

Metric Title		Metric Calculation	NW Natural Feedback on Edits	NW Natural Potential Revisions
<b>Goal 1: Resilient, reliable, and customer-focused distribution grid</b>				
<b>Outcome 1: Ensure utility responsiveness to customer outages and restoration times.</b>				
1	Equity in Reliability (SAIDI and CAIDI) for Named Communities and Non-named Communities.	Sum all customer interruption minutes for interruptions greater than 5(?) minutes for one year and divide it by the average annual customer count. Provide this calculation for the service territory as a whole and separately for Named Communities. <i>Not applicable to gas. With and without major event days?</i>	<ul style="list-style-type: none"> <li>Not applicable to NW Natural.</li> </ul>	<ul style="list-style-type: none"> <li>NW Natural agrees that this metric is not applicable to gas.</li> </ul>
2	Equity in Reliability (SAIFI and CAIFI) for Named Communities and Non-named Communities.	Sum the total number of all customer interruptions for interruptions greater than 5(?) minutes for one year and divide it by the average annual customer count. Provide this calculation for the service territory as a whole and separately for Named Communities. <i>Not applicable to gas. With and without major event days?</i>	<ul style="list-style-type: none"> <li>Not applicable to NW Natural.</li> </ul>	<ul style="list-style-type: none"> <li>NW Natural agrees that this metric is not applicable to gas.</li> </ul>
3	Equity in Reliability: length of power outages	Average and median length (in minutes) of power outages per year, separately calculating Named and Non-named Communities for comparison. <i>Not applicable to gas. With and without major event days?</i>	<ul style="list-style-type: none"> <li>Not applicable to NW Natural.</li> </ul>	<ul style="list-style-type: none"> <li>NW Natural agrees that this metric is not applicable to gas.</li> </ul>
4	Historically Worst Performing Circuits	The 10 worst performing circuits in any given year separately by both frequency and duration. In addition, of the 10 worst performing circuits (separately by frequency and duration), the number of years over the past five years that a circuit has appeared on the list. <i>Not applicable to gas</i>	<ul style="list-style-type: none"> <li>Not applicable to NW Natural.</li> </ul>	<ul style="list-style-type: none"> <li>NW Natural agrees that this metric is not applicable to gas.</li> </ul>
<b>Outcome 2: Utilities are prepared for and respond to outages and other impacts caused by cyber-attacks, significant events, wildfires, storms, extreme weather events, and other</b>				
5	Wildfire Avoidance	Number of utility-caused wildfires, ignitions (that do not result in wildfires but could have), and risk events (event with probability of ignition – need definition). <i>Not applicable to gas. Maybe worth including input metrics. CA has wildfire mitigation handbook with definitions; WA does not. Maybe worth measuring events that increase wildfire risk.</i>	<ul style="list-style-type: none"> <li>Not applicable to NW Natural.</li> </ul>	<ul style="list-style-type: none"> <li>NW Natural agrees that this metric is not applicable to gas.</li> </ul>
6	Response Time to Natural Gas System Emergencies	Average and median length (in minutes) from customer call to arrival of field technician in response to natural gas system emergencies. <i>Maybe worth including input metrics (e.g., # employees attending emergency response training). Suggestion to add outage duration.</i>	<ul style="list-style-type: none"> <li>Proposed input metrics are not fully understood. Number of employees who attend an emergency response training may simply show the size of the utility, not the preparedness of first responders.</li> <li>Regarding suggestion to add outage duration: Response times to natural gas outages are more appropriate as they are safety related. Outage duration can vary widely based on the cause of the outage, location, and magnitude of customers impacted (natural gas equipment must be reit, requiring in-home service to all affected customers). Many of these factors are out of the utility's control.</li> </ul>	<ul style="list-style-type: none"> <li>Strike all language added at November 7, 2022 workshop.</li> </ul>
<b>Outcome 3: Resilient infrastructure and service, including distributed energy resources, to enable customers to maintain essential functions during times of potential outages.</b>				
