

**BEFORE THE STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE PETITION OF)
ROCKLAND ELECTRIC COMPANY FOR)
APPROVAL OF A LOW INCOME AUDIT)
AND INSTALL ENERGY EFFICIENCY) BPU DOCKET NO. ER17080869
PROGRAM AND ASSOCIATED)
RATE RECOVERY MECHANISM)
(LOW INCOME III))

**DIRECT TESTIMONY OF EZRA D. HAUSMAN, PH.D.
ON BEHALF OF THE
STATE OF NEW JERSEY
DIVISION OF RATE COUNSEL**

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**IN THE MATTER OF THE VERIFIED PETITION OF
ROCKLAND ELECTRIC COMPANY FOR APPROVAL OF
A LOW INCOME AUDIT AND DIRECT INSTALL ENERGY
EFFICIENCY PROGRAM AND ASSOCIATED RATE RECOVERY
(LOW INCOME AUDIT III PROGRAM)**

BPU DOCKET NO. ER17080869

DIRECT TESTIMONY OF EZRA D. HAUSMAN, PH.D.

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1 **I. STATEMENT OF QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME, ADDRESS, AND QUALIFICATIONS.**

3 A. My name is Ezra D. Hausman, Ph.D. I am an independent consultant on energy markets
4 and policy doing business as Ezra Hausman Consulting. My business address is 77
5 Kaposia Street, Auburndale, Massachusetts, 02466. A summary of my professional and
6 educational background is attached as Attachment A.

7 **Q. ON WHOSE BEHALF ARE YOU OFFERING THIS TESTIMONY?**

8 A. I am testifying on behalf of the New Jersey Division of Rate Counsel (“Rate Counsel”).

9 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE NEW JERSEY BOARD**
10 **OF PUBLIC UTILITIES (“BOARD” OR “BPU”)?**

11 A. Yes. I provided written prefiled testimony in BPU Docket No. EO17030196, the petition
12 of Public Service Electric and Gas Company for approval of its 2017 Energy Efficiency
13 (“EE”) programs and associated cost recovery (Order dated August 23, 2017.) I have also
14 provided expert support to Rate Counsel for its participation in the following dockets
15 involving utility energy efficiency investments:

- 16 • BPU Docket No. GO14121412: New Jersey Natural Gas SAVEGREEN
17 Continuation filing, 2014-2015, Order dated January 27, 2016.
- 18 • BPU Docket Nos. GR15010090 and GO12050363: South Jersey Gas Energy
19 Efficiency Program filing, 2015, Order dated June 27, 2016.
- 20 • BPU Docket Nos. GR16070618 and GO15050504: Pivotal Utility Holdings d/b/a
21 Elizabethtown Gas Energy Efficiency Program Extension filing, 2016-2017,
22 Order dated April 21, 2017.

1 In each of these cases the parties reached a stipulated settlement prior to submission of
2 intervener testimony.

3 II. SCOPE AND PURPOSE OF TESTIMONY

4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

5 A. The purpose of my testimony is to address a number of issues related to the Petition
6 (“Petition”) filed by Rockland Electric Co. (“RECO” or, “the Company”) with the New
7 Jersey Board of Public Utilities (“BPU” or, “Board”) to initiate a Low Income Audit and
8 Direct Install Energy Efficiency Program (“Low Income Audit III Program”). RECO’s
9 proposed program is an extension of the Company’s Low Income Audit I Program, first
10 approved by the Board as part of the Company’s Energy Efficiency Stimulus Program by
11 Order dated November 23, 2009 in Docket Nos. E009010056 and E009010061, and its
12 Low Income Audit II Program, approved by the Board in Order in Docket No.
13 ER13060535 dated April 23, 2014.

14 In preparing this testimony, I have reviewed the materials included in RECOs
15 filing, including RECO’s petition and supporting testimony and exhibits. I focus on the
16 testimony of RECO witness Donald Kennedy, Director of Energy Services for Orange
17 and Rockland Utilities, and on Petition Exhibit H, the cost benefit report prepared on the
18 Company’s behalf by Rutgers University’s Center for Energy, Environment and
19 Economic Policy (“CEEEP”) and dated January 17, 2017 (“CEEEP CBA Report”). I
20 have also reviewed the discovery responses provided by RECO in response to requests
21 from Rate Counsel and Board Staff.

