Oregon
Tina Kotek, Governor

Public Utility Commission
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September 21, 2023

BY EMAIL
Cascade Natural Gas Corporation
cngcregulatory@cngc.com

RE: Advice No. O23-07-05

At the public meeting on September 21, 2023, the Commission adopted Staff's recommendation in this matter docketed as ADV 1531. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Katharine Mapes

Katie Mapes
Administrative Law Judge
Public Utility Commission of Oregon
(503) 559-0947

ITEM NO. CA1

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 21, 2023

REGULAR ____ **CONSENT** __X__ **EFFECTIVE DATE** __October 1, 2023__

DATE: September 11, 2023

TO: Public Utility Commission

FROM: Kaitlin Lynch

THROUGH: Caroline Moore **SIGNED**

SUBJECT: CASCADE NATURAL GAS:
(Docket No. ADV 1531/Advice No. O23-07-05)
Update to Schedule 33, Oregon Low-income Energy Conservation Program.

STAFF RECOMMENDATION:

Approve Cascade Natural Gas Corporation's (Cascade or Company) Advice Filing No. O23-07-05 to update Schedule 33, Oregon Low-income Energy Conservation Program (OLIEC or the Program), with an effective date of October 1, 2023.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve Cascade's proposed modifications to Schedule 33, OLIEC Program, with an effective date of October 1, 2023.

Applicable Rule

ORS 469.633[1] requires investor-owned utilities to have energy efficiency programs, and ORS 757.262 states that the Commission may adopt policies designed to encourage the acquisition of cost-effective conservation resources[2] and may authorize period rate adjustments associated with the implementation of such policies.[3]

[1] ORS.469.633.
[2] ORS.757.262(1).
[3] ORS.757.262(2).

Pursuant to ORS 757.205(1), a public utility shall file with the Commission schedules showing all rates, tolls, and charges that it has established and are in force at the time for any service performed by it within the state, or for any service in connection therewith or performed by any public utility controlled or operated by it.[4]

Subsequently, ORS 757.210 states that the Commission may approve tariff changes if they are deemed to be fair, just, and reasonable.[5] Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025.[6]

OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.[7] Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the changes. ORS 757.220, OAR 860-022-0015.

Analysis

Background

OLIEC provides qualifying low-income households within Cascade's service territory with rebates for the installation of certain weatherization and conservation measures. The measures are performed by qualifying Community Action Agencies, 501(c)3 non-profit agencies, or Community Based Organizations (CBOs) (referred to collectively as Agencies). The Program is funded through the portion of Cascade's Public Purpose Charge (PPC) that supports funding for low-income conservation and bill assistance activities. During the past three completed program years (2020 – 2022), only one household received weatherization services through OLIEC.

Cascade has been collecting PPC funds since May 2006 to provide weatherization to its customers.[8] The PPC was first approved by the Commission in Docket No. UG 167 through Commission Order No. 06-191. As part of a settlement agreement adopted in Docket No. UG 287, effective February 1, 2016, all OLIEC funding comes from the PPC applied to residential, commercial, and core industrial customers' bills.

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[4] ORS 757.205(1).

[5] ORS 757.210(1)(a) (Whenever any public utility files with the Public Utility Commission any rate or schedule of rates stating or establishing a new rate or schedule of rates or increasing an existing rate or schedule of rates, the commission may, either upon written complaint or upon the commission's own initiative, after reasonable notice, conduct a hearing to determine whether the rate or schedule is fair, just and reasonable).

[6] OAR 860-022-0025.

[7] OAR 860-022-0025(2).

[8] *See* Docket No. RG 7, *Cascade Natural Gas Company Low-Income Energy Conservation (OLIEC) Annual Report*, Nov. 30, 2022, accessed at https://edocs.puc.state.or.us/efdocs/HAQ/rg7haq142917.pdf.

Cascade's Proposed Changes
On July 28, 2023, Cascade filed Advice No. O23-07-05, which proposes several housekeeping changes and program modifications to OLIEC in an effort to increase program uptake.[9] On August 18, 2023, the Company filed replacement sheets adding clarifying and corrective text as discussed with Commission Staff.[10]

The filing updates Schedule 33 with housekeeping changes by:

1. Revising language for increased clarity;
2. Updating the program measures list; and
3. Removing references to the Conservation Achievement Tariff (CAT) as an overlay to OLIEC or a pilot offering, as it has been an established as part of the OLIEC Program offering since 2017.

