

**Fitchburg Gas and Electric Lighting Company d/b/a Unitil
2019-2021 Energy Efficiency Term Report
PART TWO - NARRATIVE**

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1. CORE INITIATIVE VARIANCES & COST-EFFECTIVENESS

A. Residential Programs

The actual 2019-2021 benefit-cost ratio for the Residential sector is 1.24.

(1) RESIDENTIAL NEW BUILDINGS

The Residential New Buildings program was cost-effective for the term with a benefit-cost ratio of 2.61.

a. Residential New Homes & Renovations

Significant Variances¹ - The variances for this initiative are as follows:

Evaluated total benefits were 11 percent less than preliminary results. The decrease in evaluated benefits is due to a reduction in attributable energy savings as a result of the 2019 Residential New Construction Baseline and Code Compliance Study (2019 Plan-Year Report D.P.U. 20-50 Appendix 4D, Study 19-27). The evaluation study updated the User Defined Reference Home (“UDRH”), last updated in 2016, based on current common installation practices for non-participating homes. The study found that program homes are significantly more efficient than non-program homes, but the difference between the two is decreasing.

Cost-Effectiveness - The Residential New Homes & Renovations core initiative was cost-effective for the term with a benefit-cost ratio of 2.61.

(2) RESIDENTIAL EXISTING BUILDINGS

The Residential Existing Buildings program was cost-effective for the term with a benefit-cost ratio of 1.24.

¹ Significant variances are defined in the D.P.U. 11-120-B Term Report Template as three-year core initiative variances between: (1) planned and actual core initiative budget of 10 percent or greater; (2) planned and preliminary core initiative total lifetime savings showing a decrease of 10 percent or greater; (3) planned and preliminary core initiative total resource benefits showing a decrease of 10 percent or greater; and (4) preliminary and evaluated core initiative total benefits of 10 percent or greater.

a. Residential Coordinated Delivery

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 18 percent less than budgeted. This variance was due to underspending in program years 2019 and 2020 in Participant Incentives, with spending in 2020 reaching only 65 percent of plan. Underspending also occurred in Sales, Technical Assistance and Training (“STAT”) and Marketing and Advertising.

The drop in spending was most pronounced in 2020 as a result of the cessation of most weatherization work due to the COVID-19 pandemic. This interruption caused a drop-off in both home energy assessments and weatherization projects, as well as associated savings and benefits resulting from in-home energy efficiency improvements. Activity rebounded in 2021, in which participant incentives exceeded the term year budget by 15 percent.

Preliminary lifetime savings were 12 percent less than planned. This variance was the result of the reduced participation noted above.

Cost-Effectiveness - The Residential Coordinated Delivery core initiative was cost-effective for the term with a benefit-cost ratio of 1.60.

b. Residential Conservation Services

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 90 percent greater than budgeted. The primary reason for the variance was an error in how the budget was developed for the Residential Conservation Services (“RCS”) core initiative, resulting in an under-allocation of planned STAT costs RCS and an overallocation of planned STAT costs to Residential Coordinated Delivery (“RCD”) STAT for the 2019-2021 term.

Taken together, the actual STAT costs for the two core initiatives were 11 percent higher than the budgeted amount. This variance was due in part to the removal of the cap on weatherization services for customers late last term, which also drove the associated STAT costs higher than in the 2016-20218 term. In addition, additional unanticipated costs related to personal protective equipment and bonuses for completion of certain work were incurred in program years 2020 and 2021.

c. Residential Retail

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 103 percent greater than budget. This variance was driven by significantly higher spending on participant incentives than anticipated during planning. The Company's success in promoting heating systems as well as indirect water heaters in this core initiative far outpaced planned values. In 2021 alone, this core initiative expended \$200k more in rebates than was budgeted for just three measures: high-efficiency boilers, combination boiler / hot water heaters, and high efficiency furnaces. Over the term, the Company rebated twice as many heating systems and expended 243 percent on participant incentives than planned. The other budget categories were underspent compared to plan. This increased participation led to comparable increases in lifetime natural gas savings and total benefits of 105 percent and 95 percent, respectively.

