

Public Utility Commission of Oregon Attention: Filing Center 201 High Street SE, Suite 100 Salem, OR 97301-3398 Via Electronic filing only to: PUC.FILINGCENTER@puc.oregon.gov

December 28, 2021

RE: UE 374 PacifiCorp dba Pacific Power Request for General Rate Revision Compliance filing re Partial Stipulation

On December 18, 2020 the Public Utility Commission of Oregon issued Order No. 20-473 adopting a partial stipulation in docket UE 374. In paragraph 21 of the partial stipulation, PacifiCorp d/b/a Pacific Power (PacifiCorp) committed to creating a Marketing, Education, and Outreach ("ME&O") for Schedule 23 customers, to work collaboratively with SBUA regarding the ME&O plan for these customers, particularly as it relates to enrollment in Schedules 23/210 and 29.

Also, the Company committed to consulting with SBUA prior to providing an informational report on data obtained regarding Schedule 23 customers and to provide the Stipulating Parties an informational report exploring potential alternative rate design changes for Schedule 23 customers that may be proposed in a future general rate case.

SBUA submits this letter to confirm that SBUA did meet and confer with PacifiCorp regarding ME&O on or about September 28, 2021 and also re the informational report regarding Schedule 23 Advanced Metering Information ("AMI") data obtained. Attached herein is ME&O resource material SBUA submitted to the utility on September 24, 2021.

Please contact Diane Henkels, contact information below, with any questions.

Sincerely,

S/ Diane Henkels

Diane Henkels She/her/hers Attorney, Small Business Utility Advocates 541-270-6001 / diane@utilityadvocates.org 621 SW Morrison St. Ste 1025 Portland, OR 97205

Enclosure

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### SBUA Study Memorandum re UE 374 PacifiCorp Marketing, Education and Outreach Plan for Small Business Customers<sup>1</sup>

### 1. Introduction

The purpose of this document is to provide PacifiCorp d/b/a Pacific Power ("PAC") information to consider as it develops its Marketing, Education and Outreach Plan ("ME&O") for its small commercial customer class, per the UE 374 Partial Stipulation.<sup>2</sup> By improving accessibility of information and outreach geared for small business, PAC can encourage behavioral changes to improve energy consumption, promote desirable shifts in energy usage, and support equity.

The Commission continues to emphasize equity and these same equity considerations must be acknowledged when discussing a diverse group like small commercial customers.<sup>3</sup> Appropriate outreach to utility customers is particularly important in the context of Oregon's strong policy direction towards clean energy.<sup>4</sup>

### 2. Background

Paragraph 21 of the UE 374 Partial Stipulation provides that:

PacifiCorp d/b/a Pacific Power ("PAC") agrees to do additional outreach to small commercial customers regarding the availability of applicable pilots.<sup>5</sup>

<sup>3</sup> Many of the struggles faced disproportionate by BIPOC communities, for example, are shared with BIPOC-owned businesses. SBUA anticipates a successful ME&O will be carried out with particular cognizance towards COBID certified businesses.

<sup>4</sup> H.B. 2021, 81st Leg. Assemb. (Or. 2021). <u>https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/HB2021/Enrolled</u>. (Requiring retail electricity providers to reduce greenhouse emissions to 80% below baseline emissions levels by 2030, 90% by 2035, and 100% by 2040).

<sup>5</sup> <u>https://apps.puc.state.or.us/orders/2020ords/20-473.pdf</u> at 148 (last accessed 09/23/21). SBUA UE 374 Partial Stipulation Para 21 ME&O Study Memorandum 0/23/21

Small Business Utility Advocates

<sup>&</sup>lt;sup>1</sup> Many thanks to Elias Pite, second year law student at Lewis & Clark Law School who did much of the work preparing this memorandum. Contact Diane Henkels diane @ utilityadvocates.org for questions / comments.

