan.

- Gas efficiency services and incentives are available to all types and sizes of industries, however Transport customers (typically large users who opt to purchase their gas commodity from a 3rd party, not NWN or CNG) are not eligible to participate.

- The program strategy of continued expansion of Custom PDC outreach and services to small industries (described below) provides an opportunity for long term growth in gas savings from custom and streamlined projects at these sites, most of whom are eligible and not Transport.

The Custom Track provides a comprehensive approach to industrial customer service and one-of-a-kind process efficiency projects, including gas and electric retrofits, new construction and O&M. Savings in the Custom track rely on the work of numerous, specialized consultants and other technical contractors, who are hired by Energy Trust through competitive processes to perform high quality technical work at industrial customer sites on an ongoing or one off basis.

- Delivery is provided by Custom Program Delivery Contractors (PDCs). These contracted industrial engineers and analysts work with all sizes of industrial sites, facilitating program participation. PDCs meet savings goals within a geographic territory by delivering custom projects, which due to the unique processes in most industries represent the majority of program savings. Custom track PDCs act as the primary point of contact with the PE program within their territory, a technical resource and a sales force for the wide variety of tracks and offerings available through the program, in addition to delivery of savings from custom projects at those sites.

    - Expand custom PDC support and services to small-medium industries. In 2014, custom PDCs began serving all sizes of industries in their geographic territory, a shift from their historic focus on medium – large customers. This shift in program strategy requires a multi-year effort to implement, which will continue to grow and evolve in 2015/2016. It builds on the proven success of custom PDCs serving larger customer sites and feedback received through market research showing that staff at smaller industries need more help from Energy Trust to be successful reducing their energy use. Proactive investment in greater services to smaller industries also ties to a long range strategy to invest more in industrial customers paying both 1149 and 838.

    - Leverage custom PDCs as influencers for Trade Ally delivered streamlined measures. Utilize custom PDC relationships with all sizes of

industrial customers and their scoping activities to encourage and reinforce customer awareness and uptake of lighting, small compressed air, and other simpler measures delivered through the streamlined tracks.

- Maintain a pool of well qualified ATACs with engineering expertise in specific systems or industries for one-off Technical Analysis Studies that inform and enable customer investment decision making and provide the basis for custom project incentive offers and savings verification.

- Further deploy cutting edge approaches to engage participants and their employees in implementing permanent operational changes across complex systems, processes or entire organizations. Continue to provide custom technical services including industrial systems retro-commissioning and energy value stream mapping to help customers identify and reduce energy waste.

- Custom Project Incentives will be maintained at the current levels.
    - Custom Capital: incentives are $.25/kWh or $2.00/therm, capped at 50% of eligible costs. Capital projects with < 1 year payback receive $.02/kWh or $.20/therm, capped at 50% of eligible costs.
    - Custom O&M: Savings from industrial systems retro-commissioning or similar persistent custom O&M projects receive $.08/kWh or $.40/therm, capped at 50% of project cost.
        - These Custom O&M projects are also eligible for the 90 by 90 incentive, which increases the project cost cap to 90% of project cost if the O&M project is expedited and complete within 90 days of the study recommendations being made. Maintain current base incentive level of $.25/ first year kWh, capped at 50% of project cost for custom capital projects.

Further develop and deploy **Strategic Energy Management (SEM)**. Provide technical expertise, training and savings incentives to help companies plan, manage and continuously improve their energy performance. Customers practicing SEM have an

organizational commitment to energy management, a plan to improve how they use energy and a way to track measure progress.

SEM savings derive from numerous operational and behavioral changes that have been implemented at a plant as a result of holistic adoption of energy management practices and principles. They are calculated at a meter level using regression based analysis that normalizes for production and other key variables that drive energy use at the plant.

- Continue to recruit a steady stream of 40-60 new SEM participants annually and help the more than 100 sites who have already participated maintain and continuously improve their SEM programs.

- Complete development of' curriculum, tools, materials and implementation guidelines for Core SEM cohorts, which will be the name of the sector's 1 year, intensive introductory SEM offering starting in mid-2015. Core SEM is the synthesis of lessons learned while implementing IEI, CORE and other SEM offerings with over 100 sites from 2009 – 2014. Development of a standardized approach to offering introductory SEM is a key enabler for implementing SEM at a growing number of industrial sites.

    - Core SEM cohorts of 10-15 companies will be open to industrial customers with at least $50,000/ year in eligible energy costs, and will include both larger and smaller industries in the same cohort. This design change follows on the successful CORE SEM pilot for small-medium industries in 2013-2014, which found few real differences between how large and smaller industries adopt SEM. Expanding eligibility to all sizes of industries has also allowed the program to recruit 2015 SEM cohorts in Southern and Central Oregon, for the first time.

