

REV Demonstration Project Implementation Plan

Residential Customer Marketplace

Date: November 20, 2015

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REV Demonstration Project Implementation Plan Residential Customer Marketplace

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Executive Summary

This Project Implementation Plan ("Plan") for Orange and Rockland Utilities, Inc.'s ("O&R" or the "Company") Residential Customer Marketplace Reforming the Energy Vision ("REV") Demonstration Project ("Project") sets forth the demonstration design, roles and responsibilities, demonstration work plan, budget, and reporting plan.

Staff of the Department of Public Service ("Staff") reviewed the outline of the Project, dated July 1, 2015, and deemed it in compliance with Ordering Clause 4 of the Public Service Commission's ("Commission") Order Adopting Regulatory Policy Framework and Implementation Plan issued February 26, 2015 in the Reforming the Energy Vision ("REV") Proceeding. This Plan is a living document and may be updated throughout the duration of the project execution due to new developments. Test hypotheses, population, and scenarios, while based on market analysis and estimation, may be subject to change over the course of the demonstration, requiring updates to this Plan.

O&R, in partnership with Simple Energy, will implement the Project. The Project is designed to establish and to continue to expand, a network of third party product and service partners accessible through a Customer Engagement and Marketplace Platform ("CEMP") in order to:

- Increase customer awareness and education of energy consumption issues;
- Motivate customers to participate in O&R programs;
- Increase distribution and adoption of distributed energy resources ("DER"); Develop new revenue streams for O&R and its partners and;
- Encourage third party product and service provider participation without significant barriers of entry.

The Project will be executed in the following phases:

Phase 0: Strategy— design and develop program components;

Phase 1: Launch – implement marketplace with limited offerings;

Phase 2: Category Expansion – integrate data analytics and implement a complete line of product and service offerings, activate Green Button download for participating customers;

Phase 3: Decision on Project Expansion – evaluate program performance to determine next steps, launch additional products, Third Party and ESCO offerings, active Green Button download for all residential customers;

Phase 4: Advanced Metering Infrastructure ("AMI") Integration – upon implementation of AMI, evaluate rate design plans for peak time rebates (time of use ("TOU") analytics), include customer TOU enrollment functionality; and

¹ Case 14-M-0101 - Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision.

Phase 5: Revenue Optimization – streamline product and service lines to maximize revenue opportunities.

The Project will test the following hypotheses:

- An O&R-sponsored marketplace that matches specific DER and energy efficiency (EE) solutions to eligible customers will launch the adoption of DER products on the marketplace;
- A marketplace sponsored by O&R will encourage customer participation in DER and EE offerings and generate new utility revenue opportunities through the engagement of TPS installers
- A combined marketplace that provides customers with DER and EE offerings, instantaneous and enhanced rebates, easy to use interactive tools and options, and access to recommended third party supplier ("TPS") installers will drive a rewarding customer experience leading to ongoing customer interactions.

The Project aims to achieve the following benefits:

- Provide customers with high quality products and services that promote EE and demand reduction;
- Facilitate the use of customer owned DER products and services while allowing O&R to obtain effective management of the grid and defer investment in traditional utility infrastructure;
- Reduce carbon emissions through reduced customer energy usage, contributing towards overall emission reduction in the State of New York;
- Establish an animated and active market for energy products and services within the O&R service territory;
- Develop a new model for EE and DER delivery that leverages information-based tools, enhanced by targeted incentives, to drive tailored customer experience; Elucidate the effective roles utilities can assume in building customer motivation and streamlining customer action;
- Test transaction, fee, and advertising based models and potentially expand the testing
 into financing, integration to supply management, and other ways to monetize the asset
 value beyond only rate-base; and
- Potentially demonstrate the benefits of integrating future offerings that may use smart metering, demand response, time of use rates, and other aspects of the customer experience.

Section 1: Demonstration Design

A) Test Statements

An important objective of the demonstration project is to test alternative revenue stream opportunities for O&R. The main hypothesis is that there is a potential to generate revenue from product vendors, third party supplier TPS installers, Energy Service Companies (ESCOs) and DER providers through advertising, customer/vendor transactions, and bundled solutions with ongoing service fees. Specific tests supporting that overarching hypothesis are outlined in the table below.