<sup>&</sup>lt;sup>2</sup> UE 374 Partial Stipulation approved by the Oregon Public Utility Commission ("Commission") on December 18, 2020 in Order no. 20-473. A Small Nonresidential Consumer: A Nonresidential Consumer whose demand has not exceeded 30 kW more than once within the preceding 13 months or with seven months or less of service whose demand has not exceeded 30 kW the rates schedules are broken out based on the electrical load

https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/ tariffs/rules/01\_Definitions.pdf at pg. 5



PAC additionally agrees<sup>6</sup> to do the following with respect to small business customers:

- A. Create a Marketing, Education, and Outreach plan for Schedule 23 customers.<sup>7</sup>
- B. Work collaboratively with SBUA regarding the ME&O plan for these customers, particularly as it relates to enrollment in Schedules 23/210 and 29.8

SBUA initiated contact with PAC on January 15, 2021, and PAC confirmed meeting availability for April 20, 2021 meeting on PAC's existing small commercial outreach practices. The morning of April 20,2021 PAC's counsel provided presentation materials to SBUA's counsel for the meeting and these materials are included as Appendix A. This presentation provides an outline for implementing points A and B in Paragraph 21 of the UE 374 Partial Stipulation. On April 25, SBUA followed up to inform PAC that SBUA was consulting with the small business community on the PAC materials, and SBUA then proposed a follow up meeting with PAC and other small business organizations. Meanwhile SBUA has been performing research about the best practices in utility outreach to small businesses. This document and appendices 1-4 are included as helpful background information for PAC to develop an effective ME&O for its Schedule 23 customers in Oregon.

3. Crafting an ME&O Plan for a Utility's Small Commercial Customers

"Small commercial" customers include a diverse range of small business sectors including food and beverage, professional services, construction, healthcare, and many others. This diversity makes it critical to provide energy management information that is tailored to, and conscious of, this diversity within the small commercial category.<sup>9</sup> The challenge is tapping into the various motivations and interests across small business industries.

<sup>8</sup> *Id.* at lines 14-15; <u>https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/rates/029 Pilot for General Service Time-of-Use Delivery Service.pdf.</u> ("Schedule 29 PAC customers are "Nonresidential Consumers whose ... loads have not registered more than 1,000 kW, more than three times in the preceding 12-month period or more than 2,000 kW more than once in the preceding 18-month period..."); <u>https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/rates/</u>

<sup>9</sup> https://energycenter.org/sites/default/files/docs/nav/programs/swmeo/

EUC Marketing Plan 2013-2014 final%20070113.pdf at 48, 59. Marketing plan is provided by Energy Upgrade California ("EUC"), a statewide initiative teaching Californians to be more energy efficient and reduce greenhouse emissions.

<sup>&</sup>lt;sup>6</sup> *Id.* at paragraph 29, lines 17-22. PacifiCorp further agrees that, "[b]y October 2021, Company will consult with SBUA prior to providing an informational report on data obtained regarding Schedule 23 customers, and provide the Stipulating Parties an informational report exploring potential alternate rate design changes for Schedule 23 customers. The Company commits to review the data and evaluate rate design and pricing options that may be proposed in a future general rate case."

<sup>&</sup>lt;sup>7</sup> Id. at lines 12-13; <u>https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/rates/023\_General\_Service\_Small\_Nonresidential\_Delivery\_Service.pdf</u>. Schedule 23 refers to General Service-Small Nonresidential Delivery Service.

<sup>210</sup> Portfolio Time of Use Supply Service.pdf. ("Schedule 210 is Portfolio Time of Use Supply Service and applies to "[t]o Residential and Small Nonresidential Consumers receiving Delivery Service under Schedules 4, 5, 23 or 41, in conjunction with Supply Service Schedule 201, who have elected to take this service.").



One way to overcome this is through marketing segmentation. Marketing segmentation is the practice of dividing a particular target audience — such as small commercial ratepayers — into more approachable groups.<sup>10</sup> Segmentation is widely used in a variety of other industries, yet,

"[In] the energy efficiency industry, sophisticated use of segmentation on small business customers is nascent, despite the growing amount of available customer data."<sup>11</sup>

While implementing an ME&O, many utilities problematically assume that the same types of messaging operate effectively both intragroup (*e.g.*, all commercial customers or all residential customers), and intergroup (across industrial, commercial, and residential categories).<sup>12</sup> Segmentation is an effective way to overcome these mistakes.

