

## Attachment 1

### USIP- Cool Keeper Enforcement Steps

#### Current Steps

- 1) June 2016: The Company is withholding payments from USIP participants where there is no record of Cool Keeper participation (or initiation to participate) on the Account and there is not validation the customer is ineligible. The Company continues to pay customers that have enrolled in Cool Keeper, have initiated enrollment, or are not eligible to participate.
- 2) July 17, 2016: The Company sent an email to contractors affiliated with the program reiterating the Cool Keeper requirement. Placing them on notice that the equipment and participation will be verified.
- 3) July 19, 2016: The Company emailed customers that have outstanding reservations in the Utah Solar Incentive Program that Cool Keeper participation is mandatory, if eligible, and payments will be withheld until Cool Keeper participation is confirmed.
- 4) August 1, 2016: The Company emailed past program participants reminding them of the Cool Keeper requirement and providing them information on how to enroll.
- 5) August 23, 2016: The Company mailed past program participants a letter with Cool Keeper program documentation and instructions on how to apply for participation.

**Previous Program Participants:** The Company initiated an outreach program actively encouraging previous program participants to begin participation in the Cool Keeper program. This program will consist of an email and letter campaign to geographically eligible past participants.

If the Company is unsuccessful with its outreach efforts, the Company could enroll all customers who participated in the Current Program since 2013 in the Cool Keeper program, if they are eligible. The Company could deem their acknowledgement of the requirement, via the application process and the acceptance of the incentive payment(s) as their tacit agreement to enroll and participate in the Cook Keeper program.

**Current Unpaid Program Participants:** The Company is taking additional steps to validate participation in the program prior to payment. Requests for incentive payment are reviewed through the verification process described below. Documentation of participation is being collected, and in specific instances where individual customers are not eligible the reasoning is being catalogued.

As soon as a geographically eligible customer initiates participation in Cool Keeper, and has completed all other required steps for receiving an incentive their payment will be released. In some cases, customers who initiate participation in Cool Keeper will be deemed ineligible upon inspection of their facilities. In these cases, the reason for the ineligibility will be documented.

## Pre-payment Verification Process

- 1) Review site for geographic eligibility
  - a. Not Eligible: Continue processing payment
  - b. Eligible: Move to Step 2
- 2) Review Account in CSS
  - a. Current participant: If CSS indicates currently participating in Cool Keeper, continue processing payment
  - b. Not current participant: Move to Step 3
- 3) Review weekly Cool Keeper activity list (New process: Cool Keeper vendor will provide a list to Customer Generation weekly of applications received by Cool Keeper for participation from known USIP participants)
  - a. Review list for previous weeks to see if customer has contacted Cool Keeper to begin participation. If they have initiated participation, continue processing payment. Note account for follow up to create accurate tracking and reporting.
    - i. Follow up: Track project with Cool Keeper to confirm participation or document reason for ineligibility.
  - b. If there is no record of customer contact with Cool Keeper send notification of requirement to customer and installation contractor, and that payment will be held until complied with or ineligibility determined. Provide information on establishing equipment or special circumstance ineligibility. Go to Step 4
- 4) Review Ineligibility Documentation.
  - a. No AC equipment connected at the meter with the USIP site:
    - i. Confirm the lack of equipment with USIP inspector.
    - ii. Note account
    - iii. Continue processing payment
  - b. AC equipment located at site does not confirm with Cool Keeper program guidelines.
    - i. Provide information to Cool Keeper program team for ineligibility confirmation.
    - ii. Note account
    - iii. Continue processing payment
  - c. Special Circumstance Ineligibility
    - i. Evaluate condition to determine validity of claim (for example: critical system cooling or medical need)
    - ii. Note account
    - iii. Continue processing payment
- 5) Hold payment until valid justification received.