

Attachment A – Docket UG-210831

Proposed Conditions for 2022-2023 NW Natural Gas Conservation

1) Conservation Target – Approval and Conditions

- a) The following gas conservation targets are approved for NW Natural (NW Natural or Company), with conditions pursuant to RCW 80.28.380. This approval is subject to the Conditions described in Paragraphs (2) through (14) below.
 - i.) *Two-Year Conservation Target*: 619,200 therms.¹
 - ii.) *Total Two-Year Utility Conservation Goal*: 619,200 therms.²
- b) As part of NW Natural’s biennial conservation acquisition efforts, the Company must continue to invest in regional studies and market transformation, in collaboration with funding from other parties and with other strategic market partners in this biennium that complements NW Natural’s energy efficiency programs, planning, services, and measures. NW Natural must participate in the Northwest Energy Efficiency Alliance’s (NEEA) gas market transformation program through the end of NEEA’s 2020-2024 funding cycle.

- 2) **NW Natural Retains Responsibility.** Nothing in these conditions relieves NW Natural of the sole responsibility for complying with RCW 80.28.380. Specifically, the conditions regarding the need for a high degree of transparency, and communication and consultation with external stakeholders, diminish neither NW Natural’s operational authority nor its ultimate responsibility.

3) Identifying Conservation Potential

- a) *Ten-year conservation potential.* Every two years, NW Natural must project its cumulative ten-year conservation potential in a conservation potential assessment (CPA).
 - i.) This projection must consider all conservation resources that are cost-effective and available.
 - ii.) Methods for identifying conservation potential
 - (1) In identifying conservation potential NW Natural must be consistent with the methodologies used by the Northwest Power and Conservation Council (NWPPCC) as summarized in this subsection.
 - (a) Technical potential. Determine the amount of conservation that is technically feasible, considering measures and the number of these measures that could physically be installed or implemented, without regard to achievability or cost.

¹ The two-year conservation target includes the Company’s Conservation Potential Assessment (CPA), adjustments for expected site-specific conservation opportunities, and consistent with Condition 4(b) below.

² The Total Two-Year Utility Conservation Goal incorporates the Two-Year Conservation Target, the Decoupling Commitment, projected Northwest Energy Efficiency Alliance (NEEA) savings (if any), and any additional conservation savings that NW Natural expects to achieve above and beyond these targets, such as pilots or other savings.

- (b) Achievable technical potential. Determine the amount of the conservation technical potential that is available within the planning period, considering barriers to market penetration and the rate at which savings could be acquired.
- (c) Economic achievable potential. Establish the economic achievable potential, which is the conservation potential that is cost-effective, by comparing the total resource cost of conservation measures to the cost of other resources available to meet expected demand for gas. A utility may use either of the following approaches to identify economic achievable potential:
 - i.) Integrated portfolio approach. A utility may analyze, as a part of its integrated resource plan (IRP), the cost-effective potential of conservation resources over a range of potential future outcomes for unknown variables, such as future demand, costs, and resource availability. Economic achievable potential will be based on a resource plan that achieves a long-run lowest reasonable cost gas system considering all costs and quantifiable nonenergy costs and benefits.
 - ii.) Benefit-cost ratio approach. A utility may establish economic achievable potential as those conservation measures or programs that pass a total resource cost test, in which the ratio of total benefits to total costs is one or greater. The benefit-cost calculation must use inputs that incorporate the cost of risks that would otherwise be reflected in an integrated portfolio approach.
- (d) Total resource cost. In determining economic achievable potential as provided in (c) of this subsection, perform a life-cycle cost analysis of measures or programs to determine the net levelized cost, as described in this subsection:
 - i.) Conduct a total resource cost analysis that assesses all costs and all benefits of conservation measures regardless of who pays the costs or receives the benefits.
 - ii.) Include the incremental savings and incremental costs of measures and replacement measures where resources or measures have different measure lifetimes.
 - iii.) Calculate the value of the gas saved based on when it is saved. In performing this calculation, use time differentiated avoided costs to conduct the analysis that determines the financial value of gas saved through conservation.
 - iv.) Include the increase or decrease in annual or periodic operations and maintenance costs due to conservation measures.
 - v.) Include avoided energy costs equal to a forecast of regional market prices plus variable transportation costs (e.g., fuel and variable charges), which represents the cost of the next increment of gas