- Grow and deploy the pool of qualified Industrial Technical Service Providers (ITSPs) to implement SEM offerings, providing SEM training and technical support to help customers succeed at adopting SEM in their organizations. Because of the human behavior/ culture change at the root of SEM savings, ITSP services represent the majority of incentive costs associated with 1st year SEM savings. SEM services to be offered include SEM cohorts in the Willamette Valley, Southern and Central Oregon (~30 sites), the Corporate SEM for single sites (3 - 7 sites), SEM Maintenance to help re-establish or deepen SEM for

customers who participated in SEM in past years (5 - 10 sites) and peer cohort-based Refrigeration Operator Coaching (ROC) (4 - 7 sites).

- SEM incentives for energy savings are $.02/kWh or $.20/therm.

The Streamlined Tracks achieve savings by developing and equipping a network of Trade Ally vendors to cost effectively deliver prescriptive and calculated savings measures which are more common, simple and replicable. Notably, the Streamlined tracks have driven the sector's massive increase in project volume over the past 5 years, and represented over 2/3 of all projects completed in 2013. Although streamlined measures may be done at any size of industry, the structure of these tracks is particularly well suited to the resource and other business needs of smaller industries and the Ag sector.

The Streamlined Tracks are Delivered by Trade Ally Coordinator PDCs, who acquire annual savings goals on behalf of the program. The TA PDCs develop measures, tools and implement go to market strategies. They recruit, train and cultivate Trade Ally vendors. They perform key QC functions including project technical review and verification and are a resource for technology expertise to the program, trade allies and market.

Industrial Lighting

- Simultaneously promote and continue to study the rapid deployment of LED technologies in industry. Track technology performance and costs and be prepared to tune quickly as this technological change occurs in the market..

- Grow the vendor network for delivering Performance +, formerly Comprehensive Lighting Design, will help increase savings on a per project basis as well as reinforce Trade Ally willingness and ability to design lighting systems around the complex needs of industrial customers.

- Provide up to date information and ongoing support to custom PDCs to enable them to provide sales support for all streamlined savings measures at their customer sites. Coordinate and collaborate to increase the uptake of streamlined savings measures, and provide feedback to help PDCs improve their ability to

facilitate customer adoption of streamlined measures. Focus on developing more effective rural trade ally outreach and training approaches in 2015.

- Lighting incentives
    - Maintain the 2014 custom lighting incentive of $.25/kWh capped at 50% of project cost which, combined with rapid adoption of LED technology, appears to be overcoming a multi-year trend of lagging industrial lighting savings. Fine tune prescriptive LED incentives as reliable information emerges.

The **Streamlined Industrial and Agricultural Initiative** (SIA)

- Expand the Trade Ally and vendor network for effective delivery of irrigation, compressed air and other streamlined industrial measures, and to increase vendor options for participants across the state.
    - Increase outreach staffing resources in eastern, southern, central, OR and the south coast with the focus on additional TA recruitment and support.

- Increase uptake and awareness of agriculture sector offerings by customizing forms and targeting marketing, outreach and technical support more effectively to this discreet sector of PE customers. Collaborate effectively with state, regional and federal ag sector stakeholders.

- Provide up-to-date information and ongoing support to custom PDCs to enable them to provide sales support for all streamlined savings measures at their customer sites. Coordinate and collaborate to increase the uptake of streamlined savings measures, and provide feedback to help PDCs improve their ability to facilitate customer adoption of streamlined measures.

- Develop additional prescriptive and calculated measures and tools for Trade Ally/vendor delivery and require less intensive forms and administration than the custom track.
    - Target increased uptake of the newly designed Compressed Air Leak Reduction offering, which provides leak repairs for smaller compressed air systems at no cost to the customer.

- SIA Incentives

- In Calculated savings measures, savings are estimated by using a tool with a small set of custom variables. They are essentially simpler Custom projects, and incentives are set at the same levels as Custom Capital projects, at $.25/kWh or $2.00/therm, capped at 50% of eligible costs

- Where the program is required to, it will adjust prescriptive measures and incentives, but otherwise, there are no near term plans to change current prescriptive incentives, which appear to be effective.

    - Most SI prescriptive incentives have been reviewed in light of new gas avoided costs and their effect on measure cost-effectiveness. Only one prescriptive measure is now known to be withdrawn for 2015 wheel line irrigation, and this measure has had minimum uptake for years, so there should be little market or savings effect to this change.
    - It is possible that new avoided costs will affect the eligibility of some calculated savings projects, which each project has to pass, but planning analysis shows < 5% overall impact on SI savings.

