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November 27, 2019

BY RESS, EMAIL AND COURIER

Ms. Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board File No.: EB-2019-0271
2021 DSM Plans**

On September 6, 2019, Enbridge Gas submitted a letter to the Ontario Energy Board (“Board” or “OEB”) and Parties intervening in the Post 2020 Natural Gas Demand Side Management Framework Consultation proceeding (EB-2019-0003) noting the status of development of the post-2020 demand side management (“DSM”) framework and advising that it was no longer reasonable to assume that a post-2020 DSM framework followed by a multi-year plan could be completed, reviewed and approved in time for the 2021 DSM program year.¹

On September 16, 2019, the OEB issued a letter stating that “...*the OEB considers that it is appropriate to undertake a comprehensive review of the current 2015-2020 DSM framework for the purposes of establishing a new framework for the future.*” The OEB went on to state that “*The OEB expects to continue its policy consultation on a new DSM framework in the fall of 2019 and into 2020. Further details will be provided at a later date, including any requirements necessary to facilitate the transition from the current framework to the new framework.*”² To date, the OEB has issued no further correspondence or direction related to the Post 2020 Natural Gas Demand Side Management Framework Consultation or the impacts of the ongoing consultation on the 2021 DSM program year.

As there is little more than a year remaining before the current Demand Side Management Framework for Natural Gas Distributors (2015-2020) (EB-2014-0134) (“2015-2020 DSM Framework”) and OEB-approved 2015-2020 DSM Plans (EB-2015-0029/0049) expire, considering the present status of development of the next DSM framework and in the interest of maintaining continuity of DSM/conservation offerings across Ontario, Enbridge Gas requests that the OEB issue an extension of the current

¹ EB-2019-0003, Correspondence, September 6, 2019, p. 1.

² EB-2019-0003, OEB Letter, September 16, 2019, p. 2.

2015-2020 DSM Framework for one year (effective January 1, 2021 to December 31, 2021) by April 2, 2020. Further, Enbridge Gas also applies to the OEB for an order or orders effective January 1, 2021, approving Enbridge Gas's 2021 DSM Plans which roll-forward the OEB-approved 2020 DSM Plans including all programs, scorecards and parameters (i.e. budgets, targets and incentive structure) by April 2, 2020.

If you have any questions, please contact the undersigned.

Sincerely,

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications

cc.: Dennis O'Leary (Aird & Berlis)
EB-2018-0003 (Parties)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch. B;

AND IN THE MATTER OF an application by Enbridge Gas Inc., for an order or orders pursuant to Section 36(1) of the *Ontario Energy Board Act, 1998*, approving the 2021 Demand Side Management Plans.

APPLICATION

1. Enbridge Gas Inc. (“Enbridge Gas”), the Applicant, was formed by the amalgamation of Enbridge Gas Distribution Inc. (“EGD”) and Union Gas Limited (“Union”) on January 1, 2019 pursuant to the *Ontario Business Corporations Act*, R.S.O. 1990, c. B. 16. Enbridge Gas carries on the business of distributing, transmitting and storing natural gas within Ontario.
2. On December 22, 2014, the Ontario Energy Board (“OEB” or “Board”) issued the 2015-2020 Demand Side Management (“DSM”) Framework and Guidelines for Natural Gas Utilities (EB-2014-0134) (“2015-2020 DSM Framework”). On January 20, 2016 and on February 24, 2016, the OEB issued its Decision and Order and Revised Decision and Order, respectively, on the 2015-2020 DSM Plans (EB-2015-0029/0049) for the Union rate zones and EGD rate zone.
3. On November 29, 2018, the OEB issued its Report on the Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) (EB-2017-0127/1028) (“Mid-Term Report”). In its Mid-Term Report, the OEB concluded:¹
 - a. That the current suite of natural gas conservation programs remained appropriate and effective;
 - b. That material changes to the 2015-2020 DSM Framework and DSM Plans were not warranted; and

¹ EB-2017-0127/0128, Report of the Board, November 29, 2018, pp. 5-6 and 32.

