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November 29, 2012

NWN Advice No. WUTC 12-8

**VIA ELECTRONIC FILING**

Dave Danner, Secretary and Executive Director  
WASHINGTON UTILITIES &  
TRANSPORTATION COMMISSION  
1300 S Evergreen Park Drive, SW  
Post Office Box 47250  
Olympia, Washington 98504-7250

Re: Schedule G, Energy Efficiency Services and Programs – Residential and Commercial

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files the following tariff sheet stated to become effective with service on and after **January 1, 2013**:

Eighth Revision of Sheet G-1,  
Schedule G,  
“Energy Efficiency Services and Programs – Residential and Commercial.”

The purpose of this filing is to revise the Company’s Energy Efficiency Plan (EE Plan or Plan) which by reference on Sheet G.1 is part of the Company’s Tariff. The Plan is revised to include the 2013 calendar year program goals and budget.

In 2013, the Company expects to spend approximately \$1,500,000 on the acquisition of 220,000 therm savings in the residential and commercial sector. The Company will continue to strive to maintain a total portfolio benefit cost ratio of 1.0, an overall levelized cost per therm of \$0.65 or less, and a first year therm cost of \$6.50 or less. The Company’s Washington Low-Income Energy Efficiency (WA-LIEE) program will seek to treat 15 to 20 low income homes, and in doing so, achieve up to 4220 therms saved at a cost of \$89,300. The uptake on the WA-LIEE program has been slower than anticipated but the Company is confident that increased marketing efforts will help the program bring in more savings than it has to date.

The Company is also revising its EE Plan to make revisions to four of its existing incentive offerings. First, the incentive for the tankless water heater is being removed for existing homes as it is no longer cost effective. Attached is a cost effectiveness calculator for this measure that demonstrates that while this measure passes the utility cost test (UCT) with a 2.91, it fails the total resource cost test (TRC) with a 0.25. Retrofitting tankless water heaters in existing homes is more costly than it is to install in new homes. As such, this measure continues to be a cost effective offering under the new homes program. It also remains cost

effective for commercial applications where energy usage is greater causing the savings per investment potential to also be greater.

Second, the duct sealing and the duct leakage test incentives for existing homes are also being removed since duct sealing is no longer cost effective. A cost effectiveness calculator is attached for this measure showing that it failed both the UCT with a 0.39 and the TRC with a 0.39. Energy Trust has been talking with contractors about these measures for almost a year, forewarning them that it was likely to be removed from the program due to a high cost to low savings ratio.

Third, the air sealing incentive for existing homes is being reduced from 50% of cost up to \$275 to a flat \$150 per installation. Costs for this measure have been rising causing the small savings acquired to be too costly. The attached cost effectiveness calculator for this measure shows that this measure has a TRC of 0.28 and a UCT of 1.11. The Company expects it will need to stop offering this measure later in 2013 if future impact analysis results do not show greater energy savings but this initial reduction is being made to strategically phase this measure out of the market place.

Finally, the commercial radiant heating incentive is being revised from a flat \$6.50 per kBtu per hour input to the following two tier incentive structure:

<b>COMMERCIAL Infrared, direct natural gas-fired radiant heaters for heating large, open areas</b>			
Tier 1: Non-modulating units	Min. 80% Efficiency New install or must replace non-radiant heating system. Indoor use only, 5,000 – 20,000 SF	4.3 therms per kBtu/ hour input	\$6.50 per kBtu/hour input
Tier 2: Modulating units	Min. 82% Efficiency New install or must replace non-radiant heating system Indoor use only, 5,000 – 20,000 SF	11.2 therms per kBtu/ hour input	\$10.00 per kBtu/hour input

A cost effectiveness calculator and a blessing memo are attached for this measure.

The following housekeeping changes are also made to the Plan:

- Language is changed in Section V to clarify the timing for process evaluations.
- Also, language is added on page 3 under Section VI that describes the information needed in tariff advice filings when adding, changing, or removing measures. Wording is added to clarify that blessing memos are only necessary when adding new measures. These memos serve to demonstrate that a measure has been studied and would be a good cost effective means for acquiring savings. It would not be a useful work paper when measures are changing or being removed since they are only applicable upon introduction into the portfolio.

