

Appendix B

Comparison of July 30, 2021 Joint Comments on Customer Benefit Indicators (CBIs) to 10/15/2021 Draft PacifiCorp CBIs

Row #	Primary CBI Category	Joint Comments - Proposed CBI	Joint Comments - Proposed Metrics	Mapping to PacifiCorp Proposed CBIs and Metrics (10/19/2021 DRAFT)
1	Energy Benefit	Improve efficiency of housing stock in utility service territory, including low-income housing		PacifiCorp initially proposed - "Participation in bill assistance, weatherization and energy efficiency programs and grant opportunities." PacifiCorp has modified a current CBI as follows: "Efficiency of housing stock and small businesses, including low-income housing."
2			Increased funding of efficiency programs targeted to low income, both owner and renter.	PacifiCorp plans to track energy efficiency expenditures.
3			Increased participation in programs.	PacifiCorp plans to track participation in programs in Named Communities and has a separate CBI of, "Participation in company energy and efficiency programs and billing assistance programs."
4			Reduction in bills due to actions taken to improve efficiency.	PacifiCorp does not plan to directly track "reduction in bills" but proposes to use the metric of energy burden: see rows 22-27 for the additional detail on those metrics proposed for measuring the "Reduce Number of Households Experiencing High Energy Burden" CBI.
5			Increase number and percentage of appliances converted to efficient models.	PacifiCorp does not plan to directly track the "increase in number and percentage of appliances converted to efficient models" but will track the participation in company energy and efficiency programs and billing assistance programs.
6			Improvement and expansion of EE in rental housing stock.	PacifiCorp plans to track participation in programs in Named Communities, which includes Renters.
7	Energy Benefit	Low income and vulnerable communities have access to an increasing number of renewable or non-emitting distributed generation resources.		The Company has historically supported the creation of state funded renewable energy incentives targeted to low income customers. As the state adopts renewable incentive programs in the future, the Company will evaluate how to encourage their use in our service territory.
8			Increase in number of distributed and community renewable projects.	PacifiCorp does not plan to track this metric. See comments above.
9			Increase in number of community groups and households that own renewable energy projects.	PacifiCorp does not plan to track this metric. See comments above.
10			Increased percentage of electricity generated by distributed renewable energy projects.	PacifiCorp does not plan to track this metric. See comments above.
11	Non-Energy Benefits	Community Employment Opportunities		PacifiCorp evaluated this as a CBI to the non-Energy Benefit category - "Support for job training programs"- but the EAG did not ultimately prioritize it in the ranking exercise. However, PacifiCorp does plan to implement a number of programs to support "community employment opportunities." See rows 12-14 for further details.
12			Increased number of local low-income and vulnerable population representation in clean energy apprenticeships and/or training programs in the state.	PacifiCorp recruitment goals for apprenticeships is aligned with this CBI. We are currently exploring opportunities to support pre-apprenticeship programs in order to increase the competitiveness of under represented individuals for apprenticeships.
13			Increase in the number of living wage/union jobs sustained.	PacifiCorp does not plan to directly track the "number of living wage/union jobs sustained," but as part of the procurement process (All Source RFP), we will document and consider diversity and employment numbers.
14			Increased representation of low-income and vulnerable communities for contractors selected in local program delivery.	PacifiCorp plans to track "headcount of staff supporting program delivery in Washington who are woman, minority, or can show disadvantage" for energy efficiency programs with exception to low income.
15	Non-Energy Benefits	Health and Community Well-Being		In the area of Health and Community Well-Being, PacifiCorp adopted a CBI for Indoor Air Quality.
16			Reduced number of school and work absences due to illness triggered by poor air quality in highly impacted communities.	PacifiCorp does not maintain generating assets in the service territory that directly contribute to poor air quality in the highly impacted communities. PacifiCorp is not aware of medically verified work and school absence data that can be statistically correlated with PacifiCorp actions. PacifiCorp will track the public health CBI via reduction in wood use.
17			Improved housing conditions: health and safety outcomes related to weatherization measure installation.	PacifiCorp plans to track participation in programs in Named Communities.
18			Improved comfort in home (for example, customers' ability to heat/cool as needed, with efficient heat pump technology) due to more affordable bills.	PacifiCorp does not plan to track "comfort in home" but we anticipate programs that incentivize equipment that improves comfort.
19			Increase in number of customers with access to electricity as a transportation fuel in highly impacted communities.	PacifiCorp plans to propose an EV grant program.
20			Increased incorporation of non-energy benefits in utility cost-effectiveness analyses, particularly for low-income weatherization measures and programs.	PacifiCorp does not plan to track "increased incorporation of non-energy benefits in utility cost-effectiveness analysis" as part of the CEIP. Per WAC 480-109-100 (10) low income weatherization is exempt from cost effectiveness calculations and low income funding is not constrained by cost effectiveness. Impact evaluations include non-energy impacts quantified by program evaluator. Reports are posted on web site. PacifiCorp plans to continue this practice and to include additional impacts such as those available from the DNV study underway in the 2020-2021 EIA docket.

