



COMMENTS ON EFFICIENCY MAINE TRUST TRIENNIAL PLAN V (FISCAL YEARS 2023-2025)

For Efficiency Maine Trust

April 9th, 2021

Energy Federation, Inc.
1 Willow Street, Suite 2
Southborough, MA 01745
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Energy Federation, Inc.
1 Willow Street, Suite 2
Southborough, MA 01745

April 9, 2021

Michelle Turner, Administrative Secretary
Efficiency Maine Trust
168 Capitol Street, Suite 1
Augusta, ME 04330

Dear Ms. Turner,

On behalf of The Energy Federation, Inc. (EFI), I am pleased to submit EFI's comments relating to Efficiency Main's RFI. EFI is a nonprofit organization based in Massachusetts that has been developing and implementing energy efficiency programs in New England for the past 35-years.

While there are many mechanisms for delivering energy efficiency, among the most effective program models are transactional energy efficiency marketplaces and point of sale instant product rebates. Marketplaces create a valuable opportunity to engage with end users through educational content that informs people about the benefits of energy efficiency and emergent technologies, cross promote other energy-saving programs, and make it easy for customers to have energy-efficiency measures delivered directly to their door. Transactional marketplaces are especially good at serving some hard-to-reach customer segments and accelerating the adoption of specific types of measures. Point of Sale Instant rebate programs offer the convenience of having rebates on energy efficient technologies applied during checkout in participating brick-and-mortar retailers.

We believe that offering an online marketplace, and/or point of sale instant rebates, will cost effectively accelerate the adoption of energy efficiency-related technologies, serve hard to reach customer segments, and increase the market for energy efficiency products statewide.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads 'Philip Scarbro'. The signature is fluid and cursive, with the first name 'Philip' being more prominent than the last name 'Scarbro'.

Philip Scarbro, Vice President
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508-870-2277 ext. 4435

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Response

We are currently planning to organize our programs into the following categories: Commercial and Industrial (C&I) Custom; C&I Prescriptive; Small Business Initiative; Distributor Initiatives; Retail Initiatives; Grid Support and Load Management; Home Energy Savings Program; Low Income Initiatives; Electric Vehicle Initiatives; Renewable Resource Fund (Demonstration Program); and Innovation Program. What discrete initiatives might we be missing? What alternative approaches to organizing these programs should we consider? What are the most important program aspects that the Plan should maintain and what are Program elements we should consider changing?

We will briefly describe two initiatives not currently offered in the State of Maine that Efficiency Maine Trust may want to consider. We would be glad to demonstrate either in advance of an RFP if Efficiency Maine Trust is interested in learning more.

MARKETPLACES

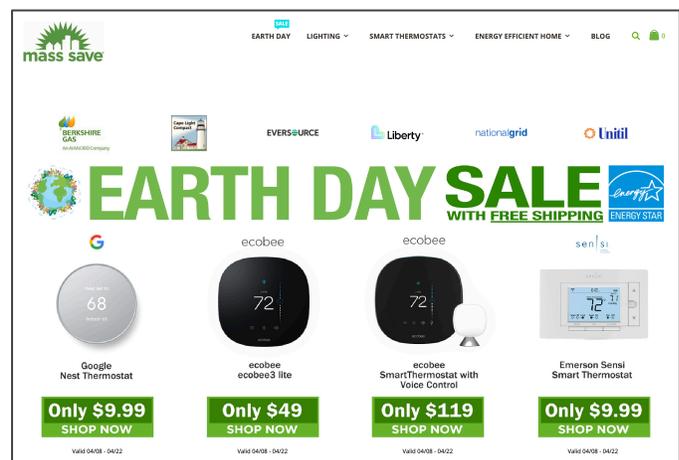
Transactional energy efficiency marketplaces are being used throughout the country to help end-users learn about and purchase energy efficient technologies. EFI has deployed numerous marketplaces since our inaugural eCommerce marketplace in 2001, and while some of these are already among the most successful in the country, we are continuously improving this program model by introducing innovative solutions that support the goals of our clients and drive additional energy savings and customer satisfaction.

The marketplace would present a one-stop shopping experience for the energy efficiency products with the opportunity to increase customer awareness of products and programs. The platform segments customers in numerous ways, including tracking shopping cart and buying history, allowing for an improved customer purchasing experience by suggesting products based on a customer’s interests and past activity.

The EFI marketplace platform allows for full brand customization, develop content specific for Efficiency Maine Trust. The process would begin with collaborative meetings between EFI’s team, Efficiency Maine Trust’s program administrator, and a representative from Efficiency Maine Trust’s marketing department or agency. We would propose layout concepts, discuss content and assets to incorporate. Throughout the development process Efficiency Maine Trust would see and comment on work “in progress” through online meetings and screenshots. Then, prior to deployment, the content would be made available in a UAT environment for further review.

