

# Translating EM&V Insights into Strategic Business Intelligence for Utility Leaders

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## ABSTRACT

Utility leaders are facing an increasingly challenging environment to meet their Demand Side Management energy savings and performance goals due to a range of market factors. This paper examines how improved reframing and translating of Evaluation, Measurement & Verification insights can help leaders better navigate these challenges. This paper draws on the experience of a large dual-fuel investor-owned utility that invests in DSM above regulatory minimums. We demonstrate some strategies for and the value of translating evaluation insights into corporate decision-making frameworks. This approach appears promising with early indications of improved cross-functional collaboration, enhanced decisionmaking and increased regulatory innovation.

## Introduction and Background

Some utilities view DSM programs as primarily regulatory obligations, while others view them as strategic business assets with multiple value streams. This later group are using their energy efficiency product portfolio as a key contributor to customer satisfaction, an enabler of energy affordability, a tool for economic development, a profit center, and an important component of integrated resource plans. This transformation requires a corresponding evolution in how evaluation supports business decisions.

Traditional evaluation has been invaluable in underpinning the regulatory framework for DSM programs, demonstrating to regulators that investments are cost-effective and achieving intended outcomes. As utilities invest in DSM, especially when above regulatory minimum requirements, evaluation must expand its role to help executives manage this business to maximize the value and minimize the risks of these strategic investments.

One challenge lies in translation. Evaluation professionals and regulators often use language and metrics that don't align well with corporate management frameworks. This misalignment can limit the utility of evaluation insights for strategic decision making, particularly among stakeholders less familiar with the more technical components of energy efficiency regulatory constructs but responsible for major investment decisions.

This paper explores a large dual-fuel utility's EM&V department ongoing journey to reframe and translate evaluation insights to support better cross-functional and cross-organization understanding and collaboration that then leads to better outcomes. We review several specific examples used for maximizing claimable energy savings, driving innovation in program operations, technology development, and mitigating business and regulatory risk.

## Understanding a Utilities DSM Stakeholders

Effective translation of EM&V insights requires understanding the diverse stakeholders involved in DSM investment decisions, their functional/management perspectives, and their goals. The following are just a few common decision makers operating at different organizational levels and some of the types of information and metrics they need.

**Senior Executives** include leaders on the company's executive team with oversight or responsibilities connected to the DSM business and most typically include the CEO, senior leaders of

Customer Experience or its equivalents, Energy Supply, Customer Operations, Sales, Regulatory and Legal. This group focuses on numerous objectives including overall company success and more specific outcomes such as customer satisfaction, grid reliability, affordability, corporate profitability, competitive positioning, regulatory outcomes, and risk management. They are best served when they understand how specific potential DSM investments, strategies and risks connect to overall corporate performance.

Evaluation insights must be translated into the specific language they use and integrated into broader company strategic processes including, but not limited to, long term strategic plans, lean quality management systems, annual and monthly scorecards, compliance processes, Integrated Resource Plans, financial planning, risk management, long-term budgets, and other key corporate processes.

**DSM Management** encompasses DSM leadership, sector directors, innovation managers, and program managers, and marketing managers who are closer to day-to-day operations but still make strategic decisions about program design and resource allocations. As those in the industry well know, these stakeholders are typically one of the EM&V team's primary internal stakeholders along with supporting regulatory and compliance teams.

DSM managers, their teams and their implementation consultants have an increasingly difficult job. They are charged with achieving aggressive savings goals in the face of declining market potential due to factors including past market penetration of their own programs/products, naturally occurring energy efficiency and significantly, higher federal standards for baseline energy efficiency of lighting and appliances that have removed key cost-effective products and product tiers from their portfolios. They are also facing significant business and regulatory pressures to ensure their programs and products are cost-effective and achieve other performance metrics in the face of inflation, tariffs, and other economic headwinds.

