

Program Guide for Business Lighting Trade Allies

Developed by Energy Trust of Oregon

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Introduction to the Program Guide

This Program Guide provides an overview of Energy Trust's Business Lighting Program (also referred to as the "Program") requirements, processes, and procedures. The requirements outlined in this guide are effective January 16, 2025, and any projects submitted on or after this date are subject to these requirements and additional updates. Projects submitted before January 16, 2025, are subject to the previous Program Guide requirements.

Part 1 of the guide focuses on Program offerings and delivery. This section outlines specific Program design changes for 2025, describes project submission procedures and provides a general policy overview.

Part 2 of the guide covers the Business Lighting Program trade ally enrollment process and summarizes expectations and requirements for enrolled trade allies.

Business Lighting trade allies are required to read, understand, and follow the requirements outlined in this guide to be authorized as an Energy Trust Business Lighting trade ally. For information on becoming a Business Lighting trade ally, see Part 2, Section 4 of this guide.

Revisions to the Program Guide

Energy Trust may revise this Program Guide to reflect changes in incentive information, requirements, procedures, or processes at any time. Once updated, Energy Trust will post a new version to the [Business Lighting trade ally page](#). Business Lighting trade allies should check this page regularly to ensure they are using the current version of the Program Guide. Energy Trust will also announce new versions of this guide in the *INSIDER*, a bi-monthly electronic newsletter distributed to all enrolled Energy Trust trade allies.

PART 1: Business Lighting Program Overview

Program Overview

Introduction to Energy Trust

Energy Trust of Oregon is an independent nonprofit organization dedicated to helping utility customers benefit from saving energy and generating renewable power. Business Lighting trade allies can read more about Energy Trust's purpose, structure, board and advisory councils on our [website](#).

Business Lighting trade allies are welcome to participate in Energy Trust's public meetings. The Conservation Advisory Council, Renewable Energy Advisory Council, Diversity Advisory Council, and the Energy Trust Board of Directors generally meet every one to two months. View upcoming public meetings and agendas [here](#).

Program Communications

Unless otherwise noted, all project review communications from Program representatives to Business Lighting trade allies will be made via email.

Email Communications

The email address for the Energy Trust Business Lighting Program is lighting@energytrust.org. To deliver documents to the Program, use lightingdocuments@energytrust.org.

Phone Communications

Call Energy Trust at 1.800.326.2917 to speak with a Business Lighting Program representative.

Mailing Address

Energy Trust of Oregon (Business Lighting)
421 SW Oak St, Suite 300
Portland, OR 97204

Business Lighting trade allies should have a thorough understanding of all Program documents. Please contact Energy Trust immediately if there are any questions about this Program Guide or any other Program documents.

Program Design

The lighting market in Oregon is rapidly transforming, driven in part by Oregon House Bill 2531 (HB 2531) that passed in June 2023 with the goal of reducing environmental impacts from mercury used in fluorescent lighting. The legislation bans the sale or distribution of screw-in and bayonet compact fluorescent bulbs (effective January 1, 2024) and pin-type compact fluorescent bulbs and linear fluorescent lighting (effective January 1, 2025).

To remain effective, Energy Trust's Business Lighting program must go beyond current practices and develop flexible, cost-efficient strategies for engaging customers across multiple channels. This shift emphasizes the importance of efficient lighting conversions, paving the way for widespread LED adoption and greater energy savings.

Lighting Offers

The Business Lighting Program balances market conditions, regulatory changes, along with specific utility incentive budgets to reach customers with a variety of offers: [Existing Buildings Downstream Lighting](#), [Industrial Downstream Lighting](#), [Horticulture Downstream Lighting](#), [Multifamily Downstream Lighting](#), [Instant Discounts](#), and [Small Business Direct Install](#) (SBDI).

The Standard Offer provides prescriptive, semi-prescriptive, and custom incentives for a range of lighting upgrades and is delivered by enrolled Business Lighting trade allies. Trade allies use the most recent versions of Program forms and the Business Lighting Tool that are in effect to deliver the Standard Offer. The Program will provide trade allies notice about updates to offerings and this guide as noted in the "Revisions to the Program Guide" section.