7	Equity in Resilience Investments	Percent of proposed resilience projects in Named Communities that are completed every year, compared to a proposed projects list that is approved/communicated (need definition/process) by the Commission. <i>Three numbers – numerator, denominator, and percentage. Suggest to measure % spending in named communities instead of % projects. Focus is impact of projects and spending.</i>	<ul style="list-style-type: none"> <li>If the metric is based on resilience projects, as suggested in the original metric, measuring percent of spending is not in alignment. Utilities base the need for and timing of resilience projects on many factors, but the ultimate goal is resiliency not dollars spent.</li> <li>We agree that the types of resilience projects to be listed and the communication/approval process and how this would complement/supplement existing regulatory processes (such as through a rate case proceeding) needs more definition.</li> </ul>	<ul style="list-style-type: none"> <li>Revise: "Percent of proposed resilience projects completed in Named Communities deemed a high risk, compared to all resilience projects deemed high risk that were completed."</li> <li>Delete spending concept.</li> </ul>
8	Customers Experiencing Multiple Interruptions (CEMI) for Named and Non-named Communities	Average number of outages for customers experiencing multiple interruptions. Total number of customers that experience more than three sustained interruptions divided by the total number of customers served. Provide this calculation for the service territory as a whole and separately for Named Communities. <i>Suggest range of values, similar to metric #9.</i>	<ul style="list-style-type: none"> <li>This appears to be an electric utility-focused metric.</li> <li>Gas customers rarely face interruptions, especially multiple sustained interruptions.</li> </ul>	<ul style="list-style-type: none"> <li>Add: "Does not apply to gas utilities."</li> </ul>
9	Customers Experiencing Long Duration Outages (CELID) for Named and Non-named Communities	Number of customers experiencing more than X hours of interruptions per year/total number of customers served, providing separate calculations for X = 0 through X = 8. Provide this calculation for the service territory as a whole and separately for Named Communities. <i>Need to define what X should be. Suggest multiple values; consider an "X days" value.</i>	<ul style="list-style-type: none"> <li>This appears to be an electric utility-focused metric.</li> <li>Gas customers rarely face interruptions. Generally, gas interruptions for firm customers occur from accidents that are beyond the utility's control.</li> </ul>	<ul style="list-style-type: none"> <li>Add: "Does not apply to gas utilities."</li> </ul>
<b>Goal 2: Customer Affordability</b>				
<b>Outcome 1: Reduce energy burden for customers experiencing high energy burden, especially those in Highly Impacted Communities, Vulnerable Populations, and low-income</b>				
10	Arrearages by Month (reported quarterly)	Arrearages by month, by class, measured by zip code - to include 30+, 60+, and 90+ days arrears for total company, and electric and natural gas stated separately for dual fuel utilities. <i>Suggest census tracts rather than zip codes.</i>	<ul style="list-style-type: none"> <li>The Company currently reports ZIP code data, but can develop reporting capabilities based on census tract, but we do note that census tract boundaries can change over time which would create administrative burden.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
11	Percent of Customers in Arrears with Arrearage Management Plans	Number of residential customers, by zip code, in arrears with arrearage management plans (AMPs)/Total customers in arrears 60+ (90+,30+?) days. <i>Suggest census tracts rather than zip codes.</i>	<ul style="list-style-type: none"> <li>Recommend not including specific thresholds for past due accounts because AMPs may vary with each utility.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
12	Customer Disconnections and Reconnections	Number and percentage (need both?) of (1) disconnect notices, (2) residential disconnections for nonpayment, and (3) reconnection, each broken out by month and zip code, for known low-income households, Highly Impacted Communities, and Vulnerable Populations, for total company, and electric and natural gas service stated separately (challenge to do this) for dual fuel utilities. <i>Suggest census tracts rather than zip codes.</i>	<ul style="list-style-type: none"> <li>Suggest using both number and percentage.</li> <li>Suggest clarifying "residential" for all measures.</li> <li>Highly Impacted Communities and Vulnerable Populations are defined under CETA. The fact that these areas are not defined for gas service territories poses an issue.</li> <li>Control metric is needed to measure outcomes in Highly Impacted Communities and Vulnerable Populations as compared to all utility customers. Suggest total utility customers by census tract.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm that both "number and percentage" should be used.</li> <li>Revise: "Number and percentage of (1) residential disconnect notices, (2) residential disconnections for nonpayment, and (3) residential reconnection, each broken out by month and census tract, for known low-income households, Highly Impacted Communities, Vulnerable Populations, and all utility customers for total company, and electric and natural gas service stated separately (challenge to do this) for dual fuel utilities."</li> </ul>