They are partners with EM&V in contributing to and using some of the same insights as needed by senior leadership regarding DSM products and the businesses they manage but also need much more granular insights. They also need a blend of longer-term strategic insights and guidance as well as more immediate metrics and insights for tactical decisions about multi-year portfolio planning, regulatory reporting, program modifications, technology investments, innovation needs, vendor performance management, and optimal marketing strategies.

**Energy Resource Managers** often work within Energy Supply functions or their equivalents and lead cross-functional integrated resource planning (IRP) teams that look to DSM as part of the utility's overall resource portfolio. They and other members of their planning and operations teams need evaluation insights that demonstrate how energy efficiency compares to other resource options in terms of cost, reliability, and long-term value. For resource planners, evaluation must provide data on forecasted DSM energy savings by year, capacity factors, peak demand impacts, and cost per MWh and MW that enables direct comparison and integration with supply-side resources.

Each group responds to slightly different concerns and metrics. Senior executives focus on issues like corporate profitability, rate affordability for customers, competitive rates for business and industrial customers, and regulatory relationships. DSM managers are concerned with program cost-effectiveness, customer satisfaction, market penetration, and operational challenges. Resource planners need data on savings persistence, load shape impacts, and resource planning assumptions.

The key to effective translation lies in understanding these different perspectives and presenting evaluation insights in formats that resonate with each stakeholder group's priorities and decision-making frameworks.

## **Positioning Evaluation for Utility Decision Making**

As decision makers approach DSM as a business decision and not just a regulatory requirement, evaluation can be important to providing the insights needed to support key decisions. This section outlines a few ways to reframe the role of evaluation to support this decision making.

## Financial Value of DSM

For all decision makers, one of the most important ways to make evaluation insights useful is to translate them into the financial implications for the company and for customers. For a utility like Consumers Energy with a DSM performance incentive, connecting insights to the impact on performance incentives is one valuable way to help support decision making. To do this, it is critical for evaluation teams to understand how their utility's performance incentives are calculated and to ensure evaluation activities provide insights on factors that positively and negatively impact this incentive.

For example, to help leaders understand the implications of evaluation findings, the Consumers Energy's Product Research and Evaluation team has begun to create formulas to translate evaluation concepts like installation rates into performance incentive dollar impacts. We recently communicated how a 10% change in average installation rates translates to \$5.8 million impact on the annual performance incentives target. This translation better communicated the importance of careful program controls, evaluation and needed portfolio adjustments to ensure that provided/rebated energy efficient equipment is correctly installed and stays installed at customer facilities by appropriate verification and by ensuring that users of that equipment receive sufficient training to ensure they are comfortable using it.

Incorporating other financial data into EM&V work appears to be another significant opportunity to enhance value and relevance. For example, we were recently asked to identify underutilized measures among the hundreds of business energy efficiency measures in our product catalog. Because evaluators don't always have easy access to program cost data, it was tempting to do this analysis primarily using volumetric data by year. However, we realized that DSM managers must prioritize measures with favorable costs of acquisition (\$/kWh) to ensure that their programs and portfolios remain cost effective. So, we found useful cost data at the measure level from within recent plan data and are incorporating that into this analysis to help us find the underutilized measures with the right cost profile to be attractive to management and customers.

## Maximizing Claimable Energy Savings

One of the most direct ways EM&V supports business objectives is by maximizing claimable energy savings, which directly translates to performance incentives and corporate profits. This requires evaluation approaches that optimize both the accuracy of savings claims and the strategic positioning of programs to capture maximum value. Framing evaluation as a way to maximize the energy savings that will be claimable—and *maximizing the return on investment in DSM*—increases its relevance.

Rigorous impact evaluation ensures that claimed savings will withstand regulatory scrutiny during certification processes. Consumers Energy achieved 100.5% of claimed savings validation during certification in Program Year 2023, enabling the utility to capture \$58 million in annual performance incentives. This level of accuracy requires sophisticated evaluation methodologies but generates substantial financial returns that justify the investment.