Evaluated total benefits were 11 percent less than preliminary results. The primary driver for these differences was a recent evaluation study, the Comprehensive TRM Review (MA19R17-B-TRM), which can be found in Appendix 4D, Study 20-8. There were two primary reasons for this variance, and both are due to baseline updates in HVAC equipment. First, the Company planned with a boiler baseline of 82 AFUE but the baseline discovered during the evaluation was determined to be 86.5 AFUE efficiency. This reduced the lifetime savings from 2812 therms for preliminary to 1926 therms in evaluated savings for the 95 AFUE boiler measure offering. The previously mentioned study results also updated the baseline for furnaces from a value of 85 AFUE used in the preliminary analysis to a value of 89 AFUE for evaluated results. This resulted in a significant reduction in lifetime savings from 1470 therms in preliminary to 816 therms in evaluated. The study also resulted in savings reductions for tankless water heaters, storage water heaters and combination condensing boilers, though the magnitude of change was smaller. These updates all resulted from baseline changes.

Cost-Effectiveness - The Residential Retail core initiative was cost-effective for the term with a benefit-cost ratio of 1.08.

d. Residential Behavior

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 37 percent less than budgeted. As was communicated in a letter to the Department dated December 29, 2020, the Company made a concerted effort to increase the savings and cost effectiveness of this core initiative during 2019-2021, in concert with its Home Energy Reports vendor. These efforts included reducing internal expenses to the extent possible, providing additional home energy reports to

participating natural gas customers, as well as sending enhanced email alerts to try to drive additional behavior change. Ultimately, the Company and its vendor concluded that continued efforts would not result in sufficient savings to achieve a cost-effective core initiative in either the short- or long-term. The Company discontinued the offering at the end of 2020.

Preliminary lifetime savings were 92 percent less than planned and preliminary total resource benefits were 93 percent less than planned given that no statistically significant savings were observed during program year 2020, and the core initiative was not offered in program year 2021.

Cost-Effectiveness - The Residential Behavior core initiative did not achieve cost-effectiveness, ending the term with a benefit-cost ratio of 0.19.

B. Income Eligible Programs

The actual 2019-2021 benefit-cost ratio for the Income Eligible sector is 1.91.

(1) INCOME ELIGIBLE EXISTING BUILDINGS

The Income Eligible Existing Buildings program was cost-effective for the term with a benefit-cost ratio of 2.02.

a. Income Eligible Coordinated Delivery

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 10 percent greater than budgeted. The reason for this variance was the higher than projected expenditures on Program Planning and Administration (“PP&A”), Sales, Technical Assistance and Training (“STAT”) and Participant Incentives. PP&A costs were 31 percent higher than planned and STAT costs were 30 percent higher than planned while Participant Incentives were 8 percent higher than planned during the term. Program activity was strongest in 2019, dropped by 50 percent in 2020 due to Covid-19, and recovered in 2021 with Participant Incentives 11 percent higher than that term year’s budget. Activity in 2021 was dominated by heating system replacements, including for individual income eligible customers within a large multifamily building.

Overall, expenditures for the Income Eligible Coordinated Delivery core initiative were 28 percent higher during 2019-2021 than in the 2016-2018 term. This significant increase in investment was driven by Participant Incentives, which were also 28 percent higher in the 2019-2021 term compared to the previous term. This increase over plan and over past performance demonstrates the Company’s commitment to and success in

reaching the most vulnerable customers in our territory in spite of the challenges and barriers the COVID-19 pandemic posed to the Company, the Community Action Agency, and our customers.

Cost-Effectiveness - The Income Eligible Coordinated Delivery core initiative was cost-effective for the term with a benefit-cost ratio of 2.02.

C. Commercial and Industrial (“C&I”) Programs

The actual 2019-2021 benefit-cost ratio for the C&I sector is 2.18.

(1) C&I NEW BUILDINGS

The C&I New Buildings program was cost-effective for the term with a benefit-cost ratio of 2.16.

a. C&I New Buildings & Major Renovations

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 14 percent less than budgeted. While the Company was not able to close any New Building or Major Renovation projects for C&I customers in 2019, it did initiate a very large project that came to fruition in 2020 and received a \$250k incentive. That was followed by reduced investment from C&I customers in new construction or renovation due to the economic uncertainties driven by the Covid-19 pandemic, resulting in no participant activity in 2021. This ‘lumpy’ activity in the C&I New Buildings and Major Renovations core initiative, in which some years have high spending, savings and benefits, while other years are marked by relatively low or no inactivity, is not uncommon for the Company, which has a small pool of C&I customers with relatively modest opportunity related to new construction and major renovations.

