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IDAHO PUBLIC
UTILITIES COMMISSION

October 6, 2023

Ms. Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

RE: Case No. INT-G-23-06

Dear Ms. Noriyuki:

Attached for consideration by this Commission is an electronic submission of Intermountain Gas Company's Application for a Determination of 2022 Energy Efficiency Expenses as Prudently Incurred, including the 2022 Energy Efficiency Annual Report.

If you should have any questions regarding the attached, please don't hesitate to contact me at (208) 377-6015.

Sincerely,

Lori A. Blattner
Director, Regulatory Affairs
Intermountain Gas Company

Enclosure

cc: Mark Chiles
Preston Carter

INTERMOUNTAIN GAS COMPANY

CASE NO. INT-G-23-06

APPLICATION

AND

EXHIBITS

**In the Matter of the Application of INTERMOUNTAIN GAS COMPANY
For a Determination of 2022 Energy Efficiency Expenses as Prudently Incurred**

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of
INTERMOUNTAIN GAS COMPANY
for a Determination of 2022 Energy
Efficiency Expenses as Prudently
Incurred

Case No. INT-G-23-06

APPLICATION

Intermountain Gas Company (“Intermountain” or “Company”), a subsidiary of MDU Resources Group, Inc. with general offices located at 555 South Cole Road, Boise, Idaho, pursuant to the Rules of Procedure of the Idaho Public Utilities Commission (“Commission”), 1) submits its *2022 Energy Efficiency Annual Report* and 2) makes application to the Commission for an order designating \$3,364,641 of 2022 Energy Efficiency expenditures as prudently incurred.

Please address communications regarding this Application to:

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and

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In support of this Application, Intermountain alleges and states as follows.

I. INTRODUCTION

Intermountain is a gas utility, subject to the jurisdiction of the Commission, engaged in the sale of and distribution of natural gas within the State of Idaho under authority of Commission Certificate No. 219, issued December 2, 1955, as amended and supplemented by Order No. 6564, dated October 3, 1962.

Intermountain provides natural gas service to the following Idaho communities and counties and adjoining areas:

Ada County - Boise, Eagle, Garden City, Kuna, Meridian, and Star;
Bannock County - Arimo, Chubbuck, Inkom, Lava Hot Springs, McCammon, and Pocatello;
Bear Lake County - Georgetown, and Montpelier;
Bingham County - Aberdeen, Basalt, Blackfoot, Firth, Fort Hall, Moreland/Riverside, and Shelley;
Blaine County - Bellevue, Hailey, Ketchum, and Sun Valley;
Bonneville County - Ammon, Idaho Falls, Iona, and Ucon;
Canyon County - Caldwell, Greenleaf, Middleton, Nampa, Parma, and Wilder;
Caribou County - Bancroft, Grace, and Soda Springs;
Cassia County - Burley, Declo, Malta, and Raft River;
Elmore County - Glenns Ferry, Hammett, and Mountain Home;
Fremont County - Parker, and St. Anthony;
Gem County - Emmett;
Gooding County - Bliss, Gooding, and Wendell;
Jefferson County - Lewisville, Menan, Rigby, and Ririe;
Jerome County - Jerome;
Lincoln County - Shoshone;
Madison County - Rexburg, and Sugar City;
Minidoka County - Heyburn, Paul, and Rupert;
Owyhee County - Bruneau, Marsing, and Homedale;
Payette County - Fruitland, New Plymouth, and Payette;
Power County - American Falls;
Twin Falls County - Buhl, Filer, Hansen, Kimberly, Murtaugh, and Twin Falls;
Washington County - Weiser.

Intermountain's properties in these locations consist of transmission pipelines, liquefied natural gas storage facilities, compressor stations, distribution mains, services, meters and regulators, and general plant and equipment.

II. BACKGROUND

In the Company's General Rate Case No. INT-G-16-02, Intermountain petitioned the Commission for authority to begin a residential Energy Efficiency Program. The Commission granted the Company's request in Order No. 33757.

Subsequently, in Case No. INT-G-17-03, the Company requested authority to implement Rate Schedule EE – Residential Energy Efficiency Rebate Program, which outlined the program offerings, and Rate Schedule EEC-RS – Energy Efficiency Charge, which established a charge to fund the program. In Order No. 33888, the Commission approved both rate schedules effective October 1, 2017.

In Case No. INT-G-19-04, Intermountain requested that the Commission approve the Company's 2017-2018 EE Program expenses as prudently incurred. In Order No. 34536, the Commission approved the prudence of the expenses with several conditions attached. Those conditions were to commission a third-party Evaluation, Measurement and Verification (“EM&V”) study, review and update the avoided cost calculation with the Energy Efficiency Stakeholder Committee (“EESC”), immediately and continuously monitor, evaluate, and update its Energy Efficiency Program incentives with the best available data, and discontinue the 80% AFUE condensing fireplace incentive.

To allow all interested customers to participate in the Residential Energy Efficiency Rebate Program, and to continue to grow the Program, Intermountain requested authority to revise Rate Schedule EEC-RS (“EEC-RS”) from \$0.00367 to \$0.02093 per therm in Case No. INT-G-19-05. The Commission approved the requested revision in Order No. 34454, effective October 1, 2019.

In Case No. INT-G-20-06, Intermountain requested that the Commission approve the Company's 2019 EE Program expenses as prudently incurred. In Order No. 34980, the Commission

approved the prudence of the expenses. The Company also requested significant changes to the program based on its first ever EM&V study that was filed as part of the case. The Commission approved the proposed modifications effective April 1, 2021. The Commission also ordered the Company to continue to review its avoided costs and update its avoided cost calculations based on the review, and to immediately and continuously monitor, evaluate, and update its EE Program incentives with the best available data.

In Case No. INT-G-21-03, Intermountain requested that the Commission approve the Company's 2020 EE Program expenses as prudently incurred. In Order No. 35313, the Commission approved the prudence of the expenses. The Commission stated, "We commend the Company for continuing to adjust its young Energy Efficiency Program to deliver cost effective energy savings to customers." The Commission also ordered the Company to continuously monitor, evaluate and update its Energy Efficiency Program incentives with the best available data using the most accurate evaluation method to do so. The Commission acknowledged the overfunded rider balance of \$1,318,197 and permitted the Company to carry forward the balance to meet anticipated increased Program participation, with the understanding the Company will seek adjustment if increased participation does not materialize.

During program year 2021, the Company retired, modified, or added residential program incentives as approved in Order No. 34980.

Order No. 34941 in Case No. INT-G-20-04 authorized the Company to implement a Commercial Energy Efficiency program in Rate Schedule EE-GS and established a funding mechanism for program costs in Rate Schedule EEC-GS ("EEC-GS"). The Commission directed the Company to develop an EM&V plan, file an Annual Commercial Energy Efficiency Program Report, include representatives from the GS-1 rate class in its EESC, and immediately and

continuously monitor, evaluate, and update its Commercial Energy Efficiency Program incentives with the best available data. The Company launched its Commercial Energy Efficiency Program on April 1, 2021, consisting of incentives for commercial space heating and commercial kitchen equipment.

In case INT-G-22-03, Order No. 35663, the Commission approved the prudence of the 2021 Energy Efficiency Program expenses. The Commission commended the Company for continuing to adjust its Energy Efficiency Program to deliver cost effective energy savings and the collaborative effort of the Company, EESC and Staff to maintain a DSM program that has value.

The Commission identified improvements to be made for future DSM prudence filings, specifically directing the Company to directly assign Energy Efficiency Program costs to either the appropriate residential or commercial program, when possible, and to provide explanations when costs are not assignable.

The Commission directed the Company to use a billing analysis to evaluate program performance for the Furnace and Whole Home measures, and also allowed for the Company to present argument and evidence to justify other empirical analysis as part of its annual DSM prudence filing. The Commission directed the Company to submit an RFP for a third-party contract to conduct an impact evaluation with billing analysis for Whole Home and Furnace measures with its 2023 prudence filing.