- available to the utility for the life of the energy efficiency measures to which it is compared.
- vi.) Include benefits from deferred infrastructure capacity costs for system capacity resources and distribution capacity resources required in peak load resource planning.
 - vii.) Include the social cost of greenhouse gas emissions from avoided gas consumption.
 - viii.) If necessary, include a risk mitigation credit to reflect the additional value of conservation, not otherwise accounted for in other inputs, in reducing risk associated with costs of avoided nonconservation resources. If this value is negative, use a value of 0 for the risk mitigation credit.
 - ix.) Include all nonenergy impacts that a resource or measure may provide that can be reasonably quantified and monetized.
 - x.) Include an estimate of program administrative costs.
 - xi.) Include the cost of financing measures using the capital costs of the entity that is expected to pay for the measure.
 - xii.) Discount future costs and benefits at a discount rate equal to the weighted average cost of capital; and
 - xiii.) Include a 10 percent bonus to the energy and capacity benefits of conservation measures as defined in 16 U.S.C. § 839a of the Pacific Northwest Electric Power Planning and Conservation Act.
- iii.) This projection must be either identified through or included as an input into NW Natural's most recent IRP. NW Natural must document any differences from the projection in the potential assessment and the IRP.
 - iv.) The CPA must include a list of each measure used in the potential, its unit energy savings value, first year therm savings, customer incremental cost, life of the measure, any applicable nonenergy impacts, and the source of the values.
- b) NW Natural must file a CPA by June 1, 2023, in a new docket. The CPA must be approved by the Commission per RCW 80.28.380.

4) Acquiring All Conservation Resources

- a) Process for acquiring all conservation
 - i.) *Process.* NW Natural's obligation to identify and acquire all conservation measures that are available and cost-effective includes the following process:
 - (1) Identify potential. Identify the cost-effective and available potential of possible technologies and conservation measures in NW Natural's service territory.
 - (2) Develop portfolio. Develop a conservation portfolio that includes all available, cost-effective conservation. NW Natural must develop programs to acquire available conservation from all the types of conservation identified in (ii) of this subsection. The portfolio must include conservation programs and mechanisms intended to reduce the energy burden of low-income customers, including programs and mechanisms identified in Condition (4)(f) below or

- other utility planning processes. If no cost-effective conservation is available from one of the types of conservation, NW Natural is not obligated to acquire such a resource.
- (3) Implement programs. Implement conservation programs identified in the portfolio to the extent the portfolio remains cost-effective and available. Implementation methods shall not unnecessarily limit the acquisition of all available conservation that is cost-effective.
 - (4) Adaptively manage. Continuously review and update as appropriate the conservation portfolio to adapt to changing market conditions and developing technologies. NW Natural must research emerging conservation technologies and assess the potential of such technologies for implementation in its service territory.
- ii.) *Types*. Types of conservation include, but are not limited to:
 - (1) End-use efficiency
 - (2) Behavioral programs; and
 - (3) Market transformation.
 - iii.) *Pilots*. NW Natural must consider, in consultation with the Advisory Group, implementing pilot projects when appropriate and expected to produce cost-effective savings within the current or immediately subsequent biennium if the overall portfolio remains cost-effective.
- b) Biennial conservation target. Beginning January 2022, and every two years thereafter, NW Natural must establish a biennial conservation target.
- i.) The biennial conservation target must identify, and quantify in therms, all conservation that is available and cost-effective.
 - ii.) The biennial conservation target must be based on the CPA developed under Condition 3 above and include any adjustments for known or expected site-specific projects. NW Natural must consult with the Advisory Group in determining how to set its target.
 - iii.) *Excess conservation*. No more than 25 percent of any biennial target may be met with excess conservation savings allowed by this condition. Excess conservation may only be used to mitigate shortfalls in the immediately subsequent two biennia and may not be used to adjust NW Natural's biennial target. The presence of excess conservation does not relieve NW Natural of its obligation to pursue the level of conservation in its biennial target.
 - (1) Cost-effective conservation achieved in excess of a biennial conservation target may be used to meet up to 20 percent of each of the immediately subsequent two biennial targets.
 - (2) NW Natural may use single large facility conservation savings achieved in excess of its biennial target to meet up to 5 percent of each of the immediately subsequent two biennial conservation targets. If NW Natural believes it has a project that may constitute a “single large facility,” it should work with its Advisory Group to determine how to meet this condition.