	Test Statement	Hypothesis
1)	We believe that a marketplace that matches specific DER and EE solutions to eligible customers will launch the adoption of DER products on the marketplace within six months of implementation of the test.	If digital and direct mail ("paper") marketplace offerings for programmable thermostats and other energy efficient products are targeted to customers with high energy usage and tailored to meet specific customer usage patterns which will provide energy savings, Then there may be as many as 4,600 transactions on the marketplace within the first six months of operation, with 13,500 in-platform actions expected at the end of year one.
		If customers with high usage patterns >1,000 kWh per month, electric hot water heating, and customers receiving TOU rates are matched to energy efficient appliances and other DER offerings, Then sales and enrollment in EE and demand response programs during the first six months of operation could produce 1386 MWh of energy reductions and 4,500 MWh by the end of year one.
		If the marketplace and digital communications are effectively designed and strategically dispatched on a periodic basis, Then e-mail open rates of 30%-40% may be achieved and click-to-open rates (clicks/opens) are expected to range between 20%-30%. Tools that will be used to achieve this will include weekly communications of normative comparisons (to neighbors), rewards for responsiveness, and appeals to environmental impacts. Strategies include customer segmentation and micro targeting (focus on specific appliance replacement such as air conditioning ("A/C") and personalization (calling out increased use in consumption) and other types of targeted messaging.
		If the in-platform marketplace advertising and digital and paper advertising is targeted to identify specific product energy savings for central A/C, pool/well pumps,

	Test Statement	Hypothesis
		programmable thermostats, window A/C, refrigerators and dehumidifiers, Then product sales of up to \$238,000 can be expected to be generated over the first six months and potentially up to \$720,000 by the end of year one.
2)	We believe a marketplace sponsored by the Company will encourage customer participation in DER and EE offerings and generate new utility revenue opportunities through the engagement of TPS installers.	If DER and EE offerings are combined with product rebates that can be applied at the time of marketplace checkout and customers are encouraged to make larger purchases and utilize TPS installers' advertising on the marketplace for referrals and project conversion Then as many as 25 TPS installers can be expected to advertise during the first six months and as many as 50 by the end of year one, producing advertising revenues of up to \$12,000 and \$25,000, respectively. If the proper mix of products and services (e.g., solar, central A/C, pool/well pumps and home energy savings services) are offered, requiring TPS installations Thenthe estimated revenue generated from TPS installer advertising referrals and conversions is expected to equal \$50,000 at the end of year one, with approximately 40% of the revenue generated by the sale of solar, 40% central A/C, 15% pool/well pumps and 5% through home services.
3)	We believe that a combined marketplace that provides customers with DER and EE offerings, instantaneous and enhanced rebates, easy to use interactive tools and options, and access to recommended TPS installers will deliver a rewarding customer experience leading to ongoing customer interactions.	If products and offerings are easily accessible and appeal to customer purchasing preferences and are linked to rebates that can be applied at the point of sale and coupled with qualified TPS installers if needed Then customers will view the marketplace as a single source for energy insight, and, therefore, are likely to return to the marketplace three to four times per year to interact, purchase additional products and services, view testimonials, perform usage analyses or browse new products and services to learn about new technologies and savings opportunities.

B) Test Population

Identifying customers with similar energy usage attributes is an important aspect of the Residential Customer Marketplace engagement process. The demonstration program consists of four target groups within a population pool of 80,000 customers. The first group will consist of TOU metered customers and customers with electric hot water heating. The second group will be customers with average monthly usage greater than 2,000 kWh. The third target group will be customers with average monthly usage between 1,500-2,000 kWh. The fourth group will be customers with average monthly usage between 1,000-1,500 kWh. The four target groups will be engaged sequentially and will be selected based on the energy usage attributes outlined in the table below.

