



UES Cost Documentation Frequently Asked Questions



Frequently Asked Questions

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Effective April 1, 2026, BPA requires cost documentation to be submitted into BPA Energy Efficiency Tracking System (BEETS) or other BPA-approved methods when requesting Energy Efficiency Incentive (EEI) payment for Unit Energy Savings (UES) measures and Option 2 Custom at the time of submission. Customer utilities (utilities) should submit the same cost documentation that has been previously accepted, with few exceptions. This document is intended to answer Frequently Asked Questions (FAQ) about what information is included in cost documentation. It is not a separate compliance document and will be updated as needed.

For detailed guidance on uploading documentation, please refer to the [BEETS Training Materials & Support Resources](#) webpage. Utilities may also contact their Energy Conservation Account Executive (ECAE – formerly EER) for further clarification.

1. I am confused by the new documentation that must be submitted to BPA. What am I required to send beginning April 1, 2026?

Effective April 1, 2026, utilities must submit cost documentation to BPA at the time of submission when requesting EEI payment for UES measures and Option 2 Custom that incur a cost. The primary change is the method of data collection, with only minor changes to what documentation is required. All Implementation Manual (IM) changes are listed in the [Appendix B. April 2026 Changes and Corrections Summary of the IM](#).

2. I have noticed structural changes in the documentation requirements tables, including a new row for “cost documentation” and “technical elements” (e.g., quantity, manufacturer, and model), which used to be under “invoice or installation cost”. What do these changes mean for me?

These structural changes have been made to the documentation requirements tables throughout the IM to clarify what documentation must be submitted to BPA at the time of reporting a measure (e.g., cost documentation) versus what information utilities keep in their customer file. Items retained in the customer file (e.g., quantity, make, model) may be requested for oversight. Often, a single document, such as a contractor invoice, may include all the required cost and technical information and can be submitted to BPA. Alternatively, utilities may have one document listing cost and another for technical elements (e.g., drawings, spec sheets, site inspections).

3. Are there any situations where cost documentation is NOT required at the time of submission?

Yes, there are two exceptions where cost documentation is not required at the time of submission to BPA:

- 1) **Self-funded measures:** For UES measures when the utility is not requesting BPA payment, cost documentation is not required for submission. However, it must be kept in the customer file and provided to BPA if selected for oversight.
- 2) **Measures without cost documentation requirements:** A limited number of measures do not require cost documentation. These include Strategic Energy Management and residential sector measures using retail or coupon/instant rebate channels (as detailed in IM Section 6.2).

4. What information should the cost documentation include?

Cost documentation varies by measure type but must always demonstrate that the measure was purchased or otherwise implemented. Per the IM, cost documentation “reflects eligible project costs incurred to implement the project.” Examples include invoices, purchase orders, receipts, requests for payment, and change orders.

5. Do estimates or quotes qualify as cost documentation?

No. Proposals, estimates, quotes, or project bid documentation can be combined with final invoicing to be considered cost documentation, but they do not qualify as cost documentation on their own.

6. How should the cost documentation files be named when submitted?

For more information on how and where to upload documentation, including file naming conventions for cost documentation, please refer to the [BEETS Training Materials & Support Resources](#) webpage.

7. Am I required to have separate documents for cost documentation and technical requirements for each measure?

No, if the cost and technical information is included in a single document, that is sufficient. This single document can be submitted to BPA and stored in the customer file.

8. What if cost documentation includes costs for two separate measures?

Costs for each measure should be clearly itemized, even if the work is completed together. Documentation should break down spending per measure, ideally with contractors providing invoices that include distinct line items. This ensures BPA can accurately attribute costs to eligible measures, especially when different eligibility criteria or funding caps apply.

9. For measures reported in bulk on a single invoice, do I need to submit the invoice for each instance?

No, these do not need to be separated into individual documents by measure if they are for the same location. Please upload one piece of cost documentation for the applicable measures, ensuring that the invoice filename clearly indicates which applications are associated with it. This also applies to situations where multiple measures are installed at the same site and appear on the same invoice (e.g., attic, wall, and floor insulation costs).