Marketing

Communicate industrial efficiency success stories and other marketing approaches to spread best practices, influence and reinforce customer behavior, make participation even easier. Program marketing is targeted to positively affect near-term and mid-term savings outcomes.

- Facilitate peer to peer influence for greatest impact. Cultivate industry champions to speak to peers about their experience at industry events, publish the Champion newsletter quarterly, create video case studies and create website enhancements that improve usability.
- Launch an integrated statewide marketing campaign for commercial and industrial markets to promote advanced lighting solutions, including LEDs, controls and lighting design.

- Create new marketing materials to support PDC outreach across the full spectrum of customers; work with the Streamlined PDCs to increase and improve marketing that drives additional savings for equipment and

lighting; provide more support for trade allies selling energy-efficient equipment and lighting products and services.

- Increase Energy Trust's presence in appropriate statewide and industry media to build a higher profile for services and benefits to the industrial sector.

Program Management and Administration

Increase PE program capacity and improve resilience to maintain and continue to grow savings outcomes. Maintain quality and effectiveness of internal management and program administration of public benefits funds despite increasing complexity of program design and strategies.

- Contract for Professional Services, Technical Management Support for Custom and Streamlined projects. Contractor will manage the highly technical, multi-stage review process for industrial efficiency projects. They will provide services to manage ATAC studies and perform technical project review year round, coordinating with PDCs and adding flexible consulting capacity to the PE team during peak periods of project activity.

- Contract for Professional Services, Program Development Support to help program staff effectively execute on efforts to increase savings mid and long term. Develop tools that increase the effectiveness of program strategies and tactics.

    - Complete final development of the standardized introductory SEM curriculum and program materials and deploy as the basis for the 2016 SEM cohorts, which will be recruited and begin by Q4 of 2015. Begin to develop Continuous SEM offering.

    - Develop an electronic Scoping Audit tool that will support PDCs in identifying Streamlined measure opportunities and minimize the time and effort needed to report back on them to customers and the program.

- Begin development of an online Business Customer Portal to empower and engage business customers. Reinforce historical success and continuity by providing direct access to their history of participation. Improve their energy project management and reduce unnecessary delays by providing information about the status of their Energy Trust projects in process.

Evaluate program and incorporate evaluation findings to improve program design, implementation, savings outcomes, cost-effectiveness and customer experience. Evaluations planned for 2015 include:

- PE Process 2014: Late in the year with more of a focus on the PDC implementation, small customer outreach and customer interviews.
- PE SEM Process and Impact: Development and implementation of impact methods and research into persistence and spillover
- PE Impact 2013: Sampling design, site visits
- CORE Pilot Process evaluation: Second year interviews and analysis of energy tracking models
- Mega-project evaluation: On-going review reported savings data
- C&I Lighting controls savings and persistence study: Focus on controls that make up or are projected to make up significant portion of the market.

Collaborators for market transformation and project leads are expected to include the IOUs, NEEA, BPA, Business Oregon, ODOE, Oregon Manufacturing Extension Partnership (OMEP), the High Performance Enterprise Consortium (HPEC), Oregon Association of Clean Water Agencies, Climate Solutions, the Northwest Food Processors Association, Society of Manufacturing Engineers, the Oregon Association of Nurseries, the Resource Conservation & Development Councils, Soil and Water Conservation Districts and national/federal actors such as CEE, ACEEE, US DOE, USDA and US EPA ENERGY STAR.

Key Assumptions for 2015:

Custom Track: Custom Projects and SEM

- Custom project savings targets in 2015 are in line with average, actual custom project savings for the past four years (2013 – 2010). The 2015 pipeline for custom projects is slightly more robust than in prior years. This mature Program offering is relatively well understood by our customers and is undergoing no major changes to offering design in 2015.

- 2015 Savings targets for SEM are 30% higher than forecasted SEM savings in 2014. The main driver for this increase in savings is the continued growth in the number of customers enrolled in SEM offerings in 2015. This spike in enrollment is due to the strategic decision to expand SEM offerings – both geographically and across customer market segments – and to continue to invest in improved outreach and offering design over the past year.

- Custom and SEM delivery costs will rise 4% in 2015. Custom Track PDCs experienced delivery costs higher than anticipated in 2014 mostly due to implementing two new outreach strategies. These outreach strategies were: providing custom technical support to small industries and actively cross-promoting streamlined savings projects to all customers. Both strategies require higher-levels of customer engagement. As the number of projects and the forecasted savings from the Streamlined Tracks are both increasing, the strategies appear to be working and the Custom Track PDCs will continue to implement them in 2015.

