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Subject:	Program Year (PY) 2024 (PY2024) TRM v11.0 Volume 5: Implementation Guidance Update

The low-income/hard-to-reach forms included in Appendix A: Low-Income Income-Eligible Verification Forms of the PY2024 TRM Volume 5: Implementation Guidance have been updated with the new federal poverty level information for 2024.

Tetra Tech completed edits to the report as outlined above and submitted it for PUCT Staff review on January 23.

Public Utility Commission of Texas

Texas Technical Reference Manual

Version 11.0

Volume 5: Implementation Guidance

Program Year 2024



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Acknowledgments

The Texas Technical Reference Manual (TRM) is maintained by the Public Utility Commission of Texas' (PUCT) independent evaluation, measurement, and verification (EM&V) contractor, Tetra Tech.

This version of the TRM was primarily developed from program documentation and measure savings calculators used by the Texas electric utilities and their energy efficiency services providers (EESPs) to support their energy efficiency efforts and original source material from petitions filed with the Public Utility Commission of Texas by the utilities, their consultants, and EESPs such as Frontier Associates (TXu 1-904-705), ICF, CLEAResult, and Nexant. Portions of the TRM are copyrighted 2001–2017 by the Electric Utility Marketing Managers of Texas (EUMMOT), while other portions are copyrighted 2001–2018 by Frontier Energy. Certain technical content and updates were added by the EM&V team to provide further explanation and direction as well as consistent structure and level of information.

TRM Technical Support

Technical support and questions can be emailed to the EM&V team's project manager (lark.lee@tetratech.com) and PUCT staff (therese.harris@puct.texas.gov).

1. INTRODUCTION

This volume of the technical reference manual (TRM) contains evaluation, measurement, and verification (EM&V) team recommendations regarding program implementation that may affect claimed savings. The EM&V contractor drafts guidance memos for the electric utilities' energy efficiency programs to provide clear direction on calculating or claiming savings. Guidance memos are consistent with the Energy Efficiency Rule 16 Texas Administrative Code (TAC) § 25.181 and the TRM but address areas where additional direction is needed for consistency and transparency across utilities' claimed savings from the programs. This volume compiles the various guidance memos produced during the EM&V effort.

Implementation guidance contained in this volume is summarized by sector below:

Commercial

- Project documentation
- Additional savings
- New construction

Residential

- Low-Income Income-Eligible verification forms
- Audit list for Low-Income programs

Cross-Sector

- Load management programs
- Commercial and residential HVAC split-systems without AHRI certification
- Data model

2. COMMERCIAL

2.1 PROJECT DOCUMENTATION

This section summarizes the progress and current status of the evaluation, measurement, and verification (EM&V) team's assessment of the utilities' efforts to meet and conform to project documentation standards and provides additional guidance for areas still in need of improvement as part of the annual EM&V statewide report.

2.1.1 Background

For all energy efficiency programs, critical inputs and methodologies needed to replicate claimed savings calculations are captured in a combination of the TRM, program manuals, program tracking data systems, and individual project documentation. Project-level documentation is critical to the transparency of claimed savings and facilitates efficient third-party EM&V at the project, program, and portfolio levels. This section specifically addresses individual project documentation needs; individual project documentation includes all relevant site-specific details (e.g., audit reports, worksheets, program applications, invoices, project overviews and descriptions, photos, and installation reports).

We provide detail on documentation best practices currently incorporated into many Texas programs (based on information gathered during PY2022 evaluation activities) and recommendations for improvement. The objective is to support the utilities in achieving industry-standard degrees of documentation rigor, clarity, and efficacy; these standards are necessary to organize and manage such information to yield transparency and facilitate efficient and effective evaluation.

2.1.2 Additional Documentation Guidance

In this section, we provide guidance geared specifically to help improve CSOP program documentation scores. However, the guidance may also be used to support the continued improvement of program documentation for other programs.

Recommendation 1: Clearly organize project files.

Organized project files are critical for many reasons, including:

- clear and transparent reporting of documentation used to support claimed savings.
- ease of identification of related program project files that may not have made the data transfer,
- backup support for information within tracking data systems,
- support custom parameter usage, and
- support deviation or enhancement of methodologies to gain greater accuracy.

An important part of organized project folders, files, and documents is clear naming conventions; this helps keep files organized and improves consistency in document placement and locating critical documents to support the EM&V efforts. Below are some examples of the difficulty the EM&V team has had with project-level folders and files received:

- The project folders often contained inconsistencies regarding file and document names, locations, and contents. Files with similar names often contained disparate information, while seemingly identical files contained dissimilar information.
- The project folders included multiple copies of project documents. Locating the final
 documents used to support the reported savings proved difficult for many projects. For
 example, when numerous photos are provided, locating those that support the key
 savings assumptions is difficult. Distinguishing between pre- and post-equipment photos
 was also, at times, difficult.
- Project folders contained documents labeled as verification reports when they were still
 actually measurement and verification (M&V) plans with no completed verification data.
 Such plans provided the methodology to verify project savings estimates yet did not
 document that project savings estimates were complete.

The project file organization example below provides a list of potential project subfolders and documents that would be ideal for collecting information to determine whether a pre- and post-inspection has been completed. Many documents listed are key elements necessary to support custom project assumptions and review.

Table 1. Project File Organization Example

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Stage	Retrofit and new construction		
Pre-project*	 Pre-project calculator Plans (e.g., drawings, fixture list) Pre-project inspection photos Pre-project audit reports Project descriptions, sponsor agreements, etc. 		
Post-project	 Post-project inspection calculator Post-inspection field notes Post-project inspection photos As-built plans Installation reports 		
Supporting documents	 Calculators (old and archived) Spreadsheets or other backup documentation (especially those to support custom calculations) Specifications, cut sheets, certifications Check requests to utility Partner letters or savings summaries Material purchase orders and invoices Email communication M&V plan for custom key input assumptions (e.g., operating hours) or custom savings methodologies 		

Stage	Retrofit and new construction	
Final documents**	 Final calculator Final M&V plan for custom projects Final verification documents for custom projects Final project notes 	

^{*} New construction projects may not necessarily include these documents.

Recommendation #2: Use photo verifications to support key measure assumptions.

When on-site fieldwork is complete—whether by trade allies, implementation staff, or utility staff—representative photos can help document and support key measure attributes and assumptions. Most programs include some form of photo documentation to support projects. Some programs in Texas even use tablets in the field whereby the project site and equipment photos are taken by trade allies and automatically uploaded to tracking systems and project folders. The table below outlines how photos can support project documentation for some of the most common commercial project types (i.e., lighting- and HVAC-based projects).

Table 2. Project Verification Applications and Examples

Stage	Lighting projects*	HVAC projects
Pre-project	 Existing lighting system types (e.g., lamp, ballast, fixture) Existing lighting equipment quantities Existing control type Existing lighting equipment operability and inoperability Building type Air conditioning type 	 Existing HVAC equipment types and sizes Existing HVAC equipment quantities Existing HVAC equipment operability and inoperability (e.g., setpoint, load display shots) Building type
Post-project	New lighting system types (e.g., lamp, ballast, fixture) New lighting equipment quantities New control type New control schedule automation (e.g., building and lighting automation system screenshots) New lighting equipment operability Building type Air conditioning type	New HVAC equipment types and sizes New HVAC equipment quantities New HVAC equipment operability (e.g., setpoint, load display shots) Building type

^{*} Note that some of these project parameters may not be possible to capture for all lighting quantities for large lighting projects. In these cases, alternative project documentation types may be preferred.

^{**} These documents also support EM&V on-site minimum requirements for data collection needs.

Recommendation #3: Include clear descriptors of measure type as well as quality assurance/quality control (QA/QC) inspections in the tracking system.

Different projects (e.g., retrofit versus new construction projects, inspected versus not inspected sites) have different documentation needs. Capturing participant descriptors can aid evaluation efforts immensely, keep cost burdens low, and facilitate transparency.

Many commercial programs continue to track and describe measure-level savings at the measure-category level (or savings calculator level) instead of the measure-specific level. For example, the tracking system will document the savings associated with a lighting project captured within a lighting calculator (e.g., Lighting Equipment Survey Form version 9.02). However, the calculator includes many different lighting fixture types, effective useful lives, and related savings. Tracking project data at the measure-specific level (e.g., integrated-ballast LED lamps, linear fluorescent, lighting controls) rather than the measure-category level will improve the data's transparency to readily assess measure types and individual claimed savings. This structure also supports ease for calculating cost-effectiveness.

As another example, new construction projects may not have pre-inspection forms or field notes. In contrast, retrofit projects may have many pre-project documentation types (e.g., pre-project calculator, pre-project plans, pre-inspection photos). Providing information regarding "greenfield" or complete demolition and rebuild projects as a differentiator from retrofits and small remodels upfront is a valuable population segmenting descriptor. When tracking systems use descriptors like these, they become a valuable screening tool; they can inform evaluators not to request certain documentation (that may not exist), which can misdirect time and resources. It also allows better budgeting and allocation of resources, improving overall efficacy. Another example is those sites or program participants that receive internal QA/QC versus those that do not. Some programs have modified their tracking systems to begin logging this data and provide a list as part of the EM&V data collection process; this list notifies the EM&V team that a site will not have specific project-level documentation because it was not site-inspected or verified, etc.

