

ITEM NO. RA2

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: February 22, 2022**

REGULAR X CONSENT _____ EFFECTIVE DATE February 23, 2022

DATE: February 14, 2022

TO: Public Utility Commission

FROM: Anna Kim

THROUGH: Bryan Conway, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1158)
2022 performance measure recommendations for Energy Trust of Oregon.

STAFF RECOMMENDATION:

Staff recommends the Oregon Public Utility Commission (Commission or OPUC) adopt the proposed performance measures as stated in this memo for evaluating the performance of Energy Trust of Oregon (Energy Trust) in 2022.

DISCUSSION:

Issue

Whether the Commission should adopt the proposed performance measures for evaluating the performance of Energy Trust in 2022.

Applicable Law

Energy Trust operates under a grant agreement with the Commission, as authorized under ORS 757.054(4), ORS 757.612(3), and ORS 757.746. The grant agreement requires the PUC to establish quantifiable performance measures that clearly define its expectation of Energy Trust's performance. The following statement can be found on page 3 of the grant agreement:

The Energy Trust and the PUC recognized the need for having valid and quantifiable performance measures that clearly define the PUC's expectation of the Energy Trust's performance. The performance measures are developed to

clarify minimum expectations for Energy Trust on an ongoing basis and may be adjusted from time-to-time. The Energy Trust will regularly report to the PUC, comparing actual performance to the PUC established performance measures. Should the Energy Trust fail to meet the performance measures adopted by the PUC, the PUC, at its discretion, may issue a Notice of Concern. In choosing to issue such a Notice of Concern, the PUC will take into account reasonable causal factors and any mitigating actions taken by the Energy Trust.

Analysis

This memo provides: (1) an overview of the performance measure development; (2) descriptions of each performance measure proposed for 2022; and (3) a table summary of the 2022 performance measures.

Purpose and Process

The purpose of Energy Trust performance measures is to clearly define the Commission's minimum expectations. Performance measures are not meant to be targets or goals. Rather, they reflect a threshold by which regulators can determine the health of Energy Trust programs. They are meant to provide early indicators of poor performance, which if not met, signal that intervention may be required. Energy Trust sets specific goals, collaboratively developed with utilities and Staff, in its annual budget and action plan. These goals are based on available conservation and renewable generation as indicated by utility Integrated Resource Plan (IRP) targets and market studies.

While the annual update of performance metrics primarily takes place between Energy Trust and Staff, a substantial amount of work happens between the utilities and Energy Trust each year to develop Energy Trust's energy efficiency and renewable goals as a part of the budget development process. Under ORS 757.746(1), Energy Trust will be developing jointly with the utilities public utility-specific budgets, action plans, and agreements. Energy Trust is working with utilities in 2022 to establish a process to develop these items jointly, and will implement the new process for the 2023 budget and action plan. In November each year, Energy Trust presents its annual budget and action plan to the Commission. The Commission then offers insight, direction, and recommendations to Energy Trust, before finalization of the budget in December by the Energy Trust Board.¹ Energy Trust presented its 2022 budget and action plan to the Commission at a special public meeting on November 16, 2021.²

¹ For more information on Energy Trust's budget process please see <https://www.energytrust.org/about/reports-financials/budget-action-plan/>.

² For more information on this special public meeting please go to https://oregonpuc.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=856.

Overview of Performance Measure Categories

Energy Trust performance measures cover a wide range of operational aspects as follows:

- 1) Electric Energy Efficiency;
- 2) Natural Gas Energy Efficiency;
- 3) Renewable Energy;
- 4) Financial Integrity;
- 5) Program Delivery Efficiency;
- 6) Staffing;
- 7) Customer Satisfaction;
- 8) Benefit/Cost Ratios;
- 9) NEEA and Market Transformation; and
- 10) Diversity, Equity, and Inclusion.

In 2012, the Commission approved a more systematic approach to developing Energy Trust's annual performance measures.³ Each performance measure was explicitly linked to either Energy Trust's annual budget goals and/or references Integrated Resource Plan (IRP) targets for a specific utility. Below, Staff reviews each metric and identifies proposed changes for 2022.