Regulatory Compliance

The Business Lighting Program does not incentivize lighting projects that are necessary to bring a building up to current building codes and comply with current laws and regulations. Regarding the implementation of HB 2531, however, the Oregon Public Utility Commission is allowing Energy Trust to continue to offer incentives on some affected measures for a limited time beyond the January 1, 2025 effective date to allow time for the market to adjust to the requirements of HB 2531.

Incentives for replacing linear fluorescent lighting and pin-style CFLs will sunset on June 30, 2025. In July 2025, an updated Lighting Tool will be released with updated Standard Offers.

Due to this compliance requirement, projects that are issued a Form 120L Incentive Application between January 16 and June 30, 2025 will have incentive reservations that expire on December 1, 2025.

Incentive Design

Business Lighting incentives are designed to motivate customers to choose a more efficient option when making lighting equipment purchases. Energy Trust’s incentive budget is developed annually, is subject to funding availability, and may change.

In 2025, the budget for Standard Offer measures has been allocated by utility, sector, and sub-sector as shown in Table 1. The Program will issue Standard incentive offers up to the available budget in each subsector. Once any subsector budget is fully subscribed, the Program will stop issuing new incentive offers for that subsector.

Table 1: Standard Offer 2025 Budget Segments

Utility	Sector	Sub-Sector
PGE	Commercial	Schools
		Non-schools
	Industrial and Agricultural	Horticulture
		Non-horticulture
PAC	Commercial	Schools
		Non-schools
		Street Lighting
	Industrial and Agricultural	Horticulture
		Non-horticulture

Program Participation

For Business Lighting Program purposes:

Commercial sites are defined as: Existing properties that are not single family residential, industrial or agricultural use. Multifamily properties and roadways are considered Commercial.

Industrial and Agricultural sites are defined as: Existing facilities or businesses that process, treat, assemble, mine, produce, repackage, or bottle a product or products for outside distribution, grows something, or has a cold storage distribution center. If the site is Industrial or Agricultural the whole campus will be serviced by Production Efficiency.

Horticulture sites include indoor agricultural operations or greenhouses where plants are grown or processed. Residential sites are not eligible. See PI490HL: Horticulture Incentives for details.

2025 Program Requirements

Energy Trust program requirements, including incentives, are subject to funding availability and may change. Business Lighting project requirements are contained within Energy Trust's Incentives for Energy Efficient Lighting program information sheets:

- Program Information – 190L
- Street Lighting – 190SL
- Public Sector Lighting – 190PS
- Horticulture Lighting – 490HL.

Trade allies are required to meet the project requirements.

Trade allies must use the current version of the Energy Trust Business Lighting Tool to submit and revise proposed lighting projects. The current Lighting Tool is provided to active, enrolled trade allies whenever the Tool is updated, and upon request.

Closed Trade Ally Network

Contractors must be enrolled as an Energy Trust Business Lighting trade ally in our Trade Ally Network to offer Energy Trust incentives to their customers for qualifying lighting projects. For additional information regarding trade ally enrollment, see Part 2 of this Program Guide. Previously, Energy Trust allowed lighting contractors outside of the network to submit projects if those projects qualified for incentives. Until further notice, Energy Trust will not accept incentive applications directly from participants for self-installed lighting projects.

Project and Participant Incentive Caps

The site cap for lighting projects is \$250,000 per year for all non-self-directing Commercial and Industrial and Agricultural sites, including Horticulture sites. See section on Self-Direct Participants (page 13).

The Existing Buildings (Commercial customers) and Production Efficiency (Industrial and Agricultural customers) programs also limit the incentive amounts a participant can receive annually at a site for all projects (lighting and non-lighting combined). Contact a Program representative if you anticipate your customer may be applying for incentives for multiple projects at a site, so we can review and discuss program incentive limits.

If a participant wants to complete multiple lighting projects at a site or wants to complete a project in multiple phases, the total incentives for all projects and phases may not exceed the annual lighting site cap of \$250,000 cap.



Figure 1: Shopping Plaza

In Figure 1, a Commercial shopping plaza has three leased businesses and one property manager/owner. Each lessee and the property owner are considered a unique site in the shopping plaza and each would be subject to a \$250,000 project cap.