The Commission also approved the Company's proposal of the following treatment of avoided costs: to update the transportation component of avoided costs as an exhibit to IRP filing, to no longer file avoided cost calculations as exhibits to the annual DSM prudence filing, to update all avoided costs as exhibits to IRP filing, and to base cost-effectiveness testing off the avoided costs in place at the time of program planning.

The Company's 2022 *Energy Efficiency Annual Report* ("Annual Report") is included as Attachment 1 to this Application and incorporated by reference. The Annual Report provides a review of the Company's Energy Efficiency Portfolio, which consists of the Residential Program and the Commercial Program. The report outlines revenues, expenditures, cost-effectiveness, and performance by measure for each Program. A review of outreach and educational activities, discussion of the Company's participation in a collaborative effort to accelerate market introduction of gas heat pump technologies, and future plans complete the Annual Report. Annual Report at 24.

III. REVENUES

The EE Program expenditures are funded through collections from customers via Energy Efficiency Charges. The EEC-RS of \$0.01564 per therm funds the Residential Program. Total Residential Program revenues for calendar year 2022 were \$5,738,001. Annual Report at 6.

The EEC-GS of \$0.00320 funds the Commercial Program. The revenue for 2022 was \$472,346. Annual Report at 17.

IV. EXPENDITURES

Expenditures for the Residential and Commercial Programs combined for January 1, 2022 through December 31, 2022 were \$3,364,641. Of this amount, \$2,608,536, or approximately 78%, is related to energy efficiency rebates paid directly to residential and commercial customers. Residential rebates accounted for \$2,555,389 and Commercial rebates accounted for \$53,147 of the total. Annual Report at 6 and 17.

In addition to the amount spent on energy efficiency rebates, the Company incurred \$756,105 of administrative expenses for labor, program delivery and market transformation. As a Portfolio, this was approximately 4% more than 2021 expenditures. The Company increased expenditures in program delivery and market transformation, but did not incur any expenses for

special studies such as CPA or EM&V. Labor expenses increased by 2% over 2021 for a total expenditure of \$650,675.

To comply with Order No. 35663 to “assign EE costs when possible or provide explanations as to why costs are not assignable,” the Company directly assigned as many Program expenses as possible as well as re-examined the allocation that was being used for expenses that could not be directly assigned.

When possible, expenses are applied directly to the related program. Residential customer promotions like engagement activities or email campaigns are direct expensed to the residential program. The Company also developed guidelines to directly apply expenses as they occur, primarily driven by the audience of the activity. Any expenses related to participation or promotion in the Building Contractor Association, focused on residential home building, is expensed to the Residential Program. Commercial customer email campaigns, as well as promotional and educational activities whose primary audience is engineers and architects, is expensed to the Commercial Program. Community-wide events are expensed to the residential program because that is the primary audience.

Labor is the largest Program expense. The Energy Efficiency Portfolio, which includes both the Residential and Commercial Programs, is delivered and administered by all Energy Efficiency staff; no team member works exclusively on either the Commercial or Residential program. This is true for both dedicated energy efficiency department employees and the Energy Services Representatives (“ESR”). ESRs engage in business development for both the residential and commercial sector and also promote the relevant energy efficiency program to those customers. This has allowed the Company to leverage the expertise and flexibility of the team to promote and

educate about either program as the opportunities arise across the service territory, creating a one-stop-shop for customers.

Based on Staff recommendations, the Company prioritized re-evaluating the expense allocation used to assign expenses that did not clearly belong to one Program or the other. The Company conducted an analysis of service starts recorded in the Company's Construction Tracking system. In 2021 there were 11,983 residential service starts and 568 commercial sales starts or a 95% and 5% split between residential and commercial activity. Therm savings also closely reflected the residential/commercial split witnessed in the analysis of service starts. Total estimated therm savings for the Energy Efficiency Portfolio were 652,650 therms: 615,806 attributed to the Residential Program and 36,844 to the Commercial Program, or a 94/6 split between the two programs. While the split between residential and commercial in both service starts and estimated therm savings were very close to the same, the 95/5 allocation was used since service starts reflect actual activity, or labor, which is the largest program expense. Labor costs were assigned based on this analysis (95% to the residential program and 5% to the Commercial program) through an automatic standard labor distribution through the Company's payroll system. Utilizing employees that work on both the residential and commercial programs is the most cost-effective approach until the Portfolio grows to a size that can accommodate separate staff for each Program.

Any expense that could not be directly assigned was also allocated 95% to the residential program and 5% to the Commercial Program. The expenses that could not be directly assigned were \$54,507 of the total.

Intermountain is committed to working to secure an energy efficient future. In 2022 Intermountain renewed its membership in the North American Natural Gas Heat Pump Collaborative ("Collaborative") to help advance the adoption of gas heat pump technology. With

efficiencies of over 100%, gas heat pump technology promises to deliver significant efficiency gains when compared to traditional heat and water heat technology. The Market Transformation expense of \$25,000 represents the Company's membership in the Collaborative. Intermountain believes the continued investment in this collaborative effort will provide our customers with significant energy savings and lower energy bills in the years to come. Annual Report at 24.

V. DEFERRAL BALANCE

The Residential Program began the year with an over-collected deferral balance of \$2,834,164. By June 2022, the Company had an over-collected balance of \$4,893,882. To reduce the over-collection, the Commission approved the Company's request in Case No. INT-G-22-05, Order No. 35539, to transfer \$4,850,000 to the Company's PGA for refund to residential customers. To more accurately match on-going revenues with expenses, the Company's filing also decreased the residential EEC rate. On October 1, 2022 the EEC-RS was reduced from \$0.02093 per therm to \$0.01564 per therm. The rider balance was \$450,521 at the end of 2022. Annual Report at 6.

The Commercial Program went into effect on April 1, 2021. The Commercial rider balance started the year with an over-collected balance of \$84,589, and remains an over-collected balance of \$463,938 at December 31, 2022. As the Commercial Program continues to gain awareness and participation with GS-1 customers, the Company will continue to monitor the rider balance to avoid over or under collection and file for adjustments as necessary. Annual Report at 17.

VI. THERM SAVINGS

The 2022 program year was the first full year of performance after residential Program modifications were implemented on April 1, 2021. The Residential Program achieved 615,806 therm savings in 2022. Annual Report at 7. In 2022 Intermountain paid out 7,945 rebates to customers, which represented a 43% increase over the previous year. The furnace rebate and new

construction rebate were again the two most redeemed rebates, followed by smart thermostats which were added to the Residential Program in April 2021.

The new Commercial Program consists of three incentives for space heating and three commercial cooking equipment incentives. In 2022, the Commercial Program achieved 36,844 estimated therm savings. Annual Report at 17. There were seven high-efficient condensing boiler rebates redeemed as well as nineteen fryers. The commercial energy savings kit pilot was a success with 342 kits distributed.

The Company is encouraged by the continued growth of the Energy Efficiency Program, and looks forward to working with customers, the Commission, and other stakeholders to maximize participation in and the cost-effectiveness of the Energy Efficiency Program going forward.

VII. AVOIDED COSTS

For this filing, the Company used the Avoided Costs as calculated in the IRP (see Case No. INT-G-21-06, Exhibit No. 5). In accordance with Order No. 35663, the Company will update the transportation component of avoided costs as an exhibit to IRP filings. In addition, as outlined in the Order, the Company will no longer file avoided cost calculations as exhibits to the annual DSM prudence filing and will instead update all avoided costs as exhibits to IRP filings. This will allow the Company to base program planning on the most recent IRP filing and to perform cost-effectiveness testing using the avoided costs in place at the time of program planning.