Recommendation #4: Complete M&V plans and reports needed for custom projects.

Utilities and their implementation contractors are encouraged to engage and collaborate with the EM&V team to discuss issues and options, obstacles, and possible solutions for custom calculations and M&V plans as new technologies or offerings become part of the Texas portfolios.

2.2 INCENTIVES AND CLAIMED SAVINGS

This section provides guidance on claiming savings when a financial incentive does not cover all project savings during the implementation of energy efficiency measures.¹

2.2.1 Background

To meet various program objectives, it is common practice for utilities to set a ceiling or cap for the financial incentive any one energy efficiency service provider (EESP) or project can receive. These "individual incentive caps" are set as an overall percentage of the total incentive budget or as a dollar amount. The established caps vary by utility and are noted in their program manuals.

Individual incentive caps are different from a "set incentive." During the application phase, utilities calculate a project incentive based on pre-installation estimated savings; reserving incentive funds are at that time. Once the project is complete, there may be some variation in the initial agreed-upon savings estimates while setting the incentive and the actual post-installation savings. This variation is due to changes in efficiency levels, quantities, or equipment types that take place between the project planning phase and the project implementation phase.

2.2.2 Considerations

In the case of incentive caps, the EM&V team has some concerns regarding claiming all project savings when reaching an incentive cap. Since all project savings are not being incentivized at the project planning phase, claiming all project savings may result in increased free-ridership. A free rider is "a program participant who would have implemented the program measure or practice in the absence of the program." (16 TAC § 25.181 (c) (24)).²

In the case of set incentives, the EM&V team has some concerns that spillover could be claimed incorrectly during post-project inspections. Spillover is "reductions in energy consumption and demand caused by the presence of an energy efficiency program, beyond the program-related gross savings of the participants and without financial or technical assistance from the program." ((16 TAC § 25.181 (c) (53)). Spillover is a component of net savings, and claimed savings are based on gross savings. Therefore, spillover should not be included in claimed savings if found on-site during post-project inspections.

¹ This guidance does not apply to behavioral, code or other market transformation programs where the primary program strategy is technical assistance and/or education that results in behavioral or operational changes for energy and demand savings.

² In addition to the incentive caps or set incentives at the individual EESP or customer-level, utilities may also set caps on incentives a customer can receive at the measure level. For example, a utility may cap lighting incentives at 50 percent of the total project incentive. The EM&V team does not have the same concerns regarding free-ridership for measure-level caps and the recommendations in this memo do not apply to these situations.

2.2.3 Recommendations

Establish greater consistency in the treatment of projects where claimed savings exceed incentive amounts and most accurately represent the savings results from these projects. The EM&V team recommends utilities either only claim the savings from the incentivized measures or the utilities apply the most updated net-to-gross (NTG) research³ to the total project savings for the claimed savings⁴ as follows:

For projects where the *claimed savings* are more than 10 percent higher than the "set incentive," the NTG ratio inclusive of free-ridership and spillover should be applied to the total project savings. No NTG ratio should be applied for projects where the set incentive and claimed savings differ by 10 percent or less to allow for normal variation between project planning and implementation.

For projects where *claimed savings* exceed the "incentive cap" savings up to 20 percent of incentivized savings, the NTG ratio inclusive of free-ridership and spillover should be applied to the total project savings.

 $NTG\ ratio_{projects\ exceeding\ set\ incentive} = 1 - Free\ Ridership + Spillover$

Equation 1

For projects where total *claimed savings* exceed the "incentive cap" by more than 20 percent of incentivized savings, the NTG ratio only accounting for free-ridership should be applied to the total project savings. Applying the NTG ratio that is also inclusive of spillover to projects that exceed incentive amounts by a percentage of incentivized savings this large would likely result in double-counting spillover.

 $NTG\ ratio_{projects\ exceeding\ incentive\ cap} = 1 - Free\ Ridership$

Equation 2

The PY2021 EM&V research updated NTG ratios for the commercial standard offer (CSOP) and market transformation programs (CMTP). The PY2021 NTG research accounts for free riders; spillover rates were derived from the PY2017 EM&V research. The CSOP NTG ratio is 100 percent for kWh and 99 percent for kW. The CMTP NTG ratio is 100 percent for kWh and kW.

	Table 3. PY2021	Commercial	Statewide NTG	Ratios b	v Program 1	vpe
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Program type/weighting	Free-ridership	Spillover	NTG
CSOP kWh	23%	24%	100%
CSOP kW	22%	21%	99%
CMTP kWh	19%	22%	100%
CMTP kW	20%	32%	100%

³ The use of a net to gross adjustment to account for free-riders is addressed in § 25.181 (e)(5)(B)(ii).

⁴ This recommendation does not apply to behavioral, code or other market transformation programs where the primary program strategy is technical assistance and education that results in behavioral or operational changes for energy and demand savings.

Projects might have multiple measures with different effective useful lives (EULs) that are taken into account when calculating lifetime savings; for these cases, the EM&V team provides the following additional guidance for adjusting claimed savings that exceed incentive levels:

- 1. Determine the total calculated savings by EUL.
- 2. Determine the percent of total project savings attributed to each EUL.
- Adjust savings as recommended above.
- Distribute adjusted savings to various project EULs using the percentages calculated in Step 2.

The following is an example of a project with 50 kW and 50,000 kWh of calculated savings. An RTU HVAC project with a 15-year EUL attributes twenty percent of those savings, and a chiller project with a 25-year EUL attributes the remaining 80 percent. The adjusted savings are 40 kW and 40,000 kWh. Those adjusted savings would be attributed to each EUL as follows:

- 1. 40 kW x 20% = 8 kW and 40,000 kWh x 20% = 8,000 kWh attributed to the 15-year EUL
- 2. $40 \text{ kW} \times 80\% = 32 \text{ kW}$ and $40,000 \text{ kWh} \times 80\% = 32,000 \text{ kWh}$ attributed to the 25-year EUL

2.3 NEW CONSTRUCTION

This section provides additional guidance to select the appropriate baseline for commercial new construction projects.

2.3.1 Overview

Utility programs include incentives for a variety of projects applicable to commercial new construction, such as lighting, HVAC, and roofs. To effectively implement new construction energy efficiency projects, utility programs need to reach decision-makers during the project design phase. However, it is common for several years to pass between the project design phase and project completion in commercial new construction. Since baselines change, this situation raises the question of what baseline utilities should use for commercial new construction projects to claim savings. For example, in PY2016, Texas' new construction baseline was IECC 2009 based on the state code in effect at that time. In PY2023, the baseline is now IECC 2015 based on the state code in effect.

2.3.2 Recommendation

For commercial new construction projects, utilities should use the building permit date to determine the applicable version of the Texas TRM and baseline to calculate savings.

3. LOW-INCOME

3.1 LOW-INCOME INCOME-ELIGIBLE VERIFICATION FORMS

This section provides implementation recommendations for the program year (PY) 2024 (PY2024) eligibility verification for low-income and hard-to-reach programs.

3.1.1 Background

Texas utilities provide energy efficiency services to low-income customers through a combination of hard-to-reach and low-income programs as specified in 16 Tex. Admin. Code (TAC) § 25.181, relating to the energy efficiency goal. All regulated Texas electric utilities are required to achieve no less than 5 percent of their total demand reduction goal through programs serving hard-to-reach customers (16 TAC § 25.181(e)(3)(F)). In addition, the ERCOT utilities are required to spend no less than 10% of each program year's energy efficiency budget on a targeted low-income efficiency program (16 TAC § 25.181(p)). The qualifying income level of 200% federal poverty level is the same for hard-to-reach and low-income programs though the programs are implemented differently.

The forms differ by single-family and multi-family, but both include a way to qualify for the programs through other low-income programs and services (Category 1) as well as through self-reported income (Category 2). The PUCT has revised the income eligibility annually based on updated federal poverty level information, but the forms have not had major changes for over a decade. Due to the importance of these forms in determining program eligibility, PUCT Staff and the EM&V team agreed to incorporate the forms into Volume 5 of the Texas Technical Reference Manual (TRM) starting with program year (PY) 2022. Forms will be updated as part of the annual TRM update process. As part of integrating the eligibility certification forms into the TRM, PUCT Staff, and the EM&V team worked with the utilities to review the forms and certification processes in-depth. Appendix A contains the Single-Family and Multifamily Income Eligibility for Full-Incentive Energy Efficiency Services forms.⁵

The objectives of the in-depth process review were to "Revise low-income/hard-to-reach eligibility verification to increase the confidence program services are going to intended customers, improve program outreach and address participation barriers, and develop efficient administration processes," as presented at the March 2021 Energy Efficiency Implementation Project (EEIP) meeting. The PY2023 TRM forms expanded Category 1 options to support streamlined participation through an expanded list of qualifying programs and services (1A), direct social service or community action agency qualification (1B), and geographic qualification (1C). If a customer does not qualify through any of the three options, income information may be used to determine eligibility (Category 2). Both Category 1A and Category 2 require customers to submit supporting documentation. Because Category 2 requires income information, all parties recognize this information can be more sensitive for customers to provide and for service providers to store securely although all personal identifying information (PII) should be redacted, except name and address of customer. Given concerns about income information as a participation barrier, Category 1 is the preferred method to verify customer eligibility whenever possible.

