



2017 PARTICIPANT HANDBOOK

POLICIES AND PROCEDURES FOR PARTICIPATION IN THE STATEWIDE SAVINGS BY DESIGN PROGRAM

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www.savingsbydesign.com

This program is funded by California utility ratepayers and administered by Pacific Gas & Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company under the auspices of the California Public Utilities Commission. The municipal portion of this program is funded and administered by Sacramento Municipal Utility District and Los Angeles Department of Water and Power.

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1.0 NEW FOR 2017

Systems Approach incentive changes:

1. Process Measure incentive rate to \$.08/kWh.
2. Lighting systems to \$0.08/kWh.
3. Demand incentive to \$150/kW.¹

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¹ For Systems Approach projects only, if at the discretion of the Investor Owned Utility (IOU), it is identified that the customer can receive incentives for proposed energy efficiency measures through more cost-effective and streamlined program offerings, the customer may be directed to apply for such programs (in lieu of Savings By Design program) by the IOU.

2.0 PROGRAM OVERVIEW AND POLICIES

2.1 INTRODUCTION

Savings By Design (SBD) is California's nonresidential new construction energy efficiency (EE) program, administered statewide and funded by Utility customers through the Public Purpose Programs surcharge applied to gas and electric services.

These are the participating utilities:

- Pacific Gas and Electric (PG&E)
- Sacramento Municipal Utility District (SMUD)
- San Diego Gas And Electric (SDG&E)
- Southern California Edison (SCE)
- Los Angeles Department of Water and Power (LADWP)

This statewide approach offers the nonresidential building industry a multi-faceted program designed to consistently serve the needs of the building community throughout California. SBD encourages energy-efficient building design and construction practices. It promotes the efficient use of energy by offering up-front design assistance, supported by financial incentives based on project performance.

SBD uses the 2016 California Building Energy Efficiency Standards (Title 24, Part 6) as a reference baseline for comparison and when appropriate, uses other industry standards to determine reference baselines for comparisons. It encourages and generates energy savings within projects to perform better than mandated by Title 24. SBD analyses provide detailed technical and financial assistance data that allows Owners and Design Teams to make informed decisions regarding EE features.

2.1.1 BENEFITS OF PARTICIPATION

Projects participating in SBD may receive design assistance, Owners' Incentives, Design Team Incentives,² Energy Design Resources, and/or other applicable services. Services begin in the project design phase and continue through construction completion. Design assistance can range from a simple plan review and/or efficiency upgrade recommendations to a complete computer simulation analysis that compares a number of alternative systems and integrated building design options. Financial incentives, to help offset increased design interaction and potential costs of construction, are available for projects that exceed thresholds established by the program. Participation in the program brings additional benefits, such as:

- a. Reduced long-term operating costs
- b. Greater comfort, health and productivity for occupants
- c. Conservation of natural resources and cleaner air due to avoided power

² Design Team Assistance to be offered in lieu of Design Team Incentives in SDG&E service territory

generation

2.1.2 DESIGNED FOR NONRESIDENTIAL NEW CONSTRUCTION PROJECTS

SBD targets the primary decision-makers in new construction and renovation/remodel projects:

- a. Building Owners
- b. Developers
- c. Architects
- d. Engineers
- e. Designers
- f. Contractors
- g. Builders
- h. Energy consultants

The program serves **commercial**, **industrial**, and **agricultural** customers.

2.2 DEFINITIONS

Alternative Calculation Method (ACM): Official method for demonstrating performance compliance with California's Energy Efficiency Standards. The 2016 ACM Approval Manual is available from the California Energy Commission (CEC).

Alternative Delivery Method (ADM): The ADM delivers the same services available to all customers through Savings By Design. The purpose of the flexible model is to provide a short term, focused offering of SBD services to promote the use of a new energy efficient technology or to cultivate participation from a particular market segment or customer type that may not have participated in the program previously.

Construction Document: Drawings and specifications created by an Architect that detailed requirements for project construction.

Design Assistance: Consultative services that assist customers in integrating energy efficient recommendations into the design of the customer's facility. Although customized for each project, design assistance may include the following: integrated design facilitation, energy calculation analysis, life-cycle cost analysis, and other services.