VIII. COST-EFFECTIVENESS

Intermountain reports the cost-effectiveness of its Portfolio based on two industry standard metrics: the Utility Cost Test (“UCT”) and the Total Resource Cost (“TRC”). The UCT measures cost-effectiveness from the utility company’s perspective and takes into consideration avoided supply costs, program administration costs, and incentives paid by the utility. The TRC measures

cost-effectiveness from the customer's perspective and focuses on avoided supply costs, program administration costs and net participant costs. Although both are common industry metrics for measuring cost-effectiveness, the Company relies more on the UCT because it measures the cost-effectiveness of items directly under the Company's control. Exhibit No. 1 outlines the cost-effectiveness for the Programs and for each individual rebate offered. It also includes a proposed schedule to ensure formal EM&V for each rebate on a regular basis.

IX. STAKEHOLDER MEETINGS

The Energy Efficiency Stakeholder Committee ("EESC") has been a valuable resource for the Company as it builds the Energy Efficiency Program. As outlined in the Annual Report, Intermountain hosted two full EESC meetings to address both the Residential and Commercial Program. The meetings included good representation from a variety of groups including representatives from the Commission Staff, the Governor's Office of Energy and Mineral Resources, a not-for-profit residential home builder, home energy raters, and city and county representatives involved in energy efficiency and sustainability with familiarity of both the residential and commercial sectors. Minutes from the two meetings are included in Exhibit No. 2.

X. EM&V REQUEST FOR PROPOSAL

A draft of the proposed RFP for a third-party contract to conduct an impact evaluation with billing analysis for the Whole Home and Furnace measures is included as Exhibit No. 3 in compliance with Order No. 35663.

MODIFIED PROCEDURE

Intermountain requests that this matter be handled under modified procedure pursuant to Rules 201-204 of the Commission's Rules of Procedure. Intermountain stands ready for immediate consideration of this matter.

XI. REQUEST FOR RELIEF

Intermountain respectfully petitions the Idaho Public Utilities Commission as follows:

- a. That the Commission issue an order designating \$3,364,641 of 2022 Energy Efficiency expenditures as prudently incurred,
- b. That this Application be heard and acted upon without hearing under modified procedure, and
- c. For such other relief as this Commission may determine just and proper.

DATED: October 6, 2023

INTERMOUNTAIN GAS COMPANY

By



Lori A. Blattner

Director – Regulatory Affairs

INTERMOUNTAIN GAS COMPANY

Givens Pursley LLP

By



Preston N. Carter

Attorney for Intermountain Gas Company

Givens Pursley LLP

EXHIBIT NO. 1

CASE NO. INT-G-23-06

INTERMOUNTAIN GAS COMPANY

Cost Effectiveness

(22 Pages)

Introduction

Intermountain's Energy Efficiency Program (EE Program) offers individual customers a way to lower their usage and monthly energy bills. It additionally benefits all customers by ensuring resources are used efficiently which delays the need for expensive system upgrades and additional supply contracts, thereby keeping costs low for everyone. Cost-effectiveness testing is vital to ensuring the Company's EE Program is in fact a least-cost resource, and is integral to the design, implementation, and success of the EE Program.

Cost-Effectiveness and Methodology

Intermountain's objective is for all rebates to have benefit/cost ratios greater than one for the Utility Cost Test (UCT). The UCT measures cost-effectiveness from the utility company's perspective and takes into consideration avoided supply costs, program administration costs and incentives paid by the utility.

Rebates undergo cost tests at several stages: preliminary design, implementation, and an annual review. For a different perspective, cost-effectiveness of rebates is also evaluated based on the customer's perspective using avoided supply costs, program administration costs and net participant costs, or the Total Resource Cost Test (TRC). However, the TRC is not the primary cost test used for decisions regarding the inclusion or exclusion of rebate offerings. In calculating the UCT and TRC, Intermountain relies on the calculations outlined in the *California Standard Practice Manual* and the National Action Plan for Energy Efficiency's (NAPEE) *Understanding Cost Effectiveness of Energy Efficiency Programs: Best Practices, Technical Methods, and Emerging Issues for Policy-Makers*.

Rebate characteristics such as estimated useful life, deemed therm savings, and incremental cost used for cost-effectiveness testing are provided by the CPA study for all rebates, except for Whole Home rebates. Estimated therm savings for Whole Home rebates are based on the EM&V impact evaluation. The rebate count used in the cost-effectiveness calculation is the actual number of rebates paid for the program year.

Cost-effectiveness of EE Program rebates are reviewed annually. The results are reported in the annual report and reviewed with the Energy Efficiency Stakeholder Committee (EESC). Rebate performance, cost-effectiveness, market insights, and lessons learned are taken into consideration when deciding whether to continue, revise or retire a rebate.

Assumptions

In calculating cost-effectiveness for each rebate and for the Program as a whole, the Company relied upon several assumptions as well as studies provided by independent third-party sources. The section below discusses the key inputs used in calculating cost-effectiveness and the assumptions and sources used.

Energy Savings

Energy savings for each rebate are calculated by multiplying each rebate's gross annual therm savings by the total number of rebates issued. The energy savings are then valued based on the Company's Avoided Cost. The Avoided Cost is used both to economically evaluate the present value of the therms saved over the life span of the measure and to track the performance of the EE Program. A more in-depth discussion of the Avoided Cost calculation and its components can be found in Case No. INT-G-2203, Exhibit No. 1 which was originally filed as Exhibit No. 5 in Intermountain's Integrated Resource Plan (Case No. INT-G-21-06).

Rebate Costs

Total rebate costs are calculated by multiplying the value of each rebate by the number of rebates issued for the year.

Equipment & Installation Cost

The incremental equipment and installation costs are inputs to the TRC cost test and were provided by the CPA. These costs represent the incremental purchase and installation costs the participant will pay between a base case measure and a higher efficient alternative. These costs are not offset by the amount of the rebate received by the participant.

Program Delivery & Administration

Program delivery and administration costs are direct assigned to their respective program, either residential or commercial, when they can be specifically identified. For example, the expense of a residential builder mailing list is charged to Residential Program delivery and administration costs. After all direct costs are assigned, the remaining pool of program and administration costs, are split between the residential program and commercial program based on a respective 95/5 split. This 95/5 split was developed after re-evaluating the company's

expense allocation. For 2022, total estimated therm savings for the Energy Efficiency Portfolio were 648,935 therms: 615,806 attributed to the Residential Program and 33,126 from the Commercial Program, or a 95/5 split between the two programs. An analysis of service starts by the ESRs, tracked in Construction Tracking, also very closely followed this split, with 8,901 residential service starts and 496 commercial sales starts or a 96% and 4% split in service starts in 2022. Therefore, the Company implemented the 95/5 allocation of expenses for all expenses that were not direct assigned.

Real Discount Rate

The real discount rate is used to account for the time-value of money and accurately compare costs. The real discount rate is based on the Company's tax-affected weighted average cost of capital. The calculation of the real discount rate can be found in Case No. INT-G-22-03, Exhibit No. 1, Page 11. Per Case No. INT-G-22-03, Order No. 35663, the Company will update the discount rate and inflation rate within the avoided cost filing in the IRP.

Inflation Rate

An inflation assumption is used in cost-effectiveness testing to convert nominal, forward-looking costs into real dollars. The company assumes an inflation rate of 2.0%.

Net-to-Gross

Net-to-gross (NTG) is a ratio that adjusts the therm savings of rebates and/or programs, so they solely reflect energy efficiency gains that are the direct result of energy efficiency programs. The NTG deducts therm savings resulting from free-ridership, or savings that would have occurred regardless of the program. It also increases therm savings to account for spillover, or savings that occurred but were not counted by the program, as well as therm savings resulting from market transformation. Unfortunately, estimates of net savings require making sweeping assumptions to model a theoretical scenario where the EE Program did not exist. Because of the difficulty in accurately calculating NTG percentages, the Company used an NTG of 100% for all rebate and program cost-effectiveness analysis. Intermountain also performs a sensitivity analysis for each rebate that determines the minimum allowable NTG ratio where the rebate would remain (or become) cost effective under the Utility Cost Test.