- c. That the Mid-Term Review provided the necessary updates to allow the natural gas utilities to continue to offer and deploy successful energy conservation programs to Ontario customers over the remainder of the term of the 2015-2020 DSM Framework.
4. On May 21, 2019, the OEB issued a letter initiating a consultation process to develop a DSM framework for natural gas distributors beginning in 2021.² In its Letter, the OEB stated that Phase 1 of the consultation process would include a Stakeholder Meeting (June 13, 2019) followed by a request for Written Comments from interested parties on the issues (June 27, 2019). Enbridge Gas participated in the Stakeholder Meeting and subsequently filed Written Comments maintaining that the current 2015-2020 DSM Framework is sufficiently robust so as to enable consideration of new program development including the issues highlighted by the OEB in its Mid-Term Report. Enbridge Gas submitted that a wholesale and fundamental review of DSM/conservation was unnecessary.³ In its Written Comments, Enbridge Gas also emphasized the importance of maintaining continuity of framework fundamentals in order to ensure a seamless transition from the current 2015-2020 DSM Plan and to avoid interruption of DSM/conservation offerings across Ontario.
5. On September 6, 2019, Enbridge Gas filed a letter with the OEB and Parties noting that the OEB had issued no further direction regarding the consultation process or development of the next DSM framework and advising that it was no longer reasonable to assume that a post-2020 DSM framework and a post-2020 DSM multi-year plan could be completed, reviewed and approved in time for the 2021 DSM program year.⁴
6. On September 16, 2019, the OEB issued a letter stating that it would undertake a comprehensive review of the current 2015-2020 DSM Framework to inform the development of a post-2020 DSM framework. The OEB went on to state that it expected

² EB-2019-0003, OEB Letter, May 21, 2019.

³ EB-2019-0003, Enbridge Gas Written Comments, June 27, 2019, pp. 17-18.

⁴ EB-2019-0003, Correspondence, September 6, 2019, p. 1.

to continue the consultation process in the fall of 2019 and into 2020, and that any requirements necessary to facilitate the transition from the current framework to the new framework, would be provided at a later date. To date, the OEB has issued no further correspondence or direction related to the Post 2020 Natural Gas Demand Side Management Framework Consultation or the impacts of the ongoing consultation on the 2021 DSM program year.

7. In its 2015-2020 DSM Framework the OEB acknowledged the time required to develop a new multi-year DSM plan, *“Implementing a new multi-year DSM Plan will require sufficient time for the gas utilities to consider the direction provided in this Framework and fully develop their overall portfolio and specific programs.”*⁵
8. Considering the present status of development of the next DSM framework and in the interest of maintaining continuity of DSM/conservation offerings across Ontario, Enbridge Gas requests that the OEB issue an extension of the current 2015-2020 DSM Framework for one year (effective January 1, 2021 to December 31, 2021).
9. Enbridge Gas hereby applies to the OEB, pursuant to Section 36 of the *Ontario Energy Board Act, 1998*, for an order or orders effective January 1, 2021 approving Enbridge Gas's 2021 DSM Plans. For such an order or orders to be implemented and effective on January 1, 2021, considering the requisite lead-time for certain existing DSM programming and to ensure continuity of DSM programming, Enbridge Gas requests approval of its 2021 DSM Plans by April 2, 2020.
10. Enbridge Gas further applies to the OEB for the following:
 - a. Approval of a DSM budget for 2021;
 - b. Approval of the Program scorecard targets for 2021;
 - c. Approval of the DSM Incentive amounts and methodology for 2021; and
 - d. Such other approvals as are necessary to give effect to the 2021 DSM Plans.

⁵ EB-2014-0134, 2015-2020 DSM Framework, p. 36.

11. As the 2021 DSM Plans are an extension of the OEB-approved 2015-2020 DSM Plans, and to avoid unnecessary ratepayer cost and regulatory burden, Enbridge Gas requests that the OEB approve this application without a hearing. Enbridge Gas submits that the Board is in a position to determine that no person will be adversely affected in a material way by the outcome of this application without a hearing pursuant to subsection 21(4) of the *Ontario Energy Board Act*, 1998. In accordance with this subsection, Enbridge Gas consents to the Board disposing of this application without a hearing.
12. Should the OEB determine that it is otherwise appropriate to proceed with its review of this application by means of a hearing, Enbridge Gas requests that the OEB's review of this application proceed by means of a written hearing in English.
13. Enbridge Gas further applies to the OEB for all necessary orders and directions concerning pre-hearing and hearing procedures for the determination of this application.
14. This application is supported by written evidence filed with this application which may be amended from time to time as circumstances may require.
15. The persons affected by this application are the customers resident or located in the municipalities, police villages, Indigenous communities and Métis organizations served by Enbridge Gas, together with those to whom Enbridge Gas sells gas, or on whose behalf Enbridge Gas distributes, transmits or stores gas. It is impractical to set out in this application the names and addresses of such persons because they are too numerous.
16. Enbridge Gas requests that all documents relating to this application and its supporting evidence, including the responsive comments of any interested party, be served on