Design Development: The preparation of more detailed drawings and final design plans, showing correct sizes and shapes for rooms. Also included is an outline of the construction specifications, listing the major materials to be used.

Design Team: The group responsible for the design and implementation of the systems in the building that use energy or affect the building's overall energy consumption. The Design Team will generally include the building Owner, Project Architect, Mechanical and Electrical Engineers, Lighting Designer, Energy Consultant, Contractor, and possibly others. Design Teams that receive

incentives are responsible for documenting and delivering program influence over the customer's energy efficient decisions on behalf of the utilities. The program influence is included in the Energy Efficiency Report.

Design Team Application: A form submitted by the Design Team Leader to the Utility indicating interest in participating in the Design Team Incentives component of the SBD program.

Design Team Leader: The person who, for purposes of this program, takes the lead in examining and implementing EE options, specifically, the person who signs the Incentive Agreement and represents the Design Team to the Utility. Generally, this will be the project architect, mechanical engineer, or energy consultant.

Energy Efficiency Report: A document that provides the Utility with a detailed explanation of the SBD project scope and EE measures that the design team has incorporated into the integrated building design. This report contains the contact information of each design team member and incremental costs for each EE measure type. The report also chronicles how the design team delivered program influence over the customer's energy efficient decisions on behalf of the Utilities. It includes, but is not limited to, a financial analysis of various EE measure combinations and associated incentive levels and energy savings.

Free Rider: A program participant who would have implemented the program measure(s) or practice(s) in the absence of the program.

Gas Surcharge: An unbundled rate component included on a customer's gas bill to fund Public Purpose Programs, including EE, income qualified services, and research and development.

Incentive Agreement: An Agreement executed between the program participant and the Utility that documents the estimated electric and gas savings and the estimated incentive amount for the project. Funds are reserved for a period of 48 months upon execution of this Agreement.

Integrated Design: Involves all Design Team members and enlists them to consider energy use and financial impacts throughout the design process in order to make appropriate decisions. Integrated design calls for the Design Team members to be synergistic in the building design, construction, operation, and maintenance of the facility.

Incremental Cost: The cost that the customer will incur above and beyond the cost associated based on their original design of the building. These costs are associated with the implementation of program recommended energy savings technologies that enable the facility's efficiency to exceed current Title 24 standards. Incremental costs are to be provided by measure type (*for example*, Lighting, Mechanical, and Envelope) and should include hardware, labor, change orders, and engineering costs.

Integrated Design Analysis: A comprehensive analysis that includes energy simulation and financial analysis to quantify the benefits associated with multiple energy efficient options and strategies.

New Construction: The New Construction (NC or NEW) installation type category includes new equipment that has been installed in a newly constructed

area, in an area that has been subject to a major renovation. It involves complete multi-system replacement, area re-construction, or equipment installed to increase the capacity of existing systems due to existing or anticipated new load handling requirements.

Owner: The building Owner and/or developer of a project participating in the SBD program.

Program Influence: A California Public Utilities Commission (CPUC) requirement where documentation must be provided which demonstrates that the customer is not a free-rider.

Project Information Form: A form completed by the building Owner, Owner's representative, or Design Team to inform the Utility of their interest in the program and to provide a brief summary of project details (*for example*, project name, address, size, building type, etc.)

Project: The scope of work contained in one set of construction documents as submitted for permits or a major phase

Public Goods Charge (PGC): A universal charge applied to each electric Utility customer's bill to support the provision of public goods. Public goods covered by California's electric PGC include Public Purpose EE Programs, income-qualified services, renewables, and energy-related research and development.

Public Purpose Programs – SBD is a Public Purpose Program, which is managed under the auspices of the CPUC and administered by the participating California gas and electric Utilities. These funds are directed toward a variety of efforts including income-qualified ratepayer assistance and EE.

Reference Baseline – SBD uses the applicable California state energy standard (Title 24 and Title 20) as a reference baseline, a benchmark from which energy savings are determined. If the ACM baseline does not accurately reflect design changes or technological advances, the Utility representative reserves the right to use a "standard practice compliant building" approach or similar baseline adjustment. Where energy standards are not applicable, but substantial energy savings are feasible, a standard practice baseline will be used. An experienced Utility engineer will determine or approve the appropriate baseline to be applied to such a building project and or process.