Results

The Company performed cost-effectiveness testing at the program level and the individual measure level. The Residential Program was found to be cost-effective with a UCT of 1.3. The Commercial Program remains in an awareness-building mode since its launch on April 1, 2021. The UCT of the Commercial Program was 2.0.

EM&V Schedule

The Company prepared a revised EM&V schedule through 2024. The dates on the schedule indicate the final year of data that will be included in the study. For example, the initial study that was conducted in 2020 used data through the year ended 2019. For measures with limited participation, the Company was advised to monitor Program participation and to conduct EM&V impact evaluations when there was sufficient participation to justify an evaluation. The Company work with a 3rd party evaluator to determine when there is enough data to provide meaningful evaluation.

The schedule was amended based on the amount of data available for analysis. The impact evaluation for residential water heating measures was moved to year end 2023 due to the limited number of both storage and tankless water heater rebates. The Company updated both the storage and water heater rebates effective April 1, 2021, and uptake has already increased. The impact evaluation planned for year-end 2022 for commercial kitchen rebates, fryer, griddle, and steamer, was also postponed. Due to the slow uptake in the Commercial Program, the Company plans to conduct a process evaluation for all commercial measures for year-end 2023. The Company plans to use a billing analysis to evaluate program performance for the furnace and Whole Home measures until such time as the Company justifies other empirical analysis as part of the annual DSM prudence filing.

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

2022 UCT Results

Rebate	Therm Savings	Annual Therm Savings	UCT Benefits	UCT Costs	UCT Ratio
Whole Home Tier I	161	161	\$ 1,265	\$ 990	1.3
Whole Home Tier II	128	179,072	\$ 1,407,149	\$ 1,105,571	1.3
Furnace - 95% AFUE	87	273,876	\$ 1,868,195	\$ 1,385,933	1.3
Combination Boiler - 95% AFUE	155	930	\$ 6,753	\$ 5,342	1.3
Boiler - 95% AFUE	159	795	\$ 6,247	\$ 4,451	1.4
Storage Water Heater	38	1,216	\$ 6,036	\$ 6,568	0.9
Tankless Water Heater Tier I	65	37,050	\$ 291,139	\$ 236,697	1.2
Tankless Water Heater Tier II	58	870	\$ 6,836	\$ 5,854	1.2
Smart Thermostat	44	121,836	\$ 529,128	\$ 521,434	1.0
		615,806	4,122,748	3,272,840	1.3

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

2022 UCT Results

Rebate	Therm Savings	Annual Therm Savings	UCT Benefits	UCT Costs	UCT Ratio
Condensing Unit Heater	409	-	\$ -	\$ -	-
Boiler Reset Control	1,212	-	\$ -	\$ -	-
High-Efficiency Condensing Boiler	1,295	9,064	\$ 71,225	\$ 18,710	3.8
Fryer - Energy Star Certified	508	9,652	\$ 44,949	\$ 17,214	2.6
Steamer - Energy Star Certified	1,054	-	\$ -	\$ -	-
Griddle - Energy Star Certified	76	-	\$ -	\$ -	-
Energy Saving Kit	53	18,128	\$ 66,597	\$ 56,168	1.2
		36,844	\$ 182,771	\$ 92,092	2.0

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Whole Home Tier I - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	161	Utility Cost	\$ 1,265	\$ 990	1.3
Lifetime Energy Savings (therms)	25	Total Resource Cost	\$ 1,265	\$ 2,207	0.6
Present Value of Energy Savings	S \$ 1,265				

Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 900	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	1				
Total Rebate Costs	R \$ 900	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 2,117	Net-to-Gross Sensitivity ^[2]			78%
Total Equipment & Installation Costs	I \$ 2,117				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 84	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 6	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 90				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Whole Home Tier II - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	179,072	Utility Cost	\$ 1,407,149	\$ 1,105,571	1.3
Lifetime Energy Savings (therms)	4,476,800	Total Resource Cost	\$ 1,407,149	\$ 3,087,954	0.5
Present Value of Energy Savings	S \$ 1,407,149				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 700	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	1,399				
Total Rebate Costs	R \$ 979,300	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 2,117	Net-to-Gross Sensitivity ^[2]			79%
Total Equipment & Installation Costs	I \$ 2,961,683				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 117,964	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 8,307	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 126,271				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Furnace - 95% AFUE - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	273,876	Utility Cost	\$ 1,868,195	\$ 1,385,933	1.3
Lifetime Energy Savings (therms)	5,477,520	Total Resource Cost	\$ 1,868,195	\$ 4,398,569	0.4
Present Value of Energy Savings	S \$ 1,868,195				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 350	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	3,148				
Total Rebate Costs	R \$ 1,101,800	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 1,307	Net-to-Gross Sensitivity ^[2]			74%
Total Equipment & Installation Costs	I \$ 4,114,436				
		NOTES			
Program Delivery & Administration		[1] Allocated based on percentage of portfolio rebate count.			
Overhead Expenses ^[1]	\$ 265,439	[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Direct Costs	\$ 18,693				
Total Program Delivery & Administration Costs	A \$ 284,133				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Combination Boiler - 95% AFUE - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	930	Utility Cost	\$ 6,753	\$ 5,342	1.3
Lifetime Energy Savings (therms)	20,460	Total Resource Cost	\$ 6,753	\$ 21,674	0.3
Present Value of Energy Savings	S \$ 6,753				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 800	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	6				
Total Rebate Costs	R \$ 4,800	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 3,522	Net-to-Gross Sensitivity ^[2]			79%
Total Equipment & Installation Costs	I \$ 21,132				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 506	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 36	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 542				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Boiler - 95% AFUE - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	795	Utility Cost	\$ 6,247	\$ 4,451	1.4
Lifetime Energy Savings (therms)	19,875	Total Resource Cost	\$ 6,247	\$ 6,281	1.0
Present Value of Energy Savings	S \$ 6,247				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 800	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	5				
Total Rebate Costs	R \$ 4,000	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 1,166	Net-to-Gross Sensitivity ^[2]			71%
Total Equipment & Installation Costs	I \$ 5,830				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 422	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 30	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 451				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Storage Water Heater - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	1,216	Utility Cost	\$ 6,036	\$ 6,568	0.9
Lifetime Energy Savings (therms)	15,808	Total Resource Cost	\$ 6,036	\$ 15,368	0.4
Present Value of Energy Savings	S \$ 6,036				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 115	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	32				
Total Rebate Costs	R \$ 3,680	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 390	Net-to-Gross Sensitivity ^[2]			109%
Total Equipment & Installation Costs	I \$ 12,480				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 2,698	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 190	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 2,888				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Tankless Water Heater Tier I - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	37,050	Utility Cost	\$ 291,139	\$ 236,697	1.2
Lifetime Energy Savings (therms)	926,250	Total Resource Cost	\$ 291,139	\$ 1,077,447	0.3
Present Value of Energy Savings	S \$ 291,139				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 325	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	570				
Total Rebate Costs	R \$ 185,250	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 1,800	Net-to-Gross Sensitivity ^[2]			81%
Total Equipment & Installation Costs	I \$ 1,026,000				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 48,062	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 3,385	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 51,447				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Tankless Water Heater Tier II - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	870	Utility Cost	\$ 6,836	\$ 5,854	1.2
Lifetime Energy Savings (therms)	21,750	Total Resource Cost	\$ 6,836	\$ 18,634	0.4
Present Value of Energy Savings	S \$ 6,836				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 300	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	15				
Total Rebate Costs	R \$ 4,500	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 1,152	Net-to-Gross Sensitivity ^[2]			86%
Total Equipment & Installation Costs	I \$ 17,280				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 1,265	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ 89	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 1,354				

INTERMOUNTAIN GAS COMPANY

Residential Energy Efficiency Program

Smart Thermostat - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	121,836	Utility Cost	\$ 529,128	\$ 521,434	1.0
Lifetime Energy Savings (therms)	1,340,196	Total Resource Cost	\$ 529,128	\$ 825,877	0.6
Present Value of Energy Savings	S \$ 529,128				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Average Rebated Amount ^[1]	\$ 98	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	2,769				
Total Rebate Costs	R \$ 271,509	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 208	Net-to-Gross Sensitivity ^[3]			99%
Total Equipment & Installation Costs	I \$ 575,952				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[2]	\$ 233,482	^[1] Rebates pay the full cost of the individual thermostat up to a maximum of \$100.			
Direct Costs	\$ 16,443	^[2] Allocated based on percentage of portfolio rebate count.			
Total Program Delivery & Administration Costs	A \$ 249,925	^[3] Minimum NTG value where rebate remains cost-effective under UCT.			