- Language is revised in Section VIII to clarify that the EEAG will meet either in person or by teleconference after the annual report has been filed. Meetings may also be scheduled as needed. In 2012 the EEAG agreed to reduce the amount of times it had scheduled teleconferences.
- Section X is also revised to state additional information that the Company will include in its annual program cost recovery advice filings. This revision is made in response to NW Natural's 2011 program cost recovery filing submitted as Advice No. 12-6 and docketed as UG-121433, Public Counsel submitted a letter on October 19, 2012, wherein it requested that the Company's future cost recovery filings include the total dollar amount it seeks to recover, as well as the incremental dollar impact of the rate change on average monthly residential and commercial customer bills. As discussed with Public Counsel, the Company is now listing these data elements in its EE Plan as required information that will be included in its annual cost recovery filings.
- The incentive for the residential air leakage test is being removed as a housekeeping change. The Company has issued no rebates to date for this measure.
- In Advice No. 12-3, WUTC Docket No. UG-120369, the Company added the Solar Thermal Pool Heating measure to the residential list of offerings. While the measure was approved for residential applications, it was inadvertently left off of the list of commercial measures, but is added now (page 11).

The Energy Efficiency Advisory Group has reviewed this filing.

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after January 1, 2013.

As required by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

A copy of the filing is available for public inspection in the Company's main office in Portland, Oregon and on its website at [www.nwnatural.com](http://www.nwnatural.com).

Please address correspondence on this matter to me with copies to the following:

Kelley Miller, Rates Specialist  
Rates & Regulatory Affairs  
220 NW Second Avenue  
Portland, Oregon 97209  
Telecopier: (503) 721-2516  
Telephone: (503) 226-4211, ext. 3589  
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Please call me if you have any questions.

Sincerely,

*/s/ Jennifer Gross*

Jennifer Gross  
NW Natural

enclosures

# NW Natural's 2013 Energy Efficiency Plan

## I. Background

Northwest Natural, dba NW Natural ("NW Natural" or Company"), began offering its current energy efficiency programs to Washington customers on October 1, 2009. The Washington Utilities and Transportation Commission's ("WUTC's") Order No. 04 in the Company's 2008 rate case, docketed as UG-080546, directed NW Natural to create and begin offering a program.

## II. Oversight

NW Natural's energy efficiency programs were developed and continue to evolve under the direction and oversight of the Energy Efficiency Advisory Group ("EEAG") which is comprised of interested parties to the Company's 2008 rate case. The EEAG includes representatives from NW Natural, Energy Trust of Oregon ("Energy Trust"), WUTC Staff, Public Counsel, Northwest Industrial Gas Users ("NWIGU"), The Energy Project, and NW Energy Coalition.

## III. Program Administration

NW Natural's general energy efficiency programs are administered by the Energy Trust, which is an independent, nonprofit organization dedicated to helping utility customers save electric and gas energy. Energy Trust was formed in 2002 in response to Oregon legislation that restructured electric utilities<sup>1</sup> for multiple reasons including allowing non-residential customers to purchase their electricity from providers other than the utility and reassigning the responsibility for demand side management from utility operations to Energy Trust.

NW Natural began using Energy Trust as the delivery arm for its Oregon energy efficiency program in 2003. Since NW Natural's Washington service territory is contiguous with its Oregon territory, it made sense to have Energy Trust extend the boundaries of the Oregon program offerings into Washington.

As agreed to in UG-080546, Energy Trust administered the Company's program for one pilot year. During this time, the EEAG monitored the program's performance and assessed whether Energy Trust should be the ongoing program administrator. On May

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<sup>1</sup> SB 1149, codified as ORS 757.612, mandated the creation of an independent entity capable of providing demand side management services to utility customers.

25, 2011, NW Natural made a compliance filing in UG-080546 wherein it stated the EEAG's opinion to allow Energy Trust to continue administering NW Natural's energy efficiency programs in Washington. On June 8, 2011, Public Counsel separately filed a letter supporting this decision.

NW Natural's Washington Low Income Energy Efficiency Program ("WA-LIEE") is administered by Clark County Community Action Agency, Klickitat County Community Action Agency and Skamania County Community Action Agency.

#### IV. Programs Offered

NW Natural offers the following general energy efficiency programs:

Residential – Residential customers with gas heated homes are offered home energy reviews wherein an energy consultant identifies measures that could be installed to improve the customer's home's efficiency. Specific incentive offerings are also available for the installation of certain efficient gas appliances.