SBD Representative: The Utility representative responsible for establishing, facilitating, and maintaining the relationship between the Utility, the Owner, and the Design Team for the purpose of achieving the benefits of the program.

Schematic Design: The preparation of studies to ascertain the requirements of the project. It consists of drawings and other documents that illustrate the scale and relationships of the project components for approval by the Owner. The Architect may also submit to the Owner a preliminary estimate of construction costs based on current area, volume, or other unit costs

Time Dependent Valuation (TDV) TDV, as the name implies, applies value to energy depending on the time it is used. This means that electricity saved on a hot summer afternoon will be worth more in the compliance process than the same amount of electricity saved on a winter morning. The value assigned to energy savings through TDV more closely reflects the market for electricity, gas,

propane, and other energy sources and provides incentives for measures, such as thermal storage or daylighting, that are more effective during peak periods.

Title 20: California Code of Regulations relating to appliance efficiency. It is also known as the Appliance Energy Efficiency Standards. Title 20 sets minimum efficiency requirements for appliances, such as package-units, exit signs, and other building elements in the state of California.

Title 24: California Code of Regulations relating to building design and construction. Part 6 of Title 24 is the Energy Efficiency Standards for Nonresidential Buildings. Title 24 sets minimum efficiency requirements for building construction materials and energy-consuming equipment in the state of California.

Warm Shell: In "warm shell" projects, the building envelope, central mechanical system, and core lighting systems are included in the design and Title 24 documentation. Future build out work or tenant improvements are typically permitted separately and may result in subsequent participation in the program if the tenant chooses to participate and the project meets the program terms and conditions in the application.

Utility: California electric and gas utilities who have chosen to participate in SBD: Pacific Gas and Electric (PG&E), Sacramento Municipal Utility District (SMUD), Los Angeles Department of Water & Power (LADWP), San Diego Gas and Electric (SDG&E), Southern California Edison (SCE), and Southern California Gas (SoCalGas).

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2.3 GENERAL REQUIREMENTS AND ELIGIBILITY

To be eligible for SBD, projects must be:

- a. At a point where the customer can be influenced by the program's offerings and incentives to implement energy efficient design alternatives in place of their current or conceived designs.
- b. Located in the service territory of a participating Utility and subject to payment of PGC for electric service and/or the gas surcharge for gas service.
- c. Within the definition of new construction.

Projects may be deemed ineligible for SBD incentives if:

1. The project is determined as a free-rider (see definition above)
2. The project results in negative energy or DEER peak demand savings
3. The project received incentives for the same measures from another incentive rebate source
4. The project does not present a Net Potential Benefit to the Rate Payer
5. Redirected by the SBD Representative to other incentive offerings

2.4 THE PARTICIPATION AND BASIC PROCESS³

To participate in the Program building Owner must adhere to the following requirements:

- a. He or she cannot be a free-rider
- b. Must be willing to consider the analysis recommendations
- c. Attend a meeting with the Design Team to discuss the viability of implementing various energy efficiency strategies
- d. Sign the Owner Agreement offered by the SBD Representative

Below is an outline of the process.

1. In order to begin the process:
 - Owners or other project representatives initiate contact with a SBD Representative (or vice versa) – OR –
 - A Design Team initiates contact with a SBD Representative (or vice versa) indicating that they have a Customer who is interested in participating in the program
2. Once contact has been made, Owner submits a completed Participation Letter, Project Information Form, or Program Application (using the appropriate form(s) provided by the Utility) indicating their interest in the program. When applicable, the Design Team must complete a Design Team Application during the conceptual or schematic design phase to establish their interest in participating, which will be reviewed and

³ For a schematic of the Savings By Design Process, see *Chart 1: Savings By Design Process* on page 12