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

Condensing Unit Heater - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	-	Utility Cost	\$ -	\$ -	
Lifetime Energy Savings (therms)	-	Total Resource Cost	\$ -	\$ -	
Present Value of Energy Savings	S \$ -				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 1,500	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	-				
Total Rebate Costs	R \$ -	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 2,889	Net-to-Gross Sensitivity ^[2]			
Total Equipment & Installation Costs	I \$ -				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ -	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ -	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ -				

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

Boiler Reset Control - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	-	Utility Cost	\$ -	\$ -	
Lifetime Energy Savings (therms)	-	Total Resource Cost	\$ -	\$ -	
Present Value of Energy Savings	S \$ -				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 350	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	-				
Total Rebate Costs	R \$ -	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 612	Net-to-Gross Sensitivity ^[2]			
Total Equipment & Installation Costs	I \$ -				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ -	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ -	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ -				

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

High Efficiency Condensing Boiler - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	9,064	Utility Cost	\$ 71,225	\$ 18,710	3.8
Lifetime Energy Savings (therms)	226,600	Total Resource Cost	\$ 71,225	\$ 35,966	2.0
Present Value of Energy Savings	S \$ 71,225				

Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Average Rebated Amount ^[1]	\$ 2,567	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	7				
Total Rebate Costs	R \$ 17,969	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 5,032	Net-to-Gross Sensitivity ^[3]			26%
Total Equipment & Installation Costs	I \$ 35,224				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[2]	\$ 671	^[1] Rebates are based on the capacity of the unit.			
Direct Costs	\$ 71	^[2] Allocated based on percentage of portfolio rebate count.			
Total Program Delivery & Administration Costs	A \$ 742	^[3] Minimum NTG value where rebate remains cost-effective under UCT.			

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

Fryer - Energy Star Certified - 2022 Cost-Effectiveness Results

Benefits			Cost-Effectiveness Tests			
Energy Savings		Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)		9,652	Utility Cost	\$ 44,949	\$ 17,214	2.6
Lifetime Energy Savings (therms)		115,824	Total Resource Cost	\$ 44,949	\$ 2,964	15.2
Present Value of Energy Savings	S	\$ 44,949				
Costs			Equations & Assumptions			
Rebate Costs		Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$	800	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count		19				
Total Rebate Costs	R	\$ 15,200	Real Discount Rate			4.68%
			Inflation Rate			2.00%
Equipment & Installation Costs			Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$	50	Net-to-Gross Sensitivity ^[2]			38%
Total Equipment & Installation Costs	I	\$ 950				
			NOTES			
Program Delivery & Administration			^[1] Allocated based on percentage of portfolio rebate count.			
Overhead Expenses ^[1]	\$	1,820	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Direct Costs	\$	193				
Total Program Delivery & Administration Costs	A	\$ 2,014				

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

Steamer - Energy Star Certified - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	-	Utility Cost	\$ -	\$ -	
Lifetime Energy Savings (therms)	-	Total Resource Cost	\$ -	\$ -	
Present Value of Energy Savings	S \$ -				
Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 1,100	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	-				
Total Rebate Costs	R \$ -	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 635	Net-to-Gross Sensitivity ^[2]			
Total Equipment & Installation Costs	I \$ -				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ -	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ -	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ -				

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

Griddle - Energy Star Certified - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	-	Utility Cost	\$ -	\$ -	
Lifetime Energy Savings (therms)	-	Total Resource Cost	\$ -	\$ -	
Present Value of Energy Savings	S \$ -				

Costs		Equations & Assumptions			
Rebate Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Rebate Amount	\$ 200	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Rebate Count	-				
Total Rebate Costs	R \$ -	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 360	Net-to-Gross Sensitivity ^[2]			
Total Equipment & Installation Costs	I \$ -				
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ -	^[1] Allocated based on percentage of portfolio rebate count.			
Direct Costs	\$ -	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ -				

INTERMOUNTAIN GAS COMPANY

Commercial Energy Efficiency Program

Energy Saving Kit - 2022 Cost-Effectiveness Results

Benefits		Cost-Effectiveness Tests			
Energy Savings	Value	Test	Benefits	Costs	Ratio
Annual Energy Savings (therms)	18,128	Utility Cost	\$ 66,597	\$ 56,168	1.2
Lifetime Energy Savings (therms)	163,149	Total Resource Cost	\$ 66,597	\$ 61,556	1.1
Present Value of Energy Savings	S \$ 66,597				
Costs		Equations & Assumptions			
Kit Costs	Value	Utility Cost Test	$= S \times NTG \div (R + A)$		
Average Kit Cost	\$ 58	Total Resource Cost Test	$= S \times NTG \div (I \times NTG + A)$		
Kit Count	342				
Total Kit Costs	R \$ 19,920	Real Discount Rate			4.68%
		Inflation Rate			2.00%
Equipment & Installation Costs		Net-to-Gross (NTG)			100%
Incremental Cost Per Unit	\$ 74	Net-to-Gross Sensitivity ^[2]			84%
Total Equipment & Installation Costs	I \$ 25,308				
		NOTES			
Program Delivery & Administration					
Overhead Expenses ^[1]	\$ 32,768	^[1] Allocated based on percentage of portfolio annual therm savings.			
Direct Costs	\$ 3,480	^[2] Minimum NTG value where rebate remains cost-effective under UCT.			
Total Program Delivery & Administration Costs	A \$ 36,248				

ENERGY EFFICIENCY PROPOSED EM&V SCHEDULE 2018-2024							
For Rebates Issued Through the Year Ended							
Energy Efficiency Program	2024	2023	2022	2021	2020	2019	2018
Residential Measures:							
Whole Home						I/P	
Whole Home Tier I		P	I				
Whole Home Tier II		P	I				
Fireplace 70% FE						P	
Fireplace 80% AFUE						P	
Combination Boiler for Space and Water Heat		I/P				P	
Furnace		I/P				I/P	
Boiler		I/P					
Storage Water Heater		I/P				P	
Tankless Water Heater Tier I		I/P				P	
Tankless Water Heater Tier II		I/P					
Smart Thermostat		P	I				

Commercial Measures:							
Condensing Unit Heater		P					
Boiler Reset Control		P					
High-Efficiency Condensing Boiler		P					
Fryer		P					
Steamer		P					
Griddle		P					
Pilot: Energy Savings Kit		O					

Evaluation Type: I=Impact, P=Process, O= Other	
Program not yet in existence	
Measure offering modified	
Measure Offering retired	

EXHIBIT NO. 2

CASE NO. INT-G-23-06

INTERMOUNTAIN GAS COMPANY

Energy Efficiency Stakeholder Committee

Meeting Minutes

(6 pages)

Intermountain Gas Energy Efficiency Stakeholder Committee Meeting

May 5, 2022 at 9:00 am

Attendees:

Lori Blattner – Intermountain Gas Company	Donn English – Idaho Public Utilities Commission
Jacob Darrington - Intermountain Gas Company	Kevin Keyt – Idaho Public Utilities Commission
Landon Barber – Intermountain Gas Company	Laura Conilogue – Idaho Public Utilities Commission
Kathy Wold – Intermountain Gas Company	Selena O’Neal - Energy Specialist with Ada County
John Fisk - Intermountain Gas Company	Taylor Thomas – Idaho Public Utilities Commission
Kody Thompson – Intermountain Gas Company	Will Gehl – City of Boise
Alexa Sakolsky-Basquill – Office of Energy and Mineral Resources	
Brian Bennett – The Energy Auditor	

Guests and Presenters:

Kathy Wold – Intermountain Gas Company
John Fisk – Intermountain Gas Company
Kody Thompson – Intermountain Gas Company
Landon Barber – Intermountain Gas Company

Meeting Facilitator: Kathy Wold

9:00 am – Meeting Convened

Kody presented on Residential Program rebate activity in 2021 and presented the cost-effectiveness testing for each measure. Kody also provided an overview of the method by which applications are received, citing specifically the increase in online rebate submissions.