22 My review in this matter was constrained by the limited and insufficient materials
23 provided by the RECO, which made it impossible to perform a thorough review of its

1 proposal. I have also attached copies of responses to following discovery requests in
2 support of my testimony (Attachment B):

3 RCR-EE-1, 2, 7, and 11;

4 S-RECO-EE-4, 14, 15 and 20; and

5 INF-4.
6

7 III. SUMMARY OF RECOMMENDATIONS

8 **Q. PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

9 **A.** For the reasons set forth below, I recommend that the Board deny the Company's Petition
10 at this time because RECO has not provided adequate materials and analysis to support a
11 thorough review of its proposed Program.

12 In the event that the Board approves RECO's Petition, I recommend that the
13 Company be directed to perform the evaluation activities as described in Petition
14 Schedule DEK-1, modified as recommended herein. Also, RECO should be directed to
15 produce annual evaluation reports detailing its completed evaluation activities and
16 presenting the results, including sample customer surveys cleansed of any identifying
17 information. Finally, RECO should be directed to provide the detailed data underlying its
18 cost-benefit analysis ("CBA"), included costs incurred, estimated savings in kWh (and
19 therms, where applicable), avoided emissions, and the dollar value of those savings from
20 the perspective of both the customer and the utility.

1 **IV. RECO'S LOW INCOME AUDIT PROGRAM**

2 **Q. PLEASE BRIEFLY DESCRIBE RECO'S PROPOSED LOW INCOME AUDIT III**
3 **PROGRAM.**

4 A. RECO's proposed program is intended to serve low income customers by "provid[ing]
5 free energy efficiency measures, recommended as a result of an energy audit, to the
6 Company's customers that meet the specified income criteria."¹ As with the Company's
7 previous Low Income Audit I and II programs, RECO proposes to target 100 eligible
8 customers per year. The proposed total budget for this two-year program is \$455,400,
9 which includes \$323,400 in customer incentives.² To fund its program, RECO proposed
10 to use approximately \$356,000 in unused funds from its Low Income Audit II Program,
11 supplemented by an additional \$100,000 of new funding.

12 **Q. HOW DOES THE RECO'S PROPOSED PROGRAM COMPARE WITH THE**
13 **LOW-INCOME "COMFORT PARTNERS" PROGRAM OFFERED BY OTHER**
14 **NEW JERSEY UTILITIES?**

15 A. According to RECO witness Donald Kennedy, "RECO's proposed Low Income Audit III
16 Program is similar to the Comfort Partners Program offered by the other New Jersey
17 utilities."³ However, Mr. Kennedy claims that customer participation in RECO's
18 programs is superior to customer participation when the Company merely participated in

¹ Petition, para.15.

² See summary budget table in Petition Schedule JD-1, Page 4 of 6.

³ Kennedy direct testimony, p.4 at 11-12.

1 Comfort Partners, because “RECO has better access to its customer base and is able to
2 customize communications to encourage interest in energy efficiency.”⁴

3 **Q. HAS RECO EVER OFFERED EE PROGRAMS THAT WERE BROADER IN**
4 **SCOPE OR THAT TARGETED OTHER CUSTOMER SEGMENTS?**

5 A. Yes, RECO’s Low Income Audit I Program, approved in November 2009, included a
6 Residential Enhanced Rebate Subprogram and an On-Line Energy Audit Subprogram.
7 However, as of 2012, the Company determined that “the On-Line Sub-Program had been
8 implemented and was up and running” but terminated the Residential Enhanced Rebate
9 Subprogram due to what the Company concluded was “a lack of customer interest” in this
10 program.⁵

11 **V. LOW INCOME AUDIT II STIPULATION OF SETTLEMENT**

12 **Q. HAVE YOU REVIEWED BOARD ORDER IN DOCKET NO. ER13060535,**
13 **DATED APRIL 23, 2014, WHICH INCLUDES THE STIPULATION OF**
14 **SETTLEMENT (“STIPULATION”) IN THAT CASE?**

15 A. Yes.

16 **Q. CAN YOU BRIEFLY DESCRIBE THE COMMITMENTS MADE BY RECO AS**
17 **PART OF THAT SETTLEMENT?**

18 A. Yes. As part of the Stipulation adopted by the Board in that case, RECO agreed to a two-
19 year program with a total budget of \$321,300 for the first year of the program and

⁴ Ibid at 19-20.