Cost-Effectiveness - The C&I New Buildings & Major Renovations core initiative was cost-effective for the term with a benefit-cost ratio of 2.16.

(2) C&I EXISTING BUILDINGS

The C&I Existing Buildings program was cost-effective for the term with a benefit-cost ratio of 2.52.

a. C&I Existing Buildings Retrofit

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 24 percent greater than budgeted. The primary reason for the variance was extraordinarily high participation during program year 2019, accounting for 85 percent of the planned spending for the term in the Participant Incentive category. That program year saw the close of a very large custom process project, as well as additional activity in commercially-metered residential buildings.

Due to the restrictions imposed as a result of the COVID-19 pandemic, spending and savings were minimal in program year 2020, followed by moderate recovery in demand for energy efficiency services and equipment in program year 2021. Based on the Company's higher spending during the first year of the term, the Company sought Energy Efficiency Advisory Council ("EEAC") approval of a mid-term modification for a 30 percent increase in the budget for Existing Building Program, which was approved on May 26, 2021. That forecasted budget increase was in line with how the term spending concluded at 24 percent above the original Plan budget.

Cost-Effectiveness - The C&I Existing Buildings Retrofit core initiative was cost-effective for the term with a benefit-cost ratio of 2.05.

b. C&I New & Replacement Equipment

Significant Variances - The variances for this initiative are as follows:

Actual expenditures were 18 percent less than budgeted. The primary reason for the variance relates to an overestimation of anticipated activity related to Participant Incentives, particularly for custom measures, demand for which was suppressed during the term due to the Covid-19 pandemic as well as related economic uncertainty. While Participant Incentives expenditures were just 56 percent of what was budgeted, PP&A and STAT expenditures were over budget.

Preliminary lifetime savings were 46 percent less than planned. As noted above, the COVID-19 pandemic led to a suppression of demand for new equipment in the C&I sector, particularly for custom measures. The planned activity and savings related to custom process measures, representing nearly half of the lifetime savings related to this core initiative, did not occur. While lifetime savings in this core initiative reached 87 percent of the Plan year goal for 2019, it dropped to just 35 percent in 2020 and slightly rebounded to 40 percent in 2021.

Preliminary total resource benefits were 48 percent less than planned. This variance is in line with the lower than planned lifetime savings, which were particularly impacted in program year 2020.

Evaluated total benefits are 72 percent higher than preliminary total benefits. This variance was due to an increase in non-energy impacts (NEI) values resulting from the C&I Operation & Maintenance (O&M) and Non-O&M Study.² The primary objective of the study was to develop O&M NEI values broadly across all C&I measures and programs, and non-O&M NEI values (excluding health and safety (H&S) NEIs) with a focus on energy-efficiency measures common to small businesses programs (though application of these NEIs would not be limited to small business programs). The overall impact of these NEI values boosted evaluated benefits across all C&I programs for 2021.

Cost-Effectiveness - The C&I New & Replacement Equipment core initiative was cost-effective for the term with a benefit-cost ratio of 3.39.

2. LOW-INCOME COST ALLOCATION

The Green Communities Act requires that at least ten percent of electric efficiency funding and 20 percent of gas efficiency funding be spent on low-income programs. G.L. c. 25 § 19(c).

Please refer to the *Customer Sector Cost Allocation* table in the Company's Data Tables for a summary and comparison of planned budget allocation and actual expenditures by customer sector. As shown in this table, actual expenditures in the low-income sector were 27 percent of total gas expenditures. The Company has, therefore, met the statutory minimum requirement.

3. MINIMIZATION OF ADMINISTRATIVE COSTS

The Green Communities Act requires that energy efficiency programs minimize administrative costs to the fullest extent practicable. G.L. c. 25 § 19(b). In accordance with the GCA, the Company has sought to minimize administrative costs to the fullest extent practicable. See the attached testimony outlining the drivers of administrative costs and specific actions taken to minimize those costs.