Test Population Description	Selection Method
Test Population Description Test population in support of Test Statement 1: The test population will include all 80,000 residential customers.	80,000 customers will be selected in the following sequence. The first target group will be customers on residential TOU service, in addition to customers with electric hot water heating; the second group will be customers with average monthly usage greater than 2,000 kWh; the third group will be users with average monthly usage in the 1,500-2,000 kWh range; and the fourth group will be customers with average monthly usage between 1,000-1,500 kWh. Utility historical usage data and program participation data will be used to select the test population. As part of our implementation plan, a third party consultant, Cadmus, will conduct the evaluation, measurement and verification process. Based on the consultant's recommendations, O&R will establish the
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Test population in support of Test Statement 2:	Identify customers with average monthly usage in
Of the 80,000 targeted customers, the test population will include customers with average monthly usage in excess of 2000 kWh, customers with electric hot water heating, and customers on TOU service.	excess of 2,000 kWh, identify electric water heating customers from the Customer Information Management system based on electric water heating rate, and all residential TOU customers.

Test Population Description	Selection Method
Test population in support of Test Statement 3:	Selected from utility customer and mapping system based on circuit information.
Of the 80,000 targeted customers to be targeted in	
the Demonstration Project, customers from each of the four groups will be statistically sampled.	Customers will be randomly sampled to determine marketplace ease of use, product and service offerings and overall effectiveness of meeting customer expectations. Information will be compiled through surveys conducted by O&R and marketplace surveys conducted by Simple Energy.

C) Test Scenarios

In implementing the Project, the Company will execute test scenarios along the four main paths described in the table below.

Scenario	Scenario Description	
Behavioral Engagement Platform	Beginning in April 2016, 80,000 customers will receive energy insight reports. Of those 80,000, approximately 60,000 customers (with usage >1000 kWh per month, hot water heating, or receive TOU rates) will receive digital energy insight reports. The remaining 20,000 customers will receive paper energy insight reports. The Company will test whether the customers receiving digital communications or the customers receiving paper communications will visit the marketplace more often and whether one of the two groups makes more multiple purchases than the other.	
	The Company will also test the efficacy of different advertising and messaging that will encourage the 20,000 paper-based users to migrate to a digital notification channel.	
Marketplace Platform Advertising	Beginning in March 2016, 25 TPS installers will begin advertising on the marketplace. The Company will test which DER and EE products and services generate the highest level of referral and conversion revenue.	
Marketplace Platform Advertising/Customer Experience	Beginning in April 2016, targeted marketing efforts, including customized digital and paper messaging for customers in load pocket areas, will focus on enhanced rebates for solar, central A/C, demand response enrollment and other EE products. The Company will test whether purchases on the marketplace that are based on customized digital and paper messaging, enhanced rebates, and targeted product offerings in the targeted areas, are more likely to motivate a purchase on the marketplace compared to non-targeted messaging.	
Search Engine Optimization ("SEO") and Social Media Advertising	Starting in January 2016, targeted advertisements will be placed in search results and social media including, but not limited to, Google, Bing and Facebook. The Company will test the extent to which targeting advertisements through these media outlets increase sales of products on the marketplace.	

D) Check Points

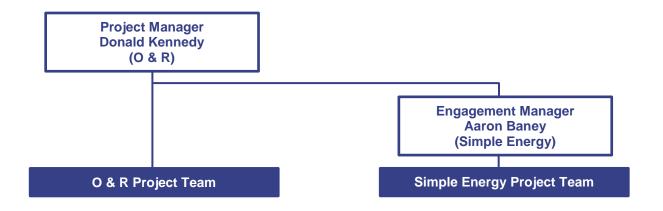
The Project will be managed by O&R in partnership with Simple Energy. The two companies will establish a project management team and governance structure (see Section 2) to review and monitor implementation of the Project. Key checkpoints, listed below, identify points at which the Project team will evaluate implementation execution and determine the need for implementation strategy adjustments. Each checkpoint has key metrics tied to it, checkpoints that do not meet expected targets will undergo further analysis to ascertain impacts on the Project and identify root causes.

