

December 10, 2009

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 4116 - The Narragansett Electric Company, d/b/a National Grid
Energy Efficiency Program Plan for 2009**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's responses to the Commission's First and Second Set of Data Requests issued on November 25, 2009 in the above-referenced proceeding.

Thank you for your attention to this transmittal. Please contact me if you have any questions concerning this Settlement at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Docket 4116 Service List

Certificate of Service

I hereby certify that a copy of the cover letter and/or any foregoing attachments accompanying this certificate were electronically submitted, hand delivered, and/or mailed to the individuals listed below.

Joanne M. Scanlon

December 10, 2009
Date

**National Grid - 2010 Energy Efficiency Program Plan – Docket No. 4116
Service list updated 11/20/09**

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Commission Data Request 1-1

Request:

Please identify the details of the incentive programs and performance standards associated with DSM or Energy Efficiency Programs for all other National Grid companies, specifying whether the incentives earned are included in earnings.

Response:

Please see Table PUC 1-1 below for a comparison of incentive programs for all other National Grid Companies. The proposed incentive for Rhode Island is included for comparison.

National Grid understands that “incentives earned are included in earnings” means shareholder earnings. All earnings from performance mechanisms in each state in which National Grid operates are returned to shareholder earnings.

Prepared by or under the supervision of: Jeremy Newberger

The Narragansett Electric Company
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Table PUC 1-1

	Incentive Design	Target Incentive as Percent of Spending or Budget	Threshold Level (Performance to be achieved to earn an incentive)	Maximum Incentive Compared to Target
Rhode Island	<p>2 Components to Electric Incentive Mechanism:</p> <ol style="list-style-type: none"> 1. Lifetime kWh savings by sector. 2. Other performance metrics. <p>Gas Incentive is based on achieved annual therm savings as compared to the approved savings goals by sector.</p> <p>The Target incentive is equal to 4.4% of the approved “spending budget”.</p>	4.4% of approved spending budget (pre-tax)	<p>60% of lifetime kWh savings goal for the sector.</p> <p>Thresholds for performance incentives are negotiated for electric only.</p>	<p>125% of the target incentive for lifetime kWh savings by sector and \$30,000 for each performance metric for electric.</p> <p>100% of the target incentive for annual therm savings by sector for gas</p>
Mass. (Proposed for 2010)	<p>3 Components to Incentive Mechanism:</p> <ol style="list-style-type: none"> 1. Savings Mechanism (value of MWh or Therm Savings) 2. Value Mechanism (\$ amount of net benefits) 3. Other Performance Metrics 	Fixed pool allocated among all program administrators, approximately 7% of spending (pre-tax)	75% of goal for the incentive component.	125% of target
New Hampshire	<p>2 Components to Incentive Mechanism:</p> <ol style="list-style-type: none"> 1. B/C ratio by sector compared to expected B/C ratio by sector. 2. Lifetime MWh/ MMBtu savings compared to Plan lifetime MWh/MMBtu savings goal. 	8% of budget (pre-tax)	<p>B/C ratio by sector must be at least 1.0</p> <p>Sector lifetime per unit savings must be at least 65% of goal.</p>	12% of budget

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	Incentive Design	Target Incentive as Percent of Spending or Budget	Threshold Level (Performance to be achieved to earn an incentive)	Maximum Incentive Compared to Target
New York – Niagara Mohawk	\$38.85/saved MWh. \$3/MCf gas saved	Incentive is tied to achieved savings without respect to the budget or actual expenses. For 2009, the target incentive is equal to approximately 14% of the budget for electric and 11% for gas.	80% of the annual savings goal.	Capped at amount associated with achieving 100% of the savings goal.
New York – KeyspanK EDNY/ KEDLI	\$3/MCf gas saved	Incentive is tied to achieved savings without respect to the budget or actual expenses. For 2009, the target incentive is equal to approximately 5% of the budget.	80% of the annual savings goal.	Capped at amount associated with achieving 100% of the savings goal.

1. The New York jurisdictions also include deadband and penalty provisions.

Prepared by or under the supervision of: Jeremy Newberger

Commission Data Request 1-2

Request:

Please identify the details of the incentive programs and performance standards associated with DSM or Energy Efficiency Programs for all other gas and electric companies in Maine, New Hampshire, Vermont, Massachusetts, Connecticut and New York, specifying whether the incentives earned are included in earnings.

Response:

The Company does not have complete information on the incentive programs and performance standards associated with energy efficiency in other states. Performance incentives for National Grid companies in Massachusetts, New Hampshire and New York are described in Commission Data Request 1-1. The list below describes other incentives to the best of the Company's knowledge.