Please refer to the *Administrative Costs* table in the Company's Data Tables for a summary and comparison by core initiative of (i) planned and actual Program Planning and Administration ("PP&A") costs, and (ii) planned and actual PP&A costs as a percent of total program costs. As shown in the table, actual PP&A spending in the portfolio wide was 47 percent greater than budget,

² D.P.U. 21-120-D.P.U.21-129 Appendix J, Study 34,"C&I O&M and non-O&M NEI with Small Business Focus" (MA20X10-B-CIOMNEI).

with the highest increase over plan occurring in the C&I sector in which costs were 87 percent higher than planned. The Residential and Income Eligible sectors each exceeded budgeted costs for PP&A by 36 percent and 28 percent respectively. The reason for these increases, applicable to all sectors, was an under-estimation during planning of the percent of internal costs that would be dedicated to PP&A.

Actual PP&A spending on internal costs during the 2019-2021 term was actually 9 percent lower than PP&A spending in the 2016-2018 term, with actual internal costs 12 percent lower term over term. As a percent of total spending, the Company was also able to reduce PP&A costs from 14.1 percent in the 2016-2018 term to 10.4 percent in the 2019-2021 term. Compared to the modest 7.6 percent allocated to PP&A portfolio wide over the term, actual PP&A expenditures as percent of total costs was 47 percent higher than planned.

During the term, the Company and its management staff followed the guidance and recommendations of the Navigant / Guidehouse study on “Best Practices for Minimizing Program Planning and Administrative Costs,” which was published in October of 2018. Subsequently, those program managers who do not have direct sales and technical assistance contact with customers were directed to consistently book all of their time to the PP&A cost category in line with the study. This contrasted with the understanding of those preparing the budget for the 2019-2021 Term who were planning for PP&A costs to be substantially below what was charged to that budget category during the 2016-2018 term in an unfulfilled expectation that internal billing practices would shift some time and expense to other budget categories.

As shown on the PPA table in the Company’s Data Tables, portfolio wide *external* PP&A costs over the term were 42 percent lower than budgeted. Of those external PP&A costs, legal services were 8 percent higher than the budget, assessments were consistent with the budget, and “other vendor services” were 74 percent lower than budgeted.

4. COMPETITIVE PROCUREMENT

The Green Communities Act requires that energy efficiency programs utilize competitive procurement processes to the fullest extent practicable. G.L. c. 25 § 19(b). In accordance with the GCA, the Company has utilized competitive procurement processes to the fullest extent practicable.

Please refer to the *Competitive Procurement* table in the Company’s Data Tables for a summary and comparison of planned and actual program outsourced activities by sector. As shown in the table, significant differences exist between planned and actual outsourced activities and competitively procured activities in the residential, low-income and C&I sectors.

For the residential sector, the actual three year “cost of services” were nearly identical to plan, with in-house activities 2 percent lower and out-sourced 2 percent higher. The only major variance to plan was non-competitively procured services were 42 percent higher than planned over the term.

The increase is primarily driven by the inclusion of MassCEC workforce development costs, paid for in 2021, which were not anticipated during planning. In addition, the Company had higher than anticipated costs associated with third-party evaluation support provided by a vendor with unique skills and provided in coordination with the other small gas program administrators, which allowed for efficiencies that would not have been achieved had Unitil procured these services on its own. Also during planning, the costs associated with DOER assessments were excluded from the competitive procurement table, but should have been included.

For the income eligible sector, actual three-year “cost of services” were 17 percent higher than planned. Total in-house activities were 24 percent higher than planned while outsourced costs were 12 percent higher than planned. Of the outsourced costs, those that were competitively procured were 44 percent lower than planned and non-competitively procured costs were 32 percent higher than planned. Significantly, the MassCEC workforce development costs, which were allocated across all sectors, were not anticipated during planning. Other costs associated with third parties such as the Income Eligible Coordinated Delivery implementation vendor, which is not competitively procured, were higher than anticipated, driven by the overall increase in spending compared to plan. This increased spending was particularly pronounced in 2019 when activity in this sector was most robust.

For the C&I sector, the actual cost of services over the term were 10 percent higher than planned, driven by the cost of in-house activities, which were 85 percent higher than planned. Total outsourced activities were 28 percent lower than planned for this sector. While competitively procured costs were 43 percent lower than planned, non-competitively procured services were 208 percent higher than planned. While this is a significant variance, the Company anticipated very little expense would be non-competitively procured during planning, with just \$28,200 budgeted based. However, as with residential and income eligible sectors, unanticipated expenses such as the MassCEC workforce development costs were incurred. Finally, support for evaluation activities and benefit cost modeling was provided by a third-party vendor whose services were not competitively procured. While the Company believes that there is adequate justification for not competitively procuring these services given the unique skills and relatively small expenditures associated with this vendor, a competitive request for proposals will be issued in the near term due to the expectation of sustained need for this support going forward.