Enbridge Gas and its counsel as follows:

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive North
Chatham, Ontario N7M 5M1

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-and-

Aird & Berlis LLP
Suite 1800, Brookfield Place, 181 Bay Street
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Toronto, Ontario
M5J 2T9

Attention: Dennis O'Leary
Legal Counsel
Telephone: (416) 865-4711
Fax: (416) 863-1515
Email: doleary@airberlis.com

Dated: November 27, 2019

Enbridge Gas Inc.

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications – Regulatory Affairs

2021 DEMAND SIDE MANAGEMENT PLANS

Background

1. The current Demand Side Management Framework for Natural Gas Distributors (2015-2020) (“2015-2020 DSM Framework”) outlining the Ontario Energy Board’s (“OEB” or “Board”) policies governing the gas utilities’ natural gas energy conservation activities is set to expire on December 31, 2020. In a letter dated May 21, 2019, the OEB indicated that it would be undertaking consultation in support of development of the next Demand Side Management (“DSM”) framework. The OEB held a Stakeholder Meeting on June 13, 2019 to seek input and comments from interested stakeholders regarding the underlying guiding principles, the goals and the objectives to be achieved and the scope of any potential framework review. Subsequently, stakeholders were invited to provide Written Comments by June 27, 2019. Enbridge Gas Inc. (“Enbridge Gas”) fully participated in this process.
2. Enbridge Gas believes that the current 2015-2020 DSM Framework is sufficiently robust and flexible for a full and complete consideration of future DSM programming. A wholesale review of the 2015-2020 DSM Framework is, in Enbridge Gas’s view, not necessary. Enbridge Gas, in its Written Comments dated June 27, 2019, proposed a process and timeline to allow for expediency and efficiency in updating the 2015-2020 DSM Framework given the importance of avoiding an interruption of its DSM/conservation efforts.

3. By letter dated September 6, 2019, given the passage of more than two months, Enbridge Gas expressed the view that it was no longer reasonable to assume that the next DSM framework and a post-2020 multi-year DSM plan could be completed, reviewed and approved in time for the 2021 DSM program year. It appeared that an extension of the current 2015-2020 DSM Framework into 2021 was required.
4. Based on the Board's assessment of Written Comments received from stakeholders, in a letter dated September 16, 2019, the Board stated that it considered it appropriate to "...undertake a comprehensive review of the current 2015-2020 DSM framework for the purposes of establishing a new framework for the future."¹ The Board further stated that it expected "...to continue its policy consultation on a new DSM framework in the fall of 2019 and into 2020."²
5. This extended and comprehensive consideration of the next DSM framework has not proceeded further since the issuance of the Board's letter on September 16. At this stage, Enbridge Gas fully anticipates that issuance by the Board of the next DSM framework will likely not be completed until well into 2020. This will not provide sufficient time for Enbridge Gas to plan for and to develop new and updated DSM program offerings to include in a multi-year DSM plan for filing and review by the Board in time for the 2021 DSM program year. This timing will therefore require that the current 2015-2020 DSM Framework be extended for a year into 2021.

¹ EB-2019-0003, OEB Letter, September 16, 2019, p. 2.

² Ibid.

6. Enbridge Gas's primary concern is to avoid any interruption of DSM/conservation offerings across Ontario. Program continuity is essential to a successful, sustained and prosperous energy conservation market. In order to confidently move forward, customers must be secure in the knowledge that their projects, which may now be in the preliminary financing or planning phase, will not be jeopardized. It is equally important for the industry, including trade allies and contractors as well as utility staff, that there is no confusion nor break in the provision of DSM/conservation program offerings to ensure continuity of service. Enbridge Gas notes that in November 2018 the Board emphasized the value of maintaining continuity of DSM/conservation programming in its Report on the Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) (EB-2017-0127/0128) ("Mid-Term Report") where it described one of the objectives of the Mid-Term Review as providing "*...the necessary updates to allow the natural gas utilities to continue to offer and deploy successful energy conservation programs to Ontario customers, uninterrupted and in an efficient and effective manner.*"³

Approvals Sought

7. Enbridge Gas is committed to ensuring that natural gas customers have access to useful and appropriate programs that help them conserve energy and assist in

