

*NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE  
OFFICE OF MARKETS & INNOVATION  
CLEAN ENERGY GUIDANCE*

# SEEP Content Guidance

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## Version History Log:

<b>Version</b>	<b>Date Issued</b>	<b>Approval</b>	<b>Changes</b>
1.0	2015-05-01	Colleen Gerwitz, Director	N/A
2.0	2016-07-28	Tina Palmero, Director, OCE	Housekeeping, modifications associated with revised filing dates for ETIPs in the Program-Cycle Guidance, inclusion of current year and upcoming planned three-year cycle, and addition of a revision process.
3.0	2017-05-11	Marco Padula, Deputy Director, Market Structure, Office of Markets and Innovation	Modifications associated with annual reporting requirements.
4.0	2018-12-20	Peggie Neville, Deputy Director, Clean Energy	Expansion to include SEEP Guidance, unspent fund carry-forward reporting, and other reporting requirement changes per 3/15/2018 Commission Order in Case 15-M-0252.
5.0	2020-09-01	Marco Padula, Director, Office of Markets & Innovation	Modifications associated with the issuance of Verified Gross Savings Guidance, issuance of the Energy Efficiency and Building Electrification Performance Management & Improvement Process Plan and other changes per Commission Orders in Case 18-M-0084.

## Purpose:

This Clean Energy Guidance document establishes common specifications and minimum requirements that each New York State electric and gas utility must follow with respect to the content of the System Energy Efficiency Plan (SEEP); including all content reflected in the previously required Energy Efficiency Transition Implementation Plan (ETIP) as well as content related to expanded rate case programs, demand reduction programs, non-wire and non-pipe alternative efforts, Reforming the Energy Vision (REV) demonstration projects, and other REV

initiatives that have an energy efficiency component, Earned Adjustment Mechanisms (EAMs) and any other additional clean energy technology program.

This updated guidance is issued pursuant to the New York State Public Service Commission's (Commission) January 16, 2020 "Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025 (January 2020 Energy Efficiency Order)"<sup>1</sup>. The January 2020 Energy Efficiency Order, among other things, authorized energy efficiency targets and budgets for New York State's large investor-owned electric and gas utilities and heat pump budgets and targets for the electric utilities for 2021-2025, directed the utilities to reflect the authorized efficiency and heat pump targets and budgets in an updated SEEP filing and in their quarterly scorecard reporting and directed Department of Public Service Staff (Staff) to update CE-02: ETIP/SEEP Guidance.

This guidance complements existing Clean Energy Guidance documents. All Clean Energy Guidance documents are in effect until revised, rescinded or superseded.

## Background:

On February 26, 2015 the Commission issued the "Order Adopting Regulatory Policy Framework and Implementation Plan" (REV Framework Order),<sup>2</sup> which required each utility to submit an annual Distributed System Implementation Plan (DSIP). The REV Framework Order also established explicit energy efficiency budgets and targets for 2016 and set forth an annual process whereby utilities will propose post-2016 energy efficiency budgets and targets for approval, directed the filing of ETIPs and directed Staff, in consultation with the E<sup>2</sup> Working Group, to develop and submit guidance specifying the elements that should be included in utility ETIPs.

Pursuant to the Commission's March 15, 2018 Order, "Order Authorizing Utility-Administered Energy Efficiency Portfolio Budgets and Targets for 2019-2020" (March 2018 Utility EE Order),<sup>3</sup> the Commission directed utilities to evolve their ETIP into a SEEP that describes the entirety of the utility's expanded reliance on and use of cost-effective energy efficiency to support their distribution system and customer needs. The March 2018 Utility EE Order identified the expanded energy efficiency content to be included in the SEEP and directed utilities to plan for the periodic review of free-ridership. Through the March 2018 Utility EE Order, the Commission also established energy efficiency budgets and targets for 2019 and 2020 and directed each utility to fully integrate energy efficiency planning into their forecasted system plans.

The March 2018 Utility EE Order further addressed details of evaluation, measurement and verification (EM&V) activities necessary to support programmatic EAMs, directed Staff to issue Gross Savings Verification Guidance<sup>4</sup> to address the wide variability in energy efficiency program

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<sup>1</sup> Case 18-M-0084, In the Matter of Utility Energy Efficiency Programs, Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025 (issued January 16, 2020).

<sup>2</sup> Case 14-M-0101, Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision, Order Adopting Regulatory Policy Framework and Implementation Plan (issued February 26, 2015).