Alternatively, if three Commercial spaces are vacant and the property owner wants to upgrade the lights in all of them, then this would be considered one participant. The entire shopping plaza would be considered as a single project with a \$250,000 project cap.



Figure 2: Corporate Campus

Figure 2 shows a Commercial corporate campus. In this case, the entire campus is considered one location with the same participant, and is subject to a \$250,000 project cap.

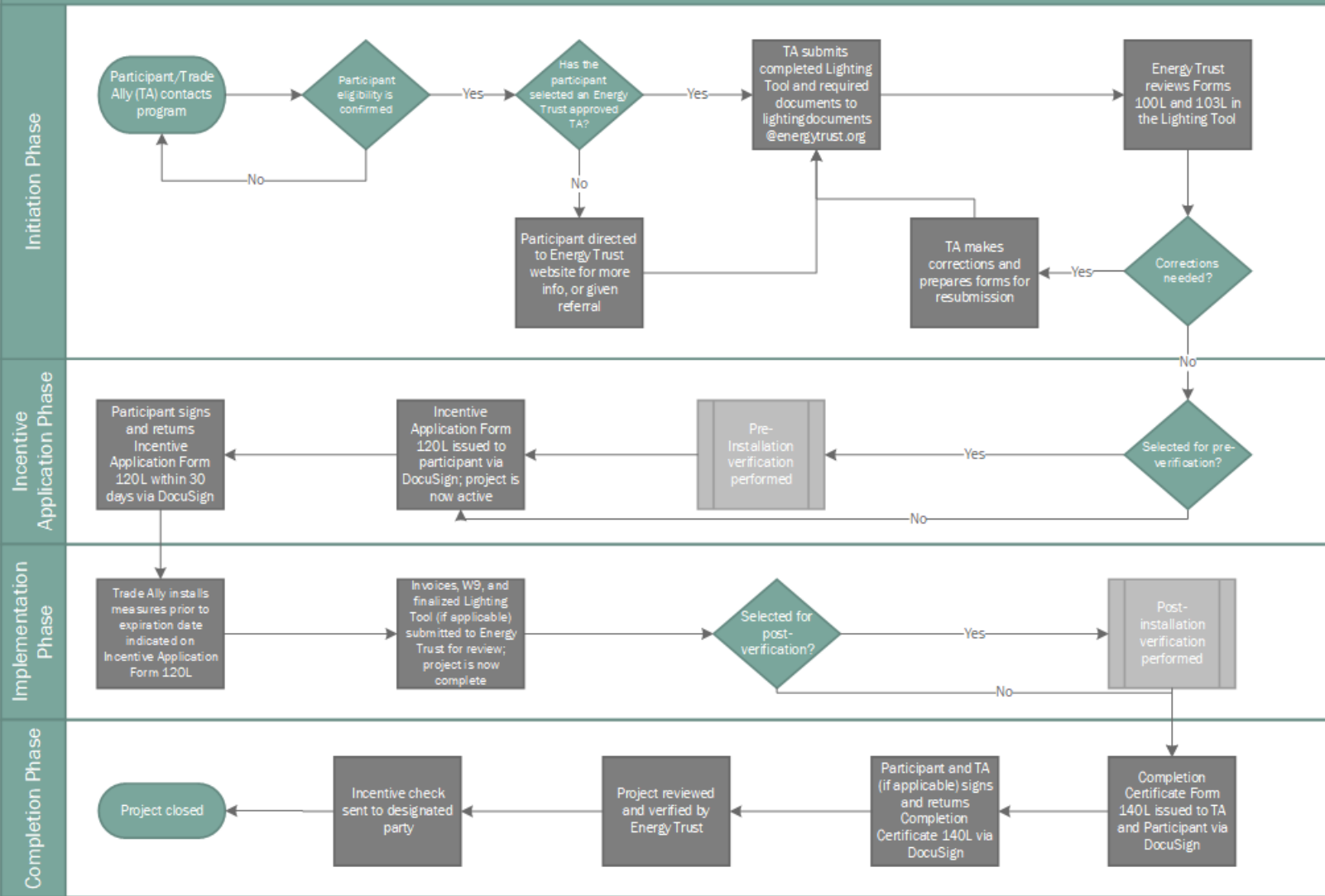
Please note that if a site is listed by the Oregon Department of Energy as a certified self-direct site, Energy Trust would use that site definition when reviewing a project (see page 12 “Self-Direct Participants”).

