A New "Twist" on a CFL Program – How One Utility Capitalized on a Creative Approach

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ABSTRACT

In 2006, Seattle City Light (SCL) decided to implement a retail compact fluorescent lamp (CFL) incentive program. Other utilities in the area had been running CFL incentive programs for several years, and City Light was hoping to catch up by piggy-backing on the existing coupon models run by two neighboring utilities. But City Light was surprised about one of the responses to their Request for Proposal that advised a very different approach, a retail mark-down in which bulbs are sold at reduced prices without the need for customers to present any coupons or rebates forms.

After reading this paper, the author hopes the reader will understand 1) the unique features of a markdown program model; 2) its cost-effectiveness compared to a coupon model; 3) the variety of creative marketing and promotional approaches which can be used to exceed sales goals; and finally, that this approach is a superior model for any utility considering implementing a CFL incentive program for their customers.

Introduction

In 2006, Seattle City Light (SCL) was mandated to find new avenues through which to acquire additional conservation resources. It had reached a plateau of our existing program offerings, and needed a program that would serve its residents with various income levels and augment energy efficiency measures already in place.

Working within a metropolitan service territory of 375,000 residential customers (defined as meter points), SCL was faced with questions about how to create a program that would equitably serve all our customers. Given the recent advances in efficient home lighting, we made the decision to implement a compact fluorescent lamp (CFL) program. Its goal was to drastically increase CFL usage in homes throughout the service territory.

Seattle City Light – A Conservation Pioneer

In 1977 the City of Seattle's governance declared that in an effort to cope with increasing demands for energy to the City, conservation would be the City's energy resource of choice. Since that time, SCL has encouraged the inception and implementation of a great variety of DSM programs that have saved over 11 million megawatt hours.

In the mid-1990's, SCL was excited about the promise of compact fluorescent lamps (CFLs). It implemented a pilot program involving a mail order catalog that had mixed results. Administrative costs per bulb ordered were high and customer satisfaction with both the performance of the CFLs and the entire ordering process was low. In 2001, SCL offered free CFLs as part of a mailed conservation kit. A whopping 58% of its customers requested the 2-bulb kit, for a total of 300,000 bulbs distributed. And evaluations showed customer satisfaction was much improved. But the Utility was still receiving complaints about early burn-out, poor

color and large size. In the meantime, SCL's neighboring utilities - Snohomish County Public Utility District (SnoPUD) and Puget Sound Energy (PSE) - had begun offering dollars-off coupons (\$2 off for regular CFLs and \$3-\$4 off for specialty CFLs) for CFLs at retailers and were reporting huge increases in sales (Williams 2007, Bandazy 2007).

Seattle City Light Joins the Party

SCL was carefully watching the successes and challenges of PSE and SnoPUD's coupon programs. By 2006, with the combination of dollars-off coupons and improved CFL performance, variety and availability, SCL felt ready to begin its own CFL retail program. Unlike the Northwest Energy Efficiency Alliance (NEEA) who was ending its regional CFL incentive programs because it considered the CFL market largely transformed, (NEEA 2006), SCL felt sure there was still a huge potential for converting incandescent sockets to CFLs. A 2007 regional CFL Saturation Study confirmed its hunch. The survey found that "roughly half (46%) of all survey respondents reporting two CFL bulbs or fewer" installed. Twenty-nine percent indicated they had no CFLs installed (EMI 2007). Based on SCL's research of PSE and SnoPUD programs, it concluded that the coupon model seemed fairly simple to implement. The coupon infrastructure was already well established in most of the major retailers we shared with our neighboring utilities.

Requests for Proposals

Late in 2006, SCL published a Request for Proposal (RFP) indicating that the utility was looking for a consultant to help it implement a CFL distribution program throughout our service territory. SCL was looking forward to taking advantage of existing coupon designs and the retail relationships already established through the ongoing PSE and SnoPUD coupon programs in the region. In the end, SCL received two categories of proposals: contractors offering coupon-based systems like our neighboring utilities, and one firm, Applied Proactive Technologies Inc. (APT), that proposed a retail markdown approach that addressed the limitations of in-store coupons, promised to be more cost effective and provide more comprehensive sales data (Feroli 2007).