- Custom and SEM incentive levels will remain the same in 2015. Growth in the overall amount of budgeted incentives for these tracks in comparison to previous year's actuals, is due to project volume increasing and not due to changes in incentive offerings to customers.

Industrial Lighting

- There is a 10% ramp in 2015 savings goals due to what is working in 2014: the success of the new custom lighting incentive, drop in LED prices and the improved coordination and cross-marketing with the other PDCs are increasing project volume and savings.

- The Lighting PDC Delivery budget increases 19.5% overall, which includes a simple scaling of effort associated with the savings goal increase and a 9% increase in the base Delivery run rate. The increase in run rate is due to the added complexity of PDC efforts needed to sustain high annual savings in the near and mid-term, including increased support for Performance +, rural trade ally outreach and managing the increased requirements and work associated with LEDs.

- In 2014, the custom lighting incentive was increased to 50% of measure cost, capped at $.25/kWh, which is identical with the PE custom non-lighting incentive level for the past 5 years. The incentive increase had a very positive effect on lighting savings, and was well timed to support a large shift to LED technology. Due to changes in the incentive, historical run rates do not provide a good window into what the program can actually expect to pay. There are indications that lighting incentive may cost 15 cents/ kWh in 2014 at year end, but it is too early know. For 2015, the budgeted incentive run rate for industrial lighting is held at 14.4 cents/kWh, the same as 2014's budget.

Streamlined Industrial and Agricultural Initiative (SI)

- Baseline savings increased approximately 10% for both gas and electric projects, reflecting an increase in uptake from some newly developed and more heavily promoted measures and an additional boost from the increased leverage of custom PDCs as sales support for streamlined savings.

- Delivery cost $ per baseline energy savings goal (ie, Delivery run rate) remains flat, but total delivery budget increases because it scales with the goal.
    - The increased trade ally outreach staffing resources in eastern, southern and central, OR and the south coast provides for additional gas and electric savings, separate from the 10% ramp discussed above. Given this new approach and the increased risk, the delivery cost for these savings is higher, but has very minimal impact on the overall Streamlined Industrial delivery run rates because first year savings expectations associated with it are low.

- Budgeted incentive run rates decreased slightly from 2014 budget and are consistent with prior year actuals on the electric side. The gas incentive run rate was dropped 13% from 2014, as there is no bonus planned. The $1 per working therm is also consistent with prior year actuals.

Primary Risks:

- **Incentive Budget Risks**: Goals and their associated incentive budgets are developed bottom up based on program history, current pipeline and estimates of future savings and spending by track. But in any given year, the actual savings and spending will differ greatly by Track and especially by utility territory. This can results in very different actual spending than what was budgeted. Due to some previous years' underspending, direction for 2015 was to minimize over-budgeting of incentives and to rely on reserves if the program has a particularly strong year for savings in a particular utility territory or if actual incentive run rates increased. While it is likely that the total incentive budget for 2015 will be more in line with actual spending at the end of year, there is also a good chance that actual spending in any particular utility territory may exceed budget in 2015.

- **Risk to goals.**- 2015 should continue 2014's forecasted trend of moderate to accelerated growth in savings, depending on the track (Custom, SEM, Lighting and Streamlined). PAC's lower overall, budgeted electric goal in 2015 should moderate the risk of coming up short; the 2015 goal is within the historic average of the past four years. For gas overall, the lower volume of projects continues to leave the Program dependent upon a small number of large projects to drive much of the savings, which increases risk of missing an annual goal. While this has been mitigated by lowering the goal again in CNG territory, the lumpiness of the pipeline remains an on-going concern in NWN territories.

- **838 Limitation on incentive spending for > 1 aMW customers.** Although 2013 spending did not trigger the limitation for spending on customers not paying 838 funding (> 1 aMW), there is a good possibility that 2014 spending will do so. This will be evaluated by April of 2015, and if triggered, the Program will begin to

implement incentive and other changes to reduce spending on these customers in PGE territory.

- 2015 and 2016 Program Goals and Incentive budgets do not include any consideration of the effects of these potential changes on annual savings, assume business as usual operations in the programs serving Large Customers. If spending reductions are needed and changes are made to reduce spending on Large Customers in mid-year of 2015, we would expect a moderate negative impact on 2015 savings and a more significant impact to 2016 savings.

- The PE program is **investing more in delivery services and offerings for the thousands of small-medium industries** who pay both 1149 and 838. There is a risk to actually achieving the benefits to go with these Delivery cost increases in the short term. Less potential savings per site and project increases average delivery cost/kWh. We need to adaptively manage in order to scale these services appropriately and get the most cost-effective outcomes.