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⁵ The most current Single-Family and Multifamily Eligibilty for Full-Incentive Energy Efficiency Services forms are available on the PUCT website, ftp.puc.texas.gov-/public/puct-info/industry/electric/forms/ee/.

3.1.2 Quality Assurance/Quality Control (QA/QC)

Utilities should audit a minimum of 10 percent of all program year projects submitted through each category (1A, 1B, 1C, and 2) to ensure the processes are working correctly and the required documentation was submitted and verified to be correct. In the cases where utilities find an error in the process or documentation during their QA/QC processes, utilities should identify a solution to remedy the error. The EM&V team encourages utilities to integrate the program eligibility audit into their existing QA/QC practices to the extent possible to facilitate the most streamlined and effective implementation of this recommendation.

While utilities are not required to store customer documentation on their systems audited as part of the QA/QC process, they should provide contact information of the auditor who has verified the documentation through a visual inspection.

While audit processes can differ to best integrate with utilities' current QA/QC processes, the following are recommended practices by category:

- Category 1A: Verify form is completed and supporting program documentation was provided
- Category 1B: Verify form is completed and signed by social service or community action agency
- Category 1C: Verify address of serviced home is within one of the two qualifying geographic designations; forms are not required for geographical qualification under 1C as long as the relevant information is in the tracking data (service address, geographic qualifier)
- Category 2: Verify form is completed and supporting income information was submitted to service provider/landlord/property manager

Utilities can either conduct the audits themselves or hire a third-party to do so on their behalf. The EM&V team will request a summary of audit results at the end of each program year. The audit result summary should identify solutions to address any errors found during the audit.

A. Program Tracking and Documentation

Utilities should add a field(s) to their program tracking data to clearly track how a low-income and hard-to-reach participant was qualified for the program (Category 1A, 1B, 1C and 2). This will allow both the utility and the EM&V team to sample projects from each category for auditing purposes.

For Category 1A, 1B and 2, all completed forms and supporting documentation, if applicable, should be stored for all projects. Forms are not required for geographical qualification under 1C as long as the relevant information is in the tracking data (service address, geographic qualifier). Forms and supporting documentation should be maintained for a minimum of 24 months.

B. Claiming Master-Metered Savings

Because master-metered complexes are a commercial rate class, costs and savings should be claimed in the commercial sector. However, if the master-metered complex qualifies for hard-to-reach or low-income program services, these costs and savings may be counted toward the utilities' goals (5 percent of total demand reduction goal for hard-to-reach customers (16 TAC § 25.181(e)(3)(F)), and no less than 10% of each program year's energy efficiency budget on a targeted low-income efficiency program (16 TAC § 25.181(r)).). To avoid double-counting, master-metered projects counted toward the goal should be a separate line item.

3.1.3 New Program Strategies

Some utilities are working on partnerships to distribute energy efficiency measures to low-income and hard-to-reach customers such as distributing LEDs at food banks. In these cases, utilities should meet with the EM&V team to agree on an approach for verifying customer eligibility and claiming savings, which will then be presented to Commission Staff. The goal of these discussions is to support the new strategies in keeping with the overall objective of the indepth process review stated above.

3.2 AUDIT LISTS FOR LOW-INCOME PROGRAMS

This section summarizes implementation guidance for program year (PY) 2024 for low-income programs. Specifically, it overviews and recommends use of the recently approved Department of Energy (DOE) audit lists as applicable. This recommendation directly addresses prior process evaluation findings that should allow more streamlined and cost-effective low-income program implementation.

Background

Households with incomes at or below 200 percent of the Federal Poverty Level are eligible to receive low-income weatherization assistance through the DOE Weatherization Assistance Program (WAP), administered through the Texas Department of Housing and Community Affairs (TDHCA). Local Community Action Agencies (also referred to as subrecipients by TDHCA) provide the weatherization services to qualifying households, including the initial audit.

In an effort to further help low-income electric customers improve the efficiency of their residences, the Texas legislature put forth that ERCOT utilities include a targeted energy efficiency program in their energy efficiency plans (PURA § 39.905(f)). Specifically, the ERCOT utilities are required to set aside a minimum of 10 percent of their energy efficiency budget for low-income programs.

Also outlined in PURA § 39.905(f)), the low-income programs are to coordinate with the federal weatherization program WAP, including complying with the same audit requirements. Therefore, all single-family homes served through the low-income programs to-date have been evaluated using the National Energy Audit Tool (NEAT). NEAT is designed to determine the most cost-effective retrofit measures for single-family and small multifamily buildings. NEAT uses each home's historic energy use data to prioritize measures for installation. Program and project cost-effectiveness is measured using the Savings-to-investment Ratio (SIR) consistent with DOE requirements.

The EM&V team conducted an in-depth process evaluation of the low-income programs in 2015,⁶ which found a primary concern raised by utilities and community action agencies alike was the NEAT tool. As noted above, legislative statute requires that the program comply with the same audit requirements as the federal weatherization program. Process evaluation interviews found that, "the NEAT audit, as a modeling tool, is not transparent; therefore, agencies and implementers have difficulty understanding why certain measures do and do not qualify in various homes. Additionally, they reported it is a cumbersome tool to use and is administratively burdensome. Due to the NEAT audit requirement, an implementer (as well as several agencies) reported that training goes into working with agencies who do not work with the DOE program. Last, there was concern that equipment that should be replaced are not prioritized by the tool (e.g., central air conditioning). Several agencies speculated that this was because the tool is set up for colder climate regions and does not recognize the unique issues associated with warmer states such as Texas," (Tetra Tech, p.4-14). While Commission Staff and the EM&V team discussed the possibility of removing the NEAT audit requirement in response to this process evaluation finding, it was determined doing so could be out of keeping

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⁶ Annual Statewide Portfolio Report for Program Year 2014—Volume I, Section 4, Tetra Tech, October 16, 2015. PY2014v1.pdf (texasefficiency.com)

with PURA's requirement to coordinate with WAP. However, recent development of audit priority lists by DOE and adoption by THDCA now allow alternative starting with PY2023.

DOE and THDCA Priority Lists

Recognizing the need for a more streamlined audit approach for WAP than the NEAT audit, DOE developed weatherization audit priority lists in 2022. DOE approved these lists for implementation starting July 1, 2022. Please refer to the below DOE link for more information:

<u>Weatherization Program Notice 22-8: Streamlining the Energy Audit Process—Optional Regional</u> Weatherization Priority Lists | Department of Energy

In response, DHCA also approved priority audit lists for use in WAP in 2022. While the lists are not exhaustive in the types of homes for which they can be used, most major housing types are covered. Please refer to the below DHCA link for more information:

Community Services Program Guidance (state.tx.us)

Recommendations

The EM&V team fully supports utilities and low-income program service providers assessing and using the DOE audit priority lists available through DHCA in place of the NEAT audit. The use of the audit priority lists is to be determined as applicable to housing types and at the discretion of each utility as it makes sense for their implementation process.

4. CROSS-SECTOR

4.1 LOAD MANAGEMENT PROGRAMS

This section summarizes additional guidance from the EM&V team on two load management topics: (1) data rounding practices for commercial and residential load management programs for PY2021 and after, and (2) implementation for the ERCOT utilities' 2023 winter load management (WLM) pilots.

4.1.1 Rounding

The EM&V team previously provided guidance on rounding practices to avoid minor discrepancies in savings calculations. While rounding differences create only minor discrepancies in calculations, the differences have the potential to sum to a level that creates confusion or doubt. Using a standard practice or documenting differences will reduce the burden on the utilities and EM&V team (as discrepancies are investigated after initial calculations are developed) and will improve the consistency and transparency of savings calculations going forward. As outlined in Table 4, rounding can occur at three different levels: customer, event, and program levels.

Customer level Event level Program level Customer 1 Curtailment kW Event 1 Program kW savings kW savings Customer 2 Curtailment kW Customer 3 Curtailment kW Customer 4 Curtailment kW Customer 1 Curtailment kW Event 2 kW savings Customer 2 Curtailment kW Customer 3 Curtailment kW Customer 4 Curtailment kW

Table 4. Load Management Savings Calculation Levels

Commercial Load Management

Data rounding to the nearest whole number should only occur at the customer and program levels for commercial load management programs. Without this standard practice, utilities should document when rounding is occurring in their calculations (e.g., no rounding or rounding at the event level) and inform the EM&V team.

Residential Load Management

Data rounding to the nearest whole number should only occur at the event and program levels for residential load management programs (NOT at the customer level). Residential programs have a very large number of participants, with the potential for rounding at the participant (customer) level driving substantial differences in savings at the event or program levels. By consistently rounding at the event level (summing individual participant savings), potential discrepancies between the EM&V team and utility calculations can be reduced. Utilities that prefer not to round the savings should document that in their calculations and inform the EM&V team.

4.1.2 Winter Load Management Implementation

This section presents implementation guidance for the ERCOT utilities' 2023 winter load management (WLM) pilots.

Background

Texas electric IOUs have two channels to offer load management programs for nonresidential customers during winter months. One method is found in § 38.075(e) of the Public Utility Regulatory Act ("PURA"); i.e., Senate Bill 3. Specifically, PURA § 39.905(a)(2) states that it is the "goal of the legislature that all customers, in all customer classes, will have a choice of and access to energy efficiency alternatives and other choices from the market that allow each customer to reduce energy consumption, summer and winter peak demand, or energy costs."