The basic design of coupon-based rebate programs begins with a relationship between the utility and retailers in their service territory. After gaining a written commitment on the part of the retailers, a utility program will then involve a coupon house - a third party entity to develop and process the coupons. The coupon house will then supply retailers with coupons. Participating retailers display the coupons on tear pads in the CFL section of the store. The coupon, which has a designated dollar value, serves as a customer subsidy for the purchase of any CFL product. Coupons are processed by retailers like a manufacturer coupon; the price reduction is taken at the register. Processed coupons are delivered to the coupon house, counted, and an invoice is sent to the energy utility on behalf of the retailer for the cumulative value of submitted coupons.

With a markdown approach, consumers do not need any type of coupon or rebate form to buy the discounted products. The CFLs are already marked down by the retailer when they are stocked on the store shelves. Instead of counting coupons to determine sales and subsequent reimbursement to the retailer, utility reimbursements would be based on actual retail sales data showing how many of each qualifying product was sold the previous month. APT's approach was unexpected because our RFP specified a coupon approach.

Coupon Program Challenges

What SCL learned from APT's proposal is that there are several problems with a couponbased program design. First and foremost, there are difficulties in tracking sales. All that can be gleaned is that a particular retailer has submitted a given quantity of coupons for processingmissing is what kind of CFLs are selling. There is no data on the wattage, CFL type or the number product sold by type. Secondly, there are issues of "shrinkage" that can take place as a result of the unsophisticated method for tallying the number of coupons used. An unscrupulous or simply careless retailer could include unused coupons in the box being mailed to the coupon data processor, without actually selling bulbs, drastically reducing the verifiable success of this type of DSM program. Third, with coupons, you are tied into inflexible discount amounts. In order to adjust CFL subsidies, you have to pull and reprint coupons. And fourth, customers must bring a coupon from home or find one in the store in order to get the discount.

Markdown Program Advantages

APT's markdown approach addressed these challenges to the more traditional coupon program for CFL incentives:

- 1. <u>Accurate sales tracking</u>: Unlike a coupon program, reimbursements to retailers are based not on the number of coupons returned, but on actual sales data from each specific model of CFL sold. Each participating retailer agrees up front in a Memorandum of Agreement signed by the utility and the retailer to supply credible sales data generated from a storebased point-of-sale system. Data reports must show the detail of sales by product and store in a monthly date range.
- 2. <u>Price flexibility</u>: The marked down price can be individually negotiated with each retailer for each product they carry, depending on their regular retail prices and what final 'subsidized' (or 'incented') price the utility feels would be most appropriate. The utility is not tied to a specific coupon amount. Given the huge number of CFL product types, price points and bulbs per pack, this is a crucial advantage.
- 3. <u>Customer convenience</u>: Customers don't have to bring a coupon from home or look for a coupon displayed somewhere in the store in order to purchase the product at a reduced price. The discounted price, advertised with point-of-purchase signs explaining CFL savings and utility sponsorship, is what the customers pay at the cash register. There is no coupon clutter on the shelves and no coupons for cashiers to validate or scan. Anyone can go into a participating retailer and take advantage of the discount.

Although SCL understood these advantages to a markdown approach, the utility was worried about four issues: 1) getting accurate sales data; 2) if any retailers would actually participate with the requirement to provide sales data, especially if some of their stores in PSE and SnoPUD territory were already offering coupons; 3) not knowing how many non-customers were buying SCL's discounted products; and 4) how to manage consumer demand within our fixed budget.

APT assured SCL program staff there would be no problem signing up two of the major sellers of CFLs – Home Depot and Costco – as APT was doing markdowns with them in other parts of the country. And both these corporations had sophisticated tracking systems that could easily provide detailed and credible sales data for each store. APT has also approached Bartell

Drug, a drugstore chain with 22 locations in SCL territory that was very interested in participating and could easily provide sales data.

If needed, APT also assured SCL that they could set up a coupon program with those retailers who didn't have the flexibility to handle two types of incentive programs. [As it turned out, no retailers in SCL territory to date have insisted on using coupons; in fact robust markdown programs are operating not just with national chains but with small independent hardware and specialty stores as detailed in the next section.]

SCL understood that there was nothing to stop customers of neighboring utilities from buying SCL-discounted CFLs. But it decided that it was willing to accept the inevitable small percentage of sales to non-customers because its neighboring utilities had similar discounts, and they accepted the fact that some SCL customers were using their coupons.

Regarding how to manage demand, APT assured SCL staff that one of the advantages of a markdown is that prices can revert back to the non-discounted price within days compared to the time it takes to visit each store location and pull coupons.