21	Reduction of Burdens	Reduction in number of customers suffering from high energy burden		"Households Experiencing High Energy Burden" was adopted as a CBI under the Cost Reduction and Reduction of Burden benefit categories.
22			Reduction in number of customers suffering from high energy burden by:	
23			a. customers in highly impacted communities;	PacifiCorp will track this metric using the DOE LEAD tool in conjunction with our residential survey.
24			b. customers in vulnerable populations;	PacifiCorp will track energy burden by vulnerable population using our residential survey, sample accuracy allowing.
25			c. participants in bill assistance programs;	PacifiCorp will track this metric using LBA participation data.
26			d. known low-income customers; and	PacifiCorp will track this metric using low-income weatherization participation data.
27			e. other residential customers with high energy burden.	PacifiCorp will track energy burden for customers not in vulnerable populations using our residential survey, sample accuracy allowing. We may also refer to the Washington Dept of Commerce's Utility Energy Program Assistance Survey Tool.
28	Reduction of Burdens	Reduced barriers for program participation		PacifiCorp adopted "Participation in Company Energy and Efficiency Programs and Billing Assistance Programs" as a CBI under the benefit categories of Cost Reduction, Reduction of Burden, Non-Energy Benefit, and Energy Benefit.
29			Increased participation in bill assistance, weatherization, and energy efficiency programs and grant opportunities	PacifiCorp plans to track participation in programs.
30			Expand translation services	PacifiCorp adopted "Culturally and linguistically responsive outreach and marketing to increase awareness of energy and conservation programs" as a CBI under the Reduction of Burdens benefit category. PacifiCorp plans to track outreach in non-English languages and percentage of responses to surveys in Spanish.
31			Reduction in cost disparities between customers who have access to EV charging at home on a residential rate and customers who do not have access to EV charging at home.	PacifiCorp plans to propose an EV grant program and plans to track public charging stations in named communities.
32	Public Health	Improved Health outcomes		PacifiCorp adopted "Indoor Air Quality" as a CBI under the benefit categories of Public Health and Non-Energy benefit.
33			Reduction of hospital admissions for asthma.	PacifiCorp does not plan to track this metric because the Company does not have significant emitting resources located within its retail service communities in Washington and is not a large direct contributor to poor air quality issues within its service territory. PacifiCorp is not aware of medically verified hospital admissions for asthma data that can be statistically correlated with PacifiCorp action. PacifiCorp will track the public health CBI via reduction in wood use and an EV grant program to expand electrification is a program under consideration as an action.
34			Decreased wood use for home heating.	PacifiCorp will track this metric through the residential survey.
35			Improvements in indoor and outdoor air quality in communities that experience poor air quality due to pollution.	See response to "reduction of hospital admissions for asthma" above.
36			Reduction in health care cost burden and reduced health care bills.	See response to "reduction of hospital admissions for asthma" above.
37	Environment	Reduction of GHG Emissions		PacifiCorp's CBI for the Environmental benefit category is "Renewable Energy Resources and Emissions." PacifiCorp will track Washington-allocated greenhouse gas emissions associated with its energy production from resources used to serve Washington customers.
38			Continuous reduction in overall greenhouse gas emissions in the utility service area.	PacifiCorp does not have any emitting resources located within its retail service communities in Washington and is therefore not a large direct contributor to greenhouse gas emissions within its service territory. See response above.
39			Increased electrification (gas to electric conversion).	PacifiCorp will track gas to electric conversion for LWX weatherization.
40			Increased electrification of medium- and heavy-duty transport and utility maintenance fleets, and last mile delivery fleets that serve or operate in highly impacted communities.	PacifiCorp does not plan to track this metric as part of the CEIP.
41			Increased electrification of transit services.	PacifiCorp plans to track the number of public charging stations in Named Communities.
42	Environment	Reduced Pollution Burden and Pollution Exposure		PacifiCorp adopted "Indoor Air Quality" as a CBI under the benefit categories of Public Health and Non-Energy benefit.
43			Decrease in share of population and pollution burden, by race/ethnicity, geography and all customer groups (e.g., income level, frontline community, senior citizens, medically vulnerable, rural/ urban, renter/homeowner, race, gender, ability/disability, language spoken, etc.).	PacifiCorp does not plan to track this metric because the Company does not have significant emitting resources located within its retail service communities in Washington and is therefore not a large direct contributor to pollution burden within its service territory. PacifiCorp will contribute to improving air quality through decreased use of wood use for home heating. PacifiCorp will track the public health CBI via reduction in wood use.
44			Decrease in air pollution exposure index, by race/ethnicity and all other customer groups.	See response above.
45			Reduction of particulates from fossil fuel burners in targeted neighborhoods.	See response above.
46			Reduction in airborne particles in neighborhoods next to rail lines that transport coal.	PacifiCorp does not plan to track this metric for this CEIP because the Company does not own or operate any coal resources in Washington and does transport coal via rail through Washington.
47			Improved air quality due to reduction in diesel particulate emissions.	PacifiCorp does not plan to track this metric because it is not a significant source of diesel particulate emissions within PacifiCorp retail service territory.
48	Reduction in Cost	Expand Bill Assistance Programs		PacifiCorp has made the commitment to expand its bill assistance programs separately from this CEIP.
49			Increase participation rates, including among highly impacted communities, vulnerable populations, and all eligible customers.	PacifiCorp plans to track this metric related to increased participation in programs.
50			Increase penetration rates (portion of those eligible participating) overall and among highly impacted communities and vulnerable populations.	PacifiCorp plans to track this metric related to increased penetration rates in programs.
51			Increase annual program budget showing increases over prior years.	PacifiCorp does not plan to track this metric as part of the CEIP. However, PacifiCorp will track program participation.
52			Increase in customers avoiding disconnection (i.e. customers who fall behind, but are ultimately spared disconnection due to assistance).	PacifiCorp adopted "Residential Customer Disconnections" as a CBI under the Energy Security benefit category.