<sup>3</sup> Case 15-M-0252, In the Matter of Utility Energy Efficiency Programs, Order Authorizing Utility-Administered Energy Efficiency Portfolio Budgets and Targets for 2019-2020 (issued March 15, 2018).

<sup>4</sup> CE-08: Gross Savings Verification Guidance as posted on the NYS DPS website.

realization rates and to place a greater focus on ‘actual realized savings,’ and established a process for the periodic filing and updating of the SEEP to provide a comprehensive view of energy efficiency activities.

In April 2018, DPS Staff and the New York State Energy Research and Development Authority (NYSERDA) issued the New Efficiency: New York (NE:NY) White Paper that recommended a comprehensive mix of strategies to support efficiency improvements to enable the State to meet the established statewide 185 TBtu (trillion British thermal units) energy efficiency savings target by 2025. The Commission’s December 18, 2018 “Order Adopting Accelerated Energy Efficiency Targets” (December 2018 Energy Efficiency Order)<sup>5</sup> authorized increases for some utility energy efficiency targets and budgets for 2019-2020. Taken together with the January 2020 Energy Efficiency Order the energy efficiency and heat pump budgets and targets through 2025 authorized by the Commission are consistent with the NE:NY energy goals and referred to throughout this guidance document as NE:NY EE portfolios/programs and NYS Clean Heat (representing the heat pump portfolio).

Due to the statewide nature of the heat pump and LMI portfolios, the January 2020 Energy Efficiency Order also required the utilities and NYSEERDA to jointly file a Statewide Heat Pump Implementation Plan and a Statewide Heat Pump Program: NYS Clean Heat Program (NYS Clean Heat) Implementation Plan which serve as the primary filing requirement for these efforts. Consistent with the January 2020 Energy Efficiency Order, the utilities are directed to reflect Heat Pump and LMI budget and target information in their SEEP filings. The format of the high-level budget and target information is described below.

## SEEP Components:

The SEEP will contain all utility-administered energy efficiency activities planned for the service territory organized as shown in the tables below and separated by: NE:NY Electric EE, NE:NY Gas EE, NYS Clean Heat, and LMI. NE:NY Electric EE and NE:NY Gas EE contains all previously approved ETIP portfolios, expanded rate case portfolios, and incremental electric and gas energy efficiency portfolios as authorized in the December 2018 and January 2020 Energy Efficiency Orders. Supplemental EE projects/programs will include all demand reduction programs, non-wire and non-pipe alternative efforts, REV demonstration projects, and any other REV initiatives that include an energy efficiency component. Both the NYS Clean Heat Program and the Statewide LMI Portfolio will also be included as components of the SEEP.

## NE:NY EE PORTFOLIO/PROGRAM DESCRIPTIONS<sup>6</sup>

- An executive summary of the 2019-2025 energy efficiency portfolio, including both the NE:NY Electric and Gas EE, as applicable highlighting any new programs.

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<sup>5</sup> Case 18-M-0084, In the Matter of Utility Energy Efficiency Programs, Order Adopting Accelerated Energy Efficiency Targets (issued December 18, 2018).

<sup>6</sup>The March 2018 Utility EE Order reinstated a strict program-level reporting requirement for this description, in contrast to previous ETIP descriptions that allowed summarization or aggregation by sector.

- Descriptions related to NYS Clean Heat and the LMI Portfolio are not required given those details being provided in their respective Statewide Implementation Plans, however in this section, utilities should provide a reference to the Implementation Plans for more information.
- Include a detailed narrative description of each NE:NY EE program the utility implemented during 2019 and 2020.
- Include a detailed narrative description of the NE:NY EE programs the utility intends to implement for any part of 2021-2025.
- The description must adequately describe the program including, but not limited to, program design, program incentives, program delivery method, target market, coordination with other programs (both within the company and with other program administrators), quality assurance/quality control procedures and anticipated project timeframe.
- If applicable, the narrative should describe any substantive anticipated program changes. For programs that will continue into the future planned portfolio the description only requires details of proposed modifications and the rationale for such changes (i.e., it is not necessary to repeat information described in the narrative from historic programs).
- Include a description of the types of costs included in the Portfolio Administration budget category.