The second is through their energy efficiency portfolios, governed by 16 Tex. Admin. Code § 25.181(§ 25.181). 16 TAC § 25.181 (c)(36) defines load management as "[l]oad control activities that result in a reduction in peak demand, or a shifting of energy usage from a peak to an off-peak period or from high-price periods to lower price periods."

All four ERCOT utilities piloted winter load management (WLM) programs in 2022. CenterPoint Energy (CNP), American Electric Power (AEP) Texas and Texas New Mexico Power (TNMP) piloted programs as a regulatory asset under Senate Bill 3. Oncor Electric Delivery (Oncor) piloted a program as part of their energy efficiency program and filed the program template for comment in the Energy Efficiency Implementation Project No. 38578 in October 2021. Oncor then included a 2023 WLM pilot in their 2022 energy efficiency plan and report (EEPR) filed April 1, 2022. In November 2022, CNP, AEP Texas and TNMP also filed notification in Project No. 38578 that they would offer WLM pilots as part of their energy efficiency portfolios beginning with the 2023 winter peak period. In response to the filings and comments, PUCT Staff facilitated a coordination call with ERCOT, the IOUs and the EM&V team on December 12, 2022.

The EM&V team verifies all claimed energy savings and demand reductions for programs in the energy efficiency portfolio. The Texas Technical Reference Manual (TRM), updated annually by the EM&V team, includes the methodology for calculating energy savings and demand reductions for load management programs.

Pilot guidance for calculated savings

The EM&V team applauds the utilities implementing 24/7 programs, which we believe increases the value of the load management programs during emergency levels when ERCOT would call curtailment events. Our reading of § 25.181 limits claimed savings to peak periods defined in the Rule, which are "the hours from one p.m. to seven p.m. during the months of June, July, August, and September, and the hours of six a.m. to ten a.m. and six p.m. to ten p.m. during the months of December, January, and February, excluding weekends and Federal holidays." Therefore, even if an unscheduled emergency event is called by ERCOT outside of peak periods, those demand reductions could not be claimed by IOUs under § 25.181. We fully recognize this would likely undercount pilot savings as emergency level reductions are likely to be larger than scheduled events called in peak periods. To recognize the value to the grid, the EM&V proposes that the IOUs can use all events, even those outside of the § 25.181 defined peak hours, to calculate savings for the purpose of calculating the pilots' cost-effectiveness. If a utility chooses to do this, the difference in claimed savings and savings in the cost-effectiveness testing should be clearly documented in EEPRs. This will facilitate utilities paying incentives to customers for events outside of peak hours while remaining in compliance with § 25.181.

Secondly, the EM&V team recognizes that business responses to winter weather events that would necessitate an ERCOT winter event may result in scenarios not previously encountered in summer load management programs. One possible scenario provided by a utility on the December 12 coordination call was if a participant decides not to open in response to an unscheduled event, but the baseline period also includes days the business was not open. Recognizing the need for flexibility to support full participation in unscheduled events, the EM&V team will work with utilities on a case-by-case basis to determine the best methodology to most accurately reflect demand reductions within the peak period.

Stakeholder Working Groups

The EM&V team facilitated four topic-specific working groups in PY2023. One of the priority topics focused on demand response/load management programs. One of the objectives was to discuss changes to § 25.181 that would better support 24/7 programs. Results of the working group discussions can be found in Volume 1 of the PY2022 EMV Statewide Energy Efficiency Report.

4.2 COMMERCIAL AND RESIDENTIAL HVAC SPLIT-SYSTEMS WITHOUT AHRI CERTIFICATION

This section provides guidance in determining efficiency levels of eligible HVAC split systems that do not have AHRI certification. The methodology outlined in this memo can be used starting in PY2023.

Constructing AC and heat pump systems can be done using outdoor units and indoor units from different manufacturers; not all these combinations are certified by AHRI. Savings should be calculated and reported consistently across utilities and in agreement with industry-standard practice and the Energy Efficiency Rule 16 TAC § 25.181.

Projects in PY2020 were affected by changes in supply chains due to COVID-19, leading to project equipment and timeline adjustments; supply chain issues are expected to continue into PY2023. In addition to the AHRI certification, the process outlined in this guidance memo may guide HVAC project efficiency calculations impacted by supply chain issues. Coordination with the evaluation team for alternate applications of the process is recommended.

4.2.1 Background

Texas TRM 10.0 allows air conditioning and heat pump split systems to be either AHRI-certified or listed on the DOE Compliance Certification Management System (CCMS). Split systems consist of an outdoor unit and an indoor unit, which can be made by the same manufacturer or separate manufacturers. The system's efficiency and size are driven primarily by the outdoor unit, although various indoor units can slightly affect the system efficiency.

Texas TRM 10.0 clarifies the allowable efficiency levels for outdoor and indoor unit pairs listed in the DOE CCMS and not AHRI-certified. The TRM states that the claimed efficiency for these non-certified pairs should not exceed the AHRI-certified pairs' average. The guidance below provides an example to identify the not-to-exceed value.

4.2.2 Guidance

The following guidance should be applied if paired outdoor and indoor HVAC units are not in the AHRI certification list and only have DOE CCMS testing results. In that case, the high-efficient condition's capacity and efficiency shall not exceed the average of the AHRI-certified pair listing for the matching outdoor (condenser) unit. The DOE CCMS listing provides documentation of the results that are on the AHRI certification listing and can be downloaded and filtered based on listings that use a similar condenser and various indoor units.

The following is an example scenario designed to direct the user on interpreting the guidance in this memo.

Example: A split system is listed in DOE CCMS and is not AHRI certified.

<u>Analysis scenario:</u> A high-efficiency split-system heat pump is installed with a Goodman GSZ16 outdoor unit (condenser) and a third-party indoor unit (air handler). The specific pair is not listed in the AHRI database.

Step 1: Access the DOE CCMS⁷ and select the appropriate measure category for the product pair. In this example, it is the *Air Conditioners and Heat Pump – Central* measure category.⁸ Search for the critical component to the system's efficiency (the outdoor unit (condenser)), with model number GSZ160241B*. The * is added near the end of the model number to allow for different condenser unit variations.

Step 2: Identify the specific air handler match and record the specifications from the DOE CCMS. In this example, the Airmark GES244 indoor unit pairs with the Goodman GSZ160241B outdoor unit with the following specifications:

Table 5. Specification of an Example Split System

Cooling capacity (Btu/h)	24,000
Heating capacity (Btu/h)	24,000
SEER	16
EER	13
HSPF	9
Link to FTC Energy Guide label	(blank)*

^{*(}blank) indicates the pair is not listed in the AHRI database.

The Link to FTC Energy Guide label column will identify other certifications obtained by this equipment pair. In the example, the column is blank, indicating it is not listed in the AHRI database.

Step 3: Filter the DOE CCMS database to match the specification of the installed pair. Filter the *product code description*, *cooling capacity*, and *Link to FTC Energy Guide Label* to find a representative sample of similar AHRI-listed units. Table 6 details the filter selected for the example. Figure 1 shows the filter on the CCMS database interface.

Table 6. Example DOE CCMS Filter to Similar Equipment

Product code description	Single-split-system-heat-pump	
Cooling capacity	22,500 to 26,500	
Link to FTC Energy Guide Label	www.ahridirectory.org	

ODE Compliance Certification Database. https://www.regulations.doe.gov/certification-data/#q=Product Group s%3A*

Note that the measure categories are based on technology and not use. The example is for a split system, but the category in the database is central system because the condenser technology meets that definition.

ENERGY Energy Efficiency & Processor & Processor & Energy Street & Control of Energy Energy Energy Energy Efficiency & Processor & Control of Energy & Processor & Energy Ar Constitutes and Held Policies - Certifie certification report for each model it imports, even if the model already appears on this was site. List to Full Continuous This web site is updated approximately every two weeks. Air Conditioners and Heaf Pumps - Central Samuel George Discovery Surse (SCIR) in the Win-Descriptions of the Atlanta Studies a il second a a Spotent homest with an Air Moure, mach as a Foresser il et . e. Market S-45 In the Officiancy Second on a System Terror without so the Mines $y_i x_i \in Gall$ (but System) or a System Second with an Au Mines, such as a Farmach b X_i , ADW to FTC Deep Guint Land

Figure 1. Example Filter of DOE CCMS Database

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Step 4: Download the filtered database using the *download* **button on the right side of the screen.** A .csv spreadsheet will download. Project documentation should include a copy of the downloaded .csv file with the download date in the file name. Since the DOE CCMS is constantly updated, this file is the record of the DOE CCMS entries on the date of application review.

Figure 2 below shows the downloaded spreadsheet with three rows added above. Rows 2 and 3 identify the filters and the performance metric columns. Column C is the filter for the outdoor unit in Step 1. Columns G and Q (not shown) are the filters applied in Step 3.

Columns I, K, and M contain the performance metrics for the filtered products and represent the AHRI-certified performance metrics for similar split-system pairs with the matching outdoor unit (condenser).