Descriptions of Performance Measure Categories

Measures 1 and 2: Electric and Natural Gas Efficiency Savings and Levelized Costs

These performance measures for savings and levelized costs use the Board-approved savings goal as the basis for their calculations. The single savings objective per utility is calculated each year as 85 percent of Energy Trust's Board-approved savings goal at a levelized cost ceiling.⁴ The table below compares the 2021 and 2022 savings and proposes a levelized cost performance measure for each utility.

³ See UM 1158, Commission Order No. 12-094.

⁴ The OPUC's levelized cost ceiling for Energy Trust is 115 percent of the Board-approved levelized cost goal for that year.

Table 1 – Efficiency Performance Measures by Utility, 2021 and 2022

Utility	2021 Performance Measure (Minimum aMW/therm and Levelized Cost)	2022 Performance Measure (Minimum aMW/therm and Levelized Cost)
Portland General Electric (PGE)	21.1 aMW at no greater than \$0.046/kWh	24.7 aMW at no greater than \$0.040/kWh
PacifiCorp (PAC)	17.1 aMW at no greater than \$0.040/kWh	18.3 aMW at no greater than \$0.039/kWh
Northwest Natural (NWN – Oregon Only)	4.3 M therms at no greater than \$0.51/therm	4.9 M therms at no greater than \$0.54/therm
Cascade (CNG)	0.49 M therms at no greater than \$0.63/therm	0.64 M therms at no greater than \$0.63/therm
Avista	0.38 M therms at no greater than \$0.48/therm	0.56 M therms at no greater than \$0.59/therm

Staff notes the continuing year-over-year increase in levelized costs for two of the natural gas utilities, and reductions for the electric utilities. This is an improvement over the 2021 budget, in which Energy Trust anticipated increasing levelized costs in four out of five utilities. As discussed in Staff’s memo on Energy Trust’s budget, Energy Trust predicted an overall increasing levelized costs for gas. Energy Trust cautions that these declining levelized costs for 2022 are not a trend, and many factors led to these forecasts, with no dominant factor.⁵

While levelized costs are an important indicator of performance, Staff anticipates net peak reductions, greenhouse gas reductions, and other forms of targeted energy efficiency to alleviate energy burden or localized distribution needs will become as important in future budgets. These key considerations may translate to future discussions on additional performance metrics.

Measure 3: Renewable Energy

In 2020, the Commission adopted Staff’s recommendation to make minor adjustments within the metric. The new measures report on trends over time and allow OPUC to

⁵ Staff Memo, Presentation of 2022 Draft Budget and 2022-23 Action Plan. p 12. found at https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&clip_id=856&meta_id=31180.

offer more customized insights without penalizing Energy Trust for the normal variations in custom, non-solar project development and completion.

- 1) Deploy \$1.5 Million in project and market development assistance with a project pipeline of non-solar projects in excess of 15 projects. Energy Trust will report the number of projects served, total funds spent, and summarize progress.
- 2) For project and market development assistance, Energy Trust will report annual results, including number of projects supported, milestones, and documentation or results from market and technology perspectives.
- 3) For the standard net-metered solar program, obtain at least 3.4 aMW of installed generation.
- 4) For solar projects funded outside of the program's standard net-metered incentive offer, Energy Trust will report all sources of funding for projects and the criteria for selection.

Staff proposes a fifth metric for the Renewables Program for 2022. HB 3141 requires that Energy Trust spend 25 percent of renewables funds (including self-direct customers) on activities, resources, and technologies that serve low and moderate income customers starting this year.⁶ Energy Trust expects to be close to the 25 percent target in 2021 and is prepared to spend the target in 2022.

- 5) Invest at least \$3.8 million, 25 percent of public purpose revenue for renewables, to provide activities, resources and technologies for low and moderate income customers.