Opinion Dynamics Corporation (ODC) is an energy-focused opinion research group that offers strategic planning and operational enhancement.<sup>13</sup> ODC prepared a presentation for Marketing, Education and Outreach Strategy for Energy Efficiency, identifying several additional suggestions for creating effective ME&O plans to address these concerns, a few of which are below.

### • Semantics Matter

A successful ME&O requires consideration of the language being used in the marketing campaign.<sup>14</sup> Small business owners are not necessarily savvy when it comes to understanding their utility bills or energy efficiency in general.

### Competing With Other Pro-social Behaviors

Marketing must elevate the importance of energy efficiency and conservation in order for the outreach to translate into meaningful action by customers.<sup>15</sup>

### "I'm doing everything I can"

Effective marketing encourages ways to improve behavior by providing a simple strategy.<sup>16</sup> Drawing a clear line between your ME&O and the purported benefit of the customer's actions will lead to a more responsive campaign. <u>Customers are generally</u>

11 https://illumeadvising.com/files/Know-Before-you-Go.pdf.

<sup>12</sup> See id.

13 https://opiniondynamics.com/about-us/ (last accessed 09/23/21).

14 Id. at 9.

15 See id. at 17.

<sup>16</sup> *Id.* at 19.

<sup>&</sup>lt;sup>10</sup> <u>https://www.qualtrics.com/experience-management/brand/what-is-market-segmentation/</u> (last accessed 06/29/21) ("Subdivisions are often shaped by demographics, needs, common interests, and other behavioral criteria.").



<u>receptive to making pro-environmental changes</u>. Therefore, the key to showing customers that there is more they can do is to make the benefits of joining, and the path to their involvement, clear and approachable.

### • Barriers v. Motivations

ODC maintains that marketing should tackle barriers directly to increase the relevance of energy efficiency and conservation. Every product and pilot comes with unique barriers for customers. Assuming that awareness and action are synonymous is a mistake. A successful ME&O plan simultaneously acknowledges:

- The unique barriers inherent in each advertised product or pilot, and
- Taps into the motivations from the client-customer perspective.

Once an ME&O is crafted but before progress is evaluated, you have to determine what marketing and outreach metrics to track. A few examples include:

- Number of leads, assessments, and upgrades associated with specific campaigns
- Cost per lead achieved through a specific outreach channel
- Conversions of leads to assessments and upgrades
- Percentage of customers taking advantage of incentives from outreach campaign

• Advertising response rate, or response rate to campaign call to action.<sup>17</sup> It is also important to remember that marketing tactics do not necessarily lead to action. Even without action, these marketing tactics still lead to increased program/pilot exposure — another metric worth measuring.<sup>18</sup>

### 4. Application of Ideas to PacifiCorp dba Pacific Power in Oregon

For example, on March 17, 2021 PAC published a news release and social media posts to draw attention to its new Time of Use Options, which gave customers greater control over their energy use.<sup>19</sup> Based on the above information, determining the effectiveness of such a campaign might include tracking how many small commercial customers changed their time of use management within a reasonable time of the news release and social media campaign. Another example of effective marketing tracking would be PAC's ongoing outreach to new small commercial customers via email.<sup>20</sup> Here, PAC could track the number or frequency in which emails are opened regarding new Wattsmart energy efficiency programs, for example.

### 5. Examples of other Small Commercial ME&O Plans

Utilities have diverse approaches to their ME&O operations. Below are some examples starting with PacifiCorp dba Pacific Power, and other utilities serving Oregon.

<sup>18</sup> Id.

<sup>19</sup> Appendix 1, "Energy Choices — Time of Use."

<sup>20</sup> Appendix 1 at slide 6 "Ongoing Outreach to New Customers"

<sup>&</sup>lt;sup>17</sup> *Id.* at 3.



### **Oregon Utilities**

### I. PacifiCorp dba Pacific Power — Current Approach

In April 2021, PAC shared its annual Oregon Small Business Communications & Outreach presentation.<sup>21</sup> PAC highlighted four of the most effective strategies they have found for communicating with small businesses. These include:

- Email,
- Paid social media advertising that targets small businesses,
- Working with local chambers and organizations, and
- Multicultural outreach.