### SUPPLEMENTAL EE PROJECT/PROGRAM DESCRIPTIONS

- Include a high-level narrative description of each Supplemental EE project/program the utility implemented during 2019 and 2020.
- Include a high-level narrative description of Supplemental EE projects/programs the utility intends to implement for any part of 2021-2025.
- Include a reference to the Commission proceeding from which the program was approved or has been proposed. The high-level narrative description can be a brief summary so long as the reference to the Commission proceeding and associated project/program documentation contains a detailed narrative of the project/program and describes the way in which the project/program activities incorporate energy efficiency savings and align with REV activities.

### BUDGET AND SAVINGS PLAN SUMMARY

The Program Spend and Savings Plans identified in Tables 1-4B refer to funding and savings plans that are specific to individual NE:NY EE programs. The columns identified as Planned Spend or Planned Savings are specific to individual programs rather than Commission-authorized portfolio-level targets. As previously discussed, the March 2018 Utility EE Order directed each utility to provide this information for each energy efficiency program, for as many programs as are included in its NE:NY EE portfolio for electric and gas.

**TABLE 1: ACTUAL VS. PLANNED PROGRAM SPEND<sup>7</sup>**

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)<sup>8</sup></b>	<b>Actual Spend 2019</b>	<b>Planned Spend 2020</b>	<b>Actual Spend 2020<sup>9</sup></b>	<b>Total Actual Spend 2019-2020</b>
<i>Commercial &amp; Industrial (C&amp;I) Sector</i>				
<b>C&amp;I Program 1</b>				
Incentives & Services <sup>10</sup>				
Program Implementation <sup>11</sup>				
<b>Total C&amp;I Program 1 Budget</b>				
<b>C&amp;I Program 2</b>				
Incentives & Services				
Program Implementation				
<b>Total C&amp;I Program 2 Budget</b>				
<i>Residential Sector</i>				
<b>Residential Program 1</b>				
Incentives & Services				
Program Implementation				
<b>Total Residential Program 1 Budget</b>				
<b>Residential Program 2</b>				
Incentives & Services				
Program Implementation				
<b>Total Residential Program 2 Budget</b>				
<i>Multifamily Sector</i>				
<b>Multifamily Program 1</b>				
Incentives & Services				
Program Implementation				

<sup>7</sup> Tables 1, 2, 3 and 4 show only two programs per sector for illustrative purposes only. Per the Utility EE Order, each utility should provide this information, for each NE:NY EE program, for as many programs as are included in the NE:NY portfolio of programs. Utilities should use the actual program names within each of the electric and gas portfolios when completing these tables.

<sup>8</sup> In Tables 1, 2, 3, 4, 5 and 6 the utility should separate the electric and gas portfolios and indicate the applicable programs in each

<sup>9</sup> For Tables 1, 1A and 1B utilities should estimate current-year Actual Spend through December 31 and update to actuals in a subsequent SEEP revision.

<sup>10</sup> For Tables 1 and 2 Incentives & Services include incentives/rebates paid to customers and payments made directly to contractors for specific projects and services.

<sup>11</sup> For Tables 1 and 2 Program Implementation includes funds spent on program implementation or technical support, which includes costs associated with contractors implementing programs on the administrator's behalf or other costs associated with implementation of the program. Includes quality assurance and standards, market research, marketing activities and outreach/recruitment of program participants, partners, pilots etc.

PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE) <sup>8</sup>	Actual Spend 2019	Planned Spend 2020	Actual Spend 2020 <sup>9</sup>	Total Actual Spend 2019-2020
<b>Total Multifamily Program 1 Budget</b>				
<b>Multifamily Program 2</b>				
Incentives & Services				
Program Implementation				
<b>Total Multifamily Program 1 Budget</b>				
Portfolio Administration <sup>12</sup>				
Portfolio EM&V <sup>13</sup>				
<b>Total Actual Portfolio Expenditure</b>				
<b>Commission-Authorized Total Budget</b>				
<b>Budget Remaining/Unspent Funds<sup>14</sup></b>				

TABLE 1A: ACTUAL VS. PLANNED NYS CLEAN HEAT PROGRAM SPEND

PORTFOLIO (NYS Clean Heat)	Actual Spend 2019	Planned Spend 2020	Actual Spend 2020	Total Actual Spend 2019-2020
<b>Total Actual Portfolio Expenditure<sup>15</sup></b>				
<b>Commission-Authorized Total Budget</b>				
<b>Budget Remaining/Unspent Funds</b>				

TABLE 1B: ACTUAL VS. PLANNED LMI PORTFOLIO SPEND

PORTFOLIO (LMI Electric or LMI Gas)	Actual Spend 2019	Planned Spend 2020	Actual Spend 2020	Total Actual Spend 2019-2020
Incentives and Services				
Program Implementation				

<sup>12</sup> For Tables 1, 1B, 2 and 2B Portfolio Administration costs include funds spent on portfolio administration costs which includes all portfolio-level (non-program specific) costs other than Portfolio EM&V costs or labor costs of utility employees that are recovered through a utility's base rates.