⁵ Stipulation (BPU Docket No. ER13060535), page 3.

1 \$328,330 for the second year.⁶ Among other stipulated matters, RECO committed to
2 choose an independent contractor to perform audits and installations,⁷ and to engage in
3 specific program evaluation activities.

4 **Q. TO WHAT PROGRAM EVALUATION ACTIVITIES DID RECO COMMIT IN**
5 **THAT STIPULATION?**

6 A. RECO committed to evaluate program savings using the August 2012 “New Jersey Clean
7 Energy Program Protocols to Measure Resource Savings” or other methods if necessary.
8 RECO further committed that “A minimum 10% of the total participants will be
9 randomly selected for verification and inspection by the independent contractor selected
10 by the Company or by a Company employee.”⁸ RECO further committed to “survey all
11 of its participating customers to ascertain customer satisfaction with the Program.”⁹

12 Finally, the Stipulation stated that “Before the conclusion of the Program, the
13 Company will perform a cost-benefit analysis of the Program. The cost-benefit analysis
14 will be performed by [CEEEP] or in-house by the Company, at the discretion of the
15 Company and will be provided to Staff and Rate Counsel.”¹⁰

⁶ Stipulation, para.16.

⁷ Ibid, para. 5.

⁸ Ibid, para. 19.

⁹ Ibid, para. 20.

¹⁰ Ibid, para. 21.

1 Q. WHAT WAS RECO'S BUDGET FOR PROGRAM EVALUATION FOR ITS
2 LOW INCOME AUDIT II PROGRAM?

3 A. RECO set a budget of \$30,600 for evaluation.¹¹

4 Q. DID RECO COMPLETE ITS EVALUATION ACTIVITIES AND EXPEND ITS
5 EVALUATION BUDGET?

6 A. No. RECO did not spend any of its evaluation budget,¹² and it did not complete the bulk
7 of its stipulated evaluation activities. The only product of evaluation presented by the
8 Company in the current filing is the CEEEP CBA Report, which is a report by CEEEP
9 that evaluates the cost-effectiveness of RECO's Low Income Program as implemented in
10 2016 and compares them to the New Jersey Clean Energy Program ("NJCEP") Comfort
11 Partners program on the basis of certain cost effectiveness tests.

12 Q. HAVE YOU REVIEWED RECO'S COST-BENEFIT ANALYSIS?

13 A. I have reviewed the CEEEP CBA Report, referenced above, produced on behalf of
14 RECO. However, RECO did not provide any workpapers or underlying data in support of
15 the CEEEP CBA Report, despite Rate Counsel's requesting such workpapers in
16 Discovery Request RCR-EE-11. The Company responded that "The Company does not
17 have workpapers or such analysis because the Cost-Benefit Analysis was performed by
18 Rutgers' Center for Energy, Environment and Economic Policy (CEEEP) and not the
19 Company."¹³

¹¹ Response to Staff Discovery Request S-RECO-EE-4.

¹² Ibid.

¹³ Response to Discovery Request RCR-EE-11.

1 Q. DOES RECO'S FAILURE TO HAVE PERFORMED ITS STIPULATED
2 EVALUATION ACTIVITIES, AND ITS REFUSAL TO PROVIDE
3 WORKPAPERS IN SUPPORT OF ITS CBA, IMPAIR YOUR ABILITY TO
4 PERFORM A REVIEW OF ITS CURRENT PROPOSAL?

5 A. Yes. It is impossible for me to perform a thorough review of the Company's proposal in
6 the absence of these materials.

7 Q. DO YOU HAVE CONCERNS ABOUT THE COMPANY'S PERFORMANCE IN
8 DELIVERING ITS PROGRAMS THAT MIGHT BE ADDRESSED THROUGH
9 BETTER EVALUATION ACTIVITIES?