### II. Portland General Electric

PGE offers a variety of resources for small businesses customers<sup>22</sup> on their website, including multilingual support, a summary of ways they have helped their customers, and support for paying bills. PGE also provides suggestions for saving energy based on season and time of day, as well as saving tips for when a business is open, closed, or operating with limited hours. PGE does not indicate that they distribute a newsletter or send quarterly or monthly email updates.<sup>23</sup>

### III. Idaho Power

Idaho Power has a commercial webpage with business resources and energy saving tips.<sup>24</sup>

### IV. NW Natural

Similar to Idaho Power, NW Natural does not provide "small commercial" resources but does have a range of outreach options and resources for business customers.<sup>25</sup>

### **Utilities in Other Jurisdictions**

### I. Georgia Power

Georgia Power is a utility company with excellent small business resources.<sup>26</sup> Georgia Power is noteworthy because all of its resources explain the *benefits* incurred

<sup>21</sup> See Appendix 1.

<sup>22</sup> Schedule 32, or small non-residential basic services, are for small business customers and "[t]his schedule applies to business customers who have not exceeded 30 kW more than once in the previous 13 months, or once with seven months or less of service." <u>https://portlandgeneral.com/about/info/pricing-plans/understanding-our-pricing/</u> (last accessed 09/23/21).

<sup>23</sup> See Appendix 2.

<sup>24</sup> <u>https://www.idahopower.com/energy-environment/ways-to-save/savings-for-your-business/</u> (last accessed 09/23/21).

25 https://www.nwnatural.com/business (last accessed 09/23/21).

<sup>26</sup> Georgia Power is one of the largest utility providers in the Atlanta and North Georgia service areas.



by the business for conducting themselves in a certain way, or the benefit of making certain changes.

### II. Clark Public Utilities

Like Georgia Power, Clark Public Utilities in southern Washington provides business customers information on ways to pay their bills, as well as a list of basic suggestions for energy upgrades and small business energy efficiency.<sup>27</sup> Clark Public Utilities also offers a business customer newsletter sign-up option — which provides updates on current rebates, incentives, and energy-efficient technology for business.

### III. Southern California Edison ("SCE")

One of the best examples of a utility company providing an impressive collection of small business resources is SCE. SCE provides energy savings and incentives across small commercial business types. This includes summer discount plans, commercial solar options, energy saving tips, information regarding available pilot programs, and resource centers. For every segment above, SCE provides information on energy use programs and best practices, including fact sheets, case studies, videos, and articles. In sum, SCE should be seen as a model for any utility seeking to craft an ME&O plan with an effective, accessible website.

### 6. Summary of Best Practices for Small Commercial ME&O Plans

As the examples above show, there are several best practices to integrate into an ME&O plan and website. Making sure these resources are shared proactively through newsletters or emails in addition to providing online resources is the key to a successful ME&O plan.<sup>28</sup> These resources should be simple and straight-forward to generate greater engagement. This includes:

- Multilingual or multicultural outreach and support
- Energy saving tips that are tailored to small businesses. This includes explanations of flex pricing and seasonal/time of day use, etc.
- Specific suggestions and resources based on small business type reflecting an awareness that small commercial customers are not a homogeneous group with common interests and issues — and general resources for all businesses.
- Creating a listserve email or a newsletter that business owners can sign up for when visiting the utility website. This type of customer outreach complements the more general resources available online.

Most importantly, the ME&O plan must reflect an understanding of the diversity within the small commercial class. The various interests, motivations, and barriers across small businesses makes it a difficult class to serve effectively. Still, the second most numerous class that serves as the backbone of Oregon's economy is one worth supporting.

<sup>&</sup>lt;sup>27</sup> https://www.clarkpublicutilities.com/business-customers/ (last accessed 09/23/21). See Appendix 3.

<sup>&</sup>lt;sup>28</sup> See, e.g., Clark Public Utilities' small business resources and email list sign-up at <u>https://</u>www.clarkpublicutilities.com/business-customers/. See also Appendix 3.