APT cautioned that a major downside to a markdown approach is the length of time it takes to recruit retailers and negotiate customized program participation agreements that included detailed requirements for providing monthly sales data.

Based on all the advantages and excellent references, SCL made the decision in late February of 2007 to hire APT to implement a markdown CFL incentive program.

Program Implementation

APT started recruiting and training retailers in April and true to their word, it did take until late June - longer than SCL thought - for the first marked down products to hit the shelves in Costco, Home Depot and Bartell Drug. But SCL was thrilled it had three major retailers that offered great product variety (Home Depot), extremely low prices (Costco) and many locations throughout the service territory (Bartell's) from which its customers could choose. Conservation staff at SCL let out a sigh of relief!

SCL was also pleasantly surprised to learn that it was contributing an average of only \$1.40 subsidy per bulb across all models. In fact, the average marked-down price of a 13-watt twist style bulb was under \$1.00! When these bulbs hit the shelves, SCL started running this tag line in its marketing materials: "better, brighter, under a buck!" Based on initial sales reports compared to the same period the previous year, SCL saw definite spike in sales, which did not go unnoticed by its retail partners. Participating retailers were thrilled and signed up for bigger allotments.

SCL Budget

Based on initial estimates of SCL providing a \$2.00 per bulb incentive under a coupon program, the program was modestly cost effective as a conservation resource and the 2007/2008 budget was set at 250,000 CFL sales for each year. But with the new lower average of only \$1.30 per bulb, SCL determined that the program was one of the most cost-effective of all its conservation offerings and decided that it would pay for as many CFLs as the retailers thought they could sell. In other words, SCL would provide as much budget as was needed to sell the highest number of CFLs as long as the average subsidy stayed at around \$1.30 per lamp. See

Table 1, "Seattle City Light 2007/2008 Budget" for actual 2007 budget amounts and estimates for 2008.

Table 1. Seattle City Light 2007/2008 Duuget				
	2007 (June – Dec.)		2008 (est. from JanApr. actuals)	
	APT	SCL	APT	SCL
CFL Rebates	\$448,198 (349,000 CFLs)		\$1,728,755 (1.2 million CFLs)	
Retailer Recruitment	\$31,333		\$52,408	
Data Tracking	\$20,023		\$59,556	
Field Services	125,331		\$209,631	
Marketing		\$166,802		\$120,000
Sub-Total	\$624,885	\$166,802	\$2,050,350	\$120,000
TOTAL	\$791,687 (\$2.27/CFL)		\$2,170,350 (\$1.81/CFL)	

Table 1. Seattle City Light 2007/2008 Budget

Product Mix

Once participating retailers and their CFL suppliers understood that SCL had a much larger budget, they began to request subsidies not just on regular twisty bulbs, but also on CF reflector lamps, PAR lamps, globes, 3-way lamps, dimmable lamps, A-lamps and many in a choice of warm, bright and daylight color temperatures. As long as the lamps were ENERGY STAR certified (or in the case of reflector and PAR lamps, certified by the Pacific Northwest National Laboratories to withstand high heat), SCL agreed to provide a discount.

Field Services

Part of APT's proposal included field services. This entailed APT staff making regular visits to each retailer to install and maintain *Twist & Save* shelf signage and educational material, ensure correct pricing, restock and tidy shelves and make sure store personnel understood and supported the program. Each store location is visited once or twice a month and actions are detailed in weekly reports.

The importance of these regular and consistent stores visits cannot be over-emphasized. Retailers love the help that APT staff provides in positioning and displaying CFL stock, and answering customer questions. SCL have had only a few customer calls about pricing errors, which were resolved quickly with a visit to the store. APT staff also helped differentiate its program to retailers who share locations in PSE and SnoPUD areas where coupons are still honored. SCL is now getting feedback from these retailers that many prefer the markdown approach over the coupons (Loughran 2008). In fact, PSE just hired APT to transition their CFL incentive program from a coupon model to a markdown approach.

Establishing the Program Brand Name

As with most marketing projects, an important concern was to come up with a strong brand that would both convey the purpose of a CFL retail discount program and then be easy to market. There was a desire to incorporate action into the brand, similar to "Change a Light, Change the World" (ENERGY STAR 2008). Also, the Bonneville Power Administration (BPA) had been active in the Northwest region with a CFL manufacturer buydown program called "Savings with a Twist" (PECI 2008). SCL staff liked "Savings with a Twist" but wanted something with more punch and that conveyed a sense of action. The term "twisty bulbs" had become a popular term to describe CFLs by local radio announcers, newspaper reporters and customers who called its Conservation Help Line for information about them. Staff also wanted to associate the name with something fun. The result was *Twist & Save*. See Figure 1, below.