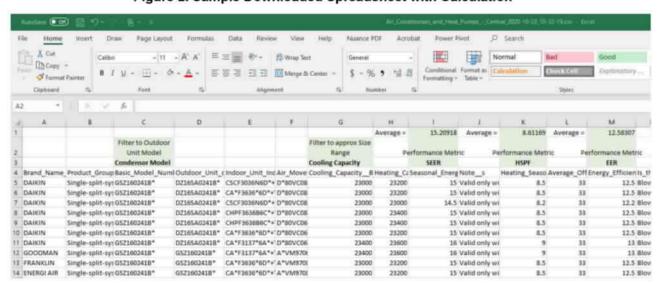


Figure 2. Sample Downloaded Spreadsheet with Calculation

Column I, K, and M are the DOE CCMS logged values of SEER, HSPF, and EER, respectively. Row 1 uses the =Average() function in Microsoft Excel to identify the average performance metrics from the data in the database. Record these values rounded to one decimal point.

Table 7. Average Performance Metrics of Similar Certified Units

SEER (AHRI average)	15.2
EER (AHRI average)	12.6
HSPF (AHRI average)	8.6

Step 5: Identify the performance metrics used for TRM energy efficiency calculations. The installed unit pair's performance metrics for the calculation shall not exceed the similarsized unit pair's performance metrics in the AHRI database.

Table 8. TRM Calculation Performance Metrics Determination

Performance metric	DOE CCMS (actual)	AHRI certification average	TRM calculation value ⁹
SEER	16	15.2	15
EER	13	12.6	12.5
HSPF	9	8.6	8.6

Step 6: Complete the TRM energy savings calculation using the TRM calculation values determined in Table 8.

Include (1) the additional documentation of the original downloaded .csv file and (2) the average efficiency calculation spreadsheet file with the project documentation required in TRM Volume 2 and Volume 3.

⁹ TRM calculation was determined using the rounding for EER and HSPF values to matched deemed tables. If the calculator can handle more detail, using the values rounded to the nearest tenth is acceptable.

4.3 DATA MODEL

With the goal of easing the interpretation of the TRM by database and tracking system developers, the EM&V team worked with EUMMOT and Texas eTRM providers (i.e., Frontier Energy, ANB Systems) to develop a standard data model that outlines common data collected for each prescriptive measure. The data model is for all residential measures in Volume 2 and a variety of commercial measures in Volume 3, which are not already utilizing savings calculators.

For example, the current data model for an ENERGY STAR® clothes dryer includes weather zone, unit type (front-loading, top-loading, compact), capacity (standard, compact), quantity installed, and date of purchase.

A benefit of a standard data model is to improve program and project analytics across service providers and implementers. A standard data model will also standardize project collection forms (e.g., on-site inspection forms) and reduce the time cleaning large data sets.

For more information, please contact an EUMMOT representative.

APPENDIX A: LOW-INCOME INCOME-ELIGIBLE VERIFICATION FORMS

Single-Family (four or less units or owner-occupied)
Income Eligibility for Full-Incentive Energy Efficiency Services

Name

This statement is made to verify my household income eligibility. The Public Utility Commission of Texas has authorized energy efficiency programs to reduce the utility bills of income-eligible households. Contractors participating in the programs receive higher incentive payments when you are income-eligible. The purpose of the higher payment is to enable the contractor to provide the improvements at a very low cost or no cost to you. Participating in this program will not affect your eligibility for other program benefits listed below.

The information provided below will be used solely for the purpose of determining household eligibility and will be kept confidential by the investor-owned utility contractor or office representative and by the Public Utility Commission of Texas and their contractor. If will not be sold or provided to any other party.

	Street Address					Apartmen	t Number	
	City					State TX	Zip Code	
	Phone Number	with Area Code			Number of P	lenons in House	ehold	
Cate	gory 1A:	Eligible through other programs	or ser	vices	5			
(☑ct		aber of my household received benefit applies, digital or paper copy of pro						
☐ Bu	reau of India	n Affairs (BIA) General Assistance		Sec	tion 8 Housi	ng Vouche	er .	
☐ Fe	Federal Public Housing Assistance (FPHA)			Sup	plemental N	utrition As	sistance Program (SNAP) (Foo	d Stam
☐ Fo	od Distributio	n Program on Indian Reservations (FDPIF	(8)	Sup	plemental S	ecurity Inc	ome (SSI)	
☐ He	ealth Benefit (Coverage under Child Health Plan (CHIP)		Tem	porary Assi	stance for	Needy Families (TANF)	
		ergy Assistance Program (LIHEAP) ive Energy Assistance Program (CEAP)		☐ Texas Lifeline Discount				
☐ Me	edicaid (inclu	des CHIP)		☐ Tribal Head Start (only households that meet the income-qualifying standard)				rd)
☐ Me	- QMB (0 - SLMB 5 - QI (Qua	ified Beneficiary qualified Medicare Beneficiary) specific Low-income Medicare Beneficiary) lified Individual Program) Qualified Disabled & Working Individual Program)		(Trib	al TANF)		ce for Needy Families or Survivors Pension Benefit	
□ Na		Lunch Program—Free Lunch Program		Vete	rans Pensio	n or Survi	vors Benefit Programs	
Your	signature is	required on the last page of this fo	rm.					
Categ	jory 1B:	Eligible through community actio					CE AGENCY)	
		ousehold participates in one of the progra stance), which our agency qualifies particip		atego	ory 1A or oth	ner low-inc	ome program service (such as	
Agency	Name	Contact Name					Contact Phone Number with Area Code ()	
Categ	ory 1C:	Eligible through geographic local		ESEN	ITATIVE OF	PROVID	ER)	
		oplicable): Form is not required for geo ta (service address, geographic qualif		ical c	qualification	as long	as the relevant information i	s in the
□ н	ousing and U	rban Development (HUD) Low-Income Ho	using-C	Jualif	ed Census	Tract or Bi	ock—GEO ID:	_
Des	1/2024						Page	1 0/2

ategory		Eligible through incor DO NOT COMPLETE IF	ne verification 1A, 1B, OR 1C COMPLETE	D ABOVE)	
o determ	ine the amo	unt of income in each cat	me, you must include the inco legory, enter the amount(s) on all identifying information i	n the check or benefit s	statement. Supporting
TEP 1:		e Income Calculation		_	
	Amounts I	listed are shown (dch	neck one): Annually Income Calculation T		leekly
	Source o	f income			Amount (5)
	Wages fro	om full- or part-time employm	nent as shown on a paystub or V	4-2 form	
	Unemploy	yment or worker's compensa	tion		
	Social sec	curity			
	Retiremen	nt income			
	Child sup	port or alimony			
	All other e				
	Total hou	usehold income	to figure your total household in	come)	
TEP 2:	below fo	or the number of personal household income is ed	d income per week, mor ons in your household. qual to or less than the amou	nt shown in the table, y	you are income-eligible
TEP 2:	below fo	or the number of personal household income is ed	ons in your household.	nt shown in the table, y	you are income-eligible
EP 2:	below fo	or the number of personal household income is endinged 200 Percent of He	ons in your household. qual to or less than the amou ealth and Human Services	nt shown in the table, y	you are income-eligible
EP 2:	below for if your total	or the number of personal household income is endinged 200 Percent of He	ons in your household, qual to or less than the amou ealth and Human Services Annual Income	nt shown in the table, y (HHS) Poverty Guidel Monthly income	you are income-eligible ines Weekly income
EP 2:	below for if your total Size of fa	or the number of personal household income is endinged 200 Percent of He	ons in your household. qual to or less than the amou ealth and Human Services Annual Income \$30,120	nt shown in the table, y (HHS) Poverty Guidel Monthly income \$2.510	you are income-eligible ines Weekly income \$579
EP 2:	Size of fa	or the number of personal household income is endinged. 200 Percent of Household	ealth and Human Services Annual Income \$30,120 \$40,880	(HHS) Poverty Guidel Monthly income \$2,510 \$3,407	you are income-eligible ines Weekly income \$579 \$786
EP 2:	Size of fa	or the number of personal household income is endinged. 200 Percent of Household	ans in your household. qual to or less than the amou ealth and Human Services Annual Income \$30,120 \$40,880 \$51,640	(HHS) Poverty Guidel Monthly income \$2,510 \$3,407 \$4,303	you are income-eligible ines Weekly income \$579 \$786 \$993
EP 2:	Size of fa	or the number of personal household income is endinged. 200 Percent of Household	and the second s	Monthly income \$2,510 \$3,407 \$4,303 \$5,200	you are income-eligible ines Weekly income \$579 \$786 \$993 \$1,200
EP 2:	Size of fa	or the number of personal household income is endinged. 200 Percent of Household	Annual Income \$30,120 \$40,880 \$51,640 \$73,160	Monthly income \$2,510 \$3,407 \$4,303 \$5,200 \$6,097	you are income-eligible ines Weekly income \$579 \$786 \$993 \$1,200 \$1,407
EP 2:	Size of fa	or the number of personal household income is endinged. 200 Percent of Household	Annual Income \$30,120 \$40,880 \$51,640 \$62,400 \$83,920	Monthly income \$2.510 \$3,407 \$4,303 \$5,200 \$6,097	you are income-eligible ines Weekly income \$579 \$786 \$993 \$1,200 \$1,407 \$1,614
EP 2:	Size of fa	or the number of personal household income is endinged. 200 Percent of Household	Annual Income \$30,120 \$40,880 \$51,640 \$62,400 \$73,160 \$83,920 \$94,680	Monthly income \$2,510 \$3,407 \$4,303 \$5,200 \$6,097 \$7,890	you are income-eligible ines Weekly income \$579 \$786 \$993 \$1,200 \$1,407 \$1,614 \$1,821
TEP 2:	Size of fa	or the number of personal household income is educated to the second of Head and the second	Annual Income \$30,120 \$40,880 \$51,640 \$62,400 \$73,160 \$83,920 \$94,680 \$105,440	Monthly income \$2,510 \$3,407 \$4,303 \$5,200 \$6,097 \$6,993 \$7,890 \$8,787 \$897	you are income-eligible ines Weekly income \$579 \$786 \$993 \$1,200 \$1,407 \$1,614 \$1,821 \$2,028
is informa ervices Fo	Size of fa 1 2 3 4 5 6 7 8 Each add * Notice Annual) By typing a tion can be arm.	the number of personal household income is ed 200 Percent of He amily unit itional person, add: I income ceilings are for it updates are posted on in my name below, I certify to	Annual Income \$30,120 \$40,880 \$51,640 \$62,400 \$73,160 \$83,920 \$94,680 \$105,440 \$10,760 February 1, 2024—January 3	Monthly income \$2,510 \$3,407 \$4,303 \$5,200 \$6,097 \$6,993 \$7,890 \$8,787 \$897 11, 2025 sstry/electric/forms/	wou are income-eligible ines Weekly income \$579 \$786 \$993 \$1,200 \$1,407 \$1,614 \$1,821 \$2,028 \$207 sest of my knowledge, ull-incentive Energy Eligible ines
lectronic is informa ervices Fo on-Elect inderstan	Size of fa 1 2 3 4 5 6 7 8 Each add * Notice Annual) By typing rition can be arm. conic) If filling that the interest of the context of the conte	itional person, add: I Income ceilings are for it updates are posted on in my name below, I certify tused for the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of page out the delineation by its angle of the purpose of page out the delineation by its angle of the purpose of page out the delineation by its angle of the purpose of page of page of the purpose of page of page of the purpose of page of page of the purpose of page of page of the purpose of page of the purpose of page of the page o	Annual Income S30,120 \$40,880 \$51,640 \$62,400 \$73,160 \$83,920 \$94,680 \$105,440 \$10,760 February 1, 2024—January 3 of the Annual Income of the Annu	Monthly income \$2,510 \$3,407 \$4,303 \$5,200 \$6,097 \$6,993 \$7,890 \$8,787 \$897 11, 2025 sstry/electric/forms/ ue and correct to the bincome Eligibility for Fu	Weekly income \$579 \$786 \$993 \$1,200 \$1,407 \$1,614 \$1,821 \$2,028 \$207
electronic is informa ervices Fo ion-Elect	Size of fa 1 2 3 4 5 6 7 8 Each add * Notice Annual) By typing a tion can be arm. conic) If filling that the introvices.	itional person, add: I Income ceilings are for it updates are posted on in my name below, I certify tused for the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of pag out the delineation by its angle of the purpose of page out the delineation by its angle of the purpose of page out the delineation by its angle of the purpose of page out the delineation by its angle of the purpose of page of page of the purpose of page of page of the purpose of page of page of the purpose of page of page of the purpose of page of the purpose of page of the page o	Annual Income \$30,120 \$40,880 \$51,640 \$62,400 \$73,160 \$83,920 \$94,680 \$105,440 \$107	Monthly income \$2,510 \$3,407 \$4,303 \$5,200 \$6,097 \$6,993 \$7,890 \$8,787 \$897 11, 2025 stry/electric/forms/ ue and correct to the bincome Eligibility for Fuginal signature and datavestor-owned utility or	Weekly income \$579 \$786 \$993 \$1,200 \$1,407 \$1,614 \$1,821 \$2,028 \$207