- c) Prudence. NW Natural retains the responsibility to demonstrate the prudence of all conservation expenditures.
- d) Energy savings. When available, NW Natural must use unit energy savings values and standard protocols approved by the regional technical forum. Unit energy savings value or standard protocol should be:
 - i.) Based on generally accepted methods, impact evaluation data, or other reliable and relevant data that includes verified savings levels; and
 - ii.) Presented to its advisory group for review. The Commission retains discretion to determine an appropriate value or protocol.
- e) Applicable sectors. NW Natural must offer a mix of conservation programs to ensure it is serving each customer sector, including programs targeted to the low-income subset of residential customers.
- f) Low-income conservation
 - i.) NW Natural must fully fund low-income conservation measures that are determined by the implementing agency to be cost-effective consistent with either the *Weatherization Manual* maintained by the Washington State Department of Commerce or when it is cost-effective to do so using utility-specific avoided costs. For purposes of this subsection, "fully fund" does not prohibit the agency leveraging other funding sources, in combination with utility funds, to fund low-income conservation projects. Measures identified through the priority list in the *Weatherization Manual* are considered cost-effective. In addition, NW Natural may fully fund repairs, administrative costs, and health and safety improvements associated with cost-effective low-income conservation measures. NW Natural shall maintain a project cost allowance of up to 30 percent for Administrative/Indirect Rate associated with the delivery of low-income conservation measures.
 - ii.) NW Natural's biennial conservation plan must include low-income conservation programs and mechanisms identified. To the extent practicable, NW Natural must prioritize energy assistance to low-income households with a higher energy burden.
 - iii.) NW Natural must exclude low-income conservation from portfolio-level cost-effectiveness calculations. NW Natural must account for the costs and benefits, including nonenergy impacts, which accrue over the life of each conservation measure.
 - iv.) NW Natural must count savings from low-income conservation toward meeting its biennial conservation target. Savings may be those calculated consistent with the procedures in the *Weatherization Manual*.

5) Conservation Planning and Reporting

- a) Biennial conservation plan
 - i.) On or before November 15 of every odd-numbered year, NW Natural must file with the Commission a biennial conservation plan.
 - ii.) The plan must include, but is not limited to:
 - (1) The extent of public participation in the development of the ten-year conservation potential and the biennial conservation target.

- (2) The ten-year conservation potential, the biennial conservation target, biennial program details, biennial program budgets, and cost-effectiveness calculations.
 - (3) A description of the technologies, data collection, processes, procedures, and assumptions NW Natural used to develop the figures in Condition 5(a)(ii)(2).
 - (4) A description of and support for any changes from the assumptions or methodologies used in NW Natural's most recent conservation potential assessment.
 - (5) An evaluation, measurement, and verification plan for the biennium including, but not limited to:
 - (a) The evaluation, measurement, and verification framework.
 - (b) The evaluation, measurement, and verification budget; and
 - (c) Identification of programs that will be evaluated during the biennium.
- iii.) For the purposes of this section, ten-year conservation potential is derived pursuant to Condition 3 above.
 - iv.) Program details must be maintained and updated as necessary in NW Natural's conservation tariff throughout the biennium, in accordance with Condition 8 below.
- b) Annual conservation report
- i.) On or before June 15 of each year, NW Natural must file with the Commission, in the same docket as its current biennial conservation plan, an annual conservation report regarding its progress in meeting its conservation target during the preceding year.
 - ii.) The annual conservation report must include, but is not limited to:
 - (1) The biennial conservation target.
 - (2) Planned and claimed gas savings from conservation, including a description of the key sources of variance between the planned and actual savings.
 - (3) Budgeted and actual expenditures made to acquire conservation through the conservation cost recovery adjustment described in Condition 12.
 - (4) The portfolio- and program-level cost-effectiveness of the actual gas savings from conservation.
 - (5) All program evaluations completed in the preceding year.
 - (6) A discussion of the steps taken to adaptively manage conservation programs throughout the preceding year.
- c) Biennial conservation report
- i.) Beginning in 2024, on or before June 15 of each even-numbered year, NW Natural must file with the Commission, in the same docket as its current biennial conservation plan, a biennial conservation report regarding its progress in meeting its conservation target during the preceding two years.
 - ii.) The biennial conservation report must include:
 - (1) The biennial conservation target.
 - (2) Planned and claimed gas savings from conservation.
 - (3) Budgeted and actual expenditures made to acquire conservation.
 - (4) The portfolio-level cost-effectiveness of the actual gas savings from conservation.