Figure 1. Twist & Save Logo



In fact, when this name was informally tested to SCL employees and their friends and families, almost everyone who heard it immediately started singing the opening line to the Beatle's version of the "Twist & Shout" song ("Come on baby now, twist and shout ..") and doing "The Twist" dance. Staff knew instantly it had a hit!

The effectiveness of a brand determines, to a large degree the ease of the marketing campaign needed to support it. *Twist and Save* has become a brand that markets itself and perpetuates its own success. While there are many avenues through which SCL has built recognition of *Twist & Save*, a few specific events and projects have been utilized as opportunities to make the *Twist & Save* name all the more present in the minds of its customers. These are as follows.

Point-of-sale materials. In each store selling *Twist & Save* products, APT has been diligent in making sure shelf signage is displayed along with every discounted lamp model. Signage is customized for each retailer, but each sign includes the full *Twist & Save* logo and the words "Discounted prices brought to you by Seattle City Light" plus the regular price and the discounted price. In addition, many retailers also include *Twist & Save* posters, flyers and brochures that hang from or are attached to shelves and endcap displays. See signage in Figure 2, below.



Figure 2. Twist & Save Display at Home Depot

Source: Applied Proactive Technologies, Inc. (2008)

Endcap displays. Many retailers chose to feature the *Twist & Save* products on special endcaps (displays on the front end of an aisle) in addition to their regular place on in the lighting aisle. See Figure 3 on next page. These displays would grab customer attention as soon as they entered the store and resulted in even higher sales then when the products were in just featured on the lighting shelves. To encourage retailers to maintain endcaps, APT designed contests in which store personnel won grocery store gift cards when *Twist & Save* sales reached certain thresholds or exceeded previous months. These contests have proven quite popular. In March of 2008, the top three winning Bartell Drug stores saw sales increases from the previous month of 163 percent, 41 percent and 34 percent (APT 2008).



Figure 3. Twist & Save End-Cap Display at Bartell Drugstore

Source: Applied Proactive Technologies, Inc. (2008)

In-store training. APT field services staff pays special attention to both store managers and store personnel when visiting stores. They are easily recognizable in their *Twist & Save* shirts. They take time to explain the program to new store personnel, answer their questions, interact with customers, tidy up the shelves displaying the *Twist & Save* products and replace worn or missing signs. In addition to program updates, APT field representatives provide detailed ENERGY STAR CFL trainings covering CFL technology, efficiency and application. Sales associates are better equipped to discuss the program with customers if they are well trained on the promotional product. With regular visits that are both helpful and informative, store personnel look forward to seeing the *Twist & Save* representatives.

In-store events. APT field services staff regular set up and attend in-store events such as grandopenings or sidewalk sale days. In conjunction with SCL, they have designed a special *Twist & Save* display that features a light box and a meter that shows the difference in energy use between a CFL and incandescent bulb. They offer consumers *Twist & Save* pens, stickers or magnets, talk about benefits of CFLs and provide information about proper disposal. Sales of *"Twist & Save* products usually double with the presence of a staffed in-store display.

Television and web. Since there are few marketing mediums today that are as effective as television and web, SCL felt the need to create a marketing tool which could be used on these two mediums. The term *Twist & Save* was so clearly associated with the song "Twist & Shout" that SCL hired a local composer to create a jingle similar to the tune. SCL then asked a number of Seattle sports, entertainment, news and government celebrities if they would be willing to "twist and save" in their respective workplaces or at various well-known Seattle locations. The result was a clever, catchy and very entertaining three-minute video segment that has been running on the Seattle Channel and as a Public Service Announcement on several local television stations. In addition, the video was also encoded for use on its own website (www.seattle.gov/twistandsave) and was uploaded to the popular YouTube, with the hopes that it might become a viral video!

During the time that the video was first being aired, SCL also ran an article in its bill publication "Light Reading", suggesting that customers submit their own *Twist & Save* videos. In addition, a number of press releases were issued promoting the *Twist & Save* program and the video that accompanied it.

