CAE-12: CCWG Report, pp. 21-22. Explain why adders and storage incentives should not be included in net savings calculations presented to customers.

RESPONSE: OCC does not have a sponsoring witness and offers the following narrative response.

As noted in the CCWG Report, p. 21, Proposal 11 (the topic of this interrogatory) "is identical to EOE's Proposal 9, except that it allows contractors to include 'applicable performance based incentives' in the calculation of estimated year one net savings." "Applicable performance based incentives" was undefined in Proposal 11. Although the discussion included specific examples, the Proposal uses the undefined term that may include other examples in the future and several participants noted concerns with the undefined term. Further, as indicated in its comments on the CCWG Report, OCC is concerned that customers receive standardized, uniform information regarding solar sales. Proposal 11 offers optionality as to what information the customer receives, meaning customers may not be able to validly compare offers.