Efficiency Maine Trust would be able to select the specific energy efficient product categories to feature, and decide for which applicable incentives would be incorporated into the purchase price (i.e. passed on to customers at the point of sale). EFI’s clients typically look to EFI to provide a curated product menu, but the product selection process is collaborative, including ENERGY STAR thermostats, small appliances, load control devices, weatherization materials, and hot water conservation-related products. As the State of Maine moves to increase resident’s awareness of EV charging equipment, for instance, these could also be made available.

From a consumer’s perspective, the most important cost associated with a transactional marketplace program is not the cost the client pays to deploy and administer the program, but the cost of products themselves. This



impacts not only the program’s cost effectiveness, but also customers’ perception of the utility. We consistently present customers with favorable retail prices, maintain compliance with manufacturer pricing policies, and then maintain competitive pricing by using price optimization software to monitor the pricing of these same products through national retailers.

Marketplaces provide an excellent opportunity to capture information about a house or energy use from customers, by asking questions after an order has been fulfilled, capturing information about the customer’s satisfaction with the program and/or the products they purchased, or other information that could be beneficial for program evaluations. The survey tool is also useful to ensure the customer remains engaged with the Efficiency Maine Trust Marketplace. Post order engagement emails can be used to cross promote other programs, drive return visitors, gather more customer feedback, and ultimately, lead to the adoption of more energy efficient technologies.

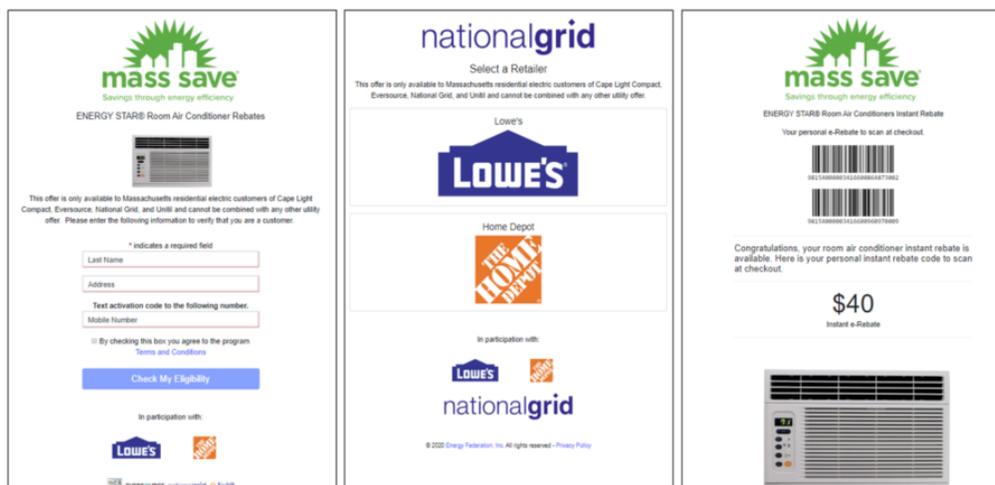
We will also call attention to the fact that we have also used transactional marketplaces to reach low income households, as well as to help small and medium-sized businesses and municipalities learn about and purchase energy efficient commercial products.

POINT OF SALE INSTANT REBATES

EFI’s In-Store Instant Rebate platform (e-rebates) allows eligible customers to purchase energy efficient products with rebates applied instantly at the point of sale at participating retailers. Customers validate their eligibility through the e-rebates platform either on their smart phone or tablet while they are shopping at a participating retailer, or from home before they leave for the store. The platform captures the required rebate-related information including customer name, address, phone number, and acceptance of terms and conditions. EFI has existing partnerships for point of sale e-rebates at Lowe’s, The Home Depot, and Best Buy.

For each implementation of an e-rebates program, EFI executes a Statement of Work with the retail partner that outlines rebate code creation and management, rebate code redemption and invoicing for instant rebates, reconciliation of invoicing and reporting, and the reimbursement of instant rebate funds.

In advance of a program deploying, each participating retailer provides EFI with a list of unique discount codes (with agreed-upon expiration dates and limited to one-time use) that will be associated with the model numbers of pre-confirmed qualifying products. If the incentive is for ENERGY STAR® certified dehumidifiers, for instance, each of the models offered by that retailer would be associated with the set of unique bar codes provided. Upon confirmation of a given customer’s eligibility, e-rebates presents the customer with a unique bar code coupon that will be compatible with the retailer’s point of sale system. When scanned during checkout, a fixed



dollar value discount equal to the utility rebate is applied against the qualifying product, with the discount subtracted from the customer's order total on their receipt. The instant rebate coupons provided can be either displayed on a mobile device and scanned by the retailer's POS system, or printed in advance and presented to the cashier during checkout.