End fest. In an effort to reach out to young people in the area, *Twist & Save* was featured in a booth at the very popular EndFest, a rock concert put on by a local radio station where local bands are featured. SCL wondered if this target group would respond to products not usually associated with a rock concert. But it had a hunch its young folks would respond to something that would help save the environment. In order to make the booth more interactive and interesting, a bicycle was connected to ten incandescent bulbs which were powered by the energy produced by the rider. The harder they pedaled, the more lights lit up. It was quite a struggle to light all 10 bulbs, and getting a colorful sticker for their efforts became a real badge of honor. In addition, older teenaged children of SCL staff were recruited to help staff the booth to draw people in and explain how the bike worked.

The bicycle soon became quite popular and there was often a line of young people waiting to ride it. While in line, a hand crank was available for the teenagers to compare the

energy required to light one incandescent bulb versus one compact fluorescent bulb. *Twist & Save* stickers were handed out to everybody who rode the bicycle and met their goal of the number of lights they thought they could light up. In retrospect, utilizing the concert as a marketing avenue was an excellent choice. Young people are indeed interested in environmental issues, especially when offered interactive displays and enthusiastic staffers. All told, about five thousand young people were exposed to the *Twist & Save* brand.

Give-a-ways. Perhaps the simplest marketing strategy has also been the most effective one that SCL have used in promoting *Twist & Save*. It's become almost habitual to take single packaged CFL bulbs to most public outreach events branded with *Twist & Save* stickers and some information about the program. Giving out bulbs has proven to be a great strategy in that customers appreciate a useful item while the utility achieves energy savings.

Bill stuffer. SCL sends out customer bills every two months. Customer surveys show that its bill publication "Light Reading" is the most important way that customers learn about SCL programs and services. *Twist & Save* was the featured story in the September/October edition. Waiting to make a broad program announcement until SCL had a few months of experience with its retailers was a wise move. Not only did it coincide with the beginning of lighting season, but by this time, customers had lots of different retailers to choose from and a variety of products were stocked on the shelves. APT field staff also had a chance to install in-store signage, making the *Twist & Save* products easy to identify. SCL had a very smooth kick-off with only a few customer complaints in that some retailers thought coupons were required for the discount.

Special events. SCL had a CFL costume made which has been worn at a variety of events including last summer's Grand Seafair Parade, a Seattle Seahawks mascot day football game, Seattle Mariners baseball "Go Green" games and the recent Seattle Green Festival. The costume consists of white foam tubes that spiral around the wearer which allows the public to make eye contact with the wearer. It's a popular character and helps draw people to the booth.

Specific marketing. This is a list of where the *Twist & Save* campaign was promoted: *Twist & Save* video:

- Seattle Mariners baseball game
- Seattle Seahawks football game
- YouTube
- KIRO TV's "Going Green NW" web page
- KOMO TV's "Your News" web page
- KING TV's "Your News" web page *Twist & Save* interviews:
- Feb. 21, 2008 live interview on KOMO's 4 p.m. news
- March 2008 15-20 airings of "Comcast Newsmaker" interview segment on CNN Headline News in the Seattle area *Twist & Save* news articles:
- Seattle Times Gordy Holt's "Around the House" weekly news column
- NW Herald Outlook weekly neighborhood paper
- "School Beat" Seattle Public Schools e-newsletter

- Summit School Newsletter *Twist & Save* video PSA's:
- KSTW Channel 11 TV
- Seattle City Government Channel 21
- KIRO TV
- KOMO TV
- KING TV
- Seattle Public Schools Channel 26
- Seattle Central Community College TV
- Seattle Cable Access Network TV *Twist & Save* radio advertisement
- Underwriting messages on public radio stations KUOW and KPLU
- 6 weeks of 30 and 60 second spots on a variety of commercial radio stations

Program Success

SCL's original goal for 2007 was to sell 250,000 CFLs. But since SCL missed the winter months and didn't start the program till half-way through the year, it was hoping to reach sales of 125,000. Final sales figures for 2007 were just over 349,000 bulbs, exceeding its goal by 280%! Retail sales data from February and March 2007 (before the program started) compared to the same period in 2008 shows an average 70% increase in sales (APT 2008).

A specific example of success is Bartell Drug. In August of 2006, total CFLs in all Bartell stores was 608. For the same period in 2007 (3 months after they began selling "*Twist & Save*" lamps), total sales for all stores was 8,284 -- an increase of 1,263 percent!