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Name of Applicant (Property Owner or Agent)

This form is to verify that at least 75 percent of the units are rented by income-eligible customers. The Public Utility Commission of Texas has authorized energy efficiency programs to reduce the utility bills of income-eligible tenant households. Contractors participating in the programs receive higher incentive payments when at least 75 percent of the tenants qualify as income-eligible. One form must be filled out for each qualifying multifamily apartment complex.

The information provided below will be used solely for the purpose of determining household eligibility and will be kept confidential by the investor-owned utility contractor or other representative and by the Public Utility Commission of Texas and their contractor. It will not be sold or provided to any other party.

Name of Property Owner

Name of Multiti	mily Apartment Complex		Number of Units in Complex			
Name of Manag	gement Company			Name of On-	Site Property Manager	
Complex Street	Address		Suite Number			
City				State TX	Zip Code	
Property Owne	r or Agent's Phone Number with Area Co	lude	Fax Number w	th Area Code		
Management C	ompany's Phone Number with Area Cod	de	Fax Number w	th Area Code		
Category 1A:	Eligible through other	er programs or service	es			
(☑ check all that required with th	apply, digital or paper	fies in one or more of the copy of proof of partic		as the la		eement
☐ HOME Rental I	lousing Development	□Rural	Rental Section	515 (FMHA	A)	
_	ousing Tax Credit Program				stance Program	
☐ Multifamily Bon	d Program	Texas	Housing Trust	Fund		
Public Housing (Texas Housing			Other income-qualifying housing program Program name:			
Your signature is	required on the last p	page of this form.				
Category 1B:		mmunity action or socia			AGENCY)	
		percent or more of tenants p /CEAP and Weatherization				
Agency Name		Contact Name		9	Contact Phone Number with Area Code)	
Category 1C:	Eligible through geo	ographic location	NTATIVE OR I	PROVIDER	ŋ	
	applicable); Form is not r	required for geographica s, geographic qualifier).	l qualification	as long as	s the relevant information	n is in
☐ Housing and Ur	ban Development (HUD) L	Low-Income Housing-Quali	fied Census Tra	act or Block	-GEO ID:	
-						

	Category 2:	Eligible through income verification
_		(DO NOT COMPLETE IF 1A, 1B, OR 1C COMPLETED ABOVE)

For an apartment complex to be eligible, at least 75 percent of the tenant household incomes before taxes are at or below 200 percent of the federal poverty guidelines.

STEP 1: Fill out the Apartment Complex Income Calculation Worksheet.

(Excel or hard copy must be included with this form)

To accurately determine tenant household income, you may use the tenant rental application showing the number of individuals residing in the unit and the household income dated from within the past 18 months. If the rental application does not show the required information or the information is over 18 months old, then the tenant(s) must complete the Single-Family Income Eligibility for Full-Incentive Energy Efficiency Services form. Supporting documentation for each unit must be available for utility audit

STEP 2: Compare the tenant's total household income per week, month, or year to the amount shown in the table below for the number of persons residing in the unit.

If the total household income is equal to or less than the amount shown in the table, the unit is income-eligible for the full incentive. If the unit is not income-eligible, the unit is eligible for the residential incentive level.

200 Percent of Health and Human Services (HHS) Poverty Guidelines

Size of family unit	Annual income	Monthly income	Weekly income
1	\$30,120	\$2,510	\$579
2	\$40,880	\$3,407	\$786
3	\$51,640	\$4,303	\$993
4	\$62,400	\$5,200	\$1,200
5	\$73,160	\$6,097	\$1,407
6	\$83,920	\$6,993	\$1,614
7	\$94,680	\$7,890	\$1,821
8	\$105,440	\$8,787	\$2,028
Each additional person, add:	\$10,760	\$897	\$207

Notice: Income ceilings are for February 1, 2024—January 31, 2025.
 Annual updates are posted on http://www.puc.texas.gov/industry/electric/forms/

STEP 3: Fill out the Apartment Complex Income Calculation Summary below.

Apartment Complex Income Calculation Summary

Apartment complex income calculation summary	Number of units
Number of income-eligible units	
Number of non-income-eligible units, including vacant units	
Total number of units	
Percentage of income-eligible units (income-eligible units divided by the total number of units)	

STEP 4: If "percentage of income-eligible units" is 75 percent or higher, please certify the eligibility of the apartment complex with your signature below.

(Electronic) By typing my name below, I certify the above statements to be true and correct to the best of my knowledge and that this information can be used for the purpose of processing my Multifamily Apartment Complex Income Eligibility for Full-Incentive Energy Efficiency Services Form. (Non-Electronic) if filling out the delineation by hand, please provide your original signature and date.

I understand that the information is subject to audit and investigation by the investor-owned utility or representative providing the program services.

Applicant Signature (Property Owner or Agent)	Date
Contractor Signature	Cate

Keep a copy of this form for your records.

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The Apartment Complex Income Calculation Worksheet is posted on Texas PUC Sharepoint.

Name

This statement is made to verify my household income eligibility. The Public Utility Commission of Texas has authorized energy efficiency programs to reduce the utility bills of income-eligible households. Contractors participating in the programs receive higher incentive payments when you are income-eligible. The purpose of the higher payment is to enable the contractor to provide the improvements at a very low cost or no cost to you. Participating in this program will not affect your eligibility for other program benefits listed below.

The information provided below will be used solely for the purpose of determining household eligibility and will be kept confidential by the investor-owned utility contractor or other representative and by the Public Utility Commission of Texas and their contractor. It will not be sold or provided to any other party.