New Homes – The New Homes program encourages builders to construct homes to an energy efficiency standard that is better than Washington building code. Qualifying homes must meet the criteria established in ENERGY STAR's Builder Option Package ("BOP") for natural gas heated new construction.

Commercial – Commercial customers are offered incentives for prescriptive efficient gas appliance installations, as well as efficient installations unique to the customer's facilities that are identified in a custom study.

Specific measure offerings are as listed in Appendix A to this Plan."

Under NW Natural's low income energy efficiency program, agencies administering the program leverage other funding sources with WA-LIEE dollars to provide whole-house weatherization services to qualifying customers. Agencies are paid \$3,500 per home for cost effective energy efficiency installations as well as an average of \$440 per home for health and safety repairs. Program details are available in the Company's Schedule I, "Washington Low Income Energy Efficiency Program (WA-LIEE)."

#### V. Program Evaluation, Monitoring and Verification ("EM&V")

##### Impact Evaluations

Deemed gross savings by measure are used to determine total therms reported as saved per program year. The deemed savings used will be consistent with the most current impact studies performed on the programs that the Energy Trust delivers in Oregon until after mid-2012 when such impact evaluations will include results from the

Washington-delivered programs. The Energy Trust performs the impact study wherein they analyze customers' energy usage data before and after a measure is installed. The savings from all measures' are analyzed annually unless sample sizes based on participation rates are not statistically significant. From the impact evaluation, the Energy Trust is able to determine if average savings are consistent with deemed savings. If they are not, the deemed savings are "trued-up" once annually to reflect the findings. A link to the annual true up report as well as a short summary of the results will be provided in the quarterly report following the report's release.

#### Process Evaluations

Besides impact evaluations, the Energy Trust contracts with a third party to perform a process evaluation on all general energy efficiency programs offered, typically on an annual basis. The third party studies and reports on the processes employed for each program. Study results are available on the Energy Trust's website: [www.energytrust.org](http://www.energytrust.org). A link to the annual process evaluation as well as a short summary of the results will be provided in the quarterly report following the report's release.

## VI. Process for Program Changes

NW Natural will file to revise Appendix A of its Energy Efficiency Plan when it plans to add, change, or remove a long-term incentive offering. Every year the Company will consider if program year changes are needed. If they are, the Company will revise its EE Plan to make requested program modifications when it makes its annual advice filing, submitted no later than December 1, to revise the performance metrics and budget that are also included in the Plan. This does not preclude the Company from filing to revise Schedule G or its EE Plan at any time during the year. Advice filings revising or adding measures will include:

- 1) A benefit cost ratio ("BCR") calculator demonstrating the measure's life, measure cost, the quantifiable non-energy benefits, the utility system benefits and the societal BCR; and
- 2) For new measures, a blessing memo which refers to an in-house Energy Trust document that summarizes the vetting of a measure before it is introduced as a program offering. The EEAG will be given the opportunity to review all tariff filings before they are filed. The Company will generally give the EEAG ten business days to review a draft filing. The EEAG's review process will not be less than five business days.

- 3) New programs proposed mid-cycle will include a program-specific plan addressing the possible need for program-specific metrics.

Please note that not all advice filings must include the EE Plan. The EE Plan will only be included when it is being revised.

The Company will work to resolve issues with EEAG members before filing. If the EEAG cannot completely recommend approval of a filing, the Company may still choose to make the filing with the WUTC with the understanding that EEAG members may intervene in that public proceeding.

## VII. Annual Schedule for Program Planning

By November 15 of each year, the Company will provide the EEAG with the following proposals for the next program year, which will subsequently be filed with the WUTC in a new docket that will contain all the required reporting for the calendar year, including a link to the Purchased Gas Adjustment (PGA) filing wherein program costs are recovered:

### Budget

The Company will provide a total estimated program budget for the next calendar year. The budget will present expected expenditures by program and customer class.

Please note that this budget forecast will be based on the best information available at the time. As the year progresses, budgeted dollars may be reallocated among various programs or new offerings that are approved by the WUTC.