In the future, Staff is considering changes to the first four performance metrics for the Renewables Program. Renewables metric 2 appears duplicative of metric 1 as both report on the same activities. Staff also notes that Energy Trust has been making a range of changes to its solar offerings and metrics 3 and 4 may need to be updated to reflect the changes.

Measure 4: Financial Integrity

Energy Trust engages a third party annually to conduct a financial audit once the calendar year has closed. Staff proposes to maintain the current performance measure for financial integrity, which is to receive an unmodified financial opinion. Energy Trust has met this measure every year since launching.

Measure 5: Program Delivery Efficiency (Administration)

The program delivery efficiency measure is a maximum threshold for administrative and program support costs and is calculated as a percentage of total annual revenues. The

⁶ OR Laws 2021, Ch. 547, Section 11.

initial target of 11 percent was set in 2004 when establishing Energy Trust's performance measures.⁷ Currently, the performance measure is set to 8 percent of revenues.⁸

Since the 2019 budget cycle, Energy Trust has updated its annual budget documents to make it easier to determine applicable costs for this OPUC performance measure.⁹

Administrative costs fall under the following categories:

- Employee Salaries and Fringe Benefits if not directly related to program delivery;
- Agency Contractor Services if not billed to program delivery;
- Planning and Evaluation Services if not billed to program delivery;
- Advertising and Marketing Services if not billed to program delivery;
- Other Professional Services if not billed to program delivery;
- Travel, Meetings, Trainings and Conferences;
- Dues, Licenses and Fees;
- Software and Hardware;
- Depreciation and Amortization;
- Office Rent and Equipment;
- Materials Postage and Telephone; and
- Miscellaneous Expenses.¹⁰

Staff proposes to keep this measure the same as last year.

Measure 6: Staffing

A performance measure for Energy Trust's staffing costs has been in effect since 2015.¹¹ The measure is determined by calculating a three-year rolling average of total staffing costs divided by total annual expenditures. The three years used in the average are: the proposed next year's budget, current year budget forecast, and prior year actual costs. In 2017, Staff worked with Energy Trust to revise the performance metric from a 7.75 percent three-year rolling average, including contractor costs, to a 7.25 percent three-year rolling average, *not including agency contractor costs*. The metric was also modified to include a 10 percent cap on year-over-year increases.¹²

⁷ See Order No. 04-593.

⁸ See Order No. 15-127.

⁹ See Order No. 18-076.

¹⁰ See Staff Report at Special Public Meeting on Energy Trust's 2019 Budget, November 8, 2018, pg. 10-11.

¹¹ See Order No. 15-127.

¹² See Order No. 18-076.

To increase transparency and accountability, Energy Trust began to report employee (staffing) costs and agency contractor costs separately in the 2019 budget. Agency contractors became a new line item in the budget.

In August 2019, in Order No. 19-292, the Commission adopted the following changes to Staffing metrics:

- 1) For the next two years (2020-2021), reduce the annual growth in staffing costs from 10 percent to no more than 9 percent from year to year.
- 2) Remove the rolling average of staffing costs as a percent of total costs as the relationship between the two cost categories is continuing to evolve.
- 3) Report to the Commission on staffing trends and provide a recommendation for 2022 performance measures.¹³

These changes were enacted in response to the combination of declining savings projections and steeply increasing medical benefits costs at the time, which indicated that the existing performance metric was not providing the information the Commission sought. In this section, Staff provides some background and analysis, and concludes with a recommendation for the Staffing performance metric.

Staff worked with Energy Trust and stakeholders in early 2020 to identify opportunities to reduce costs and monitor changes in staffing cost needs. In response to the changing impacts of the COVID-19 pandemic, Energy Trust has faced a variety of new challenges and has been making ongoing adjustments. These include encouraging employees to use accrued vacation balances in 2021, which are a financial liability within this metric.

The following table shows staffing costs by category as represented in past budgets, and estimated projections. Beginning with the 2020 budget, Energy Trust has reported numbers specifically related to the OPUC grant agreement, excluding activities in Washington and its contract with the Community Solar Program. In Table 2 below, these costs have also been removed from past budgets to ensure numbers represent the OPUC grant only.

