- Q. Reference: Pre-Filed Testimony of Patrick Bowman, page 3, lines 7-14, InterGroup
   explains that the TRC/mTRC test measures the impact on the utility and
   participating customers collectively, and a positive TRC/mTRC can still lead to any
   of the utility, participating customers, or non-participating customers being
   materially worse off from the CDM program which is why a complementary utility specific and customer-specific test are typically required.
- a) Please confirm that the PAC test is an appropriate utility-focused test to be
  used in measuring the cost effectiveness of electrification programs. If not, please
  explain why and what other tests should be considered.

b) What customer-specific tests are used in other jurisdictions, and does
 InterGroup have a recommendation for the appropriate customer-specific test to
 be used by the Utilities in measuring the cost effectiveness of electrification
 programs?

- 14 A.
- (a) PAC is an appropriate, but not comprehensive, utility-focused test to measure the
   cost-effectiveness of ECDM programs. PAC is limited by the fact it is a ratio so
   does not give absolute values for the scale of benefits. For this reason, as noted
   in TC-PUB-IC-001(a), PAC should be used in combination with NPV Analysis.
- PAC/NPV Analysis should also be used in conjunction with rate impact
   assessment, as set out in TC-PUB-IC-001(a) and TC-PUB-IC-002(a), including
   NPV analysis that considers revenue impacts.
- (b) Customer-specific tests are not typically used as a screening to determine cost effectiveness in Mr. Bowman's experience. The typical focus of customer-specific
   tests is to determine the scale of incentives that may be required to get customers
   to participate. However, as customers have complicated and overlapping interests
   (for example, convenience, comfort, environmental priorities, affordability limits),
   cost-effectiveness assessments from the customer side are only a small part of
   determining program design.
- 29 With this purpose in mind, the Participant Cost (PC) assessment is typically used.