- approved by the Utility.
3. A SBD Representative will hold a meeting with the Owner/Owner's Representative and the Design Team to explain the program's policies and procedures.
 4. A SBD Representative will work with participants to determine which program path (Whole Building Approach [WBA] or Systems Approach [SA]) to take. The SBD Representative or Design Team will then use an array of tools and energy models to help the customer cost-effectively optimize the EE of the project. Specific design assistance services will depend on the program path selected.
 5. After the customer has been persuaded by the program offerings and incentives to select the recommended EE enhancements, the Owner or Design Team will submit final plans, energy calculations (conducted using program-approved software), incremental costs, and other design documents to the SBD Representative for the Utility to review. If applicable, the Design Team will provide documentation of its interactions with the Customer and present evidence of how they worked on behalf of the program to influence the customer's decisions to install energy efficient design options.
 6. The SBD Representative reviews and approves the project and issues an Agreement to the Owner/Design Team⁴ delineating the proposed project details, estimated incentive amounts, and terms and conditions.

The Owner (and Design Team leader, if applicable) signs, dates, and returns the Agreement to the SBD Representative. By signing the Agreement, the Owner acknowledges that they have read and agree to all program eligibility requirements. Receipt and approval of the incentive agreement from the Utility indicate funds have been reserved for the project for a period of up to 48 months. Program funding is "first-come, first-served." The Owner must agree that they will not apply for or receive any other incentive funded by the PGC for the same measures covered under their SBD incentive agreement or any other incentive source identified by the program's policy and procedures.
 7. Once construction is substantially complete, the Owner or Owner's representative must submit requested documents (*for example*, approved construction submittals, commissioning report, as built documents, proof of permit closure) to the SBD Representative and request an on-site verification.
 8. Allow access to the completed facility for on-site verification and, if selected, participate in measurement and evaluation studies pursuant to CPUC program evaluation requirements. The SBD Representative may request integrated design analysis reports, manufacturer's specifications, equipment cut sheets, and incremental cost verification to verify the completed project matches the design that was proposed in the Agreement.

⁴ Design Team Assistance to be offered in lieu of Design Team Incentives in SDG&E service territory

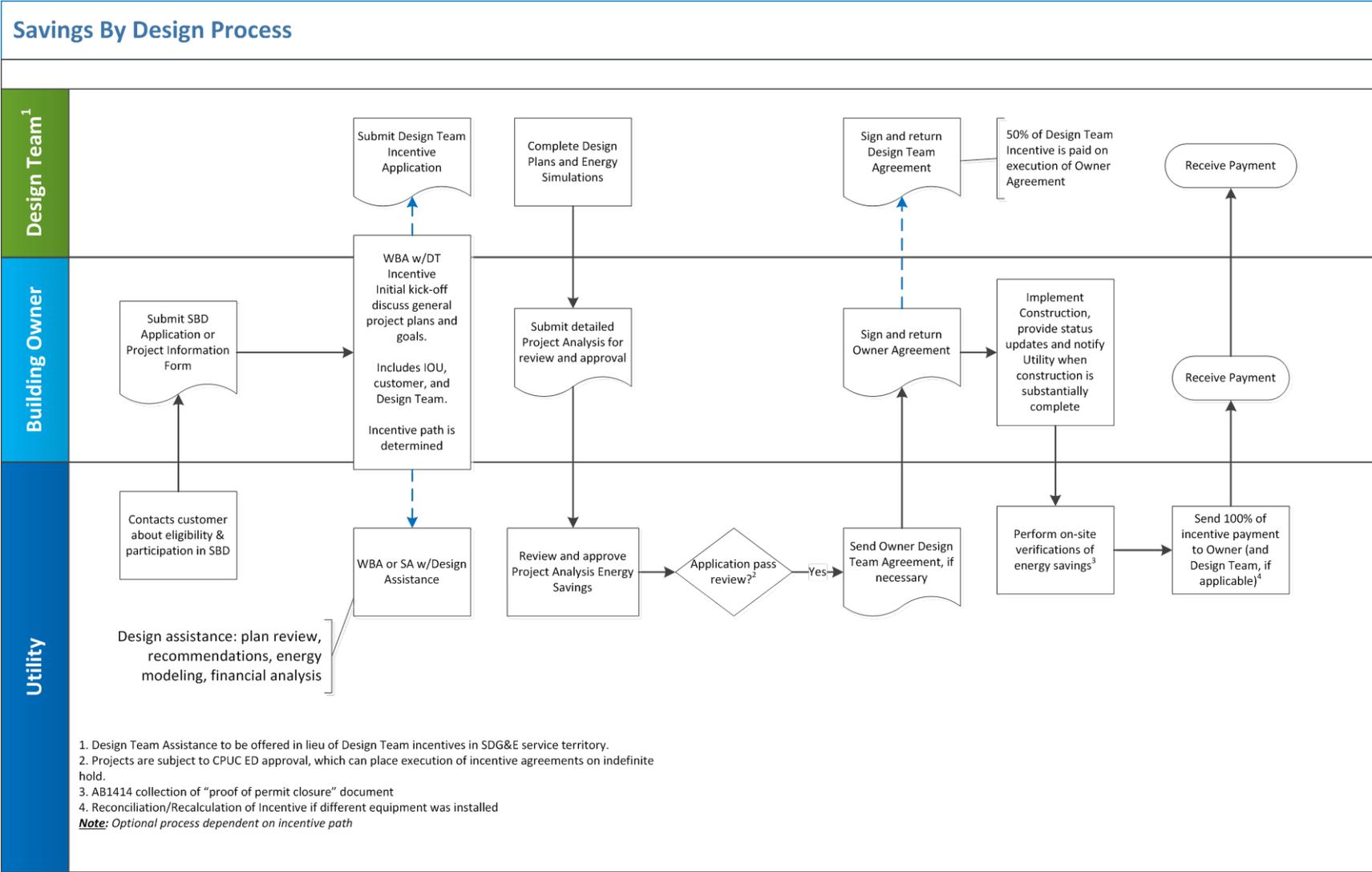
If the project is built as agreed and the project meets all program requirements, the incentive will be paid. If the as-built design differs from the one outlined in the Agreement, the incentive may be adjusted to reflect the revised, estimated building performance. If installation of the agreed-upon energy efficient equipment is initiated prior to the Utility's execution of the Agreement, the Utility or the CPUC's Energy Division (ED) may disqualify the project. Exceptions to the above process may be made at the Utility's discretion on a case-by-case basis.