10. For measures reported in bulk on multiple invoices (e.g., a single application for several “standard rebate” clothes washers), do I need to submit the invoice for each instance?

Yes. Costs for each item in an application must be submitted. These can be combined into a single file.

11. Will customers be asked to break out and itemize labor and materials by each measure?

No. Individual labor and material costs are not required to be broken out for each measure.

12. If I have one cost document that includes costs for three projects, but the labor for all three projects is a single line item, how should I document cost?

Combined labor costs are acceptable for Non-Income Qualified applications. For Income Qualified (IQ) applications, the utility should indicate how the combined labor costs were allocated to each IQ measure cost (and repair cost, if eligible).

13. What does acceptable cost documentation look like for a measure implemented using utility labor (e.g., street lighting), or utility funds (e.g., Performance Tracking System)?

There is no requirement that cost documentation be an invoice paid by the end user. Documentation that lists the utility as the payer is acceptable. Documentation of utility accounting for internal labor costs is also acceptable. Internal labor costs must be reasonable, at market value, and directly associated with the implementation of the project (e.g. time for associated with the managing of employees performing the actual work is not eligible). Please refer to the [Online Lighting Calculator \(OLC\) FAQs](#) for a detailed discussion of internal labor cost documentation.

14. My hardware store's receipt contains all the required information except for the model number. Should I contact the hardware store for the missing information?

At the time of submission, the receipt alone can satisfy the cost documentation requirement, even without the model information. However, additional documentation with model information can be retrieved from another source (e.g., the retailer or manufacturer website) and kept in the customer file and be provided to BPA if the submission is selected for oversight.

15. My UES measure was installed as part of a new construction project, and the measure details are not referenced in the cost documentation. What should I do?

Cost documentation for the entire new construction project scope is acceptable for meeting the cost documentation requirement for any measure(s) included within the scope, even if the specific measure is not itemized. In this case, additional documentation will likely be needed to support measure specific technical elements (e.g., drawings, spec sheets, site inspections).

16. Are there any special requirements for non-residential lighting projects?

Cost documentation is required at the time of submittal for all non-residential lighting projects. If the OLC is used, the cost documentation should be attached per the instructions in the [OLC User Manual](#). For OLC projects that use the new construction measure, the IM lists three different options for calculating an incremental measure cost. The cost documentation provided for these projects should align with the approach used to calculate incremental project cost. For example, if incremental cost is calculated as 2.86 percent of the whole building construction costs, then the provided cost documentation should represent the whole building construction cost.

17. I have a project where a heat pump water heater was installed for less than the payment listed in the IM. Will this affect payment eligibility?

For standard UES measures, the listed payment amount is a cost cap designed not to exceed total implementation cost of the measure at the time payments are set. Some individual project payments might exceed documented costs due to market variability and project complexity. However, unless specified for measures (e.g., including IQ or Performance Tracking Systems), BPA generally does not cap UES measure payments based on submitted cost documentation. BPA may use submitted cost documentation to inform future payment adjustments.

18. Are labor and equipment included under “cost”, especially within IQ measure costs?

Yes. All costs associated with the implementation of the measure can be reported, including:

- Equipment or materials
- Labor
- Verification of Income
- Permit fees
- Disposal fees
- Shipping or freight expenses
- Sales tax

19. For IQ measures, do measure costs and repair costs need to be itemized?

If additional EEl payment for repair costs for the measure is requested above and beyond the IQ payment cost cap, both IQ measure costs and repair costs must be itemized. If repairs are completed within the IQ measure payment cost cap and the utility does not request additional EEl payment for repairs, there is no need to distinguish between IQ measure and repair costs in the cost documentation.

20. For IQ homes that our partner Community Action Agency (CAA) works on, how do we manage this new cost requirement when documentation from CAAs often include multiple projects using different funding sources, one of which is BPA?

BPA’s funding is specifically tied to energy conservation measures that meet our program requirements. If a CAA includes information about projects using non-BPA funding in submitted cost documentation, energy conservation upgrades directly funded by BPA should be itemized. When BPA funding contributes only a small portion of a larger project, it's crucial to clearly delineate the costs associated with the BPA-funded measures.