<sup>13</sup> For Tables 1, 1B, 2 and 2B Portfolio EM&V costs are funds spent on all activities associated with the evaluation, measurement and verification of the energy efficiency program including evaluation planning, program logic models, process evaluation, impact evaluation, evaluation – related market research, measurement and verification activities, and evaluation reporting.

<sup>14</sup> For Tables 1, 1A and 1B the utility should report the cumulative total of Commission-Authorized Budget less actual expenditures to date.

<sup>15</sup> For Tables 1A and 2A, Total Actual Portfolio Expenditure includes all costs of program operation; including Incentives and Services, Program Implementation, Portfolio Administration and Portfolio EM&V.

<b>Total LMI Budget</b>				
Portfolio Administration				
Portfolio EM&V				
<b>Total Actual Portfolio Expenditure</b>				
<b>Commission-Authorized Total Budget</b>				
<b>Budget Remaining/Unspent Funds</b>				

**TABLE 2: FORECAST PROGRAM PLANNED SPEND AND BUDGETS**

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Planned<sup>16</sup> Spend 2021</b>	<b>Planned Spend 2022</b>	<b>Planned Spend 2023</b>	<b>Planned Spend 2024</b>	<b>Planned Spend 2025</b>
<i>Commercial &amp; Industrial (C&amp;I) Sector</i>					
<b>C&amp;I Program 1</b>					
Incentives & Services					
Program Implementation					
<b>Total C&amp;I Program 1 Budget</b>					
<b>C&amp;I Program 2</b>					
Incentives & Services					
Program Implementation					
<b>Total C&amp;I Program 2 Budget</b>					
<i>Residential Sector</i>					
<b>Residential Program 1</b>					
Incentives & Services					
Program Implementation					
<b>Total Residential Program 1 Budget</b>					
<b>Residential Program 2</b>					
Incentives & Services					
Program Implementation					
<b>Total Residential Program 2 Budget</b>					
<i>Multifamily Sector</i>					

<sup>16</sup> For Tables 2, 2A and 2B Planned Spend should be changed to Actual Spend for each of the years beginning 2021 through 2025 in the next applicable annual SEEP filing. For each subsequent year and its associated annual SEEP filing, Planned Spend should be changed to Actual Spend for 2021 through 2025 and moved to Tables 1, 1A and 1B, as appropriate.

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Planned<sup>16</sup> Spend 2021</b>	<b>Planned Spend 2022</b>	<b>Planned Spend 2023</b>	<b>Planned Spend 2024</b>	<b>Planned Spend 2025</b>
<b>Multifamily Program 1</b>					
Incentives & Services					
Program Implementation					
<b>Total Multifamily Program 1 Budget</b>					
<b>Multifamily Program 2</b>					
Incentives & Services					
Program Implementation					
<b>Total Multifamily Program 2 Budget</b>					
Portfolio Administration					
Portfolio EM&V					
<b>Total Planned Portfolio Budget</b>					
<b>Commission-Authorized Total Budget</b>					
<b>Budget Remaining/Unspent Funds<sup>17</sup></b>					

**TABLE 2A: FORECAST NYS CLEAN HEAT PROGRAM PLANNED SPEND AND BUDGETS**

<b>PORTFOLIO (NYS Clean Heat)</b>	<b>Planned<sup>18</sup> Spend 2021</b>	<b>Planned Spend 2022</b>	<b>Planned Spend 2023</b>	<b>Planned Spend 2024</b>	<b>Planned Spend 2025</b>
<b>Total Planned Program Expenditure</b>					
<b>Commission-Authorized Total Budget</b>					
<b>Budget Remaining/Unspent Funds</b>					

**TABLE 2B: FORECAST LMI PORTFOLIO PLANNED SPEND AND BUDGETS**

<b>PORTFOLIO (LMI Electric or LMI Gas)</b>	<b>Planned Spend 2021</b>	<b>Planned Spend 2022</b>	<b>Planned Spend 2023</b>	<b>Planned Spend 2024</b>	<b>Planned Spend 2025</b>
Incentives and Services					

<sup>17</sup> For Tables 2, 2A and 2B the utility should report the cumulative total of Commission-Authorized Budget less actual expenditures to date. This should represent a continuous running tally from Tables 1, 1A and 1B, respectively.