Project Processes

This section gives a summary of the typical project processes for the Business Lighting Program. Figure 3 is a flowchart of these processes, indicating required forms and timelines, followed by descriptions of each phase. Energy Trust reserves the right to modify these processes, including required documentation or timelines.

During any phase, Energy Trust may require a participant and/or trade ally to submit additional application documentation for certain projects as necessary to enable Energy Trust to determine measure eligibility, costs, or incentive calculations. Additional required documentation may include, but is not limited to, itemized manufacturer or authorized reseller quote(s) itemizing price per fixture, trade ally project equipment purchase orders and invoices, or (when applicable) copies of any related project financing or other external project funding agreement(s).

Business Lighting Trade Ally Participation¹



¹ Schools, governments and municipal facilities follow modified participation activities and phases.

Figure 3: Business Lighting Project Processes

Initiation Phase

During project initiation, the trade ally works with an eligible participant to plan their project. The trade ally uses the Lighting Tool, plus other required documents such as manufacturer cut sheets and incentive payee W-9, to specify the project. The trade ally submits these documents via email to Energy Trust at lightingdocuments@energytrust.org for review and pre-qualification to request incentives. Trade allies must use the current version of the Energy Trust Business Lighting Tool to submit and revise incentive applications. Any energy savings or incentive estimations provided on the 103L Analysis worksheet within the Lighting Tool are estimates for informational purposes only; no estimated incentives are reserved until a program review is complete and a signed **Form 120L Incentive Application** has been received and processed by Energy Trust

Energy Trust program requirements, including incentives, are subject to funding availability and may change. Project requirements are contained within Energy Trust's Incentives for Energy Efficient Lighting forms:

- Program Information – 190L
- Street Lighting – 190SL
- Public Sector Lighting – 190PS
- Horticulture Lighting – 490HL

Only authorized trade allies can offer potential Business Lighting incentives to participants for qualifying measures.

Incentive Application Phase

Energy Trust will only review complete project submissions. A complete project submission consists of a completed Lighting Tool and all required supporting documentation. Incomplete submissions must be corrected before they will be reviewed and qualified in the incentive application phase.

During this phase, Energy Trust reviews the project for eligibility per the 2025 Program requirements and may perform a pre-installation verification. Program staff will contact trade allies to schedule these verifications if necessary.

If the project is eligible and incentive funds are available, Energy Trust issues a Form 120L Incentive Application to the participant which they review and sign via DocuSign. The participant must sign the Form 120L Incentive Application by the deadline listed on the form. If the Program does not receive a signed Form 120L Incentive Application from the participant by the submittal deadline, the Program will send a cancellation notice to the trade ally. An expired project may be resubmitted and would be subject to incentives and requirements in effect at the time of the new submission. If a participant decides not to complete a project after signing the Form 120L Incentive Application, the trade ally is required to inform the program and the Program will cancel the project and incentive funds will no longer be reserved.

Measure equipment or installation services contracted for or purchased prior to Participant signing and returning the Form 120L Incentive Application to Energy Trust are not allowed and can result in an incentive ineligibility..

Modifications to program requirements must be approved in writing by the Program. Trade allies will not be given additional time to submit the Form 120L Incentive Application unless expressly approved by Energy Trust in writing.

Implementation Phase

If the project scope of work or project end dates change during the implementation phase, the trade ally must notify the Program of the change so the project can be re-evaluated. The trade ally must receive written approval from the Program on the change of scope or end dates.

During the implementation phase, the trade ally installs measures and submits invoices along with a final “as-installed” Lighting Analysis and Incentives Estimates (Lighting Tool Form 103L) itemizing installed labor and materials costs for the measure(s), and all other final completion documentation to Energy Trust. In 2025, the project forms and documents must be submitted before the incentive reservation expiration date listed on the issued Form 120L Incentive Application.