Check Point	Description
Test Statement 1 and 3	Measure: Click through rates on marketplace – Critical for success of the Project to measure the effectiveness of advertising and messaging How and When: Meet quarterly targets using data analytic tools Volume: Q1- 1,800, Q2- 2,800, Q34,000, Q4- 5,000 Solution/Strategy if expectations are not met: Evaluate messaging, offerings and pricing, visual site layout, evaluate most frequently visited portals to understand customer interest
Test Statement 2	Measure: TPS installer advertising on site How and When: Meet quarterly targets using data analytic tools Volume: Q1- 25, Q2- 30, Q3- 40, Q4- 50, generating annual advertising revenue of \$25,000 Solution/Strategy if expectations are not met: Evaluate pricing strategy, evaluate offerings and evaluate/establish optional advertising levels, obtain feedback from TPS installers
Test Statement 1	Measure: Product sales forecast in units How and When: Meet quarterly targets using data analytic tools Volume: Q1- 1,800, Q2- 2,800, Q3- 4,000, Q4- 5,000 Solution/Strategy if expectations are not met: Evaluate and add/change offerings, evaluate and add/change price structure, conduct customer survey to obtain direct suggestion/feedback, add additional marketing/public relations ("PR") channels
Test Statement 1 and 3	Measure: Revenue target – Critical for success of project to meet financial targets How and When: Quarterly using sales revenue analytics Volume: Q1- \$100,000, Q2- \$140,000, Q3- \$215,000, Q4- \$266,000 Solution/Strategy if expectations are not met: Evaluate messaging, offerings and pricing, identify product shortfall, change/ add product new products and services, add additional marketing/PR channels

Section 2: Project Structure & Governance

A) Project Team

The Project is a partnership between O&R and Simple Energy. Each partner provides key skillsets and is responsible for certain Project functions in order to implement a successful demonstration. O&R will maintain overall responsibility for demonstration execution and Simple Energy is a key contributing partner. The high-level Project Team and alignment is depicted below.



Utility Skillsets		
Program Management/Implementation		
Evaluation, Measurement, and Verification		
Consumer Marketing and PR		
IT Integration and Management		
E E and Demand Response Program Integration		
TPS Installer Management		
Customer Engagement/Support		

Partner Skillsets		
Ecommerce Merchandising and Copywriting		
Consumer Marketing and SEO Advertising		
Customer Support		
Program Management		
IT Integration and Management		
Financial Analysis		

In light of the skillset requirements, the project will be staffed as follows:

Utility	Relevant Skillsets	Contact Information (Email and Phone)
Don Kennedy	Program Management, TPS Installer	845-577-3064
Project Lead	Management	kennedyd@oru.com
Sandra Eason-Perez	EM&V, Finance	845-577-3634
Evaluation, Measurement and Verification ("EM&V") Lead		Easonperezs@oru.com
Meridith Nierenberg	Customer Support	845-577-3266
Customer Support Manager		Nierenbergm@oru.com

Utility	Relevant Skillsets	Contact Information (Email and Phone)
TBD	Consumer Marketing and PR	TBD
Marketing Manager/Ecommerce		
Bob Melvin	IT Integration and Management	845-577-3373
IT Manager		Melvinr@oru.com
Charmaine Cigliano	Energy Efficiency and Rebate	845-577-3121
EE/DR Subject Matter Expert	Programs	Ciglianoc@oru.com

Partner	Relevant Skillsets	Contact Information (Email and Phone)
Engagement Manager	Program Management, IT Integration and Management, Customer Support	Aaron Baney aaron@simpleenergy.com
Marketing Manager	Consumer Marketing and SEO Advertising, Copywriting	Courtney Staufer Courtney@simpleenergy.com
Merchandising Specialist	Ecommerce Merchandising	Julia Coff Julia.Coff@simpleenergy.com
Customer Service Manager	Customer Support	Leor Manelis Leor@simpleenergy.com
Finance Manager	Financial Analysis	Adam Block adam@simpleenergy.com
Engagement Director	Program Management, IT Integration and Management	Mike Konrath mike@simpleenergy.com

B) Roles & Responsibilities

The Project Implementation Team has developed a work plan with specific tasks and activities aligned to the Project timeline and overall success. The breakdown of roles and responsibilities for both O&R and Simple Energy is provided below.