While the majority of the Company’s procurements were conducted via a competitive procurement process, there are some exceptions when the Company opts to not undertake a competitive procurement process. These non-competitively procured services occurred in one of seven circumstances: (1) proprietary; (2) non-responsive bids; (3) continuation; (4) technical services and exclusive capability; (5) unique skills and exclusive capability; (6) regulated; and (7) minimum cost threshold. Each scenario is further described below.

Some services require items that are under patent, copyright, or proprietary design. These come directly from the manufacturer and comparable alternatives are unavailable. In these circumstances, the Company must contract directly with that manufacturer in order to obtain the

services of that item. These circumstances are rare, and the Company strives to avoid them when possible.

Occasionally, the Company will solicit bids, but will not receive any responsible bids from the requested bidders. In these circumstances, the Company will try to do another bid if possible. If not possible, however, then the Company will select a vendor that is most qualified to perform the services.

The continuation of work by the same vendor may be needed to complete an existing project when additional work, items, or services are required, but they were not known to be needed when the original order was placed to complete an existing project. While the original order may have been competitively procured, because this continuation of work is technically a different contract, it is considered a sole-sourced contract by the Company.

A procurement may be for technical service in connection with the assembly, installation, or servicing of equipment of a highly technical or specialized nature and there is the only qualified source. Prior to executing these procurements, the Company will conduct a reasonable inquiry to verify that only one vendor is qualified and no other potential vendors are known.

Related to the technical service exception, a procurement may be for a specialized service and only one vendor has that unique skill and capability. Prior to executing these procurements, the Company will conduct a reasonable inquire to verify that only one vendor qualified and no other potential vendors are known.

The Company has certain contractual obligations with entities due to regulatory mandates. Because the selection of these entities is out of the Company's control, the Company cannot conduct a competitive procurement process for them. This category of costs can contribute to a significant amount of non-competitive costs for the Company. For example, the GCA states "The low-income residential demand-side management and education programs shall be implemented through the low-income weatherization and fuel assistance program network and shall be coordinated with all electric and gas distribution companies in the commonwealth with the objective of standardizing implementation." The Low-Income Energy Affordability Network (LEAN) was established among the other agencies of the low-income and fuel assistance program network to provide the services required for implementing the coordination requirements of the statute. This network is primarily made up of small Community Action Agencies that provide Energy Efficiency Services (as well as other assistance services) within specific geographic areas. Given that the Company does not have control over this contractor network, these costs are classified as non-competitively procured. Additionally, in 2021, "An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy" was enacted which required the Company to provide funding to the Massachusetts Clean Energy Center for workforce development programs. Given these costs were mandated by the new legislation, they are categorized as non-competitively procured.

Finally, the Company may procure services at a cost below a certain threshold that would justify the use of a competitive procurement process. Contractors where the total costs are below \$50,000 are selected using sound business judgment and do not go through a competitive procurement process.

5. BENEFIT-COST RATIO SCREENING TOOL

Please see Appendix A for the Benefit-Cost Ratio Screening Tool in Microsoft Excel format.

6. STATEWIDE TECHNICAL REFERENCE MANUAL/LIBRARY

The Technical Reference Manual (“TRM”) documents how the energy efficiency Program Administrators consistently, reliably, and transparently calculate savings resulting from the installation of prescriptive energy efficiency measures. The TRM provides methods, formulas, and default assumptions for estimating energy, peak demand, and other resource impacts from energy efficiency measures. The Technical Reference Manual – 2021 Report Version is available at Appendix B. Please see Appendix 3 to the Company’s 2019 Plan-Year Report in D.P.U. 20-50 for the Technical Reference Manual – 2019 Report Version, and Appendix 3 to the Company’s 2020 Plan-Year Report in D.P.U. 21-70 for the Technical Reference Manual – 2020 Report Version.

The electronic version, the eTRM, is available at:
<https://www.massavedata.com/Public/TechnicalReferenceLibrary>.