<sup>18</sup> For Tables 2, 2A and 2B Planned Spend should be changed to Actual Spend for each of the years beginning 2021 through 2025 in the next applicable annual SEEP filing. For each subsequent year and its associated annual SEEP filing, Planned Spend should be changed to Actual Spend for 2021 through 2025 and moved to Tables 1, 1A and 1B, as appropriate.

<b>PORTFOLIO (LMI Electric or LMI Gas)</b>	<b>Planned Spend 2021</b>	<b>Planned Spend 2022</b>	<b>Planned Spend 2023</b>	<b>Planned Spend 2024</b>	<b>Planned Spend 2025</b>
Program Implementation					
<b>Total LMI Budget</b>					
Portfolio Administration					
Portfolio EM&V					
<b>Total Actual Portfolio Expenditure</b>					
<b>Commission-Authorized Total Budget</b>					
<b>Budget Remaining/Unspent Funds</b>					

**TABLE 3: ACTUAL VS. PLANNED PRIMARY AND SECONDARY PROGRAM SAVINGS<sup>19</sup>**

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Actual Savings 2019</b>	<b>Planned Savings 2020</b>	<b>Actual Savings 2020<sup>20</sup></b>	<b>Total Actual Savings 2019-2020</b>
<i>Commercial &amp; Industrial (C&amp;I) Sector</i>				
<b>C&amp;I Program 1</b>				
MWh or MMBtu (Primary)				
Metric 2 (Secondary)				
Metric 3 (Secondary)				
<b>C&amp;I Program 2</b>				
MWh or MMBtu (Primary)				
Metric 2 (Secondary)				
Metric 3 (Secondary)				
<i>Residential Sector</i>				
<b>Residential Program 1</b>				
MWh or MMBtu (Primary)				
Metric 2 (Secondary)				
Metric 3 (Secondary)				
<b>Residential Program 2</b>				
MWh or MMBtu (Primary)				
Metric 2 (Secondary)				

<sup>19</sup> For Tables 3, 3A, and 3B utilities may propose additional savings metrics to align with REV-like outcomes.

<sup>20</sup> For Tables 3, 3A and 3B utilities should estimate current-year Actual Savings through December 31 and update to actuals in a subsequent SEEP revision.

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Actual Savings 2019</b>	<b>Planned Savings 2020</b>	<b>Actual Savings 2020<sup>20</sup></b>	<b>Total Actual Savings 2019-2020</b>
Metric 3 (Secondary)				
<i>Multifamily Sector</i>				
<b>Multifamily Program 1</b>				
MWh or MMBtu (Primary)				
Metric 2 (Secondary)				
Metric 3 (Secondary)				
<b>Multifamily Program 2</b>				
MWh or MMBtu (Primary)				
Metric 2 (Secondary)				
Metric 3 (Secondary)				
<b>Total Portfolio</b>				
<b>MWh or MMBtu (Primary)</b>				
<b>Metric 2 (Secondary)</b>				
<b>Metric 3 (Secondary)</b>				

**TABLE 3A: ACTUAL VS. PLANNED PRIMARY AND SECONDARY NYS CLEAN HEAT SAVINGS**

<b>PORTFOLIO (NYS Clean Heat)</b>	<b>Actual Savings 2019</b>	<b>Planned Savings 2020</b>	<b>Actual Savings 2020</b>	<b>Total Actual Savings 2019-2020</b>
<i>Total Portfolio</i>				
<b>MMBtu (Primary)</b>				
<b>Metric 2 (Secondary)</b>				
<b>Metric 3 (Secondary)</b>				

**TABLE 3B: ACTUAL VS. PLANNED PRIMARY AND SECONDARY LMI PORTFOLIO SAVINGS**

<b>PORTFOLIO (LMI Electric or LMI Gas)</b>	<b>Actual Savings 2019</b>	<b>Planned Savings 2020</b>	<b>Actual Savings 2020</b>	<b>Total Actual Savings 2019-2020</b>
<i>Total Portfolio</i>				
<b>MWh or MMBtu (Primary)</b>				
<b>Metric 2 (Secondary)</b>				
<b>Metric 3 (Secondary)</b>				