Connecticut utilities can earn 2% of program costs for achieving 70% of target, 3% for 80% of target, 4% for 90% of target, 5% for reaching targets, and up to a maximum of 8% for 130% of the targets.¹ All incentives are pre-tax. Performance indicator targets are developed in twelve areas that carry different weights and goals.

Efficiency Vermont is administered by Vermont Energy Investment Corporation (VEIC), an independent non-profit energy services organization under contract to the Vermont Public Service Board.² For the 2009-2011 plan, VEIC can earn an incentive up to 2.8% of the service and initiatives budget. Since VEIC is a non-profit, the incentive is not taxed. The incentive is based on meeting 100% of targets in seven areas. Each area carries different weights, thresholds and goals.³

Currently Efficiency Maine is administered by the PUC and therefore has no performance incentive or metrics. Efficiency Maine is transitioning to the Efficiency Maine Trust, a quasi-governmental body that will be required by statute to develop quantifiable performance measures for all programs.

Prepared by or under the supervision of: Jeremy Newberger

¹ Source: 2010 Electric and Natural Gas Conservation Load Management Plan, CT Docket 9-10-03, October 1, 2009.

² Source: http://www.encyvermont.com/pages/Common/AboutUs/Efficiency_Vermont_Oversight/

³ Source: Vermont Three Year Plan, Attachment O

Commission Data Request 2-1

Request:

Please provide evidence / calculations to support the \$6.665 million of 2010 funding that is expected to be received from RGGI auctions (Table E-1, Attachment 5 of the Settlement)

Response:

Table 2-1 below shows the derivation of the \$6.665 million of funding from RGGI auctions for 2010. National Grid anticipated that approximately \$2.5 million would be carried over to 2010, along with 60% of the estimated proceeds from future auctions as shown.

Table 2-1

	Auction	Month	Year	Proceeds	60%	National Grid Budget	Carry over for future Budget
Actual Proceeds	1	9	2008	\$1,347,036			
	2	12	2008	\$1,483,056			
	3	3	2009	\$1,640,469			
	4	6	2009	\$1,485,033			
	5	9	2009	\$1,022,455			
2009 Total				\$6,978,049	\$4,186,829	\$1,721,829	\$2,465,000
Projected Proceeds	6	12	2009	\$1,400,000			
	7	3	2010	\$1,400,000			
	8	6	2010	\$1,400,000			
	9	9	2010	\$1,400,000			
	10	12	2010	\$1,400,000			
2010 Total				\$7,000,000	\$4,200,000	\$6,665,000	

Notes

- (1) Actual proceed data from http://www.rggi.org/docs/RI_Proceeds_by_Auction.pdf
- (2) Projected proceeds are based on 60% of an anticipated \$7M in auctions 6-10.
- (3) National Grid Budget includes any carryover from previous RGGI auctions

Commission Data Request 2-2

Request:

Referring to footnote 4 on Table E-1, Attachment 5:

- a. Does the \$2.47 million represent the proceeds from the 5 auctions held between September 2008 and September 2009?
- b. Does the \$4.2 million (60% of 7M) represent the expected proceeds from the 2010 auctions?
- c. When and in what amounts does Narragansett expect to receive the RGGI funds?

Response:

Please note that Footnote 4 refers to the Projected 2009 Fund Balance. Footnote 6 refers to Projected RGGI funding.

- a. In footnote 6, the \$2.47 million anticipated carryover represents 60% of the proceeds from the 5 auctions held between September 2008 and September 2009. Please see the Table in the response to Commission Data Request 2-1.
- b. Based on previous RGGI auctions, the Company-projected proceeds from auctions held between December 2009 and December 2010 (5 auctions) will total \$7.0 million. Sixty percent of the expected proceeds equals \$4.2 million. Please see the Table in the response to Commission Data Request 2-1.
- c. Following finalization of the OER's rules for the distribution of RGG I funds, on November 19, the Company formally requested Governor Carcieri's office release auction proceeds from September 2008 to September 2009. The Company also requested establishing a process to release future RGGI proceeds once they are received by the state.

Commission Data Request 2-3

Request:

For each year, 2000 to the present, please provide the following as it relates to the electric shareholder incentive:

- a. Target shareholder incentive
- b. Maximum possible shareholder incentive
- c. Actual shareholder incentive earned

For 2009, please provide estimates where actuals are not available. For 2010, please use the incentives included in the proposed settlement for a. & b.