7. STATEWIDE EVALUATION STUDIES

D. Previously Submitted Evaluation Studies Incorporated by Reference

Under the guidance and direction of the Evaluation Management Committee, 131 evaluation studies were completed during the 2019-2021 term. The majority of these studies were previously submitted to the Department in D.P.U. 20-50 (*2019 Energy Efficiency Plan-Year Report*), D.P.U. 21-70 (*2020 Energy Efficiency Plan-Year Report*) and D.P.U. 21-120 through D.P.U. 21-129 (*2022-2024 Electric & Gas Three-Year Energy Efficiency Plan*). Previously submitted studies are incorporated in the instant docket by reference. Please refer to the table in Appendix C-1 for a complete list of these studies. The table provides the name of each study, the applicable fuel, the location of the study in each report/plan, and the primary EM&V contractor conducting the study. All completed studies are also available on the Massachusetts Energy Efficiency Advisory Council’s website at: <http://ma-eeac.org/studies/>.

E. Annual Summary for Year Three (2021)

Please see Appendix C-2 for a list of evaluation studies that were completed after the Program Administrators filed their 2022-2024 Three-Year Plan and are included in this Term Report. Summaries of these evaluations are included at Appendix C-3 and full copies are available at Appendix C4. Additionally, all currently completed studies are available on the Council’s website at: <http://ma-eeac.org/studies/>.

F. Summary of the Studies with the Most Significant Effects

The Massachusetts PAs completed 32 evaluation studies in 2021 and early 2022, which are included with the 2019-2021 Term Report (D.P.U. 18-110 – D.P.U. 18-119). Appendix C-5 highlights five 2021 studies with the most significant results regarding PA baseline assumptions, energy savings, non-energy impacts (“NEIs”), and future program design:

1. C&I Custom Gas and Electric Impact Evaluations (2019-2021 Term Report, Appendix D, Study 21-11 and 21-12).
2. Non-Residential New Construction Market Characterization Study (2022-2024 Three-Year Plan, Appendix J, Study 9).
3. Residential Building Equipment Use and Characterization Study (2019-2021 Term Report, Appendix D, Study 21-1).
4. Energy Optimization Fuel Displacement Study (2022-2024 Three-Year Plan, Appendix J, Study 6).
5. C&I Operation & Maintenance (“O&M”) and Non-O&M NEI Study (2022-2024 Three-Year Plan, November 1, 2021, Appendix J, Study 34).

G. Evaluation Studies Recommendations Table

Appendix C-6 provides a table summarizing all evaluation study recommendations and, if applicable, whether the Program Administrators (or the Program Administrator for PA-specific recommendations) have implemented the recommendation to date.

8. THREE-YEAR COSTS

H. Invoice Summary Table

Please refer to [Appendix D](#) for an invoice summary table for each core initiative, sorted by budget category. The Company will continue to maintain all invoices associated with the implementation of its energy efficiency programs.

The invoice summary table is a summary of the record of how invoices were initially paid, whereas the Company's total expenditures accounts for QA/QC, additional manual adjustments, and journal entries made subsequently. Additionally, the table represents vendor invoices only. It does not include costs that are not paid via an invoice to a vendor, such as internal labor costs, internal expenses, or direct incentive payments to participants, or loans repaid by participants as part of multi-year financing opportunities in certain core initiatives. Therefore, the totals in this table will not match the totals in the Term Report Data Tables.

I. Sponsorships and Subscriptions

Please refer to [Appendix E](#) for a list of all organizations or items the Company sponsored or subscribed to during the term. The list includes the following: (a) name of the sponsored organization or item, (b) description of organization or item, (c) cost category; (d) annual funding, (e) purpose of the item, (f) whether the organization is a lobbyist, and (g) an analysis describing why the expense was reasonable, prudently incurred, and how it provided a direct benefit to Massachusetts' ratepayers. [Appendix E](#) also provides, where applicable, supporting documentation to justify the purpose and benefit. For any sponsored organization that is a registered lobbyist, [Appendix E](#) also provides a commitment from organization not to use the program funds for lobbying activities.

9. PERFORMANCE INCENTIVE MODELS

Please refer to [Appendix F](#) for the Performance Incentive calculation tables for calculations of performance incentives based on 2019-2021 achievement. Please refer to [Appendix G](#) for an illustrative report showing a calculation of the value component using net benefits.

10. RENTER, INCOME, AND LANGUAGE DATA

Please refer to [Appendix H](#) for additional data related to renters, income level, and language.