10 A. Yes. In the course of its Low Income Audit II Program, in addition to spending none of
11 its evaluation budget, RECO spent less than 37% of its budget for customer rebates.¹⁴
12 The Low Income Audit II programs further served only 120 customers in 2015-2016, far
13 short of its annual target of 100 customers (or 200 in two years.) At the same time, RECO
14 spent 95% of its administrative budget in 2015-16. As the Company explains,
15 "Administration expenses are associated to the monthly administration of the program
16 and do not vary based on the level of participation. Therefore, the administration
17 expenses were in line with the budget."¹⁵ However, the net result is that administrative
18 expenses represented 36.4% of the total budget, as opposed to the level of 17.4% of the
19 budget in the stipulated settlement – or more than twice as large a share as in the
20 stipulated budget.

¹⁴ Response to S-RECO-EE-4. RECO spent \$186,478 of its total "Rebates" budget of \$506,250.

¹⁵ Response to S-RECO-EE-20.

1 This poor level of performance should be of concern to the Board and suggests
2 the need for close review of future programs, such as the instant Low Income Audit III
3 Program. However, this necessary review is rendered practically impossible because of
4 the Company's failure to perform a thorough program evaluation or to provide a detailed
5 cost-benefit analysis.

6 **Q. WHY IS IT IMPORTANT FOR RECO TO ACTUALLY IMPLEMENT ITS**
7 **PROGRAM EVALUATION ACTIVITIES?**

8 A. Program evaluation provides an opportunity for RECO, stakeholders, and the Board to
9 review the impact of RECO's Low Income Audit Programs, to understand their cost-
10 effectiveness and other benefits, and to propose informed modifications to better serve
11 customers. By not undertaking the expected evaluation activities during its Low Income
12 Audit II period, RECO has lost the opportunity to gain valuable insight into customer
13 experience and program impact that could help the Company improve its customer
14 satisfaction, marketing and outreach materials, program delivery, and measure cost-
15 effectiveness. It has also hindered the ability of other stakeholders to provide a thorough
16 review of its programs.

17 **Q. HAVE YOU REVIEWED RECO'S PROPOSAL FOR EVALUATION**
18 **ACTIVITIES IN THE CURRENT FILING?**

19 A. Yes. RECO's proposed evaluation plan is described in Schedule DEK-1 to Mr.
20 Kennedy's direct testimony. This plan is similar to the evaluation activities to which
21 RECO committed, but largely did not perform, in its 2014 Stipulation. The only material
22 difference is that the Company proposes, instead of a full CBA at the close of its

1 program, that “a percentage of program measures will be reviewed on an annual basis to
2 determine the program's cost-effectiveness and to evaluate any changes that may be
3 necessary.”¹⁶

4 I have also reviewed RECO’s proposed survey instrument for customers,
5 provided as Attachment 1 to Informal Discovery Request INF-4.

6 **Q. DO YOU HAVE ANY COMMENTS ON RECO’S PROPOSED EVALUATION**
7 **ACTIVITIES IN THE CURRENT FILING?**

8 A. Yes. If the Low Income Audit III Program is adopted by the Board, my recommendations
9 for improving its evaluation plans, following the structure of RECO’s evaluation plan as
10 presented in Petition Schedule DEK-1, are:

- 11 • **Impact Evaluation:** RECO’s Impact Evaluation plan is reasonable;
12 however, the Company should collect its data and impact analysis and
13 submit it to the Board annually. RECO should also commit to providing
14 these data as part of an overall cost-benefit and impact analysis as part of
15 its next energy efficiency filing.
- 16 • **Process Evaluation:** Follow-up surveys should be conducted and the
17 results aggregated and submitted to the Board. However, the survey
18 instrument provided in response to Informal Discovery Request INF-4 is
19 inadequate and should be revised for clarity and to ensure that it addresses
20 “customer satisfaction with Program features,” as suggested in Petition
21 Schedule DEK-1, as well as soliciting customer input on current and
22 potential program offerings. The current survey instrument is almost
23 entirely and redundantly focused on contractor customer service, is

¹⁶ Petition Schedule DEK-1, page 4.

1 ambiguous as to its target audience,¹⁷ and uses a right-to-left scoring
2 scheme that is likely to cause respondent error in filling out the survey.

- 3 • **Quality Assurance Verification:** The Company should clarify how the
4 results of its audits will be tracked and reported.
- 5 • **Measurement and Verification:** As noted above, this area should include
6 a transparent cost-benefit analysis to be performed at the end of the two-
7 year period.

