

Program Response Memo

Recommendation 1: Improve reporting methods to capture all program savings | Given the size and significance of unreported program savings, BPA should encourage participating utilities to report all program activity and savings even after exhausting their EEI budgets. BPA may also capture these savings by improving measure tracking in IS2.0 (see Recommendation #2) and comparing to the Simple Steps program data.

Program Response: We agree and also encourage that all program activity be reported to BPA to benefit the region. This would help greatly to accurately capture all savings, and we would welcome any utility efforts to provide sales data for non-EEI funded units with us. Historically this has been a challenge as it is not a formal requirement for utilities to share this information with BPA.

Recommendation 2: Improve measure tracking | BPA should enhance their measure tracking processes. This could include adding unique reference numbers for Simple Steps to the IS2.0 database. This would allow for BPA to clearly identify the amount of savings reported to the Simple Steps program.

Program Response: We agree this would be helpful to improve BPA's internal process in identifying Simple Steps generated savings from other utility run retail efforts that use the same reference numbers (RefNos). To adopt this recommendation, the number of lighting, showerhead, and appliance measures in the UES measure list would be doubled. BPA will undertake a process to consider options (including, but not limited to unique reference numbers) to improve this situation and will weigh the pros and the cons of changes. At that time we will solicit feedback from utilities to understand their preferences and impacts of any changes.

Recommendation 3: Increase awareness of delivery components other than Retail | Awareness of non-retail program components is low. BPA should increase awareness through education and marketing of its non-retail program components to increase participation in the program among these segments.

Program Response: We agree, and are looking at how best to reach utilities with this message.

Recommendation 4: Improve marketing to guide customers toward their best suited delivery component | Many perceive that the program is not suited for rural or small utilities. BPA could alter the program marketing to promote program components that better fit the needs of utility customers¹.

Program Response: We agree. Retail distribution at brick and mortar stores alone may not be the best fit for all utilities, and we have expanded the program to include additional non-retail offerings for online and bulk purchasing. These options are available to all, but may be especially helpful for rural and small utilities. We will continue to work with our participating utilities to try to find new ways to meet their needs, with a continued focus on the needs of small and rural utilities.

¹ Since this writing, BPA has planned to launch a "no-cost" kit for non-retail delivery components intended to help small and rural utilities reach a wider customer base.

Recommendation 5: Improve utility branding across all delivery components | BPA should encourage the implementation contractor to increase the amount of utility branding across all components of Simple Steps and provide tools and advice for utilities to engage in “meta-marketing”² techniques using wider BPA promotional efforts.³

Program Response: We understand how paramount utility attribution is to our utility customers and we will continue to put forth program effort to include and improve utility branding wherever possible. The implementation contractor focuses on negotiating with Retailers on space for placement of utility logoed advertising materials, and makes a concerted effort to see that those materials remain in place with the field services team. Constraints on additional materials in stores are often due to circumstances of internal store policies, and they are regularly revisited to assess if any further changes can be made to serve our utilities. Advertising materials now de-emphasize the Simple Steps brand and put full color utility logos front and center. We will continue to spend program effort on enhancing utility branding throughout the program.

Recommendation 6: Increase communication regarding field staff visits to retail stores | The evaluation team recommends increasing the communication between public utilities and the implementation contractor around field staff visits to retail stores in their service territory to take advantage of opportunities to bolster program marketing with retail staff.

Program Response: We agree and have communicated this to the implementation contractor.

Recommendation 7: Incentives Assessment | To enable analysis of the efficacy of different program promotions, the evaluation team recommends improving the tracking of program promotions such as dates, incentive levels, marketing approach, and any other relevant store-level data.

Program Response: We agree and have communicated this to the implementation contractor.

Recommendation 8: Clearly identify monthly sales reports to reduce participant confusion and improve reporting capabilities | Participating IOUs reported issues with monthly sales reports that were untimely or variable, in addition to not meeting their own reporting requirements. Interviewees reported that not knowing when a monthly sales report is final makes it more difficult to manage their budgets as the program year progresses. The program should either issue a single preliminary and final monthly sales report when records are complete, or clearly identify each iteration of the report with a version number and date. Further, the program currently produces monthly sales reports tailored to the BPA reporting standard, which can be inconvenient for IOU participants to use for their internal reporting and could be a potential barrier to participation. BPA and the implementation contractor should work closely with participating utilities to understand the reporting requirements and provide more applicable sales reports.

² The term “meta-marketing” describes the marketing efforts BPA uses to promote Simple Steps across the entire region. Utilities can add their own logos in tandem to these marketing efforts to reach a wider audience.

³ Since this writing, BPA has planned to provide new point of purchase displays with large, full color utility logos. Further, BPA plans to increase program budget to improve overall program marketing efforts.

Program Response: We are surprised to hear this, as we have received positive feedback from our participating IOU's about the data sharing and invoicing processes currently in place. We are investigating the concerns raised about IOU reporting needs to see how best to collaborate with them.