Construction must be substantially complete and program participants must submit all required documentation to the Utility within 48 months from the date of the Utility's execution of the Agreement. If the project's completion is delayed beyond the final date, the Agreement may be voided; if voided, the project may be eligible to reapply under the program guidelines in effect at that time. Subsequent eligibility would be considered on a case-by-case basis and would require Utility approval and execution of a new Incentive Agreement. At the Utility's discretion, the original contract may be modified to allow for the completion of construction.

Funding is limited and available on a first-come, first-served basis. The Utility reserves the right to modify or discontinue this program without prior notice at its discretion, or by order of the California Public Utilities Commission (CPUC). Projects are subject to CPUC Energy Division (ED) approval, which can place execution of Incentive Agreements, on indefinite hold.

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Savings By Design Process Flow



3.0 TWO PROGRAM APPROACHES TO ENERGY EFFICIENT BUILDINGS

Two approaches — the Whole Building Approach (WBA) and the Systems Approach (SA) — are available to identify and quantify energy-efficient design improvements. The approaches provide the flexibility required to serve a large range of nonresidential projects, regardless of the approach taken. After discussing project specifics, the SBD Representative will help select the most advantageous approach based on the scope, phase, and goals of the project.

3.1 WHOLE BUILDING APPROACH

SBD promotes the use of integrated design analyses through the WBA. Analyzing the performance of the building as a whole improves the Design Team's ability to optimize interactive efficiency effects of the various building systems. WBA projects must incorporate a minimum of three energy efficiency measures (EEM), falling under at least two of the following systems: lighting, envelope, and mechanical. When the EEM's are modeled together, they must exceed Title 24 by a minimum of 10%.

3.1.1 CALCULATION REQUIREMENTS

WBA analysis requires the use of a program-approved energy design simulation tool. EnergyPro is an example of a CEC approved software that contains a SBD module.⁵ The use of other modeling tools may be acceptable at the discretion of the program administrators.

3.2 SYSTEMS APPROACH⁶

The SA encourages designers to optimize the EE of the systems within a building. The SA is most appropriate for less complex projects affecting one or two systems or for those whose systems were designed at different times. For common building types and system features, SBD provides this straightforward approach to identify potential EE options and impacts. The SBD Representative uses a simple, performance-based modeling tool to quickly estimate typical energy savings associated with recommended measures in a typical building and to calculate corresponding incentives.