	Street Address							Apartment N	lumber		
	City							State TX	Zip Code		
	Phone Numb	er with Area	Code				Number of Pers	ons in Househo	old		
	()										
Categ	ory 1A:	Elig	ible thro	ugh oth	er programs or	services					
(che		at applie			ceived benefits er copy of proo						
Bure	eau of Indi	an Affair	s (BIA) G	eneral As	sistance	Section	n 8 Housing	Voucher			
Fed	eral Public	Housin	g Assistar	ce (FPHA	A)	Suppl	emental Nut	rition Assis	stance Pro	gram (SNA	P) (Food Stamps
Foo	d Distribut	ion Prog	ram on In	dian Rese	ervations (FDPIR)	Suppl	emental Sec	urity Incor	ne (SSI)		
Hea	ilth Benefit	Covera	ge under (Child Hea	Ith Plan (CHIP)	Temp	orary Assista	ance for Ne	eedy Fam	ilies (TANF))
	/-Income E compreher				(LIHEAP) ogram (CEAP)	Texas	Lifeline Disc	count			
Med	dicaid (incl	udes CH	IIP)				Head Start households t	hat meet t	he income	e-qualifying	standard)
Med	 SLMB 	(Qualified Specific	Medicare B	Medicare E	Beneficiary)		Temporary /	Assistance	for Need	y Families	
			dividual Prog d Disabled &		ndividual Program)	Veter	ans Pension	Benefit or	Survivors	Pension Be	enefit
Nati	ional Scho	ol Lunch	Program	—Free Lu	inch Program	Veter	ans Pension	or Survivo	rs Benefit	Programs	
Your si	gnature i	s requ	ired on t	ne last p	age of this for	n.					
Catego	ory 1B:				nmunity action				E AGENC	Y)	
					ne of the program qualifies participa		y 1A or othe	r low-incor	ne progra	m service (s	such as
Agency N	ame				Contact Name			Co	ntact Phone Ni	umber with Area (Code
Catego	ory 1C:	Elig (CO	ible thro	ugh ged	ographic location	on EPRESENT	ATIVE OR F	ROVIDER	₹)		
					equired for geog ographic qualifie		alification a	as long as	the rele	vant inform	nation is in the
☐ Hot	using and	Urban D	evelopme	nt (HUD)	Low-Income Hous	sing-Qualifie	d Census Tr	act or Bloc	k—GEO I	D:	

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Category 2:	Eligible through income verification	
3	(DO NOT COMPLETE IF 1A, 1B, OR 1C COMPLETED ABOVE)	

To accurately determine your <u>household income</u>, you must include the income of all persons residing in your home from all sources. To determine the amount of income in each category, enter the amount(s) on the check or benefit statement. Supporting documentation must be provided (all personal identifying information may be redacted except name and address).

STEP 1: Fill out the Income Calculation table below.

Amounts listed are shown (☑check one): Annually Monthly Weekly

Income Calculation Table

Source of income	Amount (\$)
Wages from full- or part-time employment as shown on a paystub or W-2 form	
Unemployment or worker's compensation	
Social security	
Retirement income	
Child support or alimony	
All other earnings	
Total household income (add the amount entered on each line to figure your total household income)	\$ 0

STEP 2: Compare your total household income per week, month, or year to the amount shown in the table below for the number of persons in your household.

If your total household income is equal to or less than the amount shown in the table, you are income-eligible.

200 Percent of Health and Human Services (HHS) Poverty Guidelines

Size of family unit	Annual income	Monthly income	Weekly income
1	\$30,120	\$2,510	\$579
2	\$40,880	\$3,407	\$786
3	\$51,640	\$4,303	\$993
4	\$62,400	\$5,200	\$1,200
5	\$73,160	\$6,097	\$1,407
6	\$83,920	\$6,993	\$1,614
7	\$94,680	\$7,890	\$1,821
8	\$105,440	\$8,787	\$2,028
Each additional person, add:	\$10,760	\$897	\$207

^{*} Notice: Income ceilings are for February 1, 2024—January 31, 2025.
Annual updates are posted on http://www.puc.texas.gov/industry/electric/forms/

(Electronic) By typing my name below, I certify the above statements to be true and correct to the best of my knowledge, and that this information can be used for the purpose of processing my Single-Family Income Eligibility for Full-Incentive Energy Efficiency Services Form.

(Non-Electronic) If filling out the delineation by hand, please provide your original signature and date.

I understand that the information is subject to audit and investigation by the investor-owned utility or representative providing the program services.

Applicant Signature	Date
Contractor Signature	Date

Keep a copy of this form for your records.

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This statement is made to verify my household income eligibility. The Public Utility Commission of Texas has authorized energy efficiency programs to reduce the utility bills of income-eligible households. Contractors participating in the programs receive higher incentive payments when you are income-eligible. The purpose of the higher payment is to enable the contractor to provide the improvements at a very low cost or no cost to you. **Participating in this program will not affect your eligibility for other program benefits listed below**.

The information provided below will be used solely for the purpose of determining household eligibility and will be kept confidential by the investor-owned utility contractor or other representative and by the Public Utility Commission of Texas and their contractor. It will not be sold or provided to any other party.

	Street Address						Apartment Number					
	City						State	3	ip Code			
	Phone Number	with Area Code				Number of Pers	sons in Hou	isehold				
	()											
Categ	ory 1A:	Eligible through other	er programs or	ser	vices							
(ch		nber of my household red applies, digital or pape									1	
☐ Bur	eau of India	n Affairs (BIA) General Ass	istance		Sectio	n 8 Housing	Vouch	er				
☐ Fed	eral Public	Housing Assistance (FPHA)		Supple	emental Nut	rition As	ssistar	ce Prog	ram (SN	AP) (Food	Stamps
☐ Foo	d Distributio	on Program on Indian Rese	rvations (FDPIR)		Supple	emental Sec	curity In	come	(SSI)			
☐ Hea	ilth Benefit	Coverage under Child Heal	th Plan (CHIP)		Tempo	rary Assista	ance for	r Need	y Familie	es (TAN	=)	
		nergy Assistance Program (sive Energy Assistance Pro			Texas Lifeline Discount							
☐ Med	dicaid (inclu	des CHIP)			☐ Tribal Head Start (only households that meet the income-qualifying standard))			
☐ Med	- QMB (0	ified Beneficiary Qualified Medicare Beneficiary) Specific Low-Income Medicare B	eneficiary)	☐ Tribal Temporary Assistance for Needy Families (Tribal TANF)								
	 QI (Qua 	alified Individual Program) Qualified Disabled & Working Ind	WILLIAM SOUND MAN		Vetera	ns Pension	Benefit	or Su	rvivors P	ension E	Benefit	
☐ Nat		l Lunch Program—Free Lu			Vetera	ns Pension	or Surv	vivors I	Benefit P	rograms	ĺ	
Your si	gnature is	required on the last pa	age of this form									
Catego	ory 1B:	Eligible through com (COMPLETED BY UTIL						ICE A	GENCY)	j		
		nousehold participates in on stance), which our agency			ategory	1A or othe	r low-in	come	program	service	(such as	
Agency N	ame		Contact Name					Contact (Phone Num	ber with Area	s Code	
Catego	ory 1C:	Eligible through geo			ESENT	ATIVE OR I	PROVID	DER)				
		pplicable): Form is not re ata (service address, geo			ical qu	alification a	as long	as th	e releva	nt infor	mation is i	in the
□ но	using and U	rban Development (HUD) L	.ow-Income Housi	ng-C	Qualified	Census Tr	act or B	Block-	-GEO ID			

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ategory 2:	Eligible through income verification (DO NOT COMPLETE IF 1A, 1B, OR 1C COMPLETED ABOVE)

To accurately determine your <u>household income</u>, you must include the income of all persons residing in your home from all sources. To determine the amount of income in each category, enter the amount(s) on the check or benefit statement. Supporting documentation must be provided (all personal identifying information may be redacted except name and address).

STEP 1: Fill out the Income Calculation table below.

Amounts listed are shown (☑ check one): ☐ Annually ☐ Monthly ☐ Weekly

Income Calculation Table

Source of income	Amount (\$
Wages from full- or part-time employment as shown on a paystub or W-2 form	
Unemployment or worker's compensation	
Social security	
Retirement income	
Child support or alimony	
All other earnings	
Total household income (add the amount entered on each line to figure your total household income)	

STEP 2: Compare your total household income per week, month, or year to the amount shown in the table below for the number of persons in your household.

If your total household income is equal to or less than the amount shown in the table, you are income-eligible.

200 Percent of Health and Human Services (HHS) Poverty Guidelines

Size of family unit	Annual income	Monthly income	Weekly income
1	\$30,120	\$2,510	\$579
2	\$40,880	\$3,407	\$786
3	\$51,640	\$4,303	\$993
4	\$62,400	\$5,200	\$1,200
5	\$73,160	\$6,097	\$1,407
6	\$83,920	\$6,993	\$1,614
7	\$94,680	\$7,890	\$1,821
8	\$105,440	\$8,787	\$2,028
Each additional person, add:	\$10,760	\$897	\$207

Notice: Income ceilings are for February 1, 2024—January 31, 2025.
 Annual updates are posted on http://www.puc.texas.gov/industry/electric/forms/

(Electronic) By typing my name below, I certify the above statements to be true and correct to the best of my knowledge, and that this information can be used for the purpose of processing my Single-Family Income Eligibility for Full-Incentive Energy Efficiency Services Form.

(Non-Electronic) If filling out the delineation by hand, please provide your original signature and date.