Taylor Thomas asked about why no uptake on the Tier 1 Whole Home. Kody thought it might be because of stricter air change requirements. Brian Bennett said that it more had to do with 97% AFUE furnaces being unavailable due to supply chain, with wait times up to 5-8 months (what used to be 3-4 weeks).

John presented on the EE Team activities/outreach for the Residential Program. To leverage employees promoting the EE program, the Company conducted an employee EE awareness campaign.

John provided an overview of the Spring campaign which involved full bus wraps on Valley Ride busses. The bus routes with the highest visibility were chosen for maximum impressions.

John also covered traditional outreach methods like the new customer letter, social media posts, the annual bill insert/customer engagement activity, and builder and contractor outreach. John also represented the IGC EE Program at a code board meeting in Ammon, ID, leveraging an existing, mandatory meeting for area builders and contractors.

Committee questions following John's presentation:

- The Committee asked if the raffle prize for the employee incentive program was paid for out of the EE rider budget. Employee energy efficiency engagement prize was paid from the EE budget.
- Were the buses CNG powered buses? Yes.
- Were you able to correlate impressions with uptake? The Company was not able to correlate impressions with rebate uptake.
- Do you know how many customers receive e-bill vs. paper bill? Lori responded back in chat that 42.1% receive e-bill.

Kathy presented on Commercial Program observations and insights. The Company is working on a project to assign SIC codes to better customize outreach efforts by industry. Overall, the Commercial Program is still very much in a growth and awareness building mode.

Kody presented on Commercial Program rebate activity in 2021, cost-effectiveness results by measure and lessons learned.

Committee questions:

- Any plan to measure the actual savings being achieved on the measures that were installed (to compare to what the CPA said those measures would save)? Kathy postponed until the EM&V discussion.

John presented on the EE Team activities/outreach for the Commercial Program. John provided an overview of the development of Commercial outreach collateral: web pages, brochures, commercial customer mailings, the commercial kitchen savings calculator, and the ESK (energy savings kit) pilot program.

Landon presented on an internal EM&V type analysis to examine CPA therm saving estimate against billing data. This analysis focused on customer bills for a sample of Program participants who replaced baseline efficiency furnace with a rebated high-efficiency furnace. This analysis resulted in a therm savings of approximately 81.1 therms per year, which seemed to align with the results from the CPA savings estimate of 87 therms.

Landon also presented on the relationship between the HERS score and gas usage. This analysis found there is a 99.9% significance level that the HERS Index score is a fantastic predictor of how much gas customers would use.

The final project was a database validation analysis. This analysis was a validation of data being collected by the Program (address names, square footage and zip codes) against other sources like the Ada county assessor site, and the Company's billing database. Continuity here will be important for joining information for future studies like EM&V.

Committee responded this was good information and asked the following:

- Please describe how you did the billing analysis? Landon explained the more technical aspects of how the study was conducted.
- Was the data adjusted for weather? Yes, it was weather normalized.

Kathy provided an overview on the Program's involvement in the North American Gas Heat Pump Collaborative.

Lori presented on some restructuring (and cost saving) changes coming to EE for IGG through the creation of a West Energy Efficiency team. Lori will be leading the group that will combine Idaho, Oregon and Washington energy efficiency departments.

Kathy presented on new projects on the horizon:

- The Company will go out for RFP for CPA in the fall.
- The Company is working with the internal IT department to develop a rebate processing app to streamline rebate processing.
- Upcoming tariff filing to clean up the smart thermostat rebate offering from wi-fi enabled to Energy Star certified.
- Kathy walked through the EM&V schedule and noted much of the determination for evaluation will be the level of participation, if there is enough to evaluate given the expense of EM&V studies.
- The residential rider balance is over-collected. The Company is exploring options to correct that balance: customer refund and the possibility of a residential energy saving kit program with items focused on weatherization.

Question from the Committee:

- Does IGC has an app for e-bills. Kathy – no we don't. And she clarified what she meant by an EE rebate application app.
- Weatherization kits are not unprecedented in the state of Idaho (something like this was done during the oil embargo days in the 70s or 80s). Recommended to investigate how that was managed.
- Any supply chain issues and how much will each kit cost? Kathy wasn't sure about supply chain, but the estimate we got was about \$29.
- Would this be cost-effective? Kathy presented the preliminary cost-effectiveness.
- How would customers get these kits? Kathy – we would use an application process to have customers request these kits.
- How much would this program cost in totality? Kathy would need to run some additional analysis.
- Given the over-collected balance Committee thinks that the rider would still need to be adjusted even if residential energy savings kits are pursued.

- Comment: The weatherization kit is a great program to explore. Interested to see what uptake would be and cautioned that it can be challenging to have kits installed. Northwest Power Council Regional Technical Forum might be a resource.
- When will the CPA go to RFP and how long it will take to be completed? RFP to be issued in the fall, hopefully complete right after the first of the year.
- Have increased commodity prices increased interest in EE? Kathy has not heard anything about that, but she has heard a lot about supply chain issues. Lori mentioned customers haven't seen any IGC rate changes yet, but maybe they will after the PGA in the fall.
- Please provide the slides and for the next meeting can you provide the slides beforehand to allow participants to better prepare with questions?

Meeting adjourned at 10:40 am.

Intermountain Gas Energy Efficiency Stakeholder Committee Meeting

November 16, 2022 at 1:00 pm

Attendees:

Kathy Wold – Intermountain Gas Company

Kevin Keyt – IPUC

John Fisk – Intermountain Gas Company

Selena O’Neal – Ada County

Kody Thompson – Intermountain Gas Company

Taylor Thomas – IPUC

Alexa Bouvier - OEMR

Will Gehl – City of Boise

Guests and Presenters:

Kathy Wold – Intermountain Gas Company

John Fisk – Intermountain Gas Company

Kody Thompson – Intermountain Gas Company

Meeting Facilitator: Kathy Wold

1:00 PM – Meeting Convened

Kathy welcomed everyone to the meeting and presented the agenda for the meeting.

John presented the Safety Moment: Winter Vehicle Prep.

Members of the stakeholder committee introduced themselves.

A request was made that the slide deck be provided to committee members prior to the meeting so they may prepare.

1:15 PM – Rebates & Updates

Kody Thompson provided an update on rebate performance through Quarter 3 of 2022, including the total number of rebates and by measure for both the Residential and Commercial Programs.

Kody also provided an update on an internal project to create a rebate app that would help streamline rebate processing. Committee asked for clarification on what exactly would be automated, and if the Company anticipated the app would reduce FTE. Every rebate will still be verified and approved, but payment processing post approval would be automated (vendor list creation), and the Company expects some efficiency gains in processing, but impacts are unknown at this time.