### Funding Schedule

A funding schedule is a contractually-agreed-to timeline between NW Natural and Energy Trust whereby NW Natural will provide Energy Trust the necessary money for program administration and delivery. The amounts dispersed to the Energy Trust in one year are the sum of all funds needed for that program year determined by subtracting any unspent or uncommitted funds previously dispersed to the Energy Trust for the Washington program from the total forecasted budget.

### Metrics

The Company will propose performance metrics that will address the following:

- Total program costs
- Projected therm savings consistent with most recent IRP
- Average levelized cost for measures



- A ceiling for average cost per therm
- Projected homes to be weatherized in the WA-LIEE program

The Company expects that Total Resource Cost (TRC) and Utility Cost (UC) at the portfolio level should always be greater than 1.0 and will report compliance to this on an annual basis.

The Company will come to agreement with the EEAG on the next year's budget and performance metrics before making a tariff filing with the WUTC to modify this plan so that it incorporates the next year's projected costs and metrics accordingly. This filing will be made annually not later than December 1 for a January 1 effective date.

Generally, milestones for the program year will be as follows:

Program Year Schedule	
January 1	Start of program year
April 25	Annual report for previous program year is filed.
May 25	Q1 report on January 1 through March 31 of current year
August 25	Q2 report on April 1 through June 30 and YTD
October 1	Tariff filing submitted for program cost recovery.
November 1	Requested effective date of program cost recovery filing.
November 15	Share next year's budget range, funding schedule, and proposed performance metrics with EEAG no later than this date
November 25	Q3 report on July 1 through September 30 and YTD
December 1	Latest date to file EE Plan for next program year
January 1	Start of next program year; new EE Plan effective

## VIII. Reporting

The Company will file all required reporting with the WUTC in the docket established for the current program year.

### Quarterly

The Company will report on its program on a calendar year basis. Quarterly reports will be provided to the EEAG and filed with the WUTC on the following schedule:

- 1Q – May 25
- 2Q – August 25
- 3Q – November 25

### Annual

An annual report will be due annually for the previous year by April 25<sup>th</sup>.

### EEAG Review

The EEAG will meet either in person or by teleconference to review the annual report and on an as requested basis.

### Content of Reports

The quarterly reports will include

- Quarterly progress toward annual program metrics
- A breakdown of costs by program and customer sector
- A reporting on percentage of program costs spent on customer incentives
- The funding received to date
- The 2Q report will include a 6 month check in on WA-LIEE
  - program year costs,
  - homes served,
  - estimated total therms saved per home, and
  - total therm savings to-date
- The quarterly report following the annual release of the impact and process report will include a link to that report and a short summary of the findings

The annual report will include the following:

- Budget compared to actual results by program
- Cost-effectiveness calculations on a program by program and total portfolio basis
- Measure level participation (units installed and savings) under each program
- Reporting on achievement of metrics
- Evaluation results (if performed)
- WA-LIEE program results including:
  - total program year costs
  - homes served
  - estimated total therm savings, and
  - average therms saved per home.

## IX. Annual Program Budget

### Budgets

Forecasted program costs for the next calendar year will be reviewed annually in November when metrics are also proposed for the following program year.

### Actual Costs

Each year, the Company will file its annual report by April 25 which will detail costs and acquisitions for the previous program year. This filing will trigger the EEAG's review of general energy efficiency and WA-LIEE program costs.

## X. Cost Recovery

Energy Efficiency and WA-LIEE program costs are deferred and later amortized for recovery from applicable customers on an equal cents per margin basis as established annually in the temporary rate adjustments, Schedules 215 and 230, respectively. Beginning in 2012, the Company will annually submit a stand-alone filing concurrently with its PGA filing, for cost recovery of its energy efficiency program expenses for the prior calendar year. That annual filing will include the following information:

- Background on the Company's energy efficiency programs and cost recovery
- A copy of the prior program year's Annual Report which will include detail on the achievement of performance metrics; the forecasted budget for that year and actual expenditures
- The total dollar amount the Company is seeking to recover
- The total incremental dollar impact that the proposed rate change will have on average residential and commercial customer monthly bills.
- Total average monthly bill of proposed rate for applicable customers.
- Work papers demonstrating the analysis behind the collection rate.

Beginning on January 1, 2013, the Company will include a message on applicable Customers' monthly bills stating how much of their current monthly bill represents costs collected to pay for the residential and commercial energy efficiency programs.