By the end of 2007, SCL was quite pleased with the variety of retailers who had signed on to the program. They represent stores from every retail channel – membership, big box, home improvement, department, drug, hardware, lighting showroom – except grocery. Ten retailers – Costco, Home Depot, Lowe's, Bartell Drug, Fred Meyer, McLendon Hardware, Maple Leaf Ace Hardware, Seattle Lighting, Pacific Supply and Ecohaus – a total of 41 locations throughout the utility service area. APT is currently in negotiations with Walgreen's, Kroger, Sam's Club and Amazon.com to sign up for the program. (For a current list of retailers, products and prices, see our website <u>at www.seattle.gov/twistandsave</u>.)

The average incentive per bulb over all types of products is \$1.30, less than the \$2.00 per bulb SCL had estimated. The product mix includes spirals, globes, R and PAR lamps, plus 3-way and dimmable lamps. Wattages range from 9 to 30 and color temperatures range from 2700K – 5500 K. Participating manufacturers include Feit, TCP, Sylvania, Globe and GE.

Customer Response

Although no quantitative customer surveys have taken place, anecdotal evidence from customer calls and email to SCL's Conservation Help Line suggests that customers are very satisfied with the regular twist, globe and A-lamp products and the variety of color temperature choices. In regards to CF reflector and PAR lamps, most complaints are due to the longer warm-up times which can be up to 90 seconds to come to full brightness. Dimmable CFLs are responsible for the most complaints due to some color shift and/or stuttering when dimmed.

Feedback from CFL manufacturers (ENERGY STAR 2008) indicate they are working on the dimming problems. They are also starting to offer candelabra based lamps with a flame-tipped covering.

An important customer issue that emerged within a few months after the start of SCL's program was the presence of mercury in CFLs. Consumers were quite concerned having heard that CFLs contained this hazardous substance. Soon after a newspaper article appeared in the Seattle Times (Holt 2008), SCL's Conservation Help Line was flooded with concerned callers. SCL immediately updated its web pages with the most recent information from the Department of Energy's web site about mercury (www.energystar.gov) and linked to a list of all the places in King County where CFLs could be taken back to be recycled (www.takeitbacknetwork.org). Flyers containing the same information were printed and displayed in all participating store locations by APT field services staff. Just this year, SCL began taking back CFLs in both its utility service centers, in addition to all the places available through King County's "Take It Back Network"

Looking Forward

Given the success SCL achieved in 2007, it has increased its 2008 sales goal to 1.2 million CFLs. But most recent sales figures for the first 4 months of 2008 show sales will hit one million lamps by June. (An event with the Mayor is being planned in partnership with one of the participating retailers to recognize the one-millionth CFL being sold.)

APT plans to add retail partners especially grocery and online channels, and broaden the variety of products discounted to include more ENERGY STAR dimmable models, 3-way models, R-20 reflector lamps and color temperatures. With the increase in retail locations and products, APT will increase resources for field services in order to maintain regular visits.

SCL's marketing focus will be to 1) reach out to underserved markets such as low income homeowners, tenants and non-English speaking households; and 2) continue educating its customers about proper disposal of CFLs, available color choices and proper residential applications for the many varieties of CFLs.

SCL is currently in the process of translating all of its print materials to the six foreign languages most commonly spoken by its customers. These materials will be widely distributed to retailers in areas which are densely populated by the speakers of the respective languages. SCL is also contemplating how best to market to low-income customers and is working with local housing agencies for advice and partnering opportunities.

For overall marketing, SCL will continue using its catchy *Twist & Save* jingle, video and costume in partnerships with Seattle professional and college sports teams. Staff also plans to attend Seafair summer neighborhood festivals, and community fairs and sustainability events throughout the summer and fall.

Summary

SCL has been very pleased with the success of its CFL incentive program. It's rare when all aspects of a brand-new program - design, implementation, marketing, field services and tracking - work as planned. The utility had critical factors working in its favor:

- A program model that is easy for retailers, customers and the utility to use
- An experienced and competent contractor that excels in all areas of program implementation including retailer recruitment, field services and data tracking
- Creative in-house marketing staff

It also had a bit of luck on its side in that the timing of the program coincided with several improvements in the products offered in terms of performance, variety and availability. The author hopes other utilities considering a CFL incentive program are inspired by the success of Seattle City Light's markdown approach and the *Twist & Save* brand.

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