¹³ See Order No. 19-292 pg. 6.

Table 2 – Budgeted Staffing Costs by Category

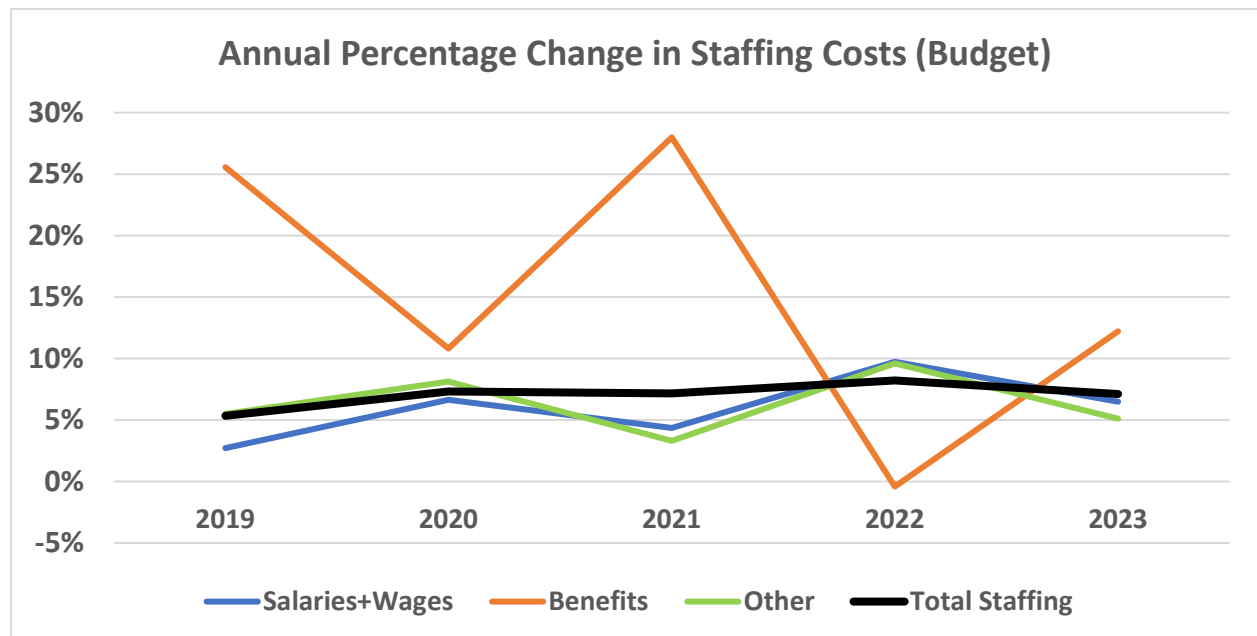
	2019 Budget	2020 Budget	2021 Budget	2022 Budget	2023 Projection
Salaries + Wages	\$10,694,487	\$11,404,360	\$11,901,167	\$13,059,737	\$13,906,577
Benefits	\$1,682,802	\$1,864,746	\$2,386,672	\$2,376,851	\$2,667,432
Other	\$1,649,684	\$1,783,992	\$1,843,003	\$2,020,051	\$2,123,359
Total Staffing	\$14,026,973	\$15,053,097	\$16,130,842	\$17,456,639	\$18,697,368

The Benefits category includes medical, dental, life insurance, and disability insurance.

The Other category contains:

- Payroll taxes;
- 401k;
- Net change in accrued vacation liability;
- Fees the organization pays to the 401k and savings plan providers; and
- Employee recognition.

The following chart shows the amount of change across staffing cost categories. The Benefits category continues to have the largest fluctuations and is primarily driven by medical benefits costs.



Staff notes that medical benefits costs continue to be an uncertainty and remain a cost that Energy Trust has little control over. After monitoring medical benefits costs and other staffing considerations over the last two years, Staff recommends that starting next year, the Commission exclude the benefits category from the Staffing cost metric.