**TABLE 4: FORECAST PRIMARY AND SECONDARY PROGRAM SAVINGS PLANS<sup>21</sup>**

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Planned Savings 2021<sup>22</sup></b>	<b>Planned Savings 2022</b>	<b>Planned Savings 2023</b>	<b>Planned Savings 2024</b>	<b>Planned Savings 2025</b>
<i>Commercial &amp; Industrial (C&amp;I) Sector</i>					
<b>C&amp;I Program 1</b>					
MWh or MMBtu (Primary)					
Metric 2 (Secondary)					
Metric 3 (Secondary)					
<b>C&amp;I Program 2</b>					
MWh or MMBtu (Primary)					
Metric 2 (Secondary)					
Metric 3 (Secondary)					
<i>Residential Sector</i>					
<b>Residential Program 1</b>					
MWh or MMBtu (Primary)					
Metric 2 (Secondary)					
Metric 3 (Secondary)					
<b>Residential Program 2</b>					
MWh or MMBtu (Primary)					
Metric 2 (Secondary)					
Metric 3 (Secondary)					
<i>Multifamily Sector</i>					
<b>Multifamily Program 1</b>					
MWh or MMBtu (Primary)					
Metric 2 (Secondary)					
Metric 3 (Secondary)					
<b>Multifamily Program 2</b>					
MWh or MMBtu (Primary)					
Metric 2 (Secondary)					

<sup>21</sup> For Tables 4, 4A and 4B utilities may propose additional savings metrics to align with REV-like outcomes.

<sup>22</sup> For Tables 4, 4A and 4B Planned Savings should be changed to Actual Savings for each of the years beginning 2021 through 2025 in the next applicable annual SEEP filing. For each subsequent year and its associated annual SEEP filing, Planned Savings should be changed to Actual Savings for 2021 through 2025 and moved to Tables 3, 3A and 3B, as appropriate.

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Planned Savings 2021<sup>22</sup></b>	<b>Planned Savings 2022</b>	<b>Planned Savings 2023</b>	<b>Planned Savings 2024</b>	<b>Planned Savings 2025</b>
Metric 3 (Secondary)					
<i>Total Portfolio</i>					
<b>MWh or MMBtu (Primary)</b>					
<b>Metric 2 (Secondary)</b>					
<b>Metric 3 (Secondary)</b>					

**TABLE 4A: FORECAST PRIMARY AND SECONDARY NYS CLEAN HEAT SAVINGS PLANS**

<b>PORTFOLIO (NYS Clean Heat)</b>	<b>Planned Savings 2021</b>	<b>Planned Savings 2022</b>	<b>Planned Savings 2023</b>	<b>Planned Savings 2024</b>	<b>Planned Savings 2025</b>
<i>Total Portfolio</i>					
<b>MMBtu (Primary)</b>					
<b>Metric 2 (Secondary)</b>					
<b>Metric 3 (Secondary)</b>					

**TABLE 4B: FORECAST PRIMARY AND SECONDARY LMI PORTFOLIO SAVINGS PLANS**

<b>PORTFOLIO (LMI Electric or LMI Gas)</b>	<b>Planned Savings 2021</b>	<b>Planned Savings 2022</b>	<b>Planned Savings 2023</b>	<b>Planned Savings 2024</b>	<b>Planned Savings 2025</b>
<i>Total Portfolio</i>					
<b>MWh or MMBtu (Primary)</b>					
<b>Metric 2 (Secondary)</b>					
<b>Metric 3 (Secondary)</b>					

## EVALUATION, MEASUREMENT AND VERIFICATION (EM&V)

This section provides descriptions of the categories of EM&V activities to include in the SEEP.

