



Update Regarding Non-Participating Savings from the Simple Steps Program

Simple Steps provides regional coordination for retail promotion of CFLs, LEDs, lighting fixtures, shower heads, and appliances. The program also includes delivery options for direct install, by request, and mailed non-request to assist NW utilities with program delivery.

In June 2015, the retail portion of the program shifted to a new funding model. Prior to that timeframe, if a store had sales to customers of both Participating and Non Participating Utilities, BPA paid for Non-Participating Savings (NPS) and reported those savings towards regional targets. This change was in direct response to the Post 2011 process in which utilities expressed interest that regional program should be funded by the utilities who participate in them.

As part of the transition to the new program model, the cost to participating utilities changed from a per unit cost to a per kWh cost, to support the wide range of product options offered by Simple Steps. In this new model, participating utilities cover most costs of the program, sales directly attributed to their service territories as well as sales in the service territories of non-participating utilities. Early in 2015, utilities requested that the pool of NPS be redistributed amongst participating utilities.

In December, Simple Steps participating utilities received notice indicating the ability to claim these savings as self-funded. Unfortunately, it was identified soon after that this was not possible due to language in both the ECA and Implementation Manual which states that conservation must be achieved in a utility's service territory to be claimed as EEI or self-funded.

To address this issue, BPA proposes to proceed with the following steps:

- CLEAResult will generate a report at the end of each fiscal year with total NPS and provide this report to Simple Steps participating utilities.
- BPA would attribute these savings to a non-utility-specific self-funding account in IS2.0 to count towards the achievement of the entire region's energy efficiency and self-funding goals.



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- The savings would remain in BPA's reporting system to ensure it can be reported to the Council as part of the utility self-funded share, with no utility assigned to them.
 - Each Simple Steps participating utility would receive a report of the sales in non-participating utility territories funded by them as a participating utility.

If you have any questions or comments about this approach, please contact your Energy Efficiency Representative with your input by Feb. 26.