- (5) An independent third-party evaluation of portfolio-level biennial conservation savings achievement.
 - (6) A summary of the steps taken to adaptively manage conservation programs throughout the preceding two years; and
 - (7) Any other information needed to justify the conservation savings achievement.
- iii.) NW Natural must provide a summary of the biennial conservation report to its customers by bill insert or other suitable method within 90 days of the Commission's final action on the report.
 - iv.) NW Natural may file the annual conservation report and the biennial conservation report together as one report, provided that the report includes all the information required in subsections (c) and (d) of this condition and states that it serves as both the annual conservation report and the biennial conservation report.
- d) Plan and report review
- i.) Interested persons may file written comments regarding the biennial conservation plan and biennial conservation report within 30 days of NW Natural's filing.
 - ii.) Upon conclusion of the Commission review of NW Natural's biennial report or plan, the Commission will issue a decision accepting or rejecting the calculation of NW Natural's conservation target; or determining whether NW Natural has acquired enough conservation resources to comply with its conservation target. If NW Natural does not meet its biennial conservation target described in Condition 1(a), the Commission will determine the amount in terms by which NW Natural was deficient.
 - iii.) Biennial plans and reports may be reviewed through the Commission's open meeting process, as described in chapter 480-07 WAC.
- e) *Publication of reports.* Beginning with the 2022-2023 BCP, all conservation plans and reports required by Commission order as well as a summary of planned and actual savings and expenditures reflected in the plans and reports, must be posted and maintained on NW Natural's website. Plans and reports must be posted on NW Natural's website within 30 days of Commission acknowledgment of the plan or order approving the report. A copy of any such plan, report, or summary must be provided to any person upon request.

6) Advisory Group

- a) NW Natural must use its Advisory Group, initially created under Docket UG-080546 to advise NW Natural on conservation issues including but not limited to:
 - i.) Conservation programs and measures.
 - ii.) Updates to NW Natural's evaluation, measurement, and verification framework.
 - iii.) Modification of existing, or development of new evaluation, measurement, and verification methods.
 - iv.) Independent third-party evaluation of portfolio-level biennial conservation achievement.
 - v.) Development of conservation potential assessments.
 - vi.) The methodology, inputs, and calculations for cost-effectiveness.

- vii.) The data sources and values used to develop and update supply curves.
 - viii.) The need for tariff modifications or mid-biennium program corrections.
 - ix.) The appropriate level of and planning for:
 - (1) Marketing conservation programs.
 - (2) Incentives to customers for measures and services; and
 - (3) Impact, market, and process evaluations.
 - x.) Programs for low-income residential customers.
 - xi.) Establishment of the biennial conservation target and program achievement results compared to the target.
 - xii.) Conservation program budgets and actual expenditures compared to budgets.
 - xiii.) Development and implementation of new and pilot programs.
- b) *Advisory group meetings.* NW Natural must meet with its conservation advisory group at least four times per year. Conservation advisory group members may request additional meetings. NW Natural must provide reasonable advance notice of all conservation advisory group meetings.
 - c) *Advance notification of filings.* Except for the conservation cost recovery adjustment filing required in Condition 12, NW Natural must provide its conservation advisory group an electronic copy of all conservation filings that NW Natural intends to submit to the Commission at least 30 days in advance of the filing. The filing cover letter must document the amount of advance notice provided to the conservation advisory group.
 - d) *Advance notification of meetings.* NW Natural must notify its conservation advisory group of Company and Commission public meetings scheduled to address its conservation programs, its conservation tariffs, or the development of its conservation potential assessment.
 - e) NW Natural must notify Advisory Group members of all public meetings scheduled to address NW Natural's integrated resource plan. NW Natural must also coordinate a meeting with Advisory Group members and the entity conducting the conservation potential assessment (CPA) addressing the scope and design of the CPA. This meeting must be held early enough in the integrated resource plan public process to incorporate the group's advice. NW Natural must notify Advisory Group members of IRP advisory group meetings that present the Company's gas price forecasts and resource cost assumptions used in the development of the Company's integrated resource plan.
 - f) NW Natural must consult with the Advisory Groups starting no later than July 1, 2023, to begin to identify achievable conservation potential for 2024-2033 and to begin to set annual and biennial targets for the 2024-2025 biennium, including necessary revisions to program details.
 - g) NW Natural must inform the Advisory Group members when its projected expenditures indicate that NW Natural will spend more than 120 percent or less than 80 percent of its annual conservation budget.
 - h) Prior to filing the Biennial Conservation Plan, NW Natural must provide the following information to the Advisory Group: draft ten-year conservation potential and two-year target no later than August 15, 2023; draft program details, including budgets, no later than September 15, 2023; and draft program tariffs no later than October 16, 2023.