The following program modifications are based on the feedback the Company received from its energy efficiency advisory group, made up of Cascade staff, Commission Staff, Community Action Partnership of Oregon (CAPO), and participating Agencies:

1. Administrative and delivery costs for the Agencies delivering OLIEC are updated to 30 percent of the total job cost, 20 percent for the audit, inspection, and paperwork, and 10 percent for indirect office support;
2. The United States Department of Energy (DOE) Priority List and Washington Department of Commerce Deemed Measure Priority List (DMPL) may be used to qualify measures instead of exclusive reliance on energy modeling that evaluates for a savings-to-investment ratio of 1.0 or higher
3. The $10,000 cap on weatherization projects is removed; and
4. Secondary funding sources are no longer required for a project to receive OLIEC funding.[11]

Staff Review
Staff reviewed Cascade's filing and met with Company representatives to discuss the proposed changes to OLIEC ahead of this advice filing. During the engagement, the Company did not receive any opposition or corrective feedback on its proposed changes. Parties, including Staff, expressed general support towards Cascade's efforts to improve OLIEC participation rates. The Program modifications are intended to

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[9] *See* ADV 1531, *Cascade Advice No. 023-07-05, Schedule 33 OLIEC, Initial Utility Filing*, July 28, 2023, accessed at https://edocs.puc.state.or.us/efdocs/UAA/uaa143632.pdf.
[10] *See* ADV 1531, *Cascade Advice No. 023-07-05, Schedule 33 OLIEC, Initial Utility Filing*, Aug. 18, 2023, accessed at https://edocs.puc.state.or.us/efdocs/UAC/adv1531uac165929.pdf.
[11] Secondary funding sources are not explicitly required by the current tariff, but Cascade noted this as a significant change in the filing cover letter. Since project costs often exceeded the $10,000 OLIEC cap, the Company encouraged Agencies to leverage other funds. Removing the $10,000 project cap alleviates the need for Agencies to utilize additional funding sources.

remove barriers that the Company believes have limited program participation and deterred Agencies from utilizing OLIEC funds.

The current Schedule 33 OLIEC tariff provides partnering Agencies a flat rate for program administration and delivery cost reimbursements, including $250 for program administration, $550 for audits, and $300 for inspections. The Company asserts that these flat rates may be insufficient to cover actual costs incurred by Agencies and thus reduces said Agencies' capacity to participate in the Program. Staff believes that a percentage-based reimbursement, as suggested in the Program update, is likely a more effective way for Agencies administering OLIEC to manage their resources and budgets dedicated to the Program. Staff agrees with Cascade that tying administrative and delivery reimbursements to the actual job cost may increase Agencies' ability to administer the Program and ultimately connect more clients with OLIEC offerings.

The Company states that using priority lists to determine measure cost-effectiveness removes the unnecessarily limiting requirement of using the state's energy modeling software for heat loss analysis to prove a savings-to-investment ratio of 1.0 or higher. Staff agrees that leveraging the work done by DOE and Washington Department of Commerce is a simpler and lower cost method of delivering savings to energy burdened customers. Staff anticipates the lists can be used to approve valuable conservation measures that may have otherwise been screened out by the energy modeling software.

Finally, the Company indicated that the $10,000 cap on weatherization projects funded through OLIEC can often create significant limitations to the efficacy of the Program when a home requires substantial health, safety, and repair upgrades prior to installing weatherization measures. This issue is further exacerbated by increasing installation costs, thus increasing costs of the measures as well. Removing the cap will allow Agencies to make required health and safety modifications and install the appropriate weatherization measures without worrying that they will not be reimbursed for the full project cost—a worry that has historically dissuaded Agencies from utilizing the Program.

Staff agrees that removing the cap will help Agencies administer OLIEC more effectively for all parties involved and hopes that this change will result in both an increase in Agencies' use of the Program and the efficacy of weatherization projects for participating homes. The Company indicated that it will share monthly updates on the level of funding remaining in the Program with Agencies, so that projects do not run the risk of not being reimbursed if the entire OLIEC fund is utilized.