During this phase, projects may be subject to a post-installation verification. If so, a program representative will contact the trade ally to schedule the verification, and the trade ally will assist with participant verification documentation and scheduling arrangements. Completion Phase

During this phase, if the project is completed successfully, passes post-installation verification and all required documents are submitted on time, Energy Trust issues a Completion Certificate form (Form 140L) to the trade ally and the participant via DocuSign. Once the Form 140L is signed by the trade ally and the participant, Energy Trust prepares the project for incentive payment. Energy Trust issues an incentive payment to the participant or, if Option to Assign section of the Form 140L is completed, to their assigned payee.

Incentives paid will not exceed incentive reservation amounts. Trade allies will not be given additional time to submit the Completion Certificate (Form 140L) unless expressly requested by the participant in writing in advance and approved by Energy Trust in writing.

Policy Overview

Complete copies of all Energy Trust’s current Board of Director-approved policies are available for review on the Energy Trust [website](#).

Confidentiality of Program Participant Information

Information submitted by Program participants is considered confidential, subject to the terms and conditions of the Form 120L Incentive Application.

Providing Information to the Participant

Business Lighting trade allies must give participants time to read and understand the terms and conditions of all incentive application forms before obtaining a signature. When providing an application to a participant for review, Business Lighting trade allies must explain, at a minimum:

- Issued Form 120L Incentive Applications are time sensitive. Incentives for any submitted application are not reserved until a complete, customer-signed Form 120L Incentive Application is received and processed by Energy Trust and will be dependent on funding availability at the time of processing.
- Energy Trust's incentive rate, the incentive application and reservation process and that the project must be installed with all required project completion documentation submitted during the incentive reservation period.
- Incentive rates for a project are subject to change at any time prior to reservation, and incentive reservations for qualifying projects are subject to funding availability, expiration periods and processing procedures. The final incentive may vary from the estimate included in the initial application depending on Energy Trust's verification of the actual system installed.

If a potential Program participant has questions about the incentive application or the process, have them contact the Program before they sign the application.

Self-Direct Participants

Energy Trust energy efficiency programs are funded through charges for cost-effective energy efficiency collected in rates by Portland General Electric and Pacific Power. Oregon law recognizes certain large retail electricity consumers that are eligible to become self-directing consumers and "self-direct" the energy efficiency charge via the Oregon Department of Energy's self-direction program. If a self-direct eligible Program participant is submitting a lighting project to the Oregon Department of Energy to receive self-direct credits, then that project is not eligible for any Energy Trust incentives.

In addition, if a Program participant is currently self-directing that portion of the amount they are charged in rates pursuant to ORS 757.054(4) for cost-effective energy efficiency resources for the site, or decides to in the future, it can affect the amount of incentive funding they will be eligible to receive from the Program for a lighting project submitted to Energy Trust.

Self-directing participants are generally eligible for up to 50% of the incentive amount that a non-self-directing entity would be eligible to receive, or they can receive the full amount if the site stops self-directing the energy efficiency charge for a period of at least 36 months. Business Lighting trade allies should contact the Program to inquire about participant eligibility if they believe a participant site may be a large electricity user.

Energy Trust staff can support trade allies in making the determination of whether a participant has been recognized by Oregon Department of Energy as eligible for self-direction. Energy Trust may also request additional information about a participant's self-direct status when reviewing application submittals.

PART 2: Business Lighting Trade Ally Enrollment, Performance and Expectations

Trade Ally Enrollment

To enroll as a Business Lighting trade ally, contractors must complete the online enrollment forms (1171A and 171L). Visit the [Energy Trust trade ally enrollment page](#) to begin the application process.

New trade allies must follow the “Begin” link under “New Ally Enrollment.” This will direct applicants to the “Programs List” page where contractors can select the program for enrollment. The applicable selection is “Business Lighting (Addendum 171L)” under Commercial.

Existing trade allies who wish to apply for the Business Lighting Program should contact Energy Trust to obtain their account number and enter it in the space provided and follow the instructions for the second option on the page. Energy Trust has specific insurance requirements for all Business Lighting trade allies and requires proof of insurance prior to processing an application.

The application process may take 10-20 minutes to complete. Once an application has been processed, Energy Trust will contact the references listed on the application. Upon successful completion of reference reviews, and submission and review of all required paperwork, Energy Trust will provide the contractor with written notice of approval as an Energy Trust Business Lighting trade ally.