Custom project evaluation deserves particular attention because custom savings often represent the largest individual savings claims and face the highest regulatory scrutiny. Early custom review processes that produce agreement on savings methodologies before project implementation reduce the risk of savings disallowance during certification. Given that custom projects can represent millions of dollars in performance incentives, this proactive evaluation approach provides substantial value. Framing this work as a way to maximize the utility's return on investment has helped translate the value to a wider range of stakeholders.

Market potential studies and program design research help identify opportunities for expanding successful programs or modifying underperforming ones. By understanding which measures and delivery

mechanisms generate the highest savings per dollar invested, evaluation guides resource allocation decisions that maximize overall portfolio performance.

Process evaluation also contributes to maximizing claimable savings by identifying operational improvements that increase participation rates and installation quality. Since performance incentives depend on actual achieved savings rather than planned savings, operational excellence directly affects financial performance.

## **Risk Management and Asset Protection**

One powerful reframing opportunity is to highlight evaluation's value in risk management and asset protection. Performance incentives are often recognized by utility finance teams as a Regulatory Asset. Mitigating risks to assets and financial performance is understandably important to senior leadership. Thus, being able to show how evaluation serves as an early warning system and helps mitigate risk to DSM savings is crucial in helping senior executives feel confident in investing in DSM as an asset. The DSM business model relies on several critical assets, all of which evaluation helps to protect, such as trust with regulators, non-contested filings, positive public reputation, accurate savings estimates, and high installation rates.

**Regulatory Compliance Risk** represents the most direct application of evaluation for risk mitigation. Regular impact evaluation provides confidence that programs will meet regulatory requirements and avoid penalties or savings disallowances. Process evaluation identifies compliance issues before they affect program certification, enabling corrective action that protects performance incentives.

Trust with regulators enables non-contested filings and smoother rate case proceedings. Evaluation helps maintain this trust by providing independent verification of program performance and early identification of potential compliance issues. The financial value of regulatory trust is substantial—for example, Consumers Energy recovers \$327 million annually through energy efficiency reconciliation filings, making regulatory relationship management a high value evaluation function.

**Reputational Risk** management involves customer satisfaction tracking and program quality monitoring. Customer complaints about unwanted equipment or poor installation quality can damage utility reputation and trigger regulatory investigations. Evaluation identifies these issues early and guides corrective action that protects customer relationships and regulatory standing.

**Financial Risk** mitigation includes load forecasting validation, cost-effectiveness monitoring, and market potential assessment. These evaluation functions help ensure that DSM investments generate expected returns and don't expose the utility to unexpected costs or performance shortfalls.

For accurate savings estimates, evaluation provides certainty that enables better forecasting and efficient use of funds. Poor savings estimates create regulatory risk and financial exposure. For example, for Consumers Energy a 10% loss in custom project savings could result in \$4.5 million in lost performance incentives annually, making the investment in rigorous custom project evaluation highly justified from a risk mitigation perspective.

High installation rates represent another critical asset. Evaluation demonstrates that customers actually install recommended equipment and that installations generate expected savings. When installation rates decline, performance incentives decline proportionally. annually the evaluation team helped decision makers understand the importance of protecting this asset by communicating how a 10% decrease in average installation rates equals \$5.8 million in lost performance incentives annually, making customer engagement and program design evaluation essential for asset protection.

**Operational Risk** assessment involves implementation partner performance monitoring, quality control processes, and supply chain reliability tracking. These evaluation activities help maintain program delivery capability and identify potential operational disruptions before they affect program performance.

## **Innovation and Strategic Planning**

As DSM becomes an important part of utility business and not just a regulatory requirement, strategic planning and innovation become more intertwined with utility investment levels. For utilities with the regulatory flexibility to exceed minimum targets, instead of DSM managers asking the question “what do we have to do to meet statutory targets,” now stakeholders across the utility are interested in “what is the optimal level of DSM for us to invest in?” With the latter, utilities may choose to invest more in innovation and market development if the return on investment is compelling.