Staff notes that though removing the cap on weatherization projects is intended to increase program participation, it may also ultimately lower the total number of households that can be weatherized under OLIEC. Specifically, spending more money on each household without increasing the amount of money in the Program fund can result in fewer households being served. That said, since there were few to no households being weatherized when the project cap was $10,000, Staff believes that this change will result in a net increase in the number of households being served.

Additionally, if the fund is fully expended, it is possible that Cascade will request an increase to the dollar amount of the PPC compared to recent years, which is revised yearly according to forecasted program needs and can include a credit for underspending. If increased OLIEC participation does result in the need for an increase to the dollar amount of the PPC, the request will come before the Commission in the future and will be determined at that point.

Currently, unused OLIEC funds are returned to customers in the form of a credit to the PPC, effectively lowering the amount of the charge that customers see on their bill. An increase in program uptake will reduce that credit and result in an increase in the number of dollars that customers see as a charge under the PPC. Since OLIEC funding is a relatively small portion of the PPC in general, Staff believes that any change in the credit should not be significant. Additionally, a decrease in the amount credited back to customers will mean that the Program is functioning in the way that it is meant to and that more qualified households are being weatherized. Staff sees this as a net benefit, in terms of increased energy efficiency and reduced energy burden.

Stakeholder Engagement
Over the past year, the Company engaged in multiple discussions with Staff, Agencies, and regional stakeholders, both individually and in group settings, on barriers to participation and opportunities to revise and increase the efficacy of OLIEC. Cascade also leveraged its energy efficiency advisory group in order to develop a revised tariff intended to increase program uptake. Staff has discussed this filing with advocates, such as CAPO, who shared that they are supportive of the changes being made. Oregon Citizens' Utility Board (CUB) also communicated to Staff that they are supportive of the updates to OLIEC.

Conclusion

Based on the review of Cascade's filing, Staff believes that it is reasonable to move forward with the proposed program changes. Staff appreciates the work that Cascade put into engaging with Stakeholders and Staff ahead of its filing to make collaborative changes to OLIEC and improve the operations, efficacy, and participation of the Program. The Commission has been working towards mitigating energy burden through multiple tools, and Staff views these changes as a proactive effort to improve equitable access to weatherization services and reduce energy burden for low-income households.

PROPOSED COMMISSION MOTION:

Approve Cascade Natural Gas Corporation's proposed modifications to Schedule 33, OLIEC Program, as described in Advice No. O23-07-05, with an effective date of October 1, 2023.

CNG ADV 1531

CASCADE NATURAL GAS CORPORATION
A Subsidiary of MDU Resources Group, Inc.

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July 28, 2023

Oregon Public Utility Commission
Attn: Filing Center
201 High Street S.E., Suite 100
Salem, OR 97301-3398

Re: Advice No. O23-07-05, Oregon Low-Income Energy Conservation

Cascade Natural Gas Corporation (Cascade or Company) submits to the Oregon Public Utility Commission (Commission) the following revisions to its Tariff P.U.C. OR. No. 10, stated to become effective with service on and after October 1, 2023:

Fourth Revision of Sheet No. ii
First Revision of Sheet 33.1
First Revision of Sheet 33.2
Second Revision of Sheet 33.3
Second Revision of Sheet 33.4
Second Revision of Sheet 33.5

The Company withdraws the following sheets in their entirety:

Original Sheet 33.6
First Revision of Sheet 33.7

This housekeeping filing updates Schedule 33, Oregon Low-income Energy Conservation (OLIEC) Program by revising language for increased clarity, updating the program measures list, and removing references to the Conservation Achievement Tariff (CAT) as an overlay to OLIEC or a pilot offering as it has been an established as part of the OLIEC Program offering since 2017.

Besides housekeeping changes, the Company has also been considering how to increase participation in OLIEC. After a few programs years where few to no homes were treated under OLIEC, Cascade brainstormed potential barriers to the program and listed them in in its 2023-2022 Annual Report, filed in Docket RG-7. After discussing these barriers with its Advisory Group, the Company is making the following program modifications to increase program uptake: 1) Secondary funding sources are no longer required for a project to receive OLIEC funding; 2) Administrative and delivery costs for the Community Action Agencies, 501(c)3's, and Community Based Organizations (CBOs) delivering OLIEC are updated to 30% of the total job cost, 20% for the audit, inspection and paperwork, and 10% for indirect office support; 3) DOE Priority List and Washington Department of Commerce Deemed Measure Priority List (DMPL) may be used to qualify a measure instead of performing heat loss analysis; and 4) The $10,000 cap on weatherization projects is removed. These changes are The Company requests that these changes be effective October 1, 2023, with the start of the 2023-2024 program year.