Utility	Description
Marketing Manager Role #1	Identify target customer group through the use of rate code and usage history. Initial target group will include customers with an email address on file and with usage in the following categories, electric water heating, TOU, >2000 kWh, 1500-1900 kWh and >1000 kWh.
Marketing Manager Role #2	Identify products and services to be introduced and when. This includes evaluating the products and services to be included in the initial Project phase and products and services to be introduced in the subsequent phase.
IT Manager Role #3	Monitor and confirm usage data file transfer and encryption of data, coordinate all customer system integration and validate data transfer.

Utility	Description
Marketing Manager Role #4	Review and approve marketing documents and timing of notifications, provide changes and recommendations, design and develop ongoing corporate program messaging, review and validate usage reports, prepare and distribute internal documentation, conduct internal training.
Customer Support Manager Role # 5	Establish participation criteria, conduct initial and ongoing information sessions, establish review and maintain contractual requirements, create and maintain price point for advertising, referral and conversion fees.
EE/DER Subject Matter Expert Role # 6	Evaluate product rebate requirements, monitor and report on rebates applied by product type, evaluate and integrate rebates into new product offerings.
EMV Lead Role # 7	Work with Company selected contractor to perform EMV of program and provide feedback on program performance to Simple Energy.

Partner	Description
Engagement Manager Role #1	Oversee and manage the execution of the program by evaluating user experience, marketplace activity, ongoing vendor product review and management (vendor agreements, negotiations) and evaluate and resolve issues relating to the operation of the marketplace. This function also includes managing and updating the program schedule and implementation plan, managing the technical integration of activities, product and service offerings available in the marketplace and monitoring and maintaining project roll-out timeline. Serves as Key Point of Contact to O&R
Marketing Manager Role #2	Develop the program and customer marketing strategy which includes marketplace ad design, customer paper communications, digital communications, ad design, selecting effective advertising venue and securing advertising media. Track, monitor and report on marketing success metrics, which includes open and click rates, marketplace actions, product interest and effectiveness of various advertising collateral.
Merchandising Specialist Role #3	Identify, recommend and negotiate product and service merchandising agreements, develop and maintain relationships with product vendors and create and monitor reseller agreements and assist when needed to interface with TPS installers to provide assistance when needed to assist with program.
Customer Service Manager Role #4	Develop and maintain customer support strategy, processes and procedures for the purpose of providing customer support functions to ensure a positive customer experience. In addition, provide training to utility staff and manage and monitor marketplace support staff, responsible for responding to inquiries received via phone, email and chat. Provide management oversight of the Simple Energy support team responsible for working with O&R.
Finance Manager Role #5	Recommend product and service price point and margins, develop and implement program management metrics and assist utility, as needed with EM&V evaluation and reporting.

Partner	Description
Engagement Director Role #6	Provide oversight for Simple Energy Team through the review of program metrics, reports and marketplace activity, provide program assistance and guidance as required and assist utility with resolving escalated issues.

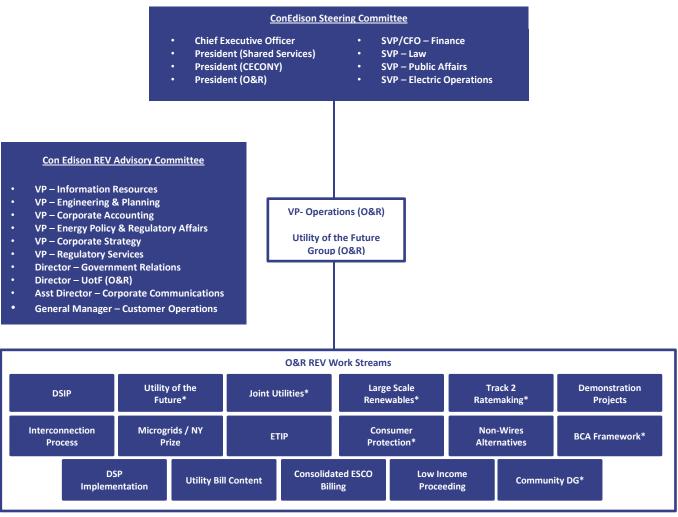
C) Governance O&R, and its affiliate Consolidated Edison Company of New York, Inc. ("Con Edison"), have overall responsibility for execution of the Project as indicated in Figure 2A below. The governance structure encompasses the Project Management Team. The Project Management Team has day-to-day execution responsibility that includes coordinating tasks and activities and conducting overall project management. The Project Management Team will continuously coordinate activities throughout implementation execution. The Project Management Team meetings will be held in-person, via conference calls, WebEx, or other communication means. The Project Management Team will be responsible for coordinating on quarterly reporting and advocating within each company's governance structure.