Response:

Table 2-3 below presents the requested data for the electric shareholder incentive. The actual amount for 2009 is an estimate of the incentive to be earned at year end 2009. Please note that a provision in the proposed shareholder incentive mechanism for 2010 will increase the target and maximum possible incentive if outside funding is secured to offset future increases in the DSM charge (please see page 32 of the Settlement for details). The table below does not assume any outside funding.

Table 2-3

	(a)	(b)	(c)
Year	Target Incentive	Maximum Possible	Actual
2000	\$660,809	\$660,809	\$596,322
2001	\$726,050	\$726,050	\$726,050
2002	\$692,139	\$692,139	\$692,139
2003	\$712,557	\$712,557	\$712,557
2004	\$781,959	\$958,699	\$604,876
2005	\$774,689	\$949,611	\$836,502
2006	\$726,627	\$888,284	\$760,623
2007	\$722,958	\$878,698	\$716,075
2008	\$647,689	\$784,612	\$675,282
2009	\$1,035,943	\$1,257,429	\$838,052
2010	\$1,489,500	\$1,824,375	

Notes

- (1) 2000-2008 Data from DSM Year-End Reports
- (2) The 125% Maximum and Performance Measures began in 2004
- (3) 2009 Actual incentive is extrapolated from 3rd Quarter Report results for Annual MWH and from 2nd Quarter Report results for performance metrics.

Prepared by or under the supervision of: Jeremy Newberger

Commission Data Request 2-4

Request:

With regard to the 10 new hires discussed on page 3 of the Introduction and Summary, please provide:

- a. The annual cost to Narragansett of salary & benefits for these individuals.
- b. The job titles of these individuals
- c. Where Narragansett records the costs associated with these individuals (i.e. is the entire cost included in the DSM budget or are some of the costs recorded elsewhere on Narragansett's books?).

Response:

The text referenced on page 3 states “During 2009, the Company further developed its program delivery infrastructure by hiring at least 10 individuals in program planning and implementation roles either wholly or partially devoted to Rhode Island.” This text refers to an estimate of new hires made in 2009.

- a. The costs of salary and overhead are included in the Program Planning and Administration (PP&A) Internal Costs column on Table E-2 and Table G-2 each year. In 2009, the total budget of salary and overhead included in PP&A for both electric and gas programs was \$1.63 M; it is \$2.23 M in 2010. The difference between these two, \$600k, is an estimate, using a full time equivalent (FTE), of the full-year salary and overhead of the new hires working on energy efficiency in RI plus any anticipated compensation increases for all staff. Please note that this comparison needs to be done on an FTE basis because employees may split their time between states that National Grid serves, and between electric and gas services.
- b. The Company has hired 17 individuals who work wholly or partially on RI energy efficiency including electric and gas programs.
 - 2 Analysts, Energy Solution Services
 - 1 Consultant, Energy Solution Services
 - 1 Principal Consultant, Energy Solution Services
 - 1 Technical Consultant, Energy Solution Services
 - 1 Lead Lighting Specialist, Implementation
 - 1 Lead Engineer, Energy Efficiency Implementation
 - 4 Senior Analysts, Energy Efficiency Implementation
 - 2 Analysts, Energy Efficiency Implementation
 - 2 Analysts, Evaluation and Regulatory Affairs
 - 2 Lead Analysts, Evaluation and Regulatory Affairs

Commission Data Request 2-4 (cont.)

c. The entire costs for these individuals are included in the DSM budget allocated, as noted, among the various states in which these individuals contribute.

Prepared by or under the supervision of: Jeremy Newberger

Commission Data Request 2-5

Request:

With regard to the discussion of potential ARRA funds on page 4 of the Introduction and Summary please provide, if possible:

- a. The total amount of ARRA funds that may be available in Rhode Island.
- b. The amount of ARRA funds awarded to Rhode Island to date.
- c. The expected date of any decisions regarding ARRA funding to Rhode Island.

Response:

a. The Company is not aware of the total amount of ARRA funds that may be available to Rhode Island. However, according to the RI Office of Energy Resources (OER) webpage, the state has received \$54.7 M from the federal Department of Energy (“DOE”) of ARRA funds related to energy projects.¹ The funds include:

- \$20.1 M in Weatherization Assistance for Low-Income, awarded to the state July 2009
- \$9.6 M in Conservation Block Grants, awarded to the state September 2009
- \$24 M in State Energy Plan (SEP), awarded to the state September 2009
- \$1 M in State Energy Efficiency Appliance Rebate Program (SEEARP), award expected December 2009

OER announced they intend to use \$7 M of SEP funds for energy efficiency related projects.² A portion of the Conservation Block Grants may be used for energy efficiency related projects – that decision is entirely up to communities receiving funds.