The Calculation Methodology for a typical SA project uses a simplified modeling tool with the assistance of the SBD Representative. Each system needs to exceed current SBD minimum thresholds.

⁵ The whole building modeling software preferred by the Savings By Design program is EnergyPro version 7 and later. Version 7 contains a module dedicated to Savings By Design called the "NR SBD Performance" module.

⁶ For Systems Approach projects only, if at the discretion of the Investor Owned Utility (IOU), it is identified that the customer can receive incentives for proposed energy efficiency measures through more cost-effective and streamlined program offerings, the customer may be directed to apply for such programs (in lieu of Savings By Design program) by the IOU.

4.0 PROGRAM COMPONENTS

SBD provides a variety of offerings to encourage the design of energy efficient buildings. The program offers design assistance on a project-appropriate level and financial incentives to both the building Owner and the Design Team.

4.1 DESIGN ASSISTANCE

Design assistance and consulting is offered by the Utility at no charge to the Owner or the Design Team⁷ The level of assistance provided for a project varies based on the program approach and according to the discretion of the Utility. Assistance may be as simple as providing plan review and recommendations or may be as involved as energy modeling with financial analysis on multiple options for energy efficient systems. Receiving design assistance does not obligate the Owner to implement the design recommendations.

4.2 FINANCIAL INCENTIVES

The program offers financial assistance to help offset the increased costs associated with designing and constructing energy efficient buildings. Owner and Design Team Incentives are based upon the project's estimated annual energy and demand savings (kW, kWh and therms) and are calculated according to the rates and program entry levels shown in Tables 1 and 2 in Section 4: Tables and Figures.

Incentives are limited to 100% of the incremental cost of the efficiency upgrades up to a maximum project cap of \$150,000.00.

Incentive payments are issued after construction completion is verified and when all other required documentation has been received. The final incentive amount is calculated based on the installed features. Final incentive payments may vary from agreed upon (committed) estimates as a result of changes in the design or installation of additional energy efficiency measures.

Projects applying for SBD incentives that include non-IOU⁸ sourced energy systems (NIOUSES) will be evaluated at the discretion of the Utility and may result in a reduction of the final savings and incentives based on the type, output, and operation of the customer's distributed generation system.

⁷ SDG&E offers a similar offering to the Design Team Incentive through their Design Team Assistance offering. Design Team Assistance to be offered in lieu of Design Team Incentives in SDG&E service territory⁸ IOU: Investor Owned Utility

⁸ IOU: Investor Owned Utility

4.2.1 SYSTEM APPROACH INCENTIVES

System Approach incentives are calculated using a set incentive rate (\$/kWh,\$/therm varies by system installed (lighting, HVAC and/or process). SA projects are eligible for an incentive based on peak demand reduction, which is calculated at a set \$150.00/kW reduced. See *System Approach Incentive Rates and Entry Levels*, in the Section 6, Table 1.