Utility Governance Structure

The O&R governance structure consists of a department with REV initiative oversight, a Con Edison corporate cross-functional advisory committee, and a Con Edison corporate senior leadership steering committee. The governance structure allows for full engagement by senior leadership, engagement by appropriate internal stakeholders, and the tracking of outcomes and project execution. O&R and Con Edison will manage the process as depicted in figure 2B below.

Figure 2A – REV Governance

O&R REV Oversight



^{*}Denotes a shared work stream with CECONY

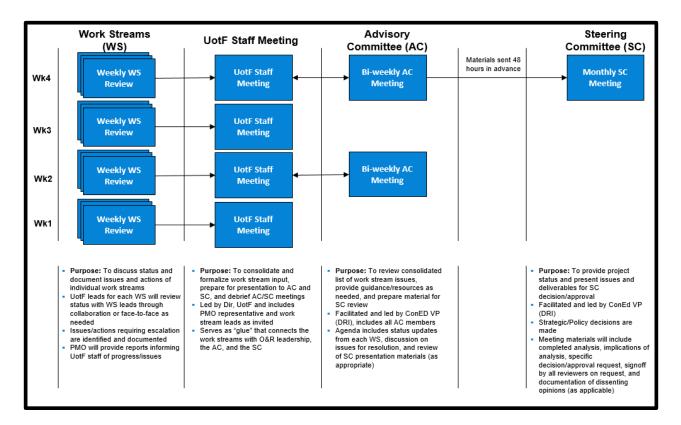


Figure 2B – O&R / Con Edison REV Demonstration Governance Process

The Project Manager is under the Vice President, Customer Service, which reports to O&R's President. Additionally, the Utility of the Future group ("UoF") provides coordination, planning, progress tracking, and governance support to all REV initiatives, including the Project.

Decision Making Body									
Utility Participants	Partner Participants								
VP Customer Service	President								
Director Demand Response and EE	Engagement Director								
Manager Demand Response and EE	Engagement Manager								
Director - Utility of the Future Team									

Decision Making Logistics										
Meeting format	Conference calls and periodic in-person meetings									
Meeting frequency	Monthly and quarterly, (first day of each month) can be scaled back if needed									

Section 3: Work Plan & Budget

A) Project Plan

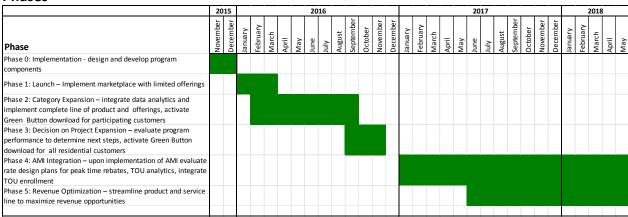
A sample Gantt chart illustration has been included below for reference and can be provided to Staff as an electronic template that can be used to track the work plan and budget.

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Milestones

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Milestone or CheckPoint *		November	December	January	February	March	April	May	June	July	August	September	October	November	December	January	February	March	April	May	June	July	August	septe mber	October	November	December	January	February	March	April	May
Marketplace Launch	1/15/2016																															
Add Additional Products - Add Fixed Price Services	2/5/2016																															
Marketplace Quarterly Check in	3/22/2016																															
Add Variable Priced Services	4/1/2016																															
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Markeplace and Engagement Platform Quarterly Check in	12/21/2017																															
Program Review and Report	5/15/2017																															
* These timelines are pending and subject to change as the pr	ogram evolves																															

Phases



B) Project Budget

Section 4: Reporting Structure

A) Report to Commission

Quarterly reports will be filed with the Commission Secretary for the period of the Project. Reporting will conclude upon either Project conclusion or inclusion of final Project costs in a rate order. O&R is responsible for consolidating all inputs for submission to the Commission.