13	Average Energy Burden	Annual residential bill/average area median income by zip code for all customers, comparing outcomes in Non-named Communities with Named Communities, with electric and natural gas service stated separately for dual fuel utilities. Suggest also % of customers experiencing high energy burden. Suggest measuring excess burden. Consider burden as total of all fuel sources (electric and gas) for dual-fuel; but suggest separate reporting by fuel is still needed. Suggest census tracts rather than zip codes.	<ul style="list-style-type: none"> <li>Agree that this metric is better measured by census tract. We suggest, however, that the Commission be the source/provider for the average area median income data.</li> <li>Company will require time to code its customer information system such that census tract is a field that can be queried on a customer specific basis.</li> <li>Percent or number of customers on an individual basis experiencing a high energy burden is not available at this time as the Company does not obtain individual income information.</li> <li>Electric utilities in NW Natural's service territory are not under the WUTC jurisdiction (i.e., public utility districts), so obtaining average electric bills by area (ZIP code or census tract) in order to fully measure energy burden may be difficult.</li> <li>Highly Impacted Communities and Vulnerable Populations are defined under CETA. The fact that these areas are not defined for gas service territories poses an issue.</li> </ul>	<ul style="list-style-type: none"> <li>Revise: "Annual residential bill/average area median income by census tract-for all customers, comparing outcomes in Non-named Communities with Named Communities, with electric and natural gas service stated separately for dual fuel utilities."</li> </ul>
Outcome 2: Maximize utilization of cost-effective distributed energy resources and grid-enhancing technologies.		NW Natural Feedback on Edits		NW Natural Potential Revisions
14	Net Benefits of DERs and GETs	Net present value of benefits (need definition of benefits) and cost-effectiveness ratio of distributed energy resources and grid-enhancing technologies (need definitions), as measured through a Commission approved cost-benefit analysis (e.g., docket 210804).	<ul style="list-style-type: none"> <li>This appears to be an electric utility-focused metric.</li> </ul>	<ul style="list-style-type: none"> <li>Add: "Does not apply to gas utilities."</li> </ul>
15	DER Utilization	Count of MWh and MW provided by each cost-effective DER programs, and Percentage of MWh and MW provided by each cost-effective DER program as a total of MW demand. Suggest there may be reasons to deploy DER other than cost-effectiveness. Clarify enrollment vs utilization (suggest we need both).  Revised: Energy and capacity of all applicable DERs and percentage of that energy and capacity utilized annually.	<ul style="list-style-type: none"> <li>This appears to be an electric utility-focused metric.</li> </ul>	<ul style="list-style-type: none"> <li>Add: "Does not apply to gas utilities."</li> </ul>
Outcome 3: Maximize the benefit and efficiency of the energy assistance process so that support can be provided to customers based on the program resources available.		NW Natural Feedback on Edits		NW Natural Potential Revisions
16	Percent of Utility Assistance Funds Dispersed	Utility rate-based customer-funded assistance funds spent/annual budget for utility rate-based customer-funded assistance. May need to be presented with context; may be good reasons for a decrease year-over-year.	<ul style="list-style-type: none"> <li>NW Natural supports the feedback on this metric added at the November 7, 2022 workshop.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
Outcome 4: Lowest reasonable cost compliance with public policy goals and environmental requirements.		NW Natural Feedback on Edits		NW Natural Potential Revisions
17	Incremental Cost	For electric, as calculated and reported in utility filed CEIP. For natural gas, lowest reasonable cost of compliance with CCA. Suggest metric on geographic distribution of costs. May need to incorporate equity at some point.	<ul style="list-style-type: none"> <li>How is "reasonable" defined?</li> <li>Metric should align with Integrated Resource Planning (IRP) standard of least cost / least risk.</li> <li>Is this metric forward-looking, or is it based on completed projects?</li> </ul>	<ul style="list-style-type: none"> <li>Revise: "For electric, as calculated and reported in utility filed CEIP. For natural gas, lowest reasonable cost and least risk of compliance with CCA, as measured by customer bill impacts."</li> <li>Strike all language added at November 7, 2022 workshop.</li> </ul>