Each change is explained below in the order it appears in Schedule 33.1.

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Sheet No. ii. The index is revised to remove reference to the Conservation Achievement Tariff (CAT) Pilot Program. CAT, which was piloted in 2017, is incorporated into the OLIEC offering, and with this filing, will no longer be referenced as a secondary or overlay offering.

Sheet No. 33.1. The "Available" section is revised to clarify that the service is applicable to customers and that the qualifying standard for low-income is as defined by the Federal Low Income Home Energy Assistance Program (LIHEAP).

The "Program Description" section is edited to clarify the meaning and that the program may be delivered by Community Action Agencies, 501(c)3 non-profit agencies, or Community Based Organizations (CBOs).

The list of measures for "Existing Low-Income Residential Dwellings" is reformatted into two columns and efficiency ratings are removed as they change and become outdated. Instead, the descriptor, "high efficiency" is added. Likewise, the list of "New Low-income Residential Construction" measures is revised in the same manner.

Sheet No. 33.2 Language establishing possible rebates for custom projects is removed as this was a piloted option that no Agency used and the Company does not want to reserve funds for an unused option. With the removal of this option, the Company also removes the language under "Funding Availability" that references allocating funds, as custom funds will not be allocated; instead all funds will be available on a first-come, first-serve basis.

The "Annual Report" section is removed as a more detailed description of annual reporting is established on Sheet No. 33.5.

The "Funding Availability" section is revised to state the Company will allocate funds on a first-come, first-serve basis.

Under No. 3 of this same section, the list of information the Company requires from the Agency for each project is updated to include documentation that demonstrates the measure is qualified as energy efficient as established in the "Rebate Payments" section of the schedule.

Sheet No. 33-3. No. 1 in the "Agency Qualifications and Responsibilities" section is revised to include language that states that a qualifying agency per Schedule 33 may be a Community Action Agency, a 501(c)3, or a CBO. No. 3 in this same section is revised to state that documentation demonstrating that a measure qualifies an energy efficient must be provided to the Company in order for the Agency to receive a rebate.

Sheet No. 33.4. No. 3 under "Rebates" is updated to incorporate both the rebates traditionally paid under OILIEC as well as the rebates paid under the "CAT" portion of the program. CAT was introduced in 2017 as a pilot overlay to the OLIEC program. As such, the program paid two rebates for the same measure. Since CAT is not longer being piloted but is a proven part of OLIEC, language about CAT is removed and incorporated into the OLIEC offering.

No. 4. Under "Rebates" is also revised to change the paperwork that an Agency must provide the Company to demonstrate that a measure is cost-effective. With the new language, a measure qualifies for rebate if it is identified as cost-effective per the Department of Energy (DOE) Priority List or the Deemed Measure Priority List, o if the measure has a saving-to-investment ratio of 1.0 or higher as modeled in the state's energy software, REM Rate. By adding the two priority lists, the Company is leveraging the work done by

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DOE to prove out a measure's cost-effectiveness. The Company believes its prior method of simply relying on REM Rate modeling was unnecessarily limiting.

A table showing the therm savings per measure is removed as it is not needed, and the numbers are outdated.

No. 1 under "Program Administration and Delivery Costs" is revised so that Agencies will be paid 30% of the total job cost: 20% for program delivery and administration and 10% for indirect administrative office support. This replaces the former payment structure of $250 for administration, $550 for audits, and $300 for inspections. These flat rate fees proved to be insufficient to cover costs and motivate agency participation.

Sheet No. 33.5. Language specific to costs incurred in the first program year are removed as this is no longer relevant.

Sheet Nos. 6 and 7. Sheet No. 6 and 7 which explain the CAT overlay are removed as the provisions of CAT are incorporated into OLIEC. CAT was created as a secondary or overlay to OLIEC and was piloted in 2017. Since CAT is a proven component of the OLIEC program, incorporating it into OLIEC will simplify explaining the program rebates. As part of removing CAT, the $10,000 project job cap is removed as it has proven to be a barrier in addressing health and safety and repair issues within a home prior to installing weatherization measures.