- 7) **Annual Budgets and Energy Savings.** NW Natural must provide its proposed budget to the Advisory Group in a detailed format with a summary page indicating the proposed budget and savings levels for each conservation program, and subsequent supporting spreadsheets providing further detail for each program and line item shown in the summary sheet. The proposed budget must also be filed in support of any cost recovery filing, along with any other necessary workpapers. NW Natural must allocate a reasonable amount of its program budget (as determined through consultation with the Advisory Group) towards pilot programs, research, and data collection.
- 8) **Program Details.** NW Natural must maintain its conservation tariffs, with program descriptions, on file with the Commission. Program details about specific measures, incentives, and eligibility requirements must be filed and updated in this docket. NW Natural must consult its Advisory Group in accordance with Condition 6 above before making changes to program details. NW Natural must notify the Advisory Group when it files updated measures, incentives, or eligibility requirements.
- 9) **Approved Strategies for Selecting and Evaluating Energy Conservation Savings**
- a) NW Natural has identified several potential conservation measures described in the BCP. The Commission is not obligated to accept savings identified in the BCP for purposes of compliance with the targets detailed in this Order.
 - b) When NW Natural proposes a new or significant change to a program, pilot, or tariff schedule, it must present the program to the Advisory Group with program details fully defined, to the extent practicable. The Advisory Group, after consultation, may advise if a revision to the Conservation Plan in this docket is necessary.
 - c) NW Natural must spend a reasonable (as determined through consultation with the Advisory Group) amount of its conservation budget on evaluation, measurement, and verification (EM&V), including a reasonable proportion on independent, third-party EM&V. NW Natural must perform EM&V annually on a maximum four-year schedule of selected programs such that, over the EM&V cycle, all major programs are covered. The EM&V function includes impact, process, market, and cost test analyses. The results must verify the level at which claimed energy savings have occurred, evaluate the existing internal review processes, and suggest improvements to the program and ongoing EM&V processes.
 - d) A final report for the entire 2022-2023 biennium may be implemented in phases and delivered as a final product at an earlier date, as needed, by NW Natural.
- 10) **Program Design Principles**
- a) Modifications to the programs must be filed with the Commission as revisions to tariffs or as revisions to NW Natural's current Conservation Plan, as determined in consultation with the Advisory Group.
 - b) Incentives and Conservation Program Implementation — Programs, program services, and incentives may be directed to consumers, retailers, manufacturers, trade allies or

other relevant market actors as appropriate for measures or activities that lead to gas energy savings. NW Natural must work with the Advisory Group to establish a balanced portfolio of measures that provides savings from a variety of savings types and meets the needs of a broad spectrum of NW Natural customers.

- c) Conservation Efforts without Approved EM&V Protocol — NW Natural may spend up to 10 percent of its conservation budget on programs whose savings impact has not yet been measured, if the overall portfolio of conservation passes the primary cost-effectiveness test used by the Commission. These programs may include information-only, and pilot projects. NW Natural may ask the Commission to modify this spending limit, following Advisory Group consultation.
 - i.) Information-only services refers to those information services that are not associated with an active incentive program or that include no on-site technical assistance or on-site delivery of school education programs. Information-only services and behavior change services must be assigned no quantifiable energy savings value without full support of the Advisory Group.
 - ii.) If quantifiable energy savings have been identified and Commission-approved for any aspect of such programs, the budget associated with that aspect of the program will no longer be subject to this 10 percent spending restriction.