53	Reduction in Cost	Reductions in Number and Amounts of Arrearages		PacifiCorp has not adopted this CBI.
54			Reduction in number and percentage of residential customers with arrearages 90+ days—with breakout for customers by zip code/census tract, renter, highly impacted communities, vulnerable populations, known low income, and BIPOC communities.	PacifiCorp does not plan to track this metric. However, PacifiCorp plans to focus efforts on reducing disconnections and has adopted a CBI specific to disconnections.
55	Reduction in Risk	Fewer customers with low utility credit code scores / fewer customers sent to collections		PacifiCorp adopted "Residential Customer Disconnections" as a CBI under the Energy Security benefit category.
56			Reduction in number and percentage of residential customers with the lowest and second lowest utility credit code scores. -With particular attention to highly impacted and low-income communities.	PacifiCorp does not plan to track this metric. Focusing on a reduction in the number of customers disconnected and reducing overall costs for electricity will have a greater impact on customers than an internal credit review. Credit scores have little impact on customers being disconnected.
57			Utility assessment and review of its credit code score system.	PacifiCorp will include a review of the internal credit code as part of an overall disconnect reduction plan that is under development.
58			Reduction in number and percentage of customers sent to collections for residential customers, including customers in highly impacted communities.	PacifiCorp does not plan to consider this metric. It is important to note that it is only when a customer closes an account and leaves an unpaid bill that the debt is referred to a collection agency.
59	Reduction in Risk	Increase Neighborhood Safety		PacifiCorp adopted "Frequency of outages, duration of outages, and customer impact of outages" as a CBI for the benefit categories of Energy Resiliency/Risk Reduction and Energy Benefit.
60			Reduction in frequency and length of outages due to major disasters, wildfires, and extreme weather events through cost-effective investments to reduce risk.	PacifiCorp plans to track SAIDI, SAIFI, and CAIDI at the area level to include Named Communities. These metrics will be presented to include major events and exclude major events.
61			Increased capacity of local community to respond to local disasters or weather events.	Although PacifiCorp does not plan to track this metric as part of this CEIP, PacifiCorp will continue to evaluate opportunities to improve reliability where the absence of that effort could create unintended capacity consequences to the community. PacifiCorp routinely documents the effectiveness of its hardening efforts.
62	Energy Security	Reduced Residential Disconnections		PacifiCorp adopted "Residential Customer Disconnections" as a CBI under the Energy Security benefit category.
63			Reduction in number and percentage of residential customer disconnections.	PacifiCorp will consider this as a metric as it develops its residential customer disconnection program.
64			Reduction in number and percentage of residential customer disconnections by location (and demographic info) of residential customer disconnections (zip code/census tract; renter; known low-income; highly impacted communities; and BIPOC customers).	PacifiCorp will consider this as a metric as it develops its residential customer disconnection program.
65			Reduction in risk of disconnection as evidenced by increased participation in arrearage management and Percentage of Income Payment programs.	PacifiCorp will consider this as a metric as it develops its residential customer disconnection program.
66	Energy Security	Improved access to reliable clean energy		PacifiCorp adopted "Renewable Energy Resources and Emissions" as a CBI related to the Environment benefit category.
67			Increase number of neighborhoods with storage/backup/locally powered centers for emergencies.	PacifiCorp is not planning to track this metric as part of this CEIP. The Company is considering a program to support the installation of customer sited storage that can be leveraged by the utility to provide grid benefits, as well as provide increased resiliency for the host. Tracking program participation will occur if that program moves forward.
68			Increase distributed generation in low-income neighborhoods.	The Company has historically supported the creation of state funded renewable energy incentives targeted to low income customers. As the state adopts renewable programs in the future, the Company will evaluate how to encourage their use in our service territory.
69			Optimize grid investments on the distribution system through increased distribution system planning.	PacifiCorp does not plan to track this metric as part of this CEIP. However, the Company is in the process of developing its Distribution System Plan in other jurisdictions and plans to incorporate lessons learned relative to optimal grid investments and through the equity.
70	Resilience	Reduce frequency and duration of blackouts or brownouts in target communities		PacifiCorp adopted "Frequency and duration of energy outages" as a CBI for the Energy Resiliency/Risk Reduction and Energy Benefit categories.
71			Improve SAIDI and SAIFI, particularly in communities that have experienced long loss of service in the past.	PacifiCorp plans to track SAIDI, SAIFI, and CAIDI at the area level to include Named Communities. These metrics will be presented to include major events and exclude major events.
72	Resilience	Reduction in energy and capacity need		PacifiCorp adopted "Participation in Company Energy and Efficiency Programs and Billing Assistance Programs" as a CBI under the benefit categories of Cost Reduction, Reduction of Burden, Non-Energy Benefit, and Energy Benefit.
73			Increased participation in targeted demand response, load management, and behavioral programs that result in a measurable reduction to peak demand.	PacifiCorp plans to track participation in demand response, load management, and behavioral programs.
74			Increased acquisition of energy efficiency savings.	The Company is developing specific Demand-Side actions that will be presented in this CEIP.
75			Increased water savings due to water efficiency measures.	PacifiCorp does not plan to track this metric as part of this CEIP.