- In Tables 5 and 6 indicate the plan and schedule for all EM&V activities that clearly identifies the information being sought and the date by which it will be obtained to support the overall program and guidance cycle. EM&V activities may include but are not limited to Gross Savings Analysis, process evaluations that inform program design

and implementation, impact evaluations and measurement and verification activities that inform Technical Resource Manual revisions, as well as other market research.<sup>23</sup>

- An initial Gross Savings Verification (VGS) Specification should be submitted for each program to identify the PA’s overall strategy of calculating VGS for the energy efficiency portfolio within the annual SEEP and filed annually thereafter with the annual SEEP filing. A revised VGS Specification based on the findings of a Gross Savings Analysis Report should be included in the SEEP quarterly Revisions Letter. A VGS Specification template is provided as Attachment A to the Gross Savings Verification Guidance Document.
- A description of each Gross Savings Analysis Report filed in DMM in the prior year. The description should include the period of study, the program name and a summary of report findings and recommendations outlined in the study. The description should also identify how the study results will be used to inform program design and implementation, highlighting any program changes to be implemented as a result of the findings<sup>24</sup>.
- A description of each of the planned activities reflected in Tables 5 and 6. A description of the plan and schedule for the periodic review of free-ridership related to utility energy efficiency programs.<sup>25</sup>

**TABLE 5: 2019-2025 EM&V ACTIVITY SCHEDULE<sup>26</sup>**

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)</b>	<b>Expected Plan Submission Date<sup>27</sup></b>	<b>Expected Start Date</b>	<b>Expected Completion Date</b>	<b>Status<sup>28</sup></b>
Activity 1				
Activity 2				
Activity 3				

<sup>23</sup> Each PA must submit plans for EM&V activities that clearly identify assumptions, methodologies, and protocols for assessment of its energy efficiency programs, including schedules of beginning and completion dates for all planned activities. EM&V activities may include but are not limited to, the following: process evaluations to inform program design and implementation; impact evaluations, measurement, and verification activities to inform Technical Resource Manual revisions; and other market research. These plans are submitted as separate filings in Matter 16-02180.

<sup>24</sup> This represents a compilation of the GSA Reports completed throughout the year. These descriptions should also be included in the Revision Letters for the quarter they are completed.

<sup>25</sup> The March 2018 Utility EE Order, which shifted away from the application of a default 0.9 net to gross ratio and instead adopted the policy of authorizing and tracking gross savings, required a periodic review of free-ridership related to utility energy efficiency programs. The free-ridership review is intended to ensure that the policy change does not result in utility programs primarily incenting free-riders.

<sup>26</sup> Where dates are specified, the date should be expressed in a Quarter/Year Format.

<sup>27</sup> Date the EM&V Plan is expected to be filed in DMM.

<sup>28</sup> Provide the appropriate status: Upcoming, In Progress, Delayed, Withdrawn, or Completed for annual filing. If activities have been completed or withdrawn within a year, the status should be updated in the quarterly revisions to the SEEP. Completed and withdrawn activities should be reflected in the Annual Report and do not need to be carried forward in the annual SEEP filing.

**TABLE 6: 2019-2025 EM&V ACTIVITY FORECASTED EXPENDITURES<sup>29,30</sup>**

<b>PORTFOLIO (NE:NY Electric EE or NE:NY Gas EE)*</b>	<b>Actual Year 2019</b>	<b>Planned Year 2020</b>	<b>Planned Year 2021</b>	<b>Planned Year 2022</b>	<b>Planned Year 2023</b>	<b>Planned Year 2024</b>	<b>Planned Year 2025</b>
Activity 1							
Activity 2							
Activity 3							
<b>Total EM&amp;V Forecasted Expenditures</b>							
<b>Unallocated Budget</b>							

\*Activities identified within Tables 5 and 6 should be identified as electric or gas. If the Activity is being conducted for more than one portfolio, separate lines should appear in each table, identifying the amount expended (either actual or planned) for each portfolio budget.

### BENEFIT COST ANALYSIS (BCA)

This section provides descriptions of the BCA information to include in the SEEP.

- For transparency, BCA results that supported previously authorized energy efficiency programs should be documented in the SEEP.<sup>31</sup>
- The results of the BCA should be summarized and provided in the format of Tables 7 and 8. Utilities should be prepared to provide workpapers demonstrating all BCA assumptions, procedures, elements, and calculations performed as described by CE-07: Benefit Cost Analysis Filing Requirements Guidance.<sup>32</sup>

<sup>29</sup> The portfolio-level annual EM&V budgets must be allocated to the various tasks.

<sup>30</sup> Activity names and descriptions reflected in Table 6 should match those used in Table 5: 2019-2025 EM&V Activity Table.

<sup>31</sup> The March 2018 Utility EE Order states that in the near-term, the initial SEEP should describe and quantify the utility's full investment in energy efficiency and expected benefits, inclusive of their base energy efficiency programs (i.e., ETIP) and non-ETIP programs and initiatives such as expanded rate case programs, demand reduction programs, non-wire and non-pipe alternative efforts, REV demonstration projects, and other REV initiatives.

