

Summary of Audit Related Changes Effective April 1, 2026

From mid-2024 to mid-2025, BPA's Energy Conservation (EC) organization was subject to an internal controls audit. This audit resulted in several changes to BPA's Energy Conservation Program that take effect on April 1, 2026. A ["tracked changes" version of the Implementation Manual](#) (IM) will be posted along with the [IM](#) so customer utilities (utilities) can see how the audit-related changes are reflected in the IM.

Below is a summary of the changes in requirements, links to more information, and resources to help utilities prepare for the changes.

Cost Documentation Requirements and Related IM Changes

Beginning April 1, 2026, utilities must submit cost documentation at the time of submission for all measures where:

1. Implementation costs are incurred
2. EEI reimbursement is requested

Measures exempt from submitting cost documentation include but are not limited to self-funded, Strategic Energy Management (SEM), retail, and coupon or instant rebate measures. Cost documents for these measures may still be requested as part of the oversight process. BPA made changes throughout the IM to clarify what must be submitted at the time of application submission, and what should be retained in the customer file. In addition, BPA eliminated the requirements to submit equipment order or purchase date and expired the requirement to report installed costs in the UES upload template.

For questions about Cost Documentation, please refer to the [UES Cost Documentation FAQ](#) in the [Document Library](#).

How to Upload: Recommendations, User Guides, and Trainings

Bulk uploads (UES and Option 2 Custom): For large files or submitting multiple files at once, BPA strongly recommends using Box. If utilities are submitting only a small number of files and prefer to upload files individually, users can attach a file to each individual application in the [BPA Energy Efficiency Tracking System](#) (BEETS).

BPA is developing a process for bulk uploading files within BEETS, but it will not be ready by April 1, 2026. Please stay tuned for updates on this method.

Lighting: For all lighting measures, please submit cost documentation through the Online Lighting Calculator.

All other programs: Upload documentation according to existing processes.

For instructions on how to upload cost documentation, please refer to the Box Bulk File User Guides (User Guide) and training videos. They are located on [BPA's BEETS Training Materials & Support Resources](#) webpage, under the heading "Cost Documentation Upload Guides and Training Materials."

BPA Site Inspections

Beginning April 1, BPA will conduct 10 total site inspections across the region per fiscal year. Five utilities will be selected each fiscal year. For each selected utility, BPA will conduct two site inspections of UES projects that were reported in BEETS and received EEI funding. The purpose of the site inspections is to verify that the projects meet the applicable Implementation Manual requirements. BPA will select projects from all five EC sectors and will seek to minimize administrative burden on the utility throughout this new process.

Notification and scheduling: The program compliance specialist (PCS - formerly COTR) will email the utility contact informing them of the projects selected for verification. The engineer will follow up with the utility to schedule a site visit and answer any questions.

BPA requests that the utilities contact their end-user to notify them of the site verification and arrange a date and time for the site visit. Utilities are encouraged to participate in the site visit with the engineer whenever possible. If the end-user refuses to participate, please notify the PCS and engineer. BPA will work with the utility to find a solution or identify an alternative project.

Site inspection and follow-up: Inspections will be completed by BPA Engineering staff. The engineer will notify the PCS, the energy conservation account executive (ECAE- formerly EER), and the utility of the results. If a compliance issue is found, the PCS will take the same actions as they would during oversight. ECAEs can answer general questions about the site inspection process, but questions about a specific inspection should be directed to the conducting engineer.

Additional Audit-Related Changes

Utilities will see a few other audit-related changes to BEETS effective April 1, 2026:

- The UES utility review form will have a checkbox that utilities can use to indicate whether they completed a site inspection. BPA may request documentation for these customer site inspections.
- The Direct Funding Distribution (DFD) checkbox will change to a yes/no dropdown, with an additional field to input the DFD agreement number. Utilities will now be required to indicate when an application is supported by DFD.

For More Information:

For a more detailed overview, please review the [presentation](#) and [video recording](#) from the February 26 webinar “April 1, 2026 Implementation Manual Audit Related Changes.”

Please contact your ECAE if you have any questions or need additional information.