Note: This mapping exercise compares the July 30, 2021 Joint Comments to PacifiCorp's refined CBIs posted in the October 2021 slide deck for the Equity Advisory Group Meeting 6A. CBIs, metrics and any related actions remain subject to change as the CEIP is drafted.

PAC Clean Energy Implementation Plan Summary of Customer Benefit Indicators & Public Comments

Advocates

17 CBIs
57 Metrics

After reviewing peer utilities' draft CEIPs, PacifiCorp removed "directionality from the move-forward CBIs and metrics, to allow tracking and measurement to be more objective and easier to interpret." (pp. 35)

PAC

9 CBIs
17 Metrics

"PacifiCorp compared the Joint Advocate CBIs and metrics to those being considered by PacifiCorp. This mapping exercise resulted in refinements to several of PacifiCorp's CBIs and the adoption of additional metrics as reflected in Table 2.3". (pp.35)

PAC proposed a baseline analysis for the 17 metrics on pp. 35-45.

Key Findings

1. Some of PAC's CBIs are not as extensive or detailed as the Joint Advocates' (JA). The JA offer steps on *how* to achieve the CBI.
2. The Joint Advocates proposed CBIs and metrics *not* mentioned by PAC. PAC addresses some of these in other areas within the Draft CEIP (home comfort, reduced healthcare costs, water savings).
3. 49% of the metrics proposed by the Joint Advocates were at least partially addressed by PAC. Some JA metrics were not applicable to PAC.