Residential Program Outreach and Education

John Fisk presented updates on the results on the residential customer engagement activity, “Grocery Card Giveaway,” Parade of Homes outreach partnering with builders and the home buying community, and an IGC Employee engagement activity.

1: PM – Commercial Program Outreach

John discussed a customized marketing outreach with restaurants to promote foodservice equipment rebates. He also cited advice from the Energy Services Representatives that we promote the Commercial Program with engineers and architects to get energy efficiency implemented in the design process, rather than just the retrofit market and provided examples of targeted promotions with design organizations such as ads and active sponsorship at golf tournaments with ASHRAE and AIA. He also presented an update on a commercial contractor and design outreach effort to promote a GHP Workshop hosted by the Energy Solutions Center. He also provided an update on the Commercial ESK Program. The Committee asked how many of the 250 kits we have remaining. The Company responded 143, with another email campaign to take place before the end of the year.

Committee asked about the Company’s thoughts on the difference in the “click through” rate between the two customer engagement campaigns (35% vs. 10%).

The Company did not have a exact explanation for the difference in the open rates, but suspected it was driven by the engagement activity, people saw it, didn’t want to take a quiz, or saw it and took the energy efficiency quiz to enter for a chance to win a grocery card. Despite the lower click thru rate, the activity still resulted in more customer responses than any other engagement activity.

1:20 PM – What’s Next?

Kathy relayed the Company is in the very early stages of exploring the possibilities of a custom program for the Commercial EE Program.

2:05 PM – Meeting Adjourned

EXHIBIT NO. 3

CASE NO. INT-G-23-06

INTERMOUNTAIN GAS COMPANY

Draft EM&V Request for Proposal

(9 pages)



P.O. Box 7608, Boise, ID 83707-1608
Phone: 800-548-3679 • Boise/Treasure Valley 208-377-6840
Email: saveenergy@intgas.com • www.intgas.com/saveenergy

Request for Proposal

Energy Efficiency Impact Evaluation

Issued: To Be Determined
Responses Due: Two Weeks after Issue Date
Contact: Kathy Wold, Manager Energy Efficiency
Email: Kathy.wold@intgas.com



Efficient. Clean. Reliable. Domestic.



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II. Introduction

A. Project

Intermountain Gas Company (“IGC”) is seeking proposals from qualified organizations or individuals (“Respondent”) interested in providing impact evaluations with billing analysis of two specific IGC residential energy efficiency measures. Impact evaluations would provide analysis of energy savings, by measure, for the program years April 2021 through December 2022 for the energy efficiency program.

IGC Energy Efficiency Program

Intermountain Gas was granted authority by the Idaho Public Utilities Commission to implement an energy efficiency program effective October 1, 2017. The residential energy efficiency program was designed to acquire cost-effective demand side management (DSM) resources in the form of natural gas therm savings. The program includes rebates for residential customers that purchase and install qualifying high-efficiency natural gas equipment.

IGC commissioned their first Conservation Potential Assessment in 2018 to support both short-term energy efficiency planning and long-term resource planning activities. Three levels of savings potential were assessed: technical, economic and achievable.

A 2020 impact evaluation resulted in several recommendations for the Whole Home and furnace measures. It was recommended by evaluators that IGC remove the ENERGY STAR certification requirement and implement a more stringent requirement on HERS Index scores be implemented in light of the 2018 IECC residential code adoption. Evaluators also recommended implementing specific requirements such as high-efficient equipment, more stringent air sealing and duct sealing requirements to directly target natural gas savings. The Whole Home rebate was restructured as a two-tiered rebate and went into effect on April 1, 2021.

Whole Home Rebate

The Whole Home rebate provides an incentive to residential customers in IGC service territory for the construction of single-family homes incorporating energy efficient design. Initiated in April 1st of 2021, the objective of the measure is to acquire energy savings by encouraging customers to build homes incorporating energy efficient design well above most homes on the market today.

There are two tiers to the Whole Home rebate. To qualify for the Whole Home rebate, a home must comply with the following requirements.:

TIER I:

- Home must be HERS rated
- Air sealing at or below 3 ACH at 50 pa
- Ceiling insulation at or below R-49
- Ducts and air handler located inside conditioned space or duct leakage to outside of less than 4 CFM25/100 ft2 CFA.
- Furnace efficiency at or above 97% AFUE





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TIER II:

- Home must be HERS rated
- Air sealing at or below 4 ACH at 50 pa
- Ducts and air handler located inside conditioned space or duct leakage to outside of less than 4 CFM25/100 ft² CFA.
- Furnace efficiency at or above 95% AFUE

Whole Home incentives also include a “stack on” option. Water heating incentives and the smart thermostat incentive can be “stacked on” to both the Whole Home Tier I and Tier II incentives.

95% AFUE Natural Gas Furnace

The 95% AFUE natural gas furnace rebate provides an incentive to residential customers in IGC service territory for the installation of a high-efficient natural gas furnace in single family home using natural gas exclusively for space heating. Participants must be served on the residential rate. The previous furnace rebate requiring conversion to natural gas from an alternate fuel, was retired at the launch of this rebate offering. The objective of the measure is to acquire energy savings by encouraging customers to choose energy efficient options for space heating.

To qualify for the high-efficient natural gas furnace rebate, a participant must use natural gas exclusively for space heating and be served on the residential rate. The furnace must meet a minimum efficiency of 95% AFUE or higher. New construction, replacement on burnout, conversion and early retirement are all eligible for the rebate. The natural gas furnace rebate cannot be combined with the Whole Home rebate.

IGC requires all equipment must be installed according to current code and approved by local or state inspection with the signed, approved permit. All equipment must be installed, and work completed, by a licensed and bonded contractor. The company does allow self-installations with additional supporting documentation: copy of the purchase receipt of the equipment and a picture of the equipment sticker displaying the brand, model number and serial number.

Based on the 2020 impact evaluation recommendations, Intermountain revised the rebate application to capture more data points to allow for more robust evaluation of the measure in the future.

For more information regarding these offerings, please refer to the 2022 Annual Report, found at the following link: [Intermountain Gas Energy Efficiency Program - Intermountain Gas Company \(intgas.com\)](https://www.intgas.com/energy-efficiency-program)

B. Company Background

IGC is the sole distributor of natural gas in Southern Idaho. Its service area extends across the entire breadth of Southern Idaho, an area of 50,000 square miles, with a population of approximately 1,409,000. At the end of 2022, IGC served 410,005 customers in 74 communities through a system of over 12,800 miles of transmission, distribution, and service lines.



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C. Key Objectives and Deliverables

The key objectives of the impact evaluation include:

- Estimate energy savings by comparing energy consumption of participants to the consumption that would have occurred without the incentive for the timeframe April 2021 through December 2022, and corrected for weather:
 - For the Whole Home incentive evaluation will compare billed consumption of program participants to the consumption of similar new home non-participants
 - For the 95% AFUE natural gas furnace incentive the evaluation should either:
 - Compare consumption of participants to non-participants, or
 - Compare the consumption of the same participants before and after installing the measure.
- Provide confidence levels of 90 percent as well precision levels of 10 percent and program measure ex-post realization rates attributed to the Whole Home rebate measure and the 95% AFUE natural gas furnace measure.

Report findings and observations of future ex-ante savings analysis and the accurate and transparent reporting of program savings.

D. Scope of Work

IGC anticipates the selected Respondent will be required to undertake the following tasks in addressing the key objectives and deliverables. Proposals should address these tasks in detail:

1. **Scope of Work Meeting.** The Respondent will meet with IGC staff within two weeks of contract signing and present proposed evaluation methodologies, data collection plan, analysis, report preparation and delivery, and any other tasks Respondent and IGC feel pertinent to the evaluation. A final Statement of Work will be developed based on outcomes from this meeting. This Statement of Work will become part of the contract and will become the basis for this evaluation.
2. **Work Plan.** The Respondent will develop a detailed work plan based on the Statement of Work that details how the Key Objectives and Deliverables will be addressed.
3. **Site Visits and Participant Interviews.** Where appropriate, the Respondent will verify installation of energy efficiency measures and associated energy impacts, by conducting site visits to program participant locations. Respondent should recommend and propose the appropriate number of site visits based on their experience and expertise with similar evaluations.