8 VI. COST-BENEFIT ANALYSIS

9 **Q. TURNING SPECIFICALLY TO THE COST-BENEFIT ANALYSIS OF RECO'S**
10 **PROGRAM, PLEASE DESCRIBE THE CEEEP CBA REPORT.**

11 **A.** The CEEEP CBA Report analyzed the cost effectiveness of RECO's programs and
12 compared them to other low income programs in New Jersey on a cost-effectiveness
13 basis.

14 While I have no specific reason to question the validity of this analysis, RECO
15 has not provided underlying workpapers supporting the conclusions of this report or the
16 cost-effectiveness of its proposed EE programs. Nor has RECO provided in its Petition or
17 responses any additional materials to assess or support the cost-effectiveness of its
18 proposed program. In sum, RECO did not provide the necessary supporting
19 documentation to thoroughly assess the cost-effectiveness of its proposed programs.

¹⁷ The introductory sentence reads, "As a contractor for the Audit and Direct Installation Program your input is vital in our efforts to improve the quality of service we provide" suggesting that the survey is for contractors.

1 Q. DID RECO PROVIDE ANY PROSPECTIVE COST-BENEFIT ANALYSIS FOR
2 ITS PROPOSED LOW INCOME AUDIT III PROGRAM?

3 A. No.

4 Q. WHAT WAS THE CONCLUSION OF THE CEEEP ANALYSIS?

5 A. The conclusion of the CEEEP CBA Report was that the RECO program was not cost-
6 effective based on monetized costs and benefits, but that it was comparable to NJCEP
7 programs on a cost-effectiveness basis. The CEEEP CBA Report concludes:

8 Overall, the Rockland Electric Low Income Direct Install Program CBA
9 ratios are less than 1 for each of the five cost tests, indicating that the
10 total cost of the program is greater than the total benefits...the results for
11 RECO's program are very similar to the cost benefit ratios the CEEEP
12 found for NJCEP's Comfort Partners program in recent years.
13 Additionally, CEEEP...found that RECO's program costs less per unit of
14 energy saved than the Comfort Partners program in 2009-2014, in terms
15 of both total dollars spent and incentive dollars spent. Additionally, the
16 Rockland Electric program has higher kilowatt hours savings per
17 participant than other similar NJCEP programs.¹⁸

18 Low income programs often show costs that exceed monetized benefits under
19 standard cost-effectiveness test, but they are often found to be justified based on their
20 numerous non-energy benefits.¹⁹ These ancillary benefits may include health and safety
21 benefits; reduced arrearages, debt-collection costs, and cut-offs; economic benefits; and

¹⁸ Petition Exhibit H Report, page 4.

¹⁹ Hall and Riggert, 2002. Beyond energy savings: a review of the non-energy benefits estimated for three low-income programs.

1 the intrinsic value of assisting low income consumers reduce their energy usage and bills
2 without sacrificing, or even while increasing, energy utility.²⁰

3 **Q. WHAT IS YOUR RECOMMENDATION IN THE AREA OF PROGRAM**
4 **EVALUATION?**

5 A. I recommend that RECO perform the evaluation activities described in Petition Schedule
6 DEK-1, modified as recommended above. In addition, the Company should produce
7 annual evaluation reports detailing its completed evaluation activities and presenting the
8 results, including sample customer surveys cleansed of any identifying information.

9 In addition, RECO should provide the detailed data underlying its cost-benefit
10 analysis, included costs incurred, estimated savings in kWh (and therms, where
11 applicable), avoided emissions, and the dollar value of those savings from the perspective
12 of the customer and the utility. This is in addition to the data underlying the analysis for
13 the CEEEP CBA Report necessary for a complete review of that study, as discussed
14 earlier in my testimony.

15 **VII. OUTREACH AND MARKETING**

16 **Q. HOW MANY CUSTOMERS DOES RECO'S PROGRAM REACH ANNUALLY?**

17 A. From its inception, each of RECO's Low Income Audit programs has been designed to
18 reach 100 customers annually, and that is the target number of customers in the current

²⁰ National Efficiency Screening Project, 2017. National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources.

1 filing.²¹ As seen in Figure 1, RECO has only reached this number of customers in
2 program years 2011, 2012, 2013, and 2016.