EM&V insights inform innovation in both program operations and technology development, supporting the utility's long-term competitive position in energy efficiency markets. This innovation function becomes increasingly important as traditional efficiency measures face market saturation and utilities seek new sources of cost-effective savings.

Evaluation supports technology innovation by testing emerging efficiency measures and delivery mechanisms through pilot programs. Rigorous pilot evaluation provides data on savings potential, customer acceptance, operational feasibility, and cost-effectiveness that inform decisions about full-scale program deployment. This reduces the risk of major investments in unproven technologies while enabling early adoption of promising innovations.

Program design innovation benefits from evaluation insights about customer behavior, market barriers, and effective delivery mechanisms. Customer research identifies unmet needs and preferences that inform new program concepts. Process evaluation reveals operational bottlenecks and improvement opportunities that enhance program effectiveness and customer satisfaction.

Market transformation evaluation tracks changes in baseline practices and technology adoption that affect long-term savings potential. This intelligence helps utilities anticipate market changes and adjust strategies accordingly, maintaining competitive advantage in evolving efficiency markets.

Strategic planning also benefits from evaluation insights about measure life, savings persistence, and interactive effects that affect long-term resource planning assumptions. These inputs enable more accurate forecasting of DSM contributions to resource adequacy and capacity planning.

## **Reframing Evaluation Tools for Business Decision Making**

Successfully integrating EM&V into corporate decision making requires adopting business frameworks that align with how utilities manage other strategic investments. This section examines specific examples of how Consumers Energy has reframed common evaluation tools to support business objectives while maintaining regulatory compliance.

### **Adopting Corporate Frameworks: Product Lifecycle Management**

To help translate evaluation into the language and concepts that resonate with decision makers throughout a utility, it can help to use the management framework(s) used within the organization. As with many businesses, utilities often employ corporate management tools, processes, and frameworks to develop and implement strategy and operations. If evaluation processes and outputs can adopt the terminology and processes of utilities' current management frameworks, this can help make them more understandable and useful across the organization.

One successful example of this within Consumers Energy involves translating evaluation activities into Product Lifecycle Management (PLM) frameworks already used across the corporation.<sup>1</sup> PLM treats

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<sup>1</sup> Consumers Energy uses the Product Lifecycle Management framework developed by the Pragmatic Institute: <https://www.pragmaticinstitute.com/resources/articles/product/what-is-the-product-life-cycle/>.

DSM programs as products that move through typical lifecycle stages: development and introduction, growth, maturity, and decline. This framework provides familiar language and processes for corporate stakeholders while maintaining the rigor of traditional evaluation.

Within this framework, evaluation serves multiple PLM functions. For market problem identification, evaluation validates that energy efficiency addresses urgent, pervasive customer problems for which the market is willing to pay. This requires understanding energy savings potential as part of willingness-to pay calculations and connecting customer value propositions to measurable energy outcomes. Table 1 below shows how the EM&V team is working to map its traditional tools to the various stages of the PLM framework.

The evaluation team plays a critical role in assessing whether solutions result in the utility receiving payment through energy savings that translate to financial returns via performance incentives. This requires customers to find offerings valuable enough to invest time and effort in participation, commit to financial investments where required, and implement solutions that generate verifiable energy savings.