Outcome 5: Increase awareness of and equitable access to utility services, assistance, education, and benefits for all customers, with a focus on Highly Impacted Communities.		NW Natural Feedback on Edits		NW Natural Potential Revisions
18	Availability of Materials in Multiple Languages	Percentage of utility engagements (needs more definition/too broad) — including workshops, mailers, and community meetings — offered in multiple languages or with translation services. Suggestion to measure quality/meaningfulness of engagement.	<ul style="list-style-type: none"> <li>Need to understand what types of "utility engagements" would be measured.</li> <li>Measuring "quality/meaningfulness" of engagement is too subjective.</li> </ul>	<ul style="list-style-type: none"> <li>Revise: "Number of languages spoken in service territory/number of languages in formal company communications. Formal communications include: safety flyers, bill inserts, bill assistance information and payment information."</li> <li>Delete: Suggestion to measure quality/meaningfulness of engagement.</li> </ul>
19	Customer Awareness of Services/Assistance	Percent of customers in Named Communities stating that they are "somewhat aware of" or "very aware of" utility specific utility services and assistance programs. Would need new survey/tool—comes at a cost; suggest it should be recoverable.	<ul style="list-style-type: none"> <li>The Company's recent Low Income Needs Assessment (LINA) asked this same question. The LINA could be used to gather information on several of these metrics.</li> <li>We note here that developing/tracking/measuring many of the metrics in this table, in addition to Metric 19, which will require different studies to collect and analyze the information, such as a LINA, will come at incremental costs to the utility and should be recoverable in customer rates.</li> </ul>	<ul style="list-style-type: none"> <li>Add: "Survey/LINA would be needed, and the cost of the survey/LINA should be recoverable in customer rates."</li> </ul>
20	Customers Who Participate in One or More Bill Assistance Programs	Unique number of low-income customers who participate in at least one bill assistance program/vetted (definition?) estimate of total number of low-income customers that qualify for bill assistance. Consider participation in other programs/services as a result of awareness and access.	<ul style="list-style-type: none"> <li>It would be difficult to determine participation in programs/services outside of NW Natural's service territory.</li> </ul>	<ul style="list-style-type: none"> <li>"Unique number of low-income customers who participate in at least one Company bill assistance program (numerator) compared to the estimate of total number of low-income customers that qualify for Company bill assistance (denominator)."</li> <li>Strike final sentence added at November 7, 2022 workshop.</li> </ul>
Goal 3: Advancing equity in utility operations		NW Natural Feedback on Edits		NW Natural Potential Revisions
Outcome 1: Equitable and diversity-focused utility hiring, promotion, and vendor selection practices.		NW Natural Feedback on Edits		NW Natural Potential Revisions
21	Workplace Diversity	Percentage of employees and senior management (separately identifying: (a) C-suite employees and (b) directors and employees more senior than directors) who identify as: (i) a person of color; and/or (ii) a woman or non-binary.	<ul style="list-style-type: none"> <li>NW Natural supports this metric.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
22	Supplier Diversity	Percentage of suppliers that self-identify as owned by people of color, women, and other marginalized groups certified with the Washington State Office of Minority and Women's Business Enterprises, and total dollars awarded to suppliers self-identifying as owned by people of color, women, and other marginalized groups certified with the Washington State Office of Minority and Women's Business Enterprises. Suggest also including veteran-owned businesses (utilities do track this). Percentage of dollars awarded to suppliers self-identifying as owned by people of color, women, and other marginalized groups of total dollars awarded to suppliers.	<ul style="list-style-type: none"> <li>Tracking percentage of dollars awarded may be mis-leading as some items may not be available from a diverse supplier. Perhaps looking at averages over several years would help normalize this issue.</li> <li>NW Natural supports including veteran-owned businesses in this metric.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>