It is necessary that the Respondent coordinate efforts with IGC regarding customer contact and conduct research in such a manner as to minimize the time impact on IGC customers participating in this evaluation. Information provided by program participants will be considered confidential in terms of attribution and shall not be share with any other party.

4. **Data Sources.** Respondent should recommend and propose the appropriate number of site visits based on their experience and expertise with similar evaluations. The Respondent will





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conduct customer interviews/surveys, analyze program data to a set confidence level of at least 90%, and review rebate documentation where appropriate. The Respondent will verify a subset of EE measure installations and associated energy impacts by conducting a number of site visits and interviews of program participants needed to collect missing information and achieve data confidence.

5. **Impact Analysis with Billing analysis.** The Respondent will analyze the data collected from previous tasks to develop estimates of energy impacts at the measure level. The Respondent will provide these estimates by comparing deemed values to the source, data collected from site visits, desk reviews, and customer interviews. The Respondent will provide an estimation of realization rates to assist in determining ex-ante net energy savings.

Data collected by IGC, and to be made available to Respondent for analysis, includes billed consumption, brand, model, and efficiency levels of all furnaces rebated under the 95% AFUE furnace rebate. For the Whole Home rebate, available data includes billed consumption, and HERS Index score, furnace efficiency, ACH, Air Sealing, and duct leakage values provided by certified home raters.

6. **Interim Reporting.** The Respondent will be required to provide to IGC monthly status reports detailing progress toward completion and any obstacles encountered. These status reports will be due by the 15th of each month and will include an updated schedule of future activities.
7. **Draft and Final Report.** The Respondent will be required to provide to IGC bi-weekly status reports detailing progress toward completion and any obstacles encountered. These status reports will be due by the 1st and 15th of each month and will include an updated schedule of future activities.

The Respondent will provide a draft final report to Intermountain upon completion of all tasks. This draft will be reviewed by Intermountain, and comments will be provided to the Respondent for clarification as necessary. The Respondent will provide to Intermountain the final version of the report. Graphs and/or tables are recommended for information not easily conveyed in narrative form. The draft and final report is required to contain, at a minimum, sections containing, an executive summary, evaluation methodologies and findings and conclusions. The Respondent will document methods and preserve workpapers to be evaluated by the public utilities commissions and interested parties.

8. **Presentation of Results.** The Respondent will be required to present the results of this analysis to interested parties at an IGC Energy Efficiency Advisory Group meeting to be held in Boise, Idaho as well as an option to attend virtually.





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III. PROCESS INFORMATION

A. Schedule

The project schedule will be determined by the selected Respondent with the following key milestones included: Draft report of impact evaluation provided to IGC **by TBD**. Impact Evaluation final report provided to IGC **by No later than 4/1/2024**.

<u>Date</u>	<u>Event</u>
TBD	Intent to Bid submission due
One week after (above)	Last day for Respondents to submit questions
2 weeks after(above)	RFP Proposals Due by 5:00 p.m. MDT
1 week after(above)	Complete review and evaluation of proposals
4 day period starting(above)	Begin Finalist interviews
17 days after(above)	Kick-off meeting
11 weeks after(above)	Impact Evaluation Draft Report Due
2 weeks after(above) no later than 4/1/2024	Final report due – Impact Evaluation

B. Contact Information

If you have any questions regarding this invitation to bid process, please contact Kathy Wold at 208-377-6128. Your proposal may be submitted via email, mail, or FedEx and must be received by COB TBD.

Address for mailed or FedEx responses:

Intermountain Gas Company
Attn: Kathy Wold
P.O. Box 7608
555 South Cole Road
Boise, ID 83707

Email address: Kathy.Wold@intgas.com

This invitation to submit a formal proposal expires at the close of business TBD. Thank you in advance for the time and effort put forth in preparing your proposal and your prompt response to our inquiry.

C. Intent to Bid

All "Intent to Bid" forms (see Appendix A) must be received no later than the COB TBD.



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D. Proposal Content

Respondents submitting a proposal shall use the following outline and criteria:

1. A description of the firm's qualifications to conduct IGC's energy efficiency impact evaluation with billing analysis. The preferred bidder will have experience working with natural gas utilities, as well as a strong understanding of engineering, market, and building science principles as applied to demand side management planning.
2. Evaluators should have familiarity with the Idaho Building Code.
3. A technical proposal not to exceed 15 pages.
4. A management plan and proposed schedule of deliverables including a kickoff meeting scheduled within two weeks of contract signing.
5. Response to each item listed in Section II.C., Key Objectives and Deliverables and Section II.D., Scope of Work.
6. A detailed budget broken out by task, number of hours, and by individual performing the work. Key individuals should be identified by name along with billing rates for each individual. Budget should also include any additional ancillary services provided such as site visits. Budget should include time and materials on a not to exceed basis. Budget should include a rate schedule for support after submission of the final report to respond to any questions about the evaluation from the public utilities commission or other interested parties.
7. Resumes of key staff and subcontractor qualifications.
8. Three references from previous energy efficiency impact evaluation clients.
9. Example of previous energy efficiency impact evaluation reports.

E. Proprietary Information – Confidentiality

Respondent agrees that all information obtained or produced in relation to this RFP is the sole property of Intermountain Gas Company and shall not be released or disclosed to any person or entity for any purpose nor used for any purpose other than providing a proposal to IGC, without the express written consent of IGC.

Respondent agrees not to make any public comments or disclosures, including statements made for advertising purposes, regarding the Request for Proposals to the media or any other party without the prior written consent of IGC. In the event the Respondent receives any inquiries regarding the RFP from the media or any other party, said inquiries shall be forwarded to IGC.

Respondent shall specifically designate and clearly label as "**Confidential**" any and all material(s) or portions of their response that they deem to contain proprietary information.



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F. No Contract Formation

This request does not constitute a contract or an offer or acceptance of an offer to enter into a contract. Further, this correspondence may not be used to modify, supplement, novate, or waive any rights with respect to an existing contract or other binding terms.

IV. RFP EVALUATION PROCESS

A. RFP Evaluation Team

An IGC evaluation team will determine the proposal that best meets the requirements of this RFP and provides the best overall value for IGC. Proposals will be evaluated in accordance with the requirements set forth in this RFP, any addenda that are issued, and any other factor IGC deems appropriate. Based upon the RFP response evaluation and scoring, references and any subsequent activities identified during the evaluation process (clarifications, answers to questions, etc. that may be required), IGC may identify the top candidate(s) for further clarifications and/or a Respondent presentation.

Those Respondents whose proposals have not been selected will be notified via an email or a written letter at the address provided in their proposal.

B. RFP Evaluation Criteria

At a minimum, proposals will be evaluated based on the response to this RFP, which may include, but not be limited to the following criteria:

- Ability to meet RFP requirements.
- Financial stability of the company.
- Total project cost.
- Reputation for thoroughness, credibility, and client responsiveness as demonstrated through references.
- Technical approach and demonstrated understanding of the issues surrounding the administration and evaluation of natural gas utility energy efficiency measure impact evaluation.
- Experience and qualifications of proposed staff and management team. No changes in key personnel should be made without written agreement from IGC.
- The experience of the firm, with interest in evaluation of, and experience with, natural gas utility energy efficiency impact evaluations.
- The merits of the proposed evaluation methodologies.
- Responses to each item in Sections II.C (Key Objectives and Deliverables) and II.D. (Scope of Work).
- Proposed itemized budget. The proposal should be bid on a time and materials, not to exceed basis.
- Any other factors deemed appropriate by IGC.