### APPENDICES

- Appendix 1 PAC Small Business Outreach Presentation
- Appendix 2 PGE Small Business Resources
- Appendix 3 Clark Public Utility Business Customer Outreach
- Appendix 4 Southern California Edison Small Business Resources

### APPENDIX 1

### PacifiCorp dba Pacific Power Small Business Outreach Presentation

Forwarded to SBUA via email at 8:13 AM PDT on April 20, 2021 from Matthew McVee, Chief Regulatory Council for PAC.

# Communications Strategies

- Help residents, businesses and communities recover from the pandemic by offering proactive support and assistance through flexible payment arrangements, programs to help customers manage energy costs, referrals to federal and local resources and economic development efforts.
- Deliver a sustainable energy future and give customers more choices and control over their energy use by:
  - Expanding renewable resources.
  - Providing energy usage insights and more options to manage energy costs (i.e. Time of Use).
  - Transforming our resilient, smart grid to support changing customer needs.
  - Advancing clean transportation projects and expanding electric vehicle charging access.
- Develop targeted and personalized communications based on customers' needs and preferences.



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## Ongoing Outreach to New Customers

'Welcome Aboard' mailing sent to new business customers in Oregon. Includes:

- Welcome letter with information about Wattsmart energy efficiency programs (in collaboration with Energy Trust), along with web and mobile tools.
- Rights and responsibilities.
- Brochure with information about options and programs to help business customers, including billing and payment options, energy efficiency, renewable energy, online tools and more.
- Exploring moving this to a welcome email series in the coming months.



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 Annual energy choices/fuel mix bill insert

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 Annual mailing explains regulated and market-based energy options (Direct Access)

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**Energy Choices – Annual Outreach** 

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### Energy Choices – Wattsmart Energy Efficiency

Ongoing collaboration with Energy Trust of Oregon on incentives and outreach to Pacific Power businesses



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Energy Trust of Oregon can replace your old fluorescent lights with state of the art TLED light

Always har of Count Alvin calls about

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### Energy Choices – Time of Use

New Time of Use options give customers greater control over their energy use.

- March 17, 2021 news release and social media post generated positive media coverage.
- Additional outreach planned includes bill messages, video and social promotion.



Pacific Power pilot program offers discounts for shifting usage times Published on 3/17/2021. 2:17 pm

Choosing when you run your dishwasher or charge your electric vehicle could deliver slignificant savings on your power bill under new options now available to Pacific Power residential: commercial and imgation customers in Dregon These new Time of Use plans; give customers greater control over the price they pay for energy depending on when they use electricity.

The voluntary programs offer lower prices during "off-peak" hours when lower demand generally drives down the price of energy Pacific Power invites interested customers to learn more about Tone of Use options for homes businesses and farms

at <u>pacificpowar.net/tou</u> or by calling 1-888/221-7070



Pacific Power customers can now trim bills by shifting power use to off-peak times



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### **Collaboration Discussion**

- What areas should we be focusing on? How can we effectively reach this audience? How can we connect and support greater engagement?
- Messaging strategies and topics of interest
  - Energy efficiency and financial resources
  - Time of Use pilot Schedule 29
    - Target audience, business segments
- Effective ways to reach small businesses
  - Email
  - Paid social ads targeting businesses
  - Local chambers and organizations
  - Multicultural outreach
- Next steps?



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### **APPENDIX 2**

### PGE Small Business Resources

### https://portlandgeneral.com/help/covid-19/helping-small-business-customers

#### Helping our customers

We understand the hardship you and your business are facing right now. Here are some of the steps we're taking to help:

- Committed \$170K in customer assistance to directly help small business customers impacted by COVID-19. If you're a small business who's been impacted by COVID-19, call us to apply for assistance.
- Offering payment options to help make paying bills more manageable
- Waiving all third-party debit/credit card transaction fees for payments up to \$5,000
- Donating \$50,000 to the Oregon Community Foundation's Small Business Stabilization Fund ♂

#### Ways to pay your bill

- We have temporarily removed no-check and cash-only restrictions for customers, allowing everyone to safely pay using their checking account electronically or with a physical check by mail.
- Our self-service payment options are available 24/7, and we are temporarily waiving any thirdparty debit/credit transaction fees for payments up to \$5,000:
  - $\circ\,$  Pay with the PGE app
  - Pay online
  - Pay by phone: Call 503-228-6322 (Portland) or 800-542-8818 (elsewhere) and have your PGE account number handy

### COVID-19: Helping Small Business Customers

Supporting our small business customers during the coronavirus pandemic

#### En Español

We understand that the pandemic has fundamentally changed our world. The impacts continue to be felt by all of us. We know the importance of businesses in our community and we want to partner with you. If you need help paying your bill and have not set up a plan already, it's important that you call us, we're here to help.