- b. Please see response to Commission 2-5 (a) above. As indicated, all ARRA funds, except SEEARP, have been awarded to the state.
- c. OER signed a contract in October to release \$12 M of the Weatherization funds to implementing agencies. OER also issued an RFP for \$2.3 M of SEP funds intended for weatherization of oil or propane heated non-low income homes, and a decision by OER should be reached by January 2010. OER plans to begin the

¹ Source: <http://www.recovery.ri.gov/programs/energy/>

² Source: <http://www.recovery.ri.gov/programs/energy/SEP.php>

Commission Data Request 2-5 (cont.)

SEEARP rebate program in February 2010.³ National Grid is not aware of any other dates related to ARRA funding decisions.

Prepared by or under the supervision of: Jeremy Newberger

³ Source: http://www.energy.ri.gov/arra_appliance/index.php

Commission Data Request 2-6

Request:

How will the company deal with the “challenge” of competition for weatherization resources discussed on pages 4 & 5 of the Introduction and Summary?

Response:

The Company outlines how it will deal with the challenge of competition for weatherization resources in the Single Family Low Income Services program description in Attachment 2, pages 14 – 18. Specifically on page 17, the Settlement notes:

“With the pending arrival of considerable Federal American Recovery & Reinvestment Act (ARRA) funding into Rhode Island for low income weatherization, and the increase in CAP agency demands to meet those federal weatherization goals, the Company would like the opportunity to explore options where additional qualified energy professionals might also serve eligible customers in 2010. The Company would like this option in the event that ARRA funds create conditions where the local agencies are not able to sufficiently meet Company goals. Production rates will be closely watched in 2010 because of ARRA impacts. Decisions to make use of additional weatherization professionals would be need Collaboration (sic) agreement.”

Prepared by or under the supervision of: Jeremy Newberger

Commission Data Request 2-7

Request:

With regard to the company's application for a subgrant from the state's Energy Star Energy Efficiency Appliance Program (page 5, Summary & Introduction):

- a. What is the requested amount of the subgrant?
- b. What is the status of the application?
- c. Is the grant included in the funding sources outlined in Attachment 5, Table E-1?

Response:

- a. RI OER has applied to DOE for \$1,080,000 for the State Energy Efficiency Appliance Rebate Program (SEEARP). The state proposed to use \$936,000 of that amount for rebates and rebate processing – \$250,000 for residential electric appliance rebates and \$686,000 for residential gas appliances.
- b. National Grid, along with Pascoag Utility and Block Island, worked with OER on the program design. RI was not one of 25 states that received approval and funding on December 2, 2009; DOE said that remaining approvals will be made quickly. After the funds are awarded to the state, National Grid will apply as a sub-grantee to manage the \$936,000 rebates and rebate processing.
- c. National Grid and the RI Collaborative agreed not to include the \$250,000 electric sub-grant in the funding sources, Table E-1, or the \$686,000 gas sub-grant in Table G-1, because the funds are not guaranteed. Additionally, gas and electric rebates resulting from the sub-grant are not included in participant, Annual MWh or MMBtu goals.

Commission Data Request 2-8

Request:

Please update Attachment 5, Table E-3, Page 3 of 9 as follows:

- a. Remove the column which calculated the change from 2009 to 2010.
- b. Add columns for 2005, 2006, 2007 and 2008 which include actuals for each year.

Response:

Please see Table 2-8 on the next page for the requested modified table.

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Table 2-8

Proposed 2010 Budget Compared to Historical Budgets & Actual Spending (\$000)