Table 1. Mapping EM&V Tools to PLM Steps

PLM Component	PLM Definition	Applicable EM&V Tools
Market problems	Discover, collect, analyze & communicate problems found in the market. Validate these problems are urgent, pervasive & the market is willing to pay to address them.	Participant research Non-participant research Non-energy impacts Savings evaluations
Win/Loss Analysis	Uncover real reasons products win or lose in the marketplace & the journey buyers took to make decisions.	Process evaluation Journey mapping
Distinctive Competencies	Identify/leverage abilities your organization has developed, but your competitors have not, that deliver value.	Participant research Benchmarking & peer research
Market Definition	Segment markets into groups that share common problems. Prioritize and analyze these segments to identify the most attractive targets for your offerings.	Participant research Non-participant research Segmentation analysis Savings evaluations
Product Profitability	Monitor, manage and analyze KPIs to determine how well the product is performing, how it impacts company operations and ultimately how it contributes to profit.	Impact evaluation KPI tracking
Innovation	Look for creative approaches to solve market problems and fund and build products.	Pilot evaluation Peer and market research User experience testing
Positioning	Create clear and concise articulation of market problems you intend to solve. Use that to drive all internal processes, from product approval to development to go-to-market.	Logic Modeling KPI development Process evaluation
Requirements	Provide documentation and context of market problems to empower designers & developers to create the right solutions.	Participant research Non-participant research Peer and market research

As an example of how this works in practice, Figure 1 shows how the evaluation team translated process evaluation results into Consumers Energy’s PLM Win/Loss model. By using the same model being used across elsewhere in the division, this allowed DSM management to more easily assimilate the results into their product planning processes and for the EM&V team to be more responsive to planning needs.