Our Business Services team is available Monday through Friday, 7 a.m. to 6 p.m. at 800-822-1077 to discuss your options, including:





### **APPENDIX 3**

### **Clark Public Utility Business Customer Outreach**

https://www.clarkpublicutilities.com/business-customers/



#### Water Service Info

We provide water service to business in Clark County not served by city water utilities.

READ MORE -



Fraud Alert Protect yourself against telephone, text message and email scams.

READ MORE /

### **Business Newsletter**

Stay up to date on current rebates, incentives and energy-efficient technology for business.

FIRST NAME*	LAST NAME*
email address*	COMPANY NAME*
SIGN UP	

About My Service My Account Login Pay My Bill Start, Stop or Transfer Service About My Bill

Water Service

Green Lights Program

- Reduce Business Waste All Programs Education/Training Workshops
- Business Case Studies



Plug in to green power!



Sewing energy savings



### APPENDIX 4

### Southern California Edison Small Business Resources

https://www.sce.com/business/Small-Business-Resources https://www.sce.com/business

### **Solutions for Small Businesses**



## Is Your Small Business on the Right Rate Plan?

Want to get the most value out of your energy plan? Find the right plan for your small business with our <u>Rate Analyzer</u> tool. Please note, some energy plans are changing:

### **Help Your Small Business Thrive**

Need assistance to start or grow your small business? Our Economic Development Services team is ready to assist you in finding the partners and incentives you need to expand your small business.

Find Development Resources >

### TOU Rates

- You may be enrolled in Critical Peak Pricing

Additionally, if you would like to support solar power but can't install solar panels, the <u>Green Rate</u> option may be right for you.

Browse Rate Plans >



### Make Your Small Business More Energy Efficient

### **HVAC Improvements**

### LED Lighting Discounts

Find incentives and experts to improve the efficiency of your building's HVAC unit and ductwork.

HVAC optimization program

Get instant price reductions on qualified LED lighting when you use our Midstream Point of Purchase (MPOP) program.

MPOP program

#### Foodservice Equipment

Visit our demonstration kitchen to try out efficient foodservice tech and find new ways to speed up your cookline.

Foodservice Technology Center



## Find Savings for Your Small Business

Looking for ways to cut costs and be more efficient? Discover helpful tips, resources, and case studies relevant to your type of business.

Select Your Industry >

### Our Financial Assistance Programs Are Still Here For Your Small Business

While temporary COVID-19 emergency response measures have ended, our commitment to our customers will never change. We understand that many of our small business customers may still need help. Discover what other long-term options we have to offer.

Explore Your Options >

### Make Your Small Business More Energy Efficient

### **HVAC Improvements**

### LED Lighting Discounts

Find incentives and experts to improve the efficiency of your building's HVAC unit and ductwork. Get instant price reductions on qualified LED lighting when you use our Midstream Point of Purchase (MPOP) program

### **Foodservice Equipment**

Visit our demonstration kitchen to try out efficient foodservice tech and find new ways to speed up your cookline



### Energy Solutions for Businesses



Is Your Business on the Right Rate Plan?

Use our rate analyzer tool to compare costs and identify the best <u>Time of Use</u> rate plan for your business. Log in to My Account to get started.



**Business Energy Advisor** 

Want to lower your operating costs? Answer a few questions to receive custom recommendations and incentives that will help you shrink your energy bills.



### **Get Paid to Upgrade**

Find out if you're eligible for Express Solutions and get paid for improvements to lighting, climate control, and other equipment.

Learn More >

### **Monthly Bill Alerts**

Learn More >

Take advantage of our easy-to-use Budget Assistant tool to receive alerts when your monthly usage exceeds your spending goals.

### Learn More >

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