11) Cost-Effectiveness Tests

- a) The cost-effectiveness analysis required by RCW 80.28.380 must include the costs of greenhouse gas emissions established in RCW 80.28.395.
- b) For the 2022-2023 biennium, NW Natural must use the modified Total Resource Cost Test (TRC), consistent with the Council, as its primary cost-effectiveness test. The modified TRC test includes all quantifiable nonenergy impacts, a risk adder, and a 10 percent conservation benefit adder. NW Natural’s portfolio must pass the modified TRC test. All cost-effectiveness calculations will assume a Net-to-Gross ratio of 1.0, consistent with the Council’s methodology.
 - i.) In 2022-2023, NW Natural must participate in any stakeholder process where the appropriate cost-effectiveness test and discount rate to be used for gas conservation is debated.
 - ii.) Beginning with the 2024-2025 biennium, NW Natural must either:
 - (1) Employ the cost-effectiveness test developed through the stakeholder process described in Condition 11(b)(i);
 - (2) Employ a properly-balanced TRC, as described in the Commission’s 2013 natural gas conservation policy statement;³ or
 - (3) Employ a different cost-effectiveness test as determined in conjunction with Commission Staff and the Advisory Group.
- c) NW Natural must also provide calculations of the Program Administrator Cost Test (also called the Utility Cost Test) as described in the National Action Plan for Energy

³ See Docket UG-121207, “Policy Statement on the Evaluation of the Cost-Effectiveness of Natural Gas Conservation Programs,” at ¶ 35.

Efficiency’s study “Understanding Cost-Effectiveness of Energy Efficiency Programs,” (November 2008; located at: <https://www7.eere.energy.gov/seeaction/system/files/documents/understanding-cost-effectiveness-ee-programs.pdf>).

- d) NW Natural must provide calculations of both the TRC and UCT in its plans and reports.
- e) Conservation-related administrative costs must be included in portfolio level analysis.

12) Recovery through a Gas Conservation Tariff

- a) Utilities must file with the Commission for recovery of all expected conservation cost changes and amortization of deferred balances. NW Natural must include its conservation cost recovery procedures in its tariff.
- b) Scope of Expenditures — Funds collected through the Gas Conservation Tariff must be used on approved conservation programs and their administrative costs.
- c) Recovery for Each Customer Class —NW Natural shall retain existing cost recovery mechanisms, subject to the Commission’s Order 06 in Docket UG-181053.
- d) NW Natural must file revisions to its cost recovery tariff (Schedule 215) by September 15 each year, with requested effective date of November 1 of that same year.
- e) NW Natural may not accrue interest or incur carrying charges on deferred conservation cost balances. Utilities must base conservation recovery rates on forward-looking budgeted conservation program costs for the future year with revisions to recover only actual program costs of the prior year. Utilities must also include the effects of variations in actual sales on the recovery of conservation costs in the prior year.

13) Low-Income Programs

- a) *Low-Income Programs*
 - i.) NW Natural must demonstrate progress toward sustained energy burden reductions during the 2022-2023 biennium by, at a minimum, funding all eligible and cost-effective low-income conservation measures as described in Condition 4(f).
 - (1) NW Natural’s biennial report must include the contribution from low-income conservation programs toward sustained energy burden reductions. The report must include the number of participants and any other information that demonstrates progress as described above. The utility should include a discussion of barriers to success, options for overcoming these barriers, and potential uses for increased low-income conservation funding.
 - (2) Energy savings from low-income conservation measures will be counted toward conservation goals.
 - (3) NW Natural may, after consultation with advisory groups, fully fund repairs, administrative costs, and health and safety improvements associated with cost-effective low-income conservation measures. These costs are excluded from portfolio cost-effectiveness calculations.

14) Additional Commitments

- a) NW Natural should consult with its Advisory Group to determine how it should implement RCWs 80.28.260(2) and 80.28.300. Such consultation should include, but is not limited to: whether and how to research and evaluate opportunities for cool roof and tree planting conservation, with special consideration given to highly impacted communities and vulnerable populations; whether and how to provide information to their customers regarding landscaping that includes tree planting for energy conservation; and what outreach and education efforts should be conducted to inform customers of the energy and nonenergy benefits of cool roofs and strategic tree planting. NW Natural should utilize the department of health's environmental health disparities map and coordinate with the department of natural resources to identify areas within the utility's service territory that would benefit from heat island mitigation and strategic tree planting programs.
 - i.) If NW Natural pursues such research, evaluation, and/or outreach, it should detail the research and evaluation results and outreach efforts in its conservation reporting.