	Proposed Budget 2010	Approved Budget 2009	Actual Spending 2008	Actual Spending 2007	Actual Spending 2006	Actual Spending 2005
Non-Low Income Residential						
ENERGY STAR® Homes	\$1,077.9	\$860.6	\$747.0	\$801.0	\$1,112.3	\$1,275.7
ENERGY STAR® Central Air Conditionin	\$698.3	\$429.0	\$416.8	\$276.2	\$118.7	\$137.2
ENERGY STAR® Heating	\$285.3	\$209.9	\$91.3	\$124.1	\$101.0	\$224.6
EnergyWise	\$4,940.9	\$3,050.1	\$1,796.6	\$1,989.0	\$2,018.6	\$1,841.0
ENERGY STAR® Lighting	\$1,678.8	\$980.0	\$612.4	\$779.1	\$760.4	\$1,217.4
ENERGY STAR® Appliances	\$1,699.7	\$1,472.6	\$349.5	\$287.9	\$319.5	\$526.9
EERMC - Residential	\$155.8	\$125.1	\$149.2	\$0.0	NA	NA
Energy Efficiency Educational Programs	\$101.3	\$100.9	\$10.0	\$49.1	\$55.9	\$153.7
Pilots	\$337.2	NA	NA	NA	NA	NA
Home Energy Management	NA	NA	NA	NA	NA	\$46.1
Subtotal - Non-Low Income Residential	\$10,975.2	\$7,228.2	\$4,172.7	\$4,306.4	\$4,486.5	\$5,422.7
Low Income Residential						
Single Family - Low Income Services	\$3,729.2	\$2,628.3	\$1,421.0	\$1,993.9	\$1,922.5	\$1,924.9
Commercial & Industrial						
Design 2000plus	\$9,638.5	\$7,440.2	\$2,836.0	\$2,774.1	\$2,339.5	\$2,542.2
Energy Initiative	\$8,224.9	\$6,896.4	\$2,897.7	\$3,149.5	\$4,615.9	\$3,019.9
Small and Medium Business Program	\$8,109.6	\$6,252.1	\$3,755.2	\$4,155.8	\$4,061.8	\$3,368.5
EERMC - C&I	\$344.3	\$189.9	\$214.4	\$0.0	NA	NA
Subtotal Commercial & Industrial	\$26,317.3	\$20,778.6	\$9,703.2	\$10,079.5	\$11,017.2	\$8,930.6
OTHER EXPENSE ITEMS						
Company Incentive	\$1,503.0	\$1,036.0	\$675.3	\$716.1	\$760.6	\$795.6
Program Design, Evaluation and Planning	\$998.0	\$700.2	\$311.0	\$282.7	\$317.7	\$324.6
SRPP	\$425.0	\$0.0	NA	NA	NA	NA
Subtotal Other Items	\$2,926.0	\$1,736.2	\$986.3	\$998.8	\$1,078.3	\$1,120.2
TOTAL BUDGET	\$43,947.7	\$32,371.2	\$16,283.3	\$17,378.6	\$18,504.5	\$17,398.5

- (1) EERMC budgeting began in 2007, the EERMC-Residential allocation includes the Low Income Residential allocation
- (2) Pilots began a separate budget line in 2010
- (3) Home Energy Management program ended in 2005
- (4) SRPP began in 2010, please see page 12 of the 2010 EEPP
- (5) 2005-2008 from Annual Year-End Reports
- (6) 2009-2010 from Energy Efficiency Annual Plans

Prepared by or under the supervision of: Jeremy Newberger

Commission Data Request 2-9

Request:

Table E-4, page 4 of 9 of Attachment 5 reports a 2010 Benefit / Cost ratio of 3.67. Please provide the Benefit / Cost ratio for each year from 2000 to 2009.

Response:

Please see Table 2-9 on the next page for the requested benefit/cost ratios by sector.

Prepared by or under the supervision of: Jeremy Newberger

Table 2-9

Historical Cost-Effectiveness

	2010 TRC Benefit/ Cost	2009 TRC Benefit/ Cost	2008 Actual Benefit/ Cost	2007 Actual Benefit/ Cost	2006 Actual Benefit/ Cost	2005 Actual Benefit/ Cost	2004 Actual Benefit/ Cost	2003 Actual Benefit/ Cost	2002 Actual Benefit/ Cost	2001 Actual Benefit/ Cost	2000 Actual Benefit/ Cost
Commercial & Industrial											
SUBTOTAL	4.47	3.77	7.12	4.74	4.23	3.82	2.99	3.42	3.30	3.02	2.79
Low Income Residential											
SUBTOTAL	2.08	1.59	2.14	1.45	1.67	1.25	0.97	1.07	0.61	0.59	1.02
Non-Low Income Residential											
SUBTOTAL	2.38	3.28	3.95	2.33	3.17	2.41	2.53	2.73	1.72	1.70	1.59
TOTAL	3.67	3.46	6.21	3.62	4.03	3.29	2.69	3.03	2.50	2.40	2.28

Notes:

- (1) 2009-2010 are proposed B/C
- (2) In 2009, RI began using the Total Resource Cost Test where B/C Test = (Energy + Capacity + Resource Benefits) / (Program Implementation + Evaluation Costs + Customer Contribution + Shareholder Incentive); also includes effects of free-ridership and spillover.
- (3) From 2000-2008, the utility cost test was used where B/C = Value/(Implementation Expenses + Evaluation Cost + Shareholder Incentives).
- (4) From 2000-2008 the Low Income Services was included in the Non-Low income Residential Sector, it has been separated here to mirror 2010 sector divisions.