<sup>32</sup> CE-07: Benefit Cost Analysis Filing Requirements Guidance as posted on the NYS DPS website.

**TABLE 7: 2019-2025 PRIMARY BENEFIT COST ANALYSIS<sup>33 34</sup>**

<b>PORTFOLIO (NE:NY Electric EE, including NYS Clean Heat or NE:NY Gas EE)</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
<i>Commercial &amp; Industrial (C&amp;I) Sector</i>							
<b>C&amp;I Program 1<sup>35</sup></b>							
Benefits							
Costs							
<b><i>Benefit Cost Ratio</i></b>							
<b>C&amp;I Program 2</b>							
Benefits							
Costs							
<b><i>Benefit Cost Ratio</i></b>							
<i>Residential Sector</i>							
<b>Residential Program 1</b>							
Benefits							
Costs							
<b><i>Benefit Cost Ratio</i></b>							
<b>Residential Program 2</b>							
Benefits							
Costs							
<b><i>Benefit Cost Ratio</i></b>							
<i>Multifamily Sector</i>							
<b>Multifamily Program 1</b>							
Benefits							
Costs							
<b><i>Benefit Cost Ratio</i></b>							
<b>Multifamily Program 2</b>							
Benefits							
Costs							

<sup>33</sup> Provide one table for NE:NY EE Electric programs (including NYS Clean Heat) and one table for NE:NY EE Gas programs.

<sup>34</sup> Tables 7 and 8 should separate gas and electric while including NYS Clean Heat in the electric portfolio.

<sup>35</sup> For Tables 7 and 8 C&I Program 1, C&I Program 2, Residential Program 1, and all subsequent program names should be replaced with the actual program name. Each utility should use the actual program names within each of the electric and gas portfolio, for as many NE:NY EE programs as are offered.

<b>PORTFOLIO (NE:NY Electric EE, including NYS Clean Heat or NE:NY Gas EE)</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
<i>Benefit Cost Ratio</i>							
<b>NYS Clean Heat</b>							
Benefits							
Costs							
<i>Benefit Cost Ratio</i>							
<i>Total Portfolio</i>							
<b>Total Benefits</b>							
<b>Total Costs<sup>36</sup></b>							
<b>Portfolio Benefit Cost Ratio</b>							

**TABLE 8: 2019-2025 PORTFOLIO BCA RATIOS<sup>37</sup>**

<b>PORTFOLIO (NE:NY Electric EE, including NYS Clean Heat or NE:NY Gas EE)</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
<b>Societal Cost Test Ratio</b>							
<b>Utility Cost Test Ratio</b>							
<b>Ratepayer Impact Measure Test Ratio</b>							

## SEEP Filings:

The SEEP shall be updated annually to describe and quantify each utility's full investment in energy efficiency and expected benefits.

Relatedly, in the January 2020 Energy Efficiency Order, the Commission required DPS Staff to initiate a Performance Management and Improvement Process to maximize performance of the energy efficiency and building electrification portfolios. This process was commenced with Staff's May 29, 2020 filing of the Energy Efficiency & Building Electrification Performance Management and Improvement Process (PM&IP) Plan.

<sup>36</sup>Total Costs shall be defined to include all costs associated with the energy efficiency portfolio, including program specific costs, Portfolio Administration and EM&V costs, any related costs collected through base rates as well as customer costs.

<sup>37</sup>As required by the Utility BCA Handbook.

The PM&IP Plan directs utilities to file the annual SEEP early in the fourth quarter of each year, however, recognizes 2020 as a transition year into the annual PM&IP. Therefore, filing dates for 2020 and subsequent years are indicated below.

2020 SEEP Filing Date	September 15, 2020
Subsequent Annual SEEP Filing Date	October 1

Revision letters describing any revisions made since the last full SEEP filing shall be filed on January 1, April 1, and July 1 of each year. In every SEEP filing, utilities must include the 2019 through 2025 program years. As necessary, the full SEEP filing and subsequent revision letters should incorporate modifications addressing the input received through the PM&IP and include revisions to reflect new and updated information, including changes to the utility portfolio, including program and portfolio budgets and targets, EM&V activities, forecasted performance, benefit cost analyses, and portfolio and program descriptions.