I understand that the information is subject to audit and investigation by the investor-owned utility or representative providing the program services.

Applicant Signature	Date
Contractor Signature	Date

Keep a copy of this form for your records.

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Name of Applicant (Property Owner or Agent)

Name of Multifamily Apartment Complex

Name of Management Company

Complex Street Address

This form is to verify that at least 75 percent of the units are rented by income-eligible customers. The Public Utility Commission of Texas has authorized energy efficiency programs to reduce the utility bills of income-eligible tenant households. Contractors participating in the programs receive higher incentive payments when at least 75 percent of the tenants qualify as income-eligible. One form must be filled out for each qualifying multifamily apartment complex.

The information provided below will be used solely for the purpose of determining household eligibility and will be kept confidential by the investor-owned utility contractor or other representative and by the Public Utility Commission of Texas and their contractor. It will not be sold or provided to any other party.

Name of Property Owner

Number of Units in Complex

Suite Number

Name of On-Site Property Manager

	Aguardicate for the agreement of the agr			300000000000000000000000000000000000000			
	City			State TX	Zip Code		
	Property Owner or Agent's Phone Number w	th Area Code	Fax Number with Area Code				
	Management Company's Phone Number with () -	ı Area Code	Fax Number wi	th Area Code			
	Category 1A: Eligible throug	h other programs or se	ervices				
	The multifamily apartment complex (check all that apply, digital or required with this form): Affordable Housing Disposition Pro HOME Rental Housing Developme Low-Income Housing Tax Credit Pro Multifamily Bond Program Public Housing Authority (Texas Housing Association) Your signature is required on the	gram		n 8 515 (FMH Rental Assi Fund ing housing	A) stance Program g program	agreement	
	Category 1B: Eligible throug (COMPLETED B	h community action or	social service ag	ency SERVICE	E AGENCY)		
	I certify the named multifamily complex low-income program service (such as L			hich our a		ation.	
	Agency Harrie	Comaccination			() -	Coup	
]	Category 1C: Eligible throug (COMPLETED B	th geographic location Y UTILITY OR THEIR REP	RESENTATIVE OR I	PROVIDE	₹)		
	(☑ check box if applicable): Form i the utility's tracking data (service ac			as long a	s the relevant inform	ation is in	
	Housing and Urban Development (HUD) Low-Income Housing-Qualified Census Tract or Block—GEO ID:						

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\Box	Category 2:	Eligible through income verification
-	8 8	(DO NOT COMPLETE IF 1A 1B OR 1C COMPLETED ABOVE)

For an apartment complex to be eligible, at least 75 percent of the tenant household incomes before taxes are at or below 200 percent of the federal poverty guidelines.

STEP 1: Fill out the Apartment Complex Income Calculation Worksheet. (Excel or hard copy must be included with this form)

To accurately determine tenant household income, you may use the tenant rental application showing the number of individuals residing in the unit and the household income dated from within the past 18 months. If the rental application does not show the required information or the information is over 18 months old, then the tenant(s) must complete the Single-Family Income Eligibility for Full-Incentive Energy Efficiency Services form. Supporting documentation for each unit must be available for utility audit.

STEP 2: Compare the tenant's total household income per week, month, or year to the amount shown in the table below for the number of persons residing in the unit.

If the total household income is equal to or less than the amount shown in the table, the unit is income-eligible for the full incentive. If the unit is not income-eligible, the unit is eligible for the residential incentive level.

200 Percent of Health and Human Services (HHS) Poverty Guidelines

Size of family unit	Annual income	Monthly income	Weekly income
1	\$30,120	\$2,510	\$579
2	\$40,880	\$3,407	\$786
3	\$51,640	\$4,303	\$993
4	\$62,400	\$5,200	\$1,200
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8	\$105,440	\$8,787	\$2,028
Each additional person, add:	\$10,760	\$897	\$207

^{*} Notice: Income ceilings are for February 1, 2024—January 31, 2025.
Annual updates are posted on http://www.puc.texas.gov/industry/electric/forms/

STEP 3: Fill out the Apartment Complex Income Calculation Summary below.

Apartment Complex Income Calculation Summary

Apartment complex income calculation summary	Number of units
Number of income-eligible units	
Number of non-income-eligible units, including vacant units	
Total number of units	0
Percentage of income-eligible units (income-eligible units divided by the total number of units)	0%

STEP 4: If "percentage of income-eligible units" is 75 percent or higher, please certify the eligibility of the apartment complex with your signature below.

(Electronic) By typing my name below, I certify the above statements to be true and correct to the best of my knowledge and that this information can be used for the purpose of processing my Multifamily Apartment Complex Income Eligibility for Full-Incentive Energy Efficiency Services Form.

(Non-Electronic) If filling out the delineation by hand, please provide your original signature and date.

I understand that the information is subject to audit and investigation by the investor-owned utility or representative providing the program services.

Applicant Signature (Property Owner or Agent)	Date
Contractor Signature	Date

Keep a copy of this form for your records.

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Name of Applicant (Property Owner or Agent)

Name of Multifamily Apartment Complex

Name of Management Company

Complex Street Address

This form is to verify that at least 75 percent of the units are rented by income-eligible customers. The Public Utility Commission of Texas has authorized energy efficiency programs to reduce the utility bills of income-eligible tenant households. Contractors participating in the programs receive higher incentive payments when at least 75 percent of the tenants qualify as income-eligible. One form must be filled out for <u>each</u> qualifying multifamily apartment complex.

The information provided below will be used solely for the purpose of determining household eligibility and will be kept confidential by the investor-owned utility contractor or other representative and by the Public Utility Commission of Texas and their contractor. It will not be sold or provided to any other party.

Name of Property Owner

Number of Units in Complex

Suite Number

Name of On-Site Property Manager

	City	City			State	Zip Code		
	Property Owner or Agent's Phone Number with Area Code () Management Company's Phone Number with Area Code			Fax Number with Area Code () - Fax Number with Area Code				
	()	5		()	¥.			
	Category 1A:	Eligible through othe	r programs or service	es				
	(☑ check all that a required with this	partment complex qualifications apply, digital or paper of storm): ing Disposition Program	copy of proof of parti		as the l		n agreement	
		ousing Development				IAV		
		using Tax Credit Program		Rural Rental Section 515 (FMHA) Section 811 Project Rental Assistance Program				
	☐ Multifamily Bond		1	Texas Housing Trust Fund				
☐ Public Housing Authority (Texas Housing Association)			Othe	Other income-qualifying housing program Program name:				
	Your signature is	required on the last pa	ge of this form.					
	Category 1B:	Eligible through com				E AGENCY)		
		ultifamily complex or 75 pe service (such as LIHEAP/0						
	Agency Name		Contact Name			Contact Phone Number with A	ea Code	
	Category 1C:	Eligible through geog		ENTATIVE OR	PROVIDE	R)		
		oplicable): Form is not re g data (service address,		al qualification	as long a	as the relevant infor	mation is in	
	☐ Housing and Urban Development (HUD) Low-Income Housing-Qualified Census Tract or Block—GEO ID:							

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Category 2:	Eligible through income verification
_ = = =	(DO NOT COMPLETE IF 1A 1B OR 1C COMPLETED ABOVE)

For an apartment complex to be eligible, at least 75 percent of the tenant household incomes before taxes are at or below 200 percent of the federal poverty guidelines.

STEP 1: Fill out the Apartment Complex Income Calculation Worksheet. (Excel or hard copy must be included with this form)

To accurately determine tenant <u>household income</u>, you may use the tenant rental application showing the number of individuals residing in the unit and the household income dated from within the past 18 months. If the rental application does not show the required information or the information is over 18 months old, then the tenant(s) must complete the **Single-Family Income Eligibility for Full-Incentive Energy Efficiency Services form.** Supporting documentation for each unit must be available for utility audit.

STEP 2: Compare the tenant's total household income per week, month, or year to the amount shown in the table below for the number of persons residing in the unit.

If the total household income is equal to or less than the amount shown in the table, the unit is income-eligible for the full incentive. If the unit is not income-eligible, the unit is eligible for the residential incentive level.

200 Percent of Health and Human Services (HHS) Poverty Guidelines

Size of family unit	Annual income	Monthly income	Weekly income
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Each additional person, add:	\$10,760	\$897	\$207

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Annual updates are posted on http://www.puc.texas.gov/industry/electric/forms/

STEP 3: Fill out the Apartment Complex Income Calculation Summary below.

Apartment Complex Income Calculation Summary

Apartment complex income calculation summary	Number of units
Number of income-eligible units	
Number of non-income-eligible units, including vacant units	
Total number of units	
Percentage of income-eligible units (income-eligible units divided by the total number of units)	

STEP 4: If "percentage of income-eligible units" is 75 percent or higher, please certify the eligibility of the apartment complex with your signature below.

(Electronic) By typing my name below, I certify the above statements to be true and correct to the best of my knowledge and that this information can be used for the purpose of processing my Multifamily Apartment Complex Income Eligibility for Full-Incentive Energy Efficiency Services Form.

(Non-Electronic) If filling out the delineation by hand, please provide your original signature and date.

I understand that the information is subject to audit and investigation by the investor-owned utility or representative providing the program services.

Applicant Signature (Property Owner or Agent)	Date
Contractor Signature	Date

Keep a copy of this form for your records.

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