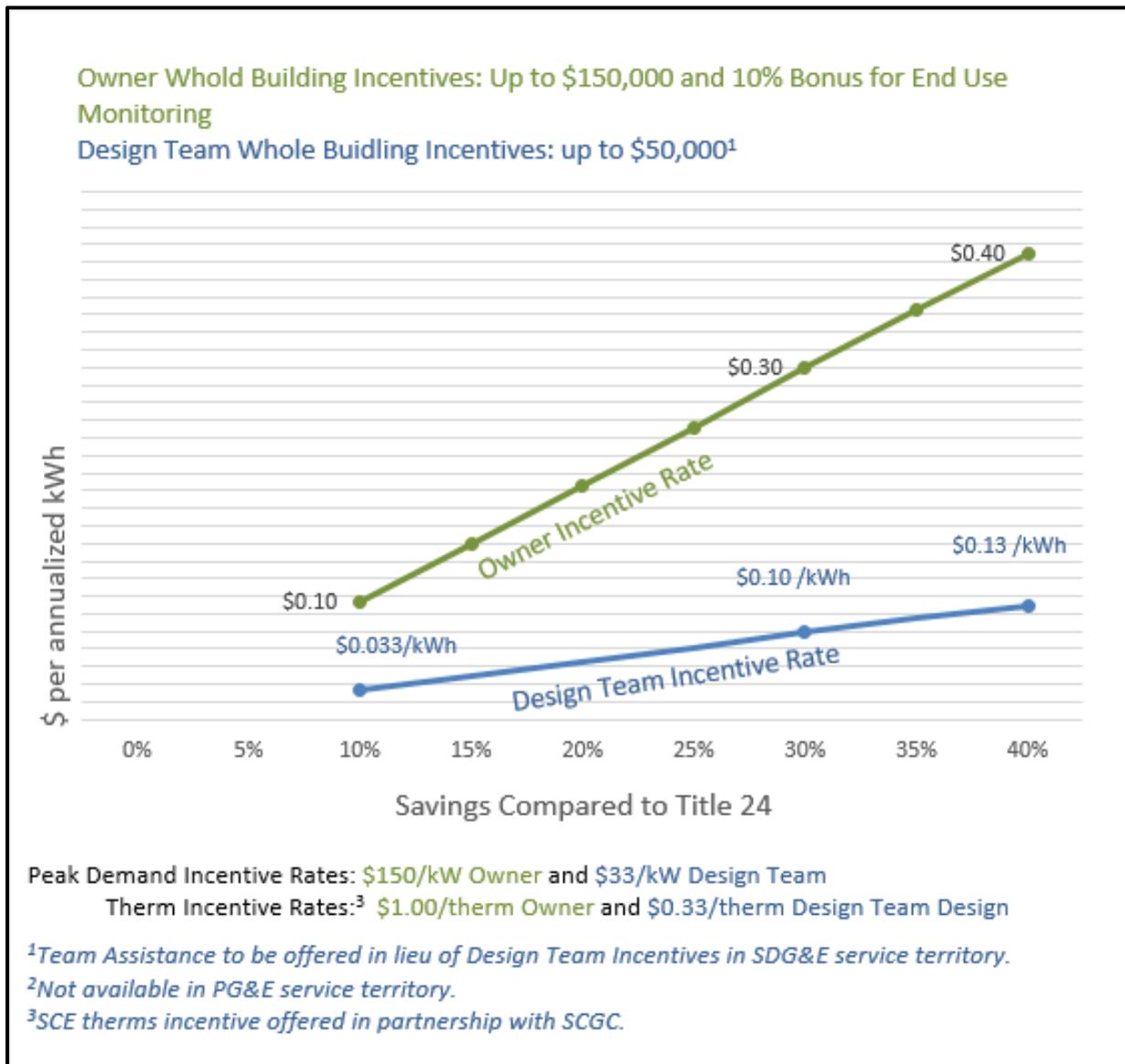
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4.2.2 WHOLE BUILDING APPROACH INCENTIVES.

The annual energy savings is calculated by an ACM compliant modeling tool to determine the % better than Title 24. For projects falling between 10% and 40% better than Title 24, the kWh incentive rate is on a sliding scale and is equal to the "% better than title 24." The Therm Incentive and Peak Demand Incentives are both flat rates. (See Figure 2). The minimum program requirement is for the project to exceed Title 24 by 10% or greater.

WBA projects are eligible for an incentive based on peak demand reduction. (See Figure 2)

Figure 2: Whole Building Approach incentive rates



4.2.3 DESIGN TEAM INCENTIVES⁹

Incentives are paid to a Design Team leader who submits a Design Team Incentive Application. Design Team Incentives are only available for Whole Building Approach projects.

Requirements and Features of the Design Team Incentive:

- a. The Design Team Leader must submit a Design Team Incentive Application early in the design process.
- b. The proposed project's energy consumption must be at least 10% below the reference baseline.
- c. The Owner must complete the whole-building Owner Agreement.
- d. The Design Team supplies the SBD Representative with an Energy Efficiency Report that summarizes:
 - The baseline case, and/or
 - The proposed case, and/or
 - The incremental costs by EE measure.

The electronic files containing the energy simulation, construction documents, and incremental cost estimates must also be submitted.