1. Some of PAC’s CBIs are *not* as extensive or detailed as the Joint Advocates’. The JA offer steps on *how* to achieve the CBI.

Example 1: All metrics pertaining to the “Environment” category

PAC	Joint Advocates
<ul style="list-style-type: none"> • Amount of renewables/non-emitting resources serving Washington • Washington allocated greenhouse gas emission from Washington allocated resources • Number of public charging stations in named communities 	<ul style="list-style-type: none"> • Continuous reduction in overall greenhouse gas emissions in the utility service area • Increased electrification (gas to electric conversions) • Increased electrification of medium- and heavy-duty transport and utility maintenance fleets, and last-mile delivery fleets that serve or operate in highly impacted communities • Increased electrification of transit services • Decrease in share of population and pollution burden, by race/ethnicity, geography and all customer groups • Decrease in air pollution exposure index, by race/ethnicity and all other customer groups • Reduction of particulates from fossil fuel burners in targeted neighborhoods • Reduction in airborne particles in neighborhoods next to rail lines that transport coal • Improved air quality due to reduction in diesel particulate emissions

2. The Joint Advocates proposed CBIs and metrics *not* mentioned by PAC. PAC addresses some of these in other areas within the Draft CEIP.

The missing CBIs and metrics pertain to:

- Improved health outcomes, pollution burden ¹
- Vehicle electrification
- Credit scores ²
- Home comfort ³
- Reduced healthcare costs ⁴
- 90+ day arrearages
- Water savings ⁵

¹ PacifiCorp does not plan to track metrics for this CBI “because the Company does not have significant emitting resources located within its retail service communities in Washington and is not a large direct contributor to poor air quality issues within its service territory.” (PAC Mapping to JA CBIS, pp. 2. 10/24/21)

² “PacifiCorp does not plan to track this metric. Focusing on a reduction in the number of customers disconnected and reducing overall costs for electricity will have a greater impact on customers than an internal credit review. Credit scores have little impact on customers being disconnected.” (PAC Mapping to JA CBIS, pp. 3. 10/24/21)

³ Not mentioned in CBIs but was mentioned in CEIP (pp. 20, 56, 60)

⁴ Not mentioned in CBIs but was mentioned in CEIP (pp. 62)

⁵ Not mentioned in CBIs but was mentioned in CEIP (pp. 20)

3. 49% of the metrics proposed by the Joint Advocates were at least partially addressed by PAC's metrics.

CATEGORY	JA CBIs	JA METRICS	DID PAC PROPOSE THIS, TOO?
ENERGY BENEFITS	Improve efficiency of housing stock in utility service territory, including low-income housing:	Increased funding of efficiency programs targeted to low income, both owner and renter.	Yes (CBI 3)
		Increased participation in programs	Yes (CBI 3)
		Reduction in bills due to actions taken to improve efficiency.	No
		Increase number and percentage of appliances converted to efficient models.	No
	Low income and vulnerable communities have access to an increasing number of renewable or non-emitting distributed generation resources:	Improvement and expansion of EE in rental housing stock.	Yes (CBI 3)
		Increase in number of distributed and community renewable projects.	No
		Increase in number of community groups and households that own renewable energy projects.	No
NON-ENERGY BENEFITS	Community Employment opportunities:	Increased percentage of electricity generated by distributed renewable energy projects.	No
		Increased number of local low-income and vulnerable population representation in clean energy apprenticeships and/or training programs in the state	Partially (CBI 2)
		Increase in number of living wage/union jobs sustained.	No
	Health and Community well-being:	Increased representation of low-income and vulnerable communities for contractors selected in local program delivery	Partially (CBI 2)
		Reduced number of school and work absences due to illness triggered by poor air quality in highly impacted communities.	No
		Improved housing conditions: health and safety outcomes related to weatherization measure installation.	Partially (CBI 4)
		Improved comfort in home (for example, customers' ability to heat/cool as needed, with efficient heat pump technology) due to more affordable bills.	No
		Increase in number of customers with access to electricity as a transportation fuel in highly impacted communities.	No
		Increase in number of customers with access to electricity as a transportation fuel in highly impacted communities.	No
		Increase in incorporation of non-energy benefits in utility cost-effectiveness analyses, particularly for low-income weatherization measures and programs.	No
REDUCTION OF BURDENS	Reduction in number of customers suffering from high energy burden by:	customers in highly impacted communities;	Yes (CBI 6)
		customers in vulnerable populations;	Yes (CBI 6)
		participants in bill assistance programs;	Yes (CBI 6)
		known low-income customers; and other residential customers with high energy burden.	Yes (CBI 6)
	Reduced barriers for program participation:	Increased participation in bill assistance, weatherization, and energy efficiency programs and grant opportunities.	Yes (CBI 3)
		Expand translation services	Yes (CBI 1)
PUBLIC HEALTH	Improved Health outcomes:	Reduction in cost disparities between customers who have access to EV charging at home on a residential rate and customers who do not have access to EV charging at home	Partially (CBI 5)
		Reduction of hospital admissions for asthma.	No
		Decreased wood use for home heating.	Yes (CBI 7)
		Improvements in indoor and outdoor air quality in communities that experience poor air quality due to pollution.	No
		Reduction in health care cost burden and reduced health care bills.	No