Trade Ally Listing on Energy Trust Website

Energy Trust maintains a searchable database of all current trade allies on its [website](#).

Trade ally website listings may include one or more “Specialties.” These Specialties reflect the sector (commercial, industrial, or multifamily) and technology of projects a Program trade ally completed in the past year.

The Program currently includes the following Specialties for Business Lighting Program trade allies:

- Lighting
- Lighting Controls
- Horticulture lighting
- Instant Discounts for Business Lighting

To maintain Specialty listings, a trade ally must install at least one project of a given Specialty each year. Specialties that are not demonstrated annually will be removed from the trade ally’s online listing.

Maintaining Trade Ally Status

Program trade allies must meet annual participation requirements each year and maintain required professional certifications to maintain their status as trade allies.

In addition, Energy Trust maintains suspension and termination policies designed to protect Energy Trust, its trade allies, and its customers from losses due to poor work quality, diminished energy savings, and health and safety issues. Energy Trust monitors the activities of trade allies on a regular basis to ensure they provide value to customers and to Energy Trust.

Energy Trust, in its sole discretion, may suspend a contractor from the trade ally network, or terminate a contractor from the trade ally network at any time. Affected contractors may be given support and opportunities for improvement, and Energy Trust may return the contractor to active status, as outlined below. At Energy Trust's discretion, Energy Trust may require a contractor to pursue quality control process consultation at the trade ally's expense prior to reinstatement as a trade ally.

Trade Ally Suspension

Certain actions may result in suspension from participation as a trade ally in the Program. Energy Trust will notify a contractor in writing if it has been placed in Program suspension. The contractor will have 30 days from the notice date to resolve the situation to Energy Trust's satisfaction. Actions resulting in suspension may include, but are not limited to:

- Abusive or vulgar behavior, physically or verbally, toward customers or Energy Trust staff
- Failure to correct violations identified during the verification process within a 30-day timeframe
- Failure to follow a required Program process
- Chronic installation corrections or repeated violations of installation or Program requirements
- Failure to attend required Energy Trust trainings
- Lapsing insurance, licenses or other required certifications
- Failure to resolve any reasonable Program participant complaint regarding the contractor's work as a trade ally under the Program
- Failure to accurately inform Program participants of current Program requirements, including but not limited to, incentive levels
- Attempting to receive lighting incentives through different program offers for the same measures

Effects of Suspension

During Program suspension, a trade ally may not submit any new incentive applications to Energy Trust, nor will Energy Trust issue any new incentive reservations for the trade ally's projects. In addition, the suspended trade ally (i) will be removed from the searchable trade ally database on the website, (ii) is no longer authorized to use Energy Trust's logo on any materials or to represent itself as a Business Lighting trade ally, and (iii) is not allowed to apply for any cooperative marketing activities. Energy Trust may also impose other restrictions on the trade ally's participation in the Program. If the violations pertain to a specific project, the Program participant will be notified at the time of the Program trade ally's suspension.

Trade allies must resolve violations resulting in suspension within 30 days. Failure to do so may result in termination of Program trade ally status.

Trade Ally Termination

In addition to any other termination provisions set forth in this Program Guide and in the trade ally agreement with Energy Trust, certain actions may result in Energy Trust immediately terminating the contractor as a Program trade ally. In the event of termination, Energy Trust will notify the contractor in writing. Actions resulting in immediate termination of trade ally status may include, but are not limited to:

- Failure to resolve any action resulting in suspension within 30 days
- Repeated Program violations
- Violation of license laws
- Discriminating in any case against any trade ally employee, Energy Trust employee, member of the Energy Trust Board of Directors, or member of the public on the basis of race, color, religion, creed, national origin, sex, age, familial status, sexual orientation, gender identity, disability, or status as a veteran.

Effects of Termination

Effective upon notice of termination, Energy Trust will not accept any new incentive applications, will not process any submitted incentive applications that have not yet received incentive reservations, and will remove the terminated contractor from the Program's trade ally database on Energy Trust's website.

Energy Trust may, in its sole discretion, allow a terminated contractor to re-apply for participation in the Program at a later date. Energy Trust may require additional documentation and proof from that contractor that it has taken appropriate measures to prevent further Program violations.