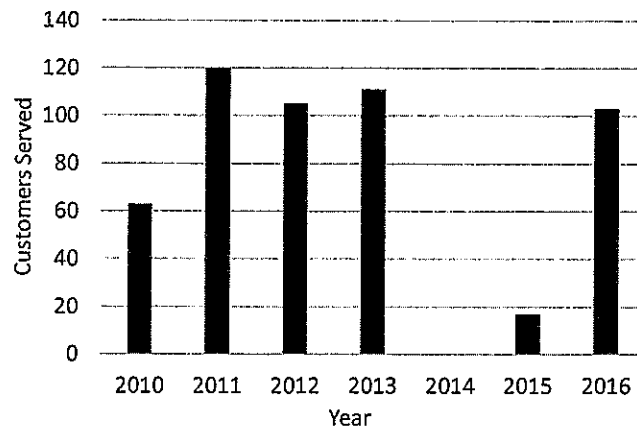


Figure 1. Customers served by RECO's Low Income Audit Programs. Source: RECO response to Rate Counsel Discovery Request RCR-EE-2.

3 **Q. WHAT ACCOUNTS FOR THE HIATUS IN SERVING CUSTOMERS IN 2014**
4 **AND THE LOW LEVEL OF PARTICIPATION IN 2015?**

5 A. According to RECO's response to Discovery Request S-RECO-EE-15, "There was no
6 participation in 2014 because there was a gap between the end of the Low Income Audit I
7 program, and the commencement of the Low Income II program." RECO also noted, in
8 response to Discovery Request S-RECO-EE-14, that "While the contract was signed in
9 early 2015, Honeywell did not begin installations until May 2015."

10 **Q. WHAT IS RECO'S PLAN FOR OUTREACH AND MARKETING FOR ITS LOW**
11 **INCOME AUDIT III PROGRAM?**

12 A. RECO described its outreach and marketing plan in response to Discovery Request RCR-
13 EE-7:

²¹ See Petition, para. 15; Response to RCR-EE-1

1 The marketing budget of \$10,000 annually consists of the creation of
2 program literature and brochures, sponsorships in outreach events, direct
3 mailings to customers to make them aware of their eligibility of the
4 program, outreach to agencies, and mailing and production costs
5 associated with the distribution of the quarterly newsletter.

6 However, RECO has also indicated that its initial participant pool of 700 USF customers
7 is largely exhausted. Response to RCR-EE-1:

8 All Universal Service Fund customers, approximately 700 are eligible
9 for the Program. However, as stated in the Petition, a majority of those
10 customers have already participated in the Program. To further broaden
11 participation beyond USF customers, the Company will strengthen
12 outreach using Community Based Organizations, collaborate with
13 Weatherization Assistance Program agencies, and coordinate
14 communications with the New Jersey Office of Information Technology.

15 In a discovery teleconference on December -6, 2017, RECO indicated that its plan
16 is for the RECO program administrator to reach out to other organizations and
17 municipalities to identify and provide contact information for additional qualified low
18 income customers.

19 **VIII. RECOMMENDATIONS AND CONCLUSIONS**

20 **Q. CAN YOU SUMMARIZE YOUR RECOMMENDATIONS TO THE BOARD IN**
21 **THIS MATTER?**

22 **A.** I recommend that the Board deny the Company's Petition at this time because RECO has
23 not provided adequate materials and analysis to support a thorough review of its proposed
24 Program.

1 In the event that RECO's Low Income Audit III Program is adopted by the Board,
2 RECO should be directed to perform the evaluation activities as described in Petition
3 Schedule DEK-1, modified as recommended herein. In addition, RECO should be
4 directed to produce annual evaluation reports detailing its completed evaluation activities
5 and presenting the results, including sample customer surveys cleansed of any identifying
6 information.

7 Finally, RECO should be directed to provide the detailed data underlying its cost-
8 benefit analysis, included costs incurred, estimated savings in kWh (and therms, where
9 applicable), avoided emissions, and the dollar value of those savings from the perspective
10 of the customer and the utility. This should include the data and workpapers underlying
11 the CEEEP CBA Report.

12 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

13 **A.** Yes. However, I reserve my right to supplement my testimony in response to relevant
14 new information presented subsequent to the filing date of my testimony.