

Interrogatories from the Low-Income Energy Network (“LIEN”)

For the purpose of these interrogatories, “residential” includes single-family dwellings and multi-occupancy other than low income.

INTERROGATORY #1

Please point in the evidence to, or otherwise provide details of, the number and type of residential participants in the DSM program, exclusive of low-income.

INTERROGATORY #2

Please confirm that, in addition to removing the allocation of funds for low-income consumers from the DSM budget, Union has also adjusted all related metrics (for example, but not limited to, number of participants and TRC) to exclude low-income consumers. Please provide supporting figures.

INTERROGATORY #3

Please point in the evidence to, or otherwise provide details of, the number of participants, costs and incentives in the Union DSM program for residential consumers, (a) in aggregate, (b) broken out into residential types (eg. single-family dwelling, multi-occupancy etc.), and, in each case, (c) broken out into basic and deeper measures.

INTERROGATORY #4

Please point in the evidence to, or otherwise provide details of, what residential communities will be targeted for outreach in the Union DSM program and how outreach of those selected communities will be achieved.

INTERROGATORY #5

Please point in the evidence to, or otherwise provide details of, and trend for growth or otherwise in the numbers reached by and participating in Union’s residential DSM programs. Please supply supporting figures.

INTERROGATORY #6

Please point in the evidence to, or otherwise provide details of, how Union measures the effectiveness of its programs in terms of the benefit to residential consumers beyond costs saved by the measures.

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