In Order No. 19-292, Staff was directed to return with recommendations on staffing performance measures. Staff recommends that the Commission maintain the Staffing performance measure for 2022:

Staffing cost growth is limited to 9 percent year-over-year increase

Staff anticipates requesting a change in the Staffing performance metric for 2023 to:

Staffing cost growth (excluding benefits) is limited to 9 percent year-over-year increase

Staff believes that making this minor change in the future will lead to a more accurate picture of Energy Trust's management of staffing costs while maintaining Energy Trust's flexibility to adjust to changing markets, including changes due to the ongoing impacts of the COVID-19 pandemic. This change is not reflected in Staff's recommendation for 2022 performance metrics. Staff presents this potential change now so that Energy Trust has the opportunity to develop its next budget under these assumptions.

Measure 7: Customer Satisfaction

Energy Trust should maintain a minimum of 85 percent of customers indicating they are satisfied or very satisfied with interaction with program representatives where they are utilized (e.g., Existing Buildings Program), and overall satisfaction. Staff proposes to keep the customer satisfaction performance measure the same as last year.

Measure 8: Benefit/Cost Ratios

Staff proposes to maintain the current performance measures for benefit/cost ratios as shown in Table 4 below.

Measure 9: NEEA and Market Transformation

Staff proposes to maintain the current performance measures for work with the Northwest Energy Efficiency Alliance (NEEA) as shown in Table 4 below.

Measure 10: Diversity, Equity, and Inclusion

In Order No. 19-292, the Commission established a new category of performance measures to support and monitor Energy Trust's work in diversity, equity, and inclusion (DEI). The existing performance measures for 2021 are:

- 1) Implement a supplier diversity tracking system as outlined in the 2021 Budget and Action Plan.
- 2) Develop a trade ally dashboard to track diverse spend in trade ally activities with stakeholder participation.
- 3) Complete implicit bias training for all hiring managers.

As of February 7, 2022, Energy Trust has completed DEI performance metrics 2 and 3. Energy Trust is unfortunately behind on DEI performance metric 1. Energy Trust did not budget sufficient time to meet with all of the necessary stakeholders during the scoping process and needed more time to complete this metric. Energy Trust expects to complete the supplier diversity tracking system mid-2022. Once complete, these three measures are no longer necessary. Staff recommends removing these performance measures and replacing them for 2022.

For 2022, Staff has been preparing to engage with stakeholders on developing environmental justice equity metrics as required by House Bill 3141, which requires the OPUC to establish in 2022 and update no less than every four years equity metrics to assess, address, and create accountability for environmental justice in the expenditure and investment of funds provided to a non-governmental entity to acquire energy efficiency and small-scale renewables.¹⁴ Staff notes significant overlap between this new statutory requirement and the existing category for DEI in support of Energy Trust's own DEI initiative.

Staff expects to begin meeting with stakeholders in early Q2 on the development of these equity metrics as required by House Bill 3141. Staff recently posted a Request for Information for a third-party consultant to assist with outreach and engagement activities related to development of these metrics.¹⁵ Staff plans to select a consultant by the end of Q1 and lead a public process to collaboratively develop equity metrics.

Given the timing of this requirement, Staff does not want to create more DEI performance metrics that will preempt the discussions to come on the equity metrics. At this time, Staff recommends that Energy Trust focus on activities that will help prepare for the larger stakeholder discussions that will take place later this year. In Staff's analysis of Energy Trust's 2022 budget and action plan, Staff discussed some opportunities for Energy Trust to collect information that will be useful for these discussions. The Commission adopted the following recommended activities for Energy Trust:

¹⁴ OR Laws 2021, Ch. 547, Section 11.

¹⁵ RFI# S-86000-00001999 found at: <https://oregonbuys.gov/bsol/>.