³ EB-2017-0127/0128, Report of the Board, November 29, 2018, p. 32.

managing their energy bills. In order to allow for continuity in the market and to maintain the momentum of current programs, Enbridge Gas proposes that it continue delivering the current DSM portfolios, as outlined in the OEB-approved DSM plans for 2020, similarly into 2021. Enbridge Gas proposes to roll-forward into 2021 the current 2020 Enbridge Gas Distribution Inc. (“EGD”) and Union Gas Limited (“Union”) DSM plans, including all programs, scorecards and parameters (i.e., budget, targets, incentive structure) as previously approved by the Board for 2020. This will facilitate a smooth evolution into the next DSM framework.

8. Further, Enbridge Gas proposes to continue to operate its DSM portfolios in 2021 as it has in the current multi-year period (2015-2020), based on the guidance provided in the 2015-2020 DSM Framework, the Mid-Term Report and the Filing Guidelines to the 2015-2020 DSM Framework, including: the annual update of input assumptions, updates to avoided costs and year-over-year consideration of audit findings.
9. Specifically, for 2021, Enbridge Gas requests that the OEB approve:
 - The same DSM annual budgets for the 2021 DSM program year as those approved by the Board for 2020 for each of EGD and Union in its EB-2015-0029/0049 Decision and Order and Revised Decision and Order,⁴ including

⁴ EB-2015-0029/0049, Decision and Order, January 20, 2016, Schedule A; EB-2015-0029/0049, Revised Decision and Order, February 24, 2016, Schedule A.

updates to budget guidance outlined in the OEB's Mid-Term Report.⁵ The proposed 2021 budget totals:

EGD rate zone 2021 DSM Budget:	\$67,757,376
Union rate zones 2021 DSM Budget:	<u>\$64,349,541</u>
	\$132,006,917

- The same scorecards originally approved by the OEB for each of EGD and Union in its Decision and Order and Revised Decision and Order (EB-2015-0029/0049), including updates subsequently directed by the Board as outlined in Appendix A of the Mid-Term Report with the same modifications to the target adjustment formula that calculates year-to-year annual targets (including those that require future financial commitments).⁶ Enbridge Gas has detailed the 2021 proposed scorecards at Exhibit A, Attachments 1 and 2.
- The same annual shareholder incentives and methodologies relative to each of the OEB-approved EGD and Union DSM plans for the 2021 DSM program year, consistent with the shareholder incentive amounts available in the 2020 DSM program year.
- The same cost-effectiveness screening to be undertaken in 2021, consistent with the approach directed by the Board in the Mid-Term Report for the 2020 DSM program year.

⁵ As outlined in the footnote on page 3 of the Mid Term Report, the only changes to the budgets approved include: (1) a continuation of EGD's Energy Leaders program (annual budget of \$0.4M) and (2) expansion of Union's Residential Adaptive Thermostats pilot into a full program (annual budget of \$1.5M).

⁶ EB-2017-0127/0128, Report of the Board, November 29, 2019, Appendix A.

Conclusion

10. In summary, in order to avoid any lengthy or complicated consideration of DSM plans for a single year (i.e. 2021) and to allow for the full resources of Enbridge Gas and stakeholders to focus on the development of the next DSM framework, Enbridge Gas believes a simple roll-over of 2020 programs and budgets to 2021 governed by the extension of the current 2015-2020 DSM Framework is the most practical and effective path forward for all parties. This will, importantly, provide certainty and clarity for our customers.

11. Given that the 2021 DSM Plans are an extension in all respects of the OEB-approved 2015-2020 DSM Plans, requiring no incremental changes to rates, and to avoid unnecessary ratepayer cost and regulatory burden, Enbridge Gas is requesting that the Board approve this application without delay and without a hearing. By doing so, the OEB will enable scarce resources to focus on supporting the development of the next DSM framework. Should the Board deem that it is otherwise appropriate to proceed with its review of this application by means of a hearing, Enbridge Gas requests that the OEB's review of this application proceed by means of a written hearing. In either instance, Enbridge Gas requests that the OEB approve this application no later than April 2, 2020.