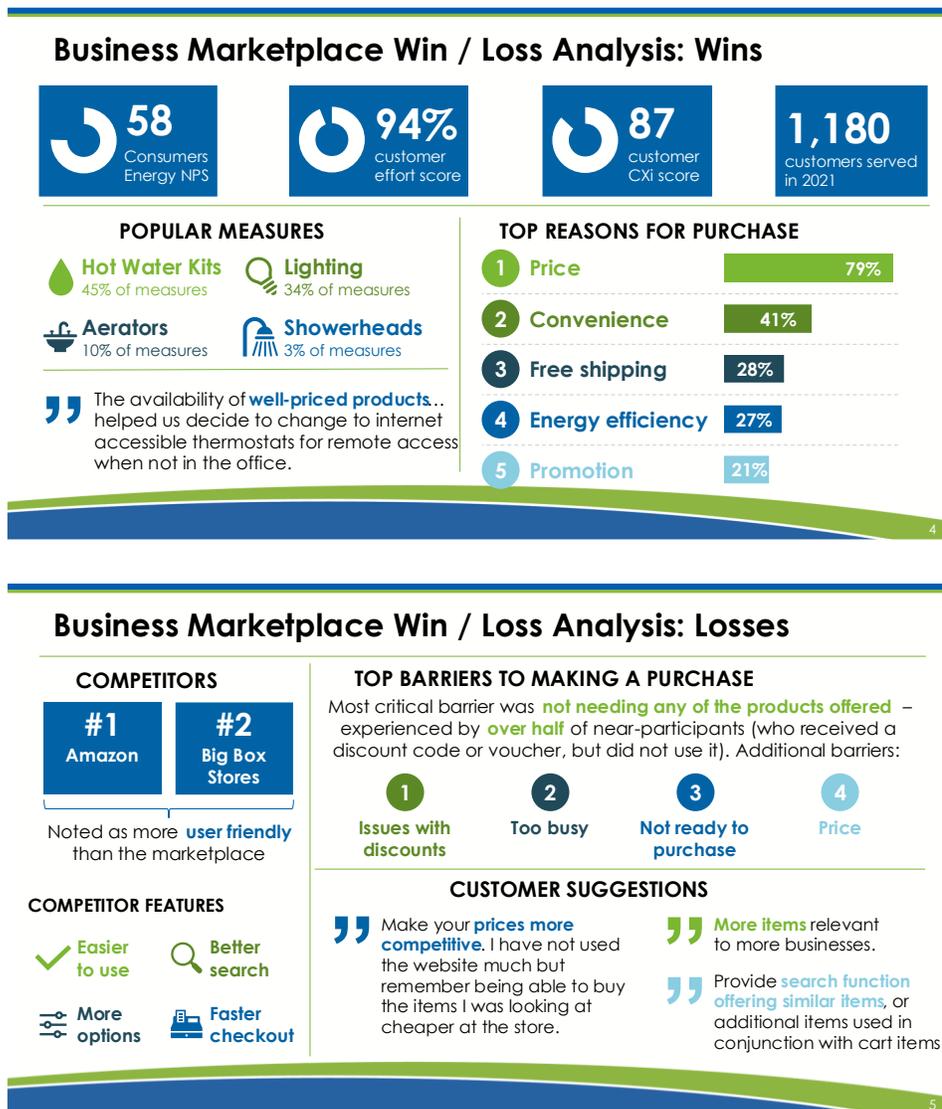


Figure 1. Example of Translating Evaluation Results into Win/Loss Analysis

## Adopting Corporate Frameworks: The CE Way

As another example of adopting the terminology and processes of utilities’ current management frameworks, the evaluation team is on a journey to better translate and integrate evaluation activities and findings into Consumers Energy’s corporate-wide lean quality improvement processes, called the CE Way.

The CE Way is a lean quality improvement process that’s currently prioritizing the following four foundational lean quality elements that support continuous improvement:

- Visual management
- Operational reviews
- Problem solving
- Standardized work and waste elimination

The CE Way underpins planning and decision making throughout the organization. As such, the evaluation team has found success in (1) adopting this language when explaining evaluation activities to stakeholders, as well as (2) aligning research with how DSM programs use this framework.

First, the evaluation team uses the CE Way in its own operations, which helps corporate decision makers see the function as an integrated part of the business, and not a regulatory requirement. This includes:

- Visual management scorecards and dashboards that mirror those used throughout the organization to track and proactively manage progress on key indicators. All vendors maintain and regularly update these scorecards just as any internal department would.
- Active participation in operational review meetings including CE stakeholders from across the business.
- Regular assessments of opportunities to standardize and increase efficiency in evaluation activities and implementation, such as embedding experimental designs within research efforts to test differences in cost vs. response rates for different data collection methods that can inform decisions in future study design.

Second, the evaluation team has adopted practices to support DSM programs use of the CE Way. This includes developing concise, highly visual summaries of key research findings that the DSM program teams can easily incorporate into their visual management tools. The evaluation team is also a regular participant in the program team’s regular operating reviews, which helps ensure that research insights and evaluation perspectives are available to the program teams during key decision-making periods, as well as helps the evaluation team ensure that planned and ongoing research address the program team’s priorities and can be used as a problem-solving tool.

As part of the CE Way, each business unit follows a business plan deployment method that includes defining and managing detailed key performance metric trees. To align with this, the evaluation team has worked to map planned evaluation and research activities to the energy efficiency program team’s KPIs, which helps them easily understand how to assimilate evaluation findings to support their business plan deployment needs. Table 2 shows a sampling of how evaluation activities have been mapped to program key performance indicators.

Table 2. Example of Mapping Research Activities to Program KPIs

Research Name	Research Details	Related KPIs tracked by CE Program Teams
Requirements for Online Application	Identify minimum requirements for application and identify what accelerates timelines	Days to process application
Midstream Requirements review + Zip Code Analysis	Review requirements for the Midstream program, complete zip code analysis & identify potential changes	EWR pipeline EWR participation EWR Savings
Paper Manufacturing Segment Insights	On-site with paper manufacturer and in-depth interview with Trade Ally	EWR Participation by segment "Untapped Potential"
Paper Manufacturing Literature Review	Literature review and/or benchmarking to identify streamlined measure mix for paper manufacturing	EWR Participation by segment EWR Savings by segment
Nucleus savings reviews and support	Review savings calculations in Nucleus and support continued updates to measures	Quarterly EWR Savings