- Work with utilities to identify environmental justice communities in their service territories.
- Estimate the prevalence and impacts of alternative fuels within the service territory.
- Research opportunities to provide low-cost cooling measures.¹⁶

Staff recommends that these activities be captured in a performance metric:

1. Energy Trust will come to the equity metrics development process prepared to discuss information requested by the Commission as outlined in the Budget related to: key communities by utility service territory, impact of alternative fuels, and cooling measure opportunities.

In addition to these actions, Staff recommends additional outreach activities that Energy Trust can conduct leading up to the discussions of equity metrics.

2. Energy Trust shall conduct a minimum of four engagement activities with community organizations to present, refine, and finalize Energy Trust goals for DEI Operations.

Staff recommends this activity as these interactions will improve Energy Trust’s relationships with stakeholder communities and collect additional information on opinions related to performance metrics.

Staff summarizes the proposed 2022 DEI measures below compared to 2021. Please note that there is also a new metric for renewables spending on low and moderate income customers discussed in the renewables section.

Table 3 – DEI Performance Measures for 2021 and 2022

2021 Measures	Proposed 2022 Measures
<ul style="list-style-type: none"> • Implement a supplier diversity tracking system as outlined in the 2021 Budget and Action Plan. • Develop a trade ally dashboard to track diverse spend in trade ally activities with stakeholder participation. • Complete implicit bias training for all hiring managers. 	<ul style="list-style-type: none"> • Energy Trust will come to the equity metrics discussions prepared to provide information requested by the Commission as outlined in the Budget related to: <ul style="list-style-type: none"> • Key communities by utility service territory • Impact of alternative fuels • Low-cost cooling measure opportunities. • Energy Trust shall conduct a minimum of four engagement activities with community organizations to present, refine and finalize Energy Trust goals for DEI Operations.

¹⁶ Staff Memo, Presentation of 2022 Draft Budget and 2022-23 Action Plan. p 15. found at https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&clip_id=856&meta_id=31180.

Proposed 2022 Performance Measures

The proposed 2022 performance measures for Energy Trust are detailed below. They include the previous year’s performance measures for comparison purposes.

Table 4 – Performance Measures for 2021 and 2022

Category	2021 Performance Measure	Proposed 2022 Performance Measure
1. Electric Energy Efficiency	Annual utility savings and levelized cost measure: <ul style="list-style-type: none"> • PGE: Obtain at least 21.1 aMW; Levelized cost not to exceed 4.6 cents/kWh. Pacific Power: Obtain at least 17.1 aMW; Levelized cost not to exceed 4.0 cents/kWh.	Annual utility savings and levelized cost measure: <ul style="list-style-type: none"> • PGE: Obtain at least 24.7 aMW; Levelized cost not to exceed 4.0 cents/kWh. • Pacific Power: Obtain at least 18.3 aMW; Levelized cost not to exceed 3.9 cents/kWh.
2. Natural Gas Energy Efficiency	Annual utility savings and levelized cost measure: <ul style="list-style-type: none"> • NW Natural: Obtain at least 4.3 million annual therm savings; Levelized cost not to exceed 51 cents/therm. • Cascade Natural Gas: Obtain at least 0.49 million annual therm savings; Levelized cost not to exceed 63 cents/therm. Avista: Obtain at least 0.39 million annual therm savings; Levelized cost not to exceed 48 cents/therm.	Annual utility savings and levelized cost measure: <ul style="list-style-type: none"> • NW Natural: Obtain at least 4.9 million annual therm savings; Levelized cost not to exceed 54 cents/therm. • Cascade Natural Gas: Obtain at least 0.64 million annual therm savings; Levelized cost not to exceed 63 cents/therm. • Avista: Obtain at least 0.56 million annual therm savings; Levelized cost not to exceed 59 cents/therm.