Conclusion. Cascade is committed to providing its low-income customers with weatherization and energy efficiency, natural gas appliances as these are the best and enduring means for reducing energy bills and making a home comfortable. The changes made herein seek to revive and stimulate program participation. The Company will be tracking the success of these program revisions, discussing them with its Advisory Group, and reporting its observations in its OLIEC Annual Report.

If you have any questions regarding this filing, please contact Mike Parvinen at (208) 734-4593.

Sincerely,

/s/ Mike Parvinen

Mike Parvinen
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
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Attachments

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

PURPOSE
The purpose of this provision is to define the terms and conditions under which that portion of the funds designated for use for low-income weatherization programs under Schedule 31, Public Purpose Charge will be administered and delivered to eligible customers.

AVAILABLE
This program is available to residential customers who meet the definition of low-income as defined by the Federal Low Income Home Energy Assistance Program (LIHEAP) and who reside in dwellings where the primary heating equipment is fueled by natural gas. (T) (T)

PROGRAM DESCRIPTION
The Oregon Low-Income Energy Conservation (OLIEC) Program is a program designed to make qualifying low-income households within Cascade's service territory more energy efficient by providing rebates for the installation of certain weatherization and conservation measures following the completion of a home energy evaluation performed by qualifying low-income Community Action Agencies, 501(c)3 non-profit agencies, or Community Based Organizations (CBOs) (referred to collectively as Agencies). (T) (T) (C) (C)

ENERGY EFFICIENCY MEASURES
The following energy efficiency measures qualify for rebates under this program:

Existing Low-Income Residential Dwellings (T)
Qualifying measures include but are not limited to the following weatherization measures and high efficiency, natural gas-fired appliances: (N) (N)

- Ceiling insulation (T)
- Wall insulation
- Floor insulation
- Water heater insulation
- Duct sealing
- Duct insulation
- Infiltration reduction
- Low-flow faucet aerators
- Low-flow showerheads
- Natural gas furnaces
- Furnace tune-up and filter replacement
- Direct vent space heater
- Natural gas water heaters (including tankless)

New Low-Income Residential Construction
The following energy efficiency measures qualify for rebate when installed in new construction designated primarily for the habitation of low-income individuals for at least a thirty-year period. Qualified measures include but are not limited to the following:

- Energy Star® Qualified Homes
- High-efficiency furnace installations where cost effective
- High-efficiency water heater

(T)

(continued)

SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

(D)
PROGRAM YEAR
The OLIEC Program year will extend from October 1 through September 30.
(D)

CUSTOMER QUALIFICATIONS
All funds collected under this program will be distributed only to qualifying income-eligible residential customers of Cascade. In the event the Company receives a rebate request for a single customer from two or more Agencies, the Company will process only one rebate request.

FUNDING AVAILABILITY (T)
1. The Company will distribute funds to Agencies on a first-come, first-serve basis. (C)
(D)
2. Any amounts not disbursed in the program year will carry over to the next program year. (T)
3. The program will be managed such that expenditures will not exceed the annual budget of 0.625% of the Company's gross revenues. If program funding is insufficient for program demand, the program offerings may not be available for a portion of the year. (M)(T)
|
(M)

(continued)

(M) refers to text previously on Sheet No. 33.3 (N)

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

(K)

AGENCY QUALIFICATIONS AND RESPONSIBILITIES (C)

1. For the purpose of this Schedule, an Agency is a Community Action Agency, a 501(c)3, or a CBO that meets the following qualifications. In order to participate in the program, an Agency must be a legal entity, contracting or subcontracting with OHCS, as an administrator of LIHEAP. An agency shall also qualify to participate in the program if it is a state-recognized Low-Income Agency, 501(c)3 nonprofit, or CBO engaged in the construction or retrofit of affordable housing designated primarily for the habitation of low-income individuals. Each participating Agency must also have an up to date, signed Memorandum of Understanding with Cascade Natural Gas. (C) (T) (T)

2. Each participating Agency will have sole responsibility to screen and approve applicants for eligibility. Each Agency shall follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by OHCS. Agencies operating the Weatherization Assistance Program shall complete their work in accordance with the Low-Income Energy Assistance Act of 1981 and subsequent amendments, as outlined in the OHCS Omnibus Contract. The Company reserves the right to verify installation and compliance with all state codes and standards prior to payment of any rebates.