## XI. 2013 Performance Metrics

Below are the 2013 program metrics. Each metric is followed by a statement explaining how it was determined.

- Total residential and commercial program costs will be between \$1,430,092 and \$1,613,437

The total costs for this metric correlate to the range of costs estimated to achieve all cost effective therms for the programs being offered as determined in the Company's 2013 Integrated Resource Plan ("IRP").

- Therms saved will be between 220,421 and 259,319

The program's primary goal is to meet system demand with the least cost conservation as required per WAC 480-90-238(1). The therm savings target is aligned with the

demand-side management targets for the programs offered as identified in the Company's 2011 Modified IRP.

- Average levelized cost for the portfolio of measures will not to exceed \$0.65 per therm

This metric is unchanged from the prior year. The profile of NW Natural Washington service territory makes it harder to reduce the averaged levelized cost per therm than it would be in an area with more industrial customers since therm savings are acquired more cost effectively for bigger customers than for residential customers.

- First year therms will cost less than \$6.50 per therm

This metric is reduced from \$8.00 per therm the first year and \$7.00 the second.

- Total Resource Cost (TRC) and Utility Cost (UC) at the portfolio level are greater than 1.0

The TRC and the UC shall be calculated as prescribed in Schedule G. A value greater than 1.0 demonstrates that the benefits received are greater than the costs. This test is applied at the portfolio level to allow measures that are less cost effective to be bundled with those that are more cost effective.

Schedule I, Washington Low Income Energy Efficiency (WA-LIEE) 2012 Performance Targets

In 2012, the WA-LIEE program will strive to weatherize 15-20 homes for a cost of \$66,975 to \$89,300. Assumptions are as provided below in Table II.

**Table II – WA-LIEE 2013 Performance Targets**

Estimated homes served	15-20
Estimated Average Cost of Incentives per home	\$3,500
Maximum Cost per home (\$3,500 incentives + \$440 health, safety and repairs and \$525 administration costs)	\$4,465
Maximum cost based on estimated homes served	\$66,975 to \$89,300
Estimated therms saved per home	211
Total estimated therms saved	3165 to 4220

## XII. 2013 Budget and Funding Schedule

Below is the 2013 budget for the residential and commercial energy efficiency programs and the WA-LIEE program.

Programs 2013 Budget		
Range	Low	High
<b>Commercial</b>		
Retrofit	\$635,568	\$717,052
<b>Residential</b>		
Retrofit	\$465,617	\$525,312
New Homes	\$328,907	\$371,074
<b>Total For Schedule G Programs</b>		
WALIEE	\$66,975	\$89,300
<b>TOTAL</b>	<b>\$1,497,067</b>	<b>\$1,702,738</b>

Funding Schedule: As of the November 2012, the Company and Energy Trust have not executed a contract to define the 2013 funding schedule but parties expect the funding schedule will mirror what was done in 2012 which was that 50% of budgeted need was provided to Energy Trust on March 1 and the remaining 50% was provided on October 1.

**APPENDIX A to EE Plan**

**The Company's Residential and Commercial Program offers incentives for measures as listed below.**

**RESIDENTIAL PROGRAM INCENTIVES**

The following are offerings for Residential customers:

<b>DESCRIPTION</b>	<b>INCENTIVE</b>
<b>Weatherization</b>	
Air Sealing	\$150 per home
Attic/Ceiling Insulation	\$0.25 per square foot
Duct Insulation	50% of cost, up to \$100
Floor Insulation	\$0.30 per square foot
Knee-Wall Insulation	\$0.30 per square foot
Boiler Pipe Insulation	\$0.50 per linear foot
Wall Insulation	\$0.30 per square foot
Windows (0.25 to 0.30)	\$2.25 to \$3.50 per square foot
<b>Heating</b>	
Gas Furnace	\$100.00
Direct Vent Gas Unit Heater	\$100.00
Direct Vent Gas Fireplace	\$100.00 to \$150.00
Intermittent Pilot Ignition	\$100.00
Gas Boiler	\$200.00
<b>Water Heating</b>	
Gas Water Heater	\$35.00 - \$150.00
Clothes Washer with gas water heat (MEF 2.2+)	\$30.00
Solar Thermal Pool Heating	\$3 per square foot of collector
<b>Direct Install Measures</b>	
Faucet Aerator	Free to customer
Home Energy Review	Free to customer
Showerhead	Free to customer
Shower wand	Free to customer
Water Heater Set Back	Free to customer
<b>Distributor or Retail Buy Down</b>	
Showerhead	\$8.50