Category	2021 Performance Measure	Proposed 2022 Performance Measure
3. Renewable Energy	<ul style="list-style-type: none"> • For project and market development assistance (part 1), deploy at least \$1.37 million in non-solar project development assistance incentives. Maintain a non-solar project development assistance pipeline in excess of 25 projects. Report number of projects served total dollars spent, and summarize project progress through development stages. • For project and market development assistance (part 2), report annual results, including number of projects supported, milestones met and documentation of results from market and technology perspective. • Obtain at least 2.5 aMW of installed generation of standard net-metered Solar program projects. • For solar projects funded outside of the Solar program's standard, net-metered incentive offer, report sources of funding for projects and the criteria for selection. 	<ul style="list-style-type: none"> • For project and market development assistance (part 1), deploy at least \$1.5 million in non-solar project development assistance incentives. Maintain a non-solar project development assistance pipeline in excess of 25 projects. Report number of projects served total dollars spent, and summarize project progress through development stages. • For project and market development assistance (part 2), report annual results, including number of projects supported, milestones met and documentation of results from market and technology perspective. • Obtain at least 3.4 aMW of installed generation of standard net-metered Solar program projects. • For solar projects funded outside of the Solar program's standard, net-metered incentive offer, report sources of funding for projects and the criteria for selection. • Invest at least \$3.8 million, 25 percent of public purpose revenue for renewables, to provide activities, resources and technologies for low and moderate income customers.
4. Financial Integrity	Unmodified financial opinion	Unmodified financial opinion
5. Program Delivery Efficiency	<ul style="list-style-type: none"> • Administrative and program support costs must be below 8% of annual revenues (no more than \$14,443,806). • Administrative and program support cost growth is limited to 10% year-over-year increase (no more than \$1,383,127). 	<ul style="list-style-type: none"> • Administrative and program support costs must be below 8% of annual revenues (no more than \$15,980,475). • Administrative and program support cost growth is limited to 10% year-over-year increase (no more than \$1,408,400).
6. Staffing	<ul style="list-style-type: none"> • Staffing cost growth is limited to 9% year-over-year increase (no more than \$1,354,779). 	<ul style="list-style-type: none"> • Staffing cost growth is limited to 9% year-over-year increase (no more than \$1,451,776).

Category	2021 Performance Measure	Proposed 2022 Performance Measure
7. Customer Satisfaction	Greater than 85% satisfaction rates for: <ul style="list-style-type: none"> • Interaction with program representatives • Overall satisfaction 	Greater than 85% satisfaction rates for: <ul style="list-style-type: none"> • Interaction with program representatives • Overall satisfaction
8. Benefit/Cost Ratios	<ul style="list-style-type: none"> • Report both utility system and societal perspective annually. • Report significant mid-year changes as warranted in quarterly reports. 	<ul style="list-style-type: none"> • Report both utility system and societal perspective annually. • Report significant mid-year changes as warranted in quarterly reports.
9. NEEA and Market Transformation	Report annually: <ul style="list-style-type: none"> • Savings and costs • Savings strategies • Show Energy Trust direction to NEEA through committee membership • Summary of Energy Trust direction to NEEA • Summary of NEEA initiatives Energy Trust opts out of and why 	Report annually: <ul style="list-style-type: none"> • Savings and costs • Savings strategies • Show Energy Trust direction to NEEA through committee membership • Summary of Energy Trust direction to NEEA • Summary of NEEA initiatives Energy Trust opts out of and why
10. Diversity, Equity, & Inclusion	<ul style="list-style-type: none"> • Implement a supplier diversity tracking system as outlined in the 2021 Budget and Action Plan. • Develop a trade ally dashboard to track diverse spend in trade ally activities with stakeholder participation. • Complete implicit bias training for all hiring managers. 	<ul style="list-style-type: none"> • Energy Trust will come to the equity performance metrics discussions prepared to provide information requested by the Commission as outlined in the Budget related to: <ul style="list-style-type: none"> • Key communities by utility service territory • Impact of alternative fuels, and • Low-cost cooling measure opportunities. • Energy Trust shall conduct a minimum of four engagement activities with community organizations to present, refine and finalize Energy Trust goals for DEI Operations.

Conclusion

Staff proposes adopting the performance measures listed in Table 4.

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PROPOSED COMMISSION MOTION:

Adopt the proposed performance measures as stated in this memo for evaluating the performance of Energy Trust in 2022.

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