The quarterly report will provide the Commission and Staff an update on implementation progress. The report will highlight progress according to the Work Plan and Budget, detailing deviations and noting task and activity progress. In addition, the report will capture key project data including: revenue requirements, in-service dates, incremental costs incurred, operational savings, tax benefits, as well as other project benefits that are observed. The quarterly report template outline is as follows:

1.0	Execu	tive Summary
2.0		nstration Highlights
	2.1	Since Previous Quarter
		2.1.1 Major Tasks Completion
		2.1.2 Activities Overview
		2.1.3 Sub-Activities Overview
	2.2	Next Quarter Forecast
		2.2.1 Checkpoints Progress
		2.2.2 Milestones Progress
		2.2.3 Planned Activities
		2.2.4 Expected Changes
	2.3	Issues
3.0	Work	Plan & Budget Review
	3.1	Phase Review
		3.1.1 Activity 1.0
		 Progress Assessment
		• Issues
		3.1.1.1 Sub-Activity 1.2
		 Progress Assessment
		• Issues
		3.1.1.2 Sub-Activity 1.3
	3.2	Work Plan
		Table 3.2.A – Updated Work Plan
4.0		Table 3.2.B – Updated Budget
4.0	Conclu	
	4.1	Lessons Learned
	4.2	Recommendations

The quarterly report will focus on the phase(s) occurring within the previous quarter or scheduled to occur within the next two quarters. Quarterly reports will focus on the current progress while providing insight into the near future. The governance structure and program management team will maintain oversight over all phase progress and include in Section 2.3 of the template (Issues) any impacts on the implementation execution beyond the report's timeline.

Checkpoint, milestone and activity progress will provide detailed status information to inform the commission and Staff of implementation progress and highlight issues, such as incremental costs or shifts in the timeline. A stoplight chart will be used to detail progress for activities in the quarterly reports. O&R will provide narrative information to support the progress report with Simple Energy related data, which will be provided in confidentiality to Staff.

Checkpoint/Milestone/Activity Progress Example

Checkpoint: Marketplace and	Engagement Transactions
Target: 1,800 Transactions	
Progress Status:	
Budget Impact: (Yes / On-Tar	get / No Impact)
Incremental Cost Incurred: \$	XXXX incurred due to expanded marketing campaign to increase awareness and
engagement	
Previous Quarter Updates:	
Future Quarter Impacts:	

Reporting Details Examples

Key Project Milestones	Target	Actual Achieved
Customer marketplace	Q1 1,800, Q2 2,700, Q3	
engagement/transactions	4,000, Q4 5,000	
Sales revenue	Q1 \$94,000 Q2 \$144,000,	
	Q3 \$216,000, Q4 \$266,000	
TPS installer engagement, advertising on	Q1 25, Q2 30, Q3 40, Q4 50	
marketplace		
TPS installer advertising revenue	Q1 \$12,500, Q2 \$15,000, Q3	
	\$20,000, Q4 \$25,000	
Messaging click through to open rates	Q1 20%, Q2 25%, Q3 26%,	
	Q4 26%	
Number of in – platform actions	Q1 1,800, Q2 2,700 Q3	
	4,000, Q4 5,000	
Customer energy savings (MWH)	Q1 546,Q2 840, Q3 1,260, Q4	
	1,554	

Project Finances	Target	Actual	Gap
Spend to date			
Revenue to date			

Summary of Prior Activities	
Activities	
Milestones	
Lessons Learned	
Changes Made Based on Lessons Learned	

Summary of Future Activities	
Activities	
Milestones	
Risks	
Actions to Mitigate Risk	

The Project Management Team will be available to respond to any follow-up questions after Staff has had an opportunity to review individual quarterly reports. In addition to the quarterly data which will be tracked and reported above, O&R will include the data outlined in the metrics created through the joint utility/staff collaborative effort and will include the key lessons learned which will be used to provide program recommendations for utility peers.