PROPOSED 2021 DSM SCORECARDS (EGD RATE ZONE)

Enbridge 2021 Resource Acquisition Scorecard					
Programs	Metrics	Metric Target			Weight
		Lower Band	Target	Upper Band	
Home Energy Conservation Residential Adaptive Thermostats Commercial & Industrial Custom Commercial & Industrial Prescriptive	Large Volume Customers Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 Large Volume Customers Resource Acquisition actual spend without overheads x 2021 Large Volume Customers Resource Acquisition budget without overheads x 1.02	150% of Target	40%
Commercial & Industrial Direct Install Run-it-Right Comprehensive Energy Management (CEM)	Small Volume Customers Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 Small Volume Customers Resource Acquisition actual spend without overheads x 2021 Small Volume Customers Resource Acquisition budget without overheads x 1.02	150% of Target	40%
Home Energy Conservation (HEC)	Residential Deep Savings Participants (Homes)	75% of Target	2020 metric achievement / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	20%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

Enbridge 2021 Low Income Scorecard					
Programs	Metrics	Metric Target			Weight
		Lower Band	Target	Upper Band	
Home Winterproofing	Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	45%
Low-Income Multi-Residential	Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	45%
Low-Income New Construction	Number of Project Applications	75% of Target	2020 metric achievement / 2020 accrued program cost without overheads x 2021 program budget without overheads x 1.02	150% of Target	10%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

Enbridge 2021 Market Transformation Scorecard					
Programs	Metrics	Metric Target			Weight
		Lower Band	Target	Upper Band	
School Energy Competition	Schools	75% of Target	2020 metric achievement/2020 actual program spend without overheads x 2021 program budget without overheads x 1.1	150% of Target	10%
Run-it-Right	Participants	75% of Target	2020 metric achievement/2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	20%
Comprehensive Energy Management (CEM)	Participants	75% of Target	2020 metric achievement/2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	20%
Residential Savings by Design	Builders	75% of Target	2020 metric achievement/2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	10%
	Homes Built	75% of Target	2020 metric achievement/2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	15%
Commercial Savings by Design	New Developments	75% of Target	2020 metric achievement/2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	25%

PROPOSED 2021 DSM SCORECARDS (UNION RATE ZONES)

Union Gas 2021 Resource Acquisition Scorecard					
Programs	Metrics	Metric Targets			Weight
		Lower Band	Target	Upper Band	
Home Reno Rebate Residential Adaptive Thermostat Commercial & Industrial Custom Commercial & Industrial Prescriptive Commercial & Industrial Direct Install	Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 Resource Acquisition actual spend without overheads x 2021 Resource Acquisition budget without overheads x 1.02	150% of Target	75%
Home Reno Rebate	Home Reno Rebate Participants (Homes)	75% of Target	2020 metric achievement /2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	25%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

Union Gas 2021 Low Income Scorecard					
Programs	Metrics	Metric Target			Weight
		Lower Band	Target	Upper Band	
Home Weatherization Furnace End-of-Life Aboriginal	Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	60%
Multi-family	Social and Assisted Multi-Family Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	35%
	Market Rate Multi-Family Cumulative Natural Gas Savings (m3)	75% of Target	2020 metric achievement (LRAM natural gas savings) / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.02	150% of Target	5%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

Union Gas 2021 Large Volume Scorecard					
Programs	Metrics	Metric Targets			Weight
		Lower Band	Target	Upper Band	
Large Volume Program for T2/R100 Customers	Cumulative Natural Gas Savings (m3)	75% of Target	Three-year rolling average (2018-2020) Rate T2/Rate 100 cost effectiveness x 2021 budget without overheads x 1.02	150% of Target	100%

*Cost effectiveness = Final verified metric achievement used for LRAMVA purposes divided by final actual program spend for that year

Union Gas 2021 Market Transformation Scorecard					
Programs	Metrics	Metric Target			Weight
		Lower Band	Target	Upper Band	
Optimum Home	Homes Built (>15% above OBC 2017) by Participating Builders	75% of Target	2020 metric achievement / 2020 actual program spend without overheads x 2021 program budget without overheads x 1.1	150% of Target	50%
Commercial New Construction	New Developments Enrolled by Participating Builders	75% of Target	2020 metric achievement/2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	50%

Union Gas 2021 Performance-Based Scorecard					
Programs	Metrics	Metric Target			Weight
		Lower Band	Target	Upper Band	
RunSmart	Participants	75% of Target	2020 metric achievement /2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	10%
	Savings (%)	75% of Target	2020 metric achievement /2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	40%
Strategic Energy Management (SEM)	Savings (%)	75% of Target	2020 metric achievement /2020 accrued program costs without overheads x 2021 program budget without overheads x 1.1	150% of Target	50%