- e. The Utility pays 50% of the Design Team Incentive after it acceptance of the Owner's Agreement and Design Team Incentive Agreement. The balance of the Design Team Incentive is to be paid upon project completion (subject to as-built conditions).
- f. See **Section 5.0, Tables 3–5** for SBD document submittal requirements

4.2.4 END USE MONITORING INCENTIVE

Projects that design for and install end-use metering equipment that is able to separately monitor and record lighting, HVAC, process, and plug loads are eligible for an incentive calculated as 10% of the Owner's incentive. Projects applying for the End Use Monitoring Incentive need to submit an End Use Monitoring Plan describing how the metering equipment will be installed and operated. Post measurement and verification (M&V) is not required for SBD projects. The Utility may request M&V data at some date after occupancy to insure that the building is operating within the parameters of the design. The findings of the end-use monitoring data will not affect any incentives previously awarded per the Agreement.

Requirements for End Use Monitoring:

- a. Design documents, reports, and/or invoices that reflect the end use metering installation and connection to the Energy Management System (EMS)
- b. Screenshot that shows the meters are connected to the EMS

⁹ Design Team Assistance to be offered in lieu of Design Team Incentives in SDG&E service territory

5.0 ENERGY DESIGN RESOURCES

The SBD program maintains Energy Design Resources, a suite of EE design products to support architects, engineers and developers with the integration of more complex equipment and designs.

The contents of www.energydesignresources.com are available free of charge, and include:

- a. Design Briefs and Case Histories
- b. Energy Design Software
- c. Training and Workshops

6.0 TABLES AND FIGURES

Table 1: Systems Approach Incentive Rates and Entry Levels¹

Program Approach and System Categories	Entry Levels (% better than T24)	Incentive	Maximum Incentive Per Project ²
Systems Approach			
Lighting Systems ^{3*}	See program brochure for specific thresholds and requirements	\$0.08 / kWh \$150.00 / peak kW	\$150,000
HVAC Systems ³		\$0.15 / kWh \$1.00 / therm \$150.00 / peak kW	
Refrigeration		\$0.15 / kWh \$1.00 / therm \$150.00 / peak kW	
Envelope Measures		\$0.15 / kWh \$150.00 / peak kW	
Service Hot Water Systems		\$1.00 / therm	
Other Systems and Processes ²		\$0.08 / kWh \$1.00 / therm \$150.00 / peak kW	
¹ Unique building types and/or processes may receive a package of services and incentives that may differ from the Handbook guidelines when we elect to use an alternative delivery method (ADM).			
² Incentives are limited to 100% of the incremental costs associated with efficiency upgrades with a maximum project cap of \$150,000.00. For Systems Approach projects only, if at the discretion of the Investor Owned Utility (IOU), it is identified that the customer can receive incentives for proposed energy efficiency measures through more cost-effective and streamlined program offerings, the customer may be directed to apply for such programs (in lieu of Savings By Design program) by the IOU.			
³ As stated previously, if the utility SBD Representative determines that the customer can receive incentives for proposed EE equipment through more cost-effective and streamlined program offerings, customers may be directed to apply through those program			

Table 2: Whole Building Incentive Rates and Entry Levels¹

Incentive Type	Entry Levels (% Better than T24)	Incentive	Maximum Incentive Per Project ²
Whole Building Approach			
Incentives paid to the Owner/Developer:			
Owner Incentive	10%	\$0.10 - \$0.40/kWh, \$1.00/therm, + \$150.00 / peak kW	\$150,000
End Use Monitoring Incentive	10%	10% of Owner Incentive	N/A
Incentives paid to the Design Team Leader			
Design Team Incentive ⁵	10% ³	1/3 of Owner Incentive ⁴	\$50,000
¹ Unique building types and/or processes may receive a package of services and incentives that may differ from the Handbook guidelines when we elect to use an alternative delivery method (ADM).			
² Incentives are limited to 100% of the incremental costs associated with efficiency upgrades with a maximum project cap of \$150,000.00.			
³ Half of the Design Team Incentive is payable upon receipt of a signed Owner's Agreement and approval by utility.			
⁴ Design Team Incentive calculations do not include End Use Monitoring incentives.			
⁵ Design Team Assistance to be offered in lieu of Design Team Incentives in SDG&E service territory			