Outcome 2: Ensure that utility operational and investment decisions promote equitable service that does not unfairly harm or disadvantage Highly Impacted Communities, Vulnerable		NW Natural Feedback on Edits	NW Natural Potential Revisions	
23	Annual Incremental Investment Spending	<p>Total amount of capital or operational expenditures that benefit Highly Impacted Communities or Vulnerable Populations in the current year/the amount of capital or operational expenditures that benefit Highly Impacted Communities or Vulnerable Populations in the previous year. Would need definition/process for how to determine which dollars go to HIC or VP; may be difficult to do. Suggestion to redefine on a per customer basis. Does this include non-enrollment transportation electrification investments?</p>	<ul style="list-style-type: none"> <li>As noted in the feedback at the November 7, 2022 workshop, tracking this metric would be very difficult (if not impossible). Much work would be required for determining a process to classify expenditures on a census tract basis that is both meaningful and works within the utility accounting construct (which generally does not classify expenses within the state). Further, we are unclear how redefining this metric on a per customer basis would make the process less difficult. Does this metric apply to expenditures that can be strictly defined as non-residential?</li> <li>Suggest limiting metric to only capital expenditures, which (while difficult), can be more easily tracked by geography.</li> <li>In subsequent phases of this docket, understanding the types of projects that can be measured (and how they will be measured and reported to and reviewed by the Commission) will be crucial.</li> </ul>	<ul style="list-style-type: none"> <li>Base the metric on residential customer-specific expenditures that can be tracked by geography (e.g., meter sets placed / replaced, excess flow valves, automated meter reading infrastructure deployment, energy efficiency measures deployed, targeted system reinforcement, etc.).</li> </ul>
24	Percentage of Non-pipeline and Non-wires Alternative Spending	<p>Total investment in non-pipeline or non-wires alternative programs targeted in Highly Impacted Communities or on Vulnerable Populations/Total investment in non-pipeline or non-wires alternative programs, separately calculated for dual fuel utilities. Suggest total projects or total # of wired solutions deferred.</p>	<ul style="list-style-type: none"> <li>Does this metric include energy efficiency or renewable supply on system? If so, perhaps metrics 25 and 26 capture this activity for gas utilities.</li> <li>We recommend further discussion about what qualifies as "non-pipeline alternative programs" in subsequent phases of this docket.</li> </ul>	<ul style="list-style-type: none"> <li>Strike all language added at November 7, 2022 workshop.</li> </ul>
Outcome 3: Equitable access to all utility energy programs, including those related to energy efficiency, demand response, and distributed energy resources.		NW Natural Feedback on Edits	NW Natural Potential Revisions	
25	Equity in DER Program Enrollment	<p>Number of customers in Named Communities or low-income customers enrolled in each utility distributed energy resource programs (providing a separate calculation for energy efficiency, electric transportation vehicle, net metering, and demand response)/total customers enrolled in each program. Add # of customers enrolled/# of eligible customers for additional context. May need electric and gas specific definitions for DER programs.</p>	<ul style="list-style-type: none"> <li>Agree that specific definitions of DER for gas and electric utilities would be helpful.</li> </ul>	<ul style="list-style-type: none"> <li>Strike: "Add # of customers enrolled/# of eligible customers for additional context."</li> </ul>
26	Equity in DER Program Spending	<p>Separately calculated percentage of utility spending on distributed energy resources for energy efficiency, electric vehicle, net metering, demand response, and renewables that benefits Named Communities as compared to Non-named Communities. May need electric and gas specific definitions for DER programs.</p>	<ul style="list-style-type: none"> <li>Agree that specific definitions of DER for gas and electric utilities would be helpful.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
Outcome 4: Ensure active and meaningful utility engagement with communities, including Highly Impacted Communities, Vulnerable Populations, and low-income customers such that		NW Natural Feedback on Edits	NW Natural Potential Revisions	
None selected – Hold for Policy Statement – EEP Report and Justice 100 may have reportable metric that could be included.		No comment.		