Measure Gap analysis and Workpaper Development	Develop workpapers for 2026 MEMD based on measure gap analysis	Measure Mix EWR Savings
Midstream measure changes impacts research	Review impact of adding measures to Midstream on Core savings	Paid EWR Savings vs Goal EWR Participation Quarterly EWR Savings Cost-effectiveness

The evaluation team uses both impact and process evaluation as a way to identify opportunities to standardize work and explore opportunities for reducing waste. In a recent process evaluation, for example, the evaluation team identified that 282 out of 1,159 data fields could be removed from the C&I energy efficiency program application without comprising savings accuracy. As shown in Figure 2, by framing this as a waste win opportunity for the program team, the value of the work is easily understood throughout the organization and helps senior executives feel comfortable in their return on investment from energy efficiency investments.

**Process review work optimizes programs.**

*EXAMPLE: APPLICATION REQUIREMENTS REVIEW*

**CHALLENGE:**  
Current program application requirements are burdensome for Trade Allies.

**SOLUTION:**  
Streamline application based on TRC review of MEMD requirements.

**IMMEDIATE IMPACT:**  
24% reduction in fields required for application & used in marketing to increase participation

TRC recommended removing 282 out of 1,159 data fields. The largest reductions were in **Compressed Air, Building Envelope & Insulation, and Lighting Controls.**

By reducing these requirements, trade allies are more likely to submit more projects, leading to greater savings.

Applying for incentives is easier than ever.

Trade Allies, we heard your feedback, and we've reduced the information required in our incentive application to make applying easier. Log fewer specifications, collect less documentation and submit your applications sooner. And don't forget — we've also added additional support that can fill out applications for you!

The new changes will be reflected in the online application starting September 20th. In the meantime, you can use the links below to see what's changed or review this year's incentives.

- [2024 Change Log](#)
- [2024 Incentive Application \(fillable PDF\)](#)
- [2024 Incentive Catalog](#)

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Figure 2. Example of How Evaluation Activities are Positioned as Part of the CE Way to Maximize Impact

To embody the CE Way, the evaluation team regularly works with program teams to turn research and evaluation findings into problem-solving opportunities. By reframing negative findings as problem-solving opportunities, the evaluation team is able to help program teams implement the CE Way – and show senior leadership how they are achieving continuous improvement. As an example, in a recent evaluation overall satisfaction with Consumers Energy’s Small Business program dropped significantly from previous years. The evaluation team worked with the program teams to discover this was driven by a small number of new-to-the-program contractors who focused on specific measures. The evaluation team worked with the program team on contractor training, installation guidelines, and contractor

oversight processes. As a result, in follow up research the program saw a 10% jump in ratings for quality of work, a 7% improvement in overall program satisfaction and a 5% rise in satisfaction with contractors.

### Using potential studies to drive long term planning

Potential studies have a long history of supporting DSM program planning. While potential studies have traditionally been useful for helping regulators set statutory targets, these can be very detailed, long documents that are not always easy for corporate leaders to understand and use. As investment in DSM becomes a business decision, however, these studies can be very useful in helping drive strategy and long-term planning *to help influence remaining potential*. Rather than being a static indicator of what could be achieved based on external factors, with the right translation these plans can help identify and unlock decisions and investments that can help change what is achievable.

With its 2022 electric energy efficiency potential study, Consumers Energy identified a gap between projected savings and the ambitious goals the utility, Michigan legislators, regulators, and other stakeholders wanted the company to achieve. Consumers Energy has translated and communicated that decline in potential as a “savings gap” in different forums and different stakeholders.

Given regulators, intervenors, and senior leadership’s commitment to pursuing increasing energy efficiency, the evaluation team needed to use the potential study results to help senior leadership understand this savings gap. The Consumers Energy evaluation team used the principles outlined above to translate the savings gap into what it meant in terms of ability to meet legislative and regulatory savings targets, potential shortfalls of a preferred resource in our IRP, and lost performance incentive. Further, the team identified emerging technologies and practices that, if further developed, could address the savings gap.