As not all instant rebate coupons issued will be redeemed by a customer, participating retailers provide EFI with documentation from their POS systems confirming the rebate coupon code was applied to a transaction. In order to be reimbursed for the instant rebates extended, each retailer submits a data file that includes the following fields:

- Unique instant rebate code applied to the transaction;
- Date of the order;
- Model number or SKU of the product for which the rebate was extended;
- Amount of the instant rebate; and,
- Store location details.

Prior to importing this file into our Incentive Management System (IMS), EFI updates the transaction level sales data provided by the retailer with the validated customer name, address, and account details from the e-rebates platform by matching on the unique instant rebate code. By merging the files prior to processing, EFI ensures that data is complete and accurate. The merged files are then entered into IMS and vetted against full program rules including re-validation of customer eligibility, re-verification of model and purchase date eligibility, and ensuring that the customer has not exceeded their limits on allowed rebated measures. Quality assurance processed prior to issuing payment to retailers also ensures that the submission is not duplicative a prior retailer submission.

Appendix

National Grid Low-Income Offer

Through the Mass Save Marketplace the 3+ million customers of all Massachusetts’ investor-owned electric and natural gas utilities to learn about and purchase a wide variety of energy efficient products with utility-sponsored rebates. EFi has managed eCommerce product offers for the sponsors since 2001, with activity driven through the current eCommerce platform since 2017.

In 2020, EFi, National Grid, Google, and Fannie Mae launched a partnership to drive energy savings in the low-income community. National Grid worked with Fannie Mae to determine which customers in their territory recently purchased a home using a HomeReady® mortgage; approximately 5,000 customers were targeted with an offer for a free Nest Thermostat E®, with funding from both National Grid and Fannie Mae. Through this limited time offer, National Grid was able to help their low-income customers save an average of \$131 to \$141 per year.

A full case study documenting this initiative can be found at <https://www.efi.org/resources/white-papers/reaching-an-underserved-community/>.

mass save

LIGHTING ▾ SMART THERMOSTATS ▾ ENERGY EFFICIENT HOME ▾ BLOG 🔍 🛒

BERKSHIRE GAS an NRG Energy Company Cape Light Compact EVERSOURCE Liberty nationalgrid Unil

Turn up your savings

Save with the all new, instantly rebated Google Nest Thermostat.

[SHOP NOW](#)

Heat set to 70 Indoor 72

SAVINGS

ACCESS SPECIAL PRICING >

Get Connected with your Home [SHOP NOW >](#)

Additional \$40 OFF

Huge savings on Honeywell smart thermostats and shipping is free! [SHOP NOW >](#)

Chargepoint EV Chargers [SHOP NOW >](#)

Interested in Solar? [LEARN MORE >](#)

Advanced Power Strips [SHOP NOW >](#)

Ameren Illinois Helpfulness Campaign

From August 14th to September 15th, 2020 Ameren Illinois offered free and deeply discounted Wi-Fi thermostats to their residential customers. A direct mail piece was sent early in September, a strategy not previously utilized by the Ameren Illinois Residential marketplace. While direct mail used to be one of the primary marketing tools used to promote energy efficiency, today our postal mail boxes are empty while our Email boxes are overflowing. Offers sent via postal mail are, as a consequence, more likely to be noticed than offers sent via email.

This utility’s helpfulness campaign attracted nearly 65,000 customers to the marketplace where they learned about smart thermostat and energy efficiency, with it being very easy for visitors to “take action.” Those customers, in turn, ordered over 12,000 smart thermostats, allowing Ameren Illinois to reach and exceed their goals.

The screenshot displays the Ameren Illinois Online Marketplace homepage. At the top, there are navigation links for Products, Search, My Account, and Cart 0. The main banner features a family photo and the text "Welcome to the Ameren Illinois Marketplace". Below the banner, there are three promotional tiles: a power strip with a "SHOP NOW" button, a Honeywell air purifier with a "SHOP & SAVE" badge, and a smart thermostat with a "SHOP NOW" button. The "FEATURED PRODUCTS" section lists three items:

- Honeywell Home Tabletop Air Purifier**: Regular Price: \$79.99, Your Price \$29.99. Includes "Add to Cart", "Add to Wishlist", and "Add to Compare" buttons.
- Google Nest Learning Thermostat**: Regular Price: \$249.00, Your Price \$149.00. Includes "Add to Cart", "Add to Wishlist", and "Add to Compare" buttons.
- Google Nest Thermostat Snow**: Regular Price: \$129.99, Your Price \$29.99. Includes "Add to Cart", "Add to Wishlist", and "Add to Compare" buttons.

At the bottom, a disclaimer states: "By accessing the Ameren Illinois Online Marketplace you certify that you are an Ameren Illinois residential customer, you intend to install purchased products in your own residence, and products are not for resale. Eligible customers may order up to 36 LED lighting products and 10 advanced power strips per one calendar year from previous purchase date. Targeted customers may be eligible for incentivized products or kits using a special promo code. Thank you for using the Ameren Illinois Online Marketplace."