ENVIRONMENT	Reduction of GHG emissions:	Continuous reduction in overall greenhouse gas emissions in the utility service area.	Partially (CBI 5)
		Increased electrification (gas to electric conversions).	Yes (CBI 4)
		Increased electrification of medium- and heavy-duty transport and utility maintenance fleets, and last-mile delivery fleets that serve or operate in highly impacted communities.	No
		Increased electrification of transit services.	Partially (CBI 5)
	Reduced Pollution Burden and Pollution Exposure:	Decrease in share of population and pollution burden, by race/ethnicity, geography and all customer groups (e.g., income level, frontline community, senior citizens, medically vulnerable, rural/ urban, renter/homeowner, race, gender, ability/disability, language spoken, etc.).	No
		Decrease in air pollution exposure index, by race/ethnicity and all other customer groups.	No
		Reduction of particulates from fossil fuel burners in targeted neighborhoods.	No
		Reduction in airborne particles in neighborhoods next to rail lines that transport coal.	No
		Improved air quality due to reduction in diesel particulate emissions.	No
REDUCTION IN COST	Expand Bill Assistance Programs:	Increase participation rates, including among highly impacted communities, vulnerable populations, and all eligible customers	Yes (CBI 3)
		Increase penetration rates (portion of those eligible participating) overall and among highly impacted communities and vulnerable populations	Yes (CBI 3)
		Increase annual program budget showing increases over prior years	No
		Increase in customers avoiding disconnection (i.e. customers who fall behind, but are ultimately spared disconnection due to assistance)	Yes (CBI 9)
	Reductions in Number and Amounts of Arrearages:	Reduction in number and percentage of residential customers with arrearages 90+ days—with breakout for customers by zip code/census tract, renter, highly impacted communities, vulnerable populations, known low income, and BIPOC communities	No
REDUCTION IN RISK	Fewer customers with low utility credit code scores / fewer customers sent to collections:	Reduction in number and percentage of residential customers with the lowest and second lowest utility credit code scores	No
		Utility assessment and review of its credit code score system.	No
		Reduction in number and percentage of customers sent to collections for residential customers, including customers in highly impacted communities	No
	Increase Neighborhood Safety:	Reduction in frequency and length of outages due to major disasters, wildfires, and extreme weather events through cost-effective investments to reduce risk.	Yes (CBI 8)
		Increased capacity of local community to respond to local disasters or weather events.	No
ENERGY SECURITY	Reduced Residential Disconnections:	Reduction in number and percentage of residential customer disconnections.	Yes (CBI 9)
		Reduction in number and percentage of residential customer disconnections by location (and demographic info) of residential customer disconnections (zip code/census tract; renter; known low-income; highly impacted communities; and BIPOC customers).	Yes (CBI 9)
		Reduction in risk of disconnection as evidenced by increased participation in arrearage management and Percentage of Income Payment programs.	Partially (CBI 9)
	Improved access to reliable clean energy:	Increase number of neighborhoods with storage/backup/locally powered centers for emergencies.	No
		Increase distributed generation in low-income neighborhoods.	No
		Optimize grid investments on the distribution system through increased distribution system planning.	No
RESILIENCE	Reduce frequency and duration of blackouts or brownouts in target communities:	Improve SAIDI and SAIFI, particularly in communities that have experienced long loss of service in the past.	Partially (CBI 8)
	Reduction in energy and capacity need:	Increased participation in targeted demand response, load management, and behavioral programs that result in a measurable reduction to peak demand.	Yes (CBI 3)
		Increased acquisition of energy efficiency savings.	Partially (CBI 4)
		Increased water savings due to water efficiency measures.	No