Goal 4: Environmental Improvements		NW Natural Feedback on Edits	NW Natural Potential Revisions	
Outcome 1: Reduce pollution burden and pollution exposure with a focus on communities with elevated exposures to health hazards, including Highly Impacted Communities,				
27	Energy-related Air Quality Emissions	<p>Annual criteria air pollutant (CO, Pb, NOx, O3, PM10, PM2.5, and SO2) and toxic air pollutant (Hg) emissions associated with utility generation, transmission, and distribution operations (including customer direct use) for the following geographies:</p> <ul style="list-style-type: none"> <li>Across the utility's service territory,</li> <li>By census tract within the utility's service territory, and</li> <li>In Named vs. Non-named Communities within the utility's service territory.</li> </ul> <p>Suggest this needs reworking through discussion with environmental impact experts. Should also consider generation sources located outside service territory but serving load in territory. Also consider benzene from gas use.</p>	<ul style="list-style-type: none"> <li>This metric appears to be electric utility focused. Further discussion is needed if applicable to gas utilities.</li> <li>Agree this metric needs further discussion with environmental/toxicology experts.</li> <li>Developing the processes for measuring and reporting air pollutant data by census tract and Name vs Non-Named Community would be very difficult if not impossible.</li> <li>Clarification needed about what is meant by "direct use."</li> </ul>	<ul style="list-style-type: none"> <li>Strike: "Also consider benzene from gas use."</li> </ul>
28	Utility Fleet Tailpipe Emissions Reductions	<p>Utility vehicle fleet tailpipe emissions and other impact (e.g., noise) reductions by vehicle type (light-, medium-, and heavy-duty) that may/regularly (need definition; could include whole fleet) operate in Named Communities, according to the utility's adoption of low- and zero-emissions vehicles, using the utility's 2022 (suggest different year due to COVID impacts; could use "previous year") fleet composition as baseline. Report total and reduction compared to baseline?</p>	<ul style="list-style-type: none"> <li>Need to understand the level of granularity of data tracking that is expected. Vehicles operating in and around Named Communities would be very difficult to track without some sort of geo-tracking technology, in addition to software to extract and analyze the data. Outfitting geo technology on Company vehicles, and the hardware/software needed to store/analyze the data may be exceedingly costly.</li> <li>NW Natural does not agree with the addition of "other impacts" to this metric. These impacts may not be identifiable or measurable, either in total or within specific geographies, and against a historic baseline.</li> </ul>	<ul style="list-style-type: none"> <li>Strike the addition of "other impact" as a component of this metric.</li> </ul>
Outcome 2: Cost-effective alignment of load with clean energy generation and storage through load management, energy efficiency measures, and demand response.		NW Natural Feedback on Edits	NW Natural Potential Revisions	
29	Utility Electric Load Management Success	<p>Energy and capacity of load reduced or shifted, and percent of load reduced or shifted, through load management, storage, energy efficiency, and demand response activities conducted by the utility, by activity (e.g., demand response versus energy efficiency). May need separate definitions for electric and gas. Should include management of transportation electrification loads, including bidirectional charging capabilities.</p>	<ul style="list-style-type: none"> <li>This metric appears to be electric utility focused.</li> <li>Need separate definitions and/or metric for gas utilities. Suggest further discussion of this metric in subsequent phases of this docket, such as in development of utility-specific metrics.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
30	DER GHG Reductions	<p>Greenhouse gas reductions from DER programs (energy efficiency, electric vehicle, net metering, and demand response). Reporting all programs in aggregate, or split out by program type? Method for measuring this could be difficult. Consider cumulative versus incrementally.</p>	<ul style="list-style-type: none"> <li>Suggest reporting all programs in aggregate and incremental reductions in GHG.</li> <li>Need definition of how to calculate metric. For instance, an energy efficiency project reduces greenhouse gas emissions in perpetuity, whereas other greenhouse gas reduction measures are point-in-time.</li> </ul>	<ul style="list-style-type: none"> <li>Revise: "Greenhouse gas reductions, in aggregate from all DER programs (energy efficiency, electric vehicle, net metering, and demand response) on an incremental basis."</li> </ul>
Outcome 3: Accelerate the cost-effective achievement of Commission or state public policy goals and statutes, including the reduction of greenhouse gas emissions.		NW Natural Feedback on Edits	NW Natural Potential Revisions	
31	Greenhouse Gas Reductions per Dollar	<p>Greenhouse gas reductions per dollar spent on programs and investments that reduce greenhouse gas emissions. Need definition of qualifying programs. Suggest comparison to linear glidepath.</p>	<ul style="list-style-type: none"> <li>Need definition of how to calculate metric. For instance, an energy efficiency project reduces greenhouse gas emissions in perpetuity, whereas other greenhouse gas reduction measures are point-in-time.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>
32	Total Greenhouse Gas Emissions	<p>Carbon intensity by CO2e (metric tons of CO2 and CO2-equivalent emissions) and CO2e/customer associated with utility generation, transmission, and distribution operations (including customer direct use), and CO2e/therm for gas utilities and in CO2e/MWh and CO2e/MW for electric utilities (dual-fuel utilities must report both separately). Suggestion to edit to include PPAs and market purchases. Also specify to include leakages for gas utilities.</p>	<ul style="list-style-type: none"> <li>To the extent these types of metrics are going to be reported going forward for the CCA, we want to make sure there is consistency in reporting requirements in order to streamline data tracking/reporting.</li> <li>Additional discussion is required to understand availability of leakage data.</li> </ul>	<ul style="list-style-type: none"> <li>See feedback.</li> </ul>