## APPENDIX A to EE Plan (Continued)

### RESIDENTIAL NEW CONSTRUCTION

Tankless Hot Water Heating	\$ 200.00 per unit
Energy Star Builder Option Package*	\$ 600.00 per home
Showerhead	Free to customer
Clothes Washer with gas water heat (MEF 2.2+)	\$30.00

\* Building requirements are as stated on this site: [http://www.energystar.gov/index.cfm?c=bop.pt\\_bop\\_washington](http://www.energystar.gov/index.cfm?c=bop.pt_bop_washington)

### COMMERCIAL

#### General

Custom	\$1 per therm
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#### Heating

Steam Traps, Small Commercial, <12 hrs/day, small-med pressure	\$ 100.00 per trap*
Gas-fired Condensing Boiler > 2500 kbtuh 0.9 EC	\$ 4.00 per kBtu hr in
Gas-fired Condensing Boiler < 300 kbtuh 0.9 AFUE	\$ 4.00 per kBtu hr in
Gas-fired Condensing Boiler >= 300 kbtuh, <= 2500 kbtuh 0.9 ET	\$ 4.00 per kBtu hr in
Boiler Vent Damper	\$ 1,000.00 per unit
High Efficiency Unit Heater - Non-Condensing with Electronic Ignition	\$ 1.50 per kBtu hr in
High Efficiency Condensing Furnace <225,000 kBtu	\$ 3.00 per kBtu hr in
Direct-fired Radiant Heating	
Minimum 80% Efficiency, non-modulating	\$ 6.50 per kBtu hr in
Minimum 82% Efficiency, modulating	\$10.00 per kBtu hr in
Pipe Insulation	\$2.00 to \$6.00 per linear foot
Building Envelope insulation	\$0.30 per sq ft
Rooftop Unit Tune Ups	\$1,250 to \$1,050
Greenhouse Thermal Curtain	\$0.9 per sq ft

\* Pre-verification of steam traps required for dry cleaners

#### Water Heating

Domestic Tankless/Instantaneous Water Heater with Electronic Ignition	\$ 2.00 per kBtu hr in
Domestic Tankless/Instantaneous Water Heater with Standing Pilot	\$ 1.50 per kBtu hr in
Condensing Tank	\$ 2.50 per kBtu hr in
Commercial Clothes Washer, Gas Water Heat, Partial Gas	\$ 200.00 per unit
Showerhead Gas	\$ 6.00 to \$10.00 per unit
Commercial Bathroom Faucet Aerators (0.5 gal per minimum; 15 unit minimum)	\$3.00 each
Commercial Kitchen Faucet Aerators (1.5 gal per minimum; 15 unit minimum)	\$5.00 each
Ozone Laundry System	\$40 per pound of washing capacity up to a max of 35% of cost of system
Solar Thermal Pool Heating	\$3 per sq ft of collector

**APPENDIX A to EE Plan (Continued)**

**Food Service**

Gas Full-Size Convection Oven	\$ 300.00 per unit
Gas Fryer	\$ 1,000.00 per unit
Gas Griddle	\$ 150.00 per unit
Gas Steam Cooker	\$ 1,300.00 per unit
Dishwasher - Single Tank Conveyor - Low temp - Gas hot water	\$ 500.00 per unit
Dishwasher - Single Tank Door/Upright - Low Temp - Gas water heat	\$ 400.00 per unit
Dishwasher - Single Tank Conveyor - High temp - Gas hot water	\$ 500.00 per unit
Dishwasher - Single Tank Door/Upright - High Temp - Gas water heat	\$ 400.00 per unit
Dishwasher - Undercounter - high temp - Gas water heat	\$ 200.00 per unit
Turbo Pot – limit one per applicant	\$40 per pot*

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\* Customers installing one other food service measure may receive one free turbo pot while promotional quantities last.

**SPECIAL PROVISIONS**

1. One time bonuses or coupons may be periodically offered to supplement standard incentives.
2. Limited time incentive offerings for measures may be offered.