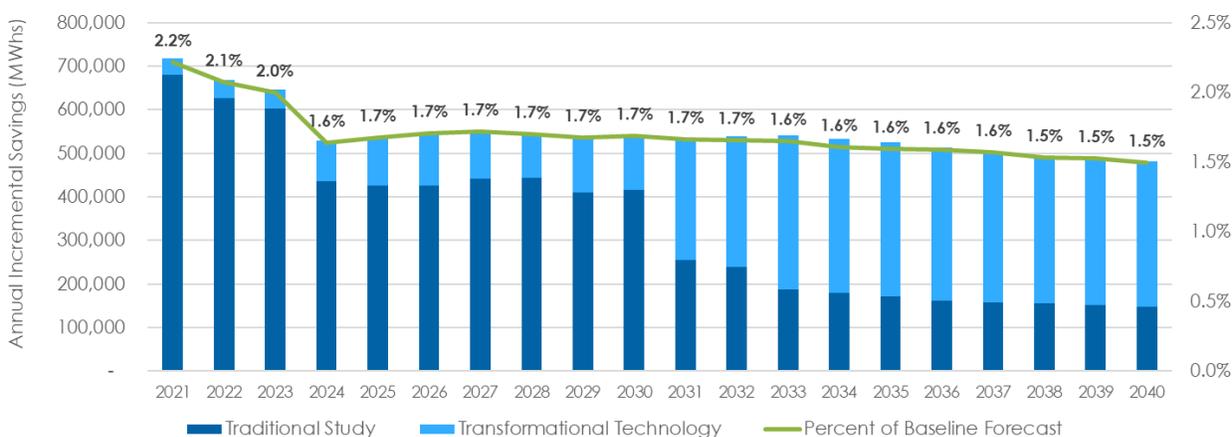


Figure 3. Energy efficiency potential from traditional resources and opportunities for new, emerging technologies (Forcillo, 2021).

Once Consumers Energy internal stakeholders understood the business value at risk and ways to mitigate that risk, they were able to make business decisions about how to invest in ways to support the longer-term pipeline for energy efficiency. That has included concerted efforts across the utility to:

- Identify measures being used elsewhere with remaining potential.
- Define new outreach strategies with customers and other market partners.
- Open up pilot program procurement processes to engage a larger pool of technology and program vendors.
- Work more proactively with regulators to add new measures/technologies into the Michigan Energy Measure Database (MEMD), the state’s Technical Resource Manual.

## Conclusion and Recommendations

The evolution of DSM from regulatory requirement to strategic business asset requires corresponding evolution in how evaluation supports utility decision making. By reframing EM&V insights in business terms and corporate management frameworks, utilities can maximize the value of their evaluation investments while maintaining regulatory compliance.

Key recommendations for utilities seeking to enhance the business value of evaluation include adopting and translating findings into corporate decision-making frameworks like a company's quality process, product management process and others. This provides familiar language for non-evaluation stakeholders, positioning evaluation as a risk management and asset protection tool that quantifies financial value of evaluation activities, developing innovation support capabilities that test new technologies and program designs through rigorous pilot evaluation, and creating stakeholder-specific reporting that translates evaluation insights into metrics and language that resonate with different decision-maker groups.

The financial returns from this approach can be substantial. Consumers Energy's experience demonstrates that rigorous evaluation along with great collaboration and execution by our DSM business partners is a key enabler to achieve substantial cost recovery and over \$60M in annual performance incentives while supporting strategic investments in efficiency innovation and market development.

As the energy industry continues to evolve, utilities that effectively integrate evaluation insights into strategic business planning will maintain competitive advantage in efficiency markets while delivering superior value to customers and shareholders. The key lies in recognizing evaluation not as a compliance cost but as strategic business intelligence that enables better decision making across the organization.

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