3. Each participating Agency shall be responsible to complete and return to the Company all required paperwork and other documentation as may be necessary for the Company to process the rebate request. The Company will provide the documentation forms to each participating Agency in electronic or hardcopy form, whichever is requested. At a minimum, the documentation must include the Agency name; customer name; the landlord name and address, if applicable; the address of the qualifying households; the square footage of the home; a list of the measures installed; documentation that the measure qualifies (per REM Rate documentation, DOE Priority List, or Deemed Measures Priority List) as established in the Rebate Payments section of this schedule; the rebate amount per measure; total rebate per household; and a statement on whether or not all eligible measures were installed at the dwelling. (C) (C)

REBATE PAYMENTS

1. The Company will reimburse participating Agencies for the installation of qualifying measures installed in each eligible household.

2. In no event will any rebate amount be greater than the actual installed cost of the measure.

(continued)

(K) refers to text that is moved to Sheet No. 33.2. (N)

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

REBATE PAYMENTS (continued)

3. Qualified measures are eligible for rebates in the amount 100% of the installed cost of the measure. (C)

4. These measures will qualify for a rebate payment to the Agencies when at least one of the following criterion is met: (a) the measures are identified as cost effective under the Department of Energy (DOE) Priority List; (b) the measures are identified as cost effective under the Deemed Measure Priority List (DMPL); or (c) each measure is identified as having a savings-to-investment ratio (SIR) of 1.0 or higher according to the Agency energy audit of the dwelling in which the measure is being installed. Participating Agencies may use REM-Rate energy modeling software when conducting audits to demonstrate an SIR of 1.0 or higher for each individual measure. Agencies must provide a copy of the DOE Priority List, DMPL or REM-Rate report along with its complete rebate application and other supporting documents as specified on the Company's current rebate application form in order to qualify for incentives. (C) (C) (D)

PROGRAM ADMINISTRATION AND DELIVERY COSTS (C)

1. Agencies will be provided reimbursement for actual project costs for homes served under the OLIEC Program. Expenses associated with project coordination will be funded up to maximum program average of 20 percent of the total project cost as billed to the Company. An additional agency indirect rate associated with the delivery of low-income conservation measures will be provided in the amount of 10 percent of the total project cost as billed to the Company. Funds will be reimbursed from the Low-Income Weatherization account. Reimbursement for project coordination and indirect rate is not to exceed 30 percent of the total project cost as billed to the Company. The Company will process rebates and Agency payments within thirty days from the date the Company receives all completed documentation in support of such rebate requests. (C)

(continued)

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SCHEDULE 33
OREGON LOW-INCOME ENERGY CONSERVATION PROGRAM

PROGRAM ADMINISTRATION AND DELIVERY COSTS (continued)

(D)

2. The Company will be reimbursed each month for actual program administration costs incurred, except that such reimbursement will not exceed 5% of the total available funds collected during each program year.

ADVISORY GROUP
An Advisory Group will assist the Company in low-income weatherization development, implementation, and evaluation. The Advisory Group will consist of at least one member each from the Company, Commission staff, Community Action Partnership of Oregon (CAPO) and two or more participating Agencies.

ANNUAL REPORT
By December 1 of each year, the Company will submit an annual report to the Commission containing the following information:

- General: 1) Program successes and barriers (if any) to implementation; 2) Associated Program outreach activities.
- Economic: 1) Revenue balance from previous year; 2) Program revenue; 3) Accrued interest; 4) Total available funds; 5) Total expenditure of OLIEC funds; 6) Total OLIEC costs allocated by measure; 7) the Company's administrative costs; 8) Funding allocations or changes within the program year; 9) Payments to Agencies for weatherization measures, administration, and program delivery; 10) Average rebate allocated per home served;
- Agency Performance: 1) percentage of homes served per Agency for the program year; 2) Total number of homes served;
- Program Results: 1) Total deemed therm savings attributable to the OLIEC program by year; 2) Total number of measures installed in all homes served during the program year; 3) Average number of measures installed per home; 4) Number of measures installed by type; 5) Number of each allowable measure installed in total during the program year; 6) Total therm savings by measure; 7) Number of multifamily dwellings treated and observations made about multifamily projects.
- General: 1) A breakdown of the number of homes served by town and agency. The Company will identify factors that account for the volume of homes served by region; 2) The Company will monitor rebate turn-around time

(D)

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