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790 S Buchanan St,
Amarillo, TX 79101

October 7, 2025

Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, TX 78701

Dear Commissioners:

Southwestern Public Service Company (SPS) submits the attached Program Templates in response to Tetra Tech's memos to non-ERCOT utilities in Docket No. 57468, filed April 24, 2025, and in compliance with TAC §25.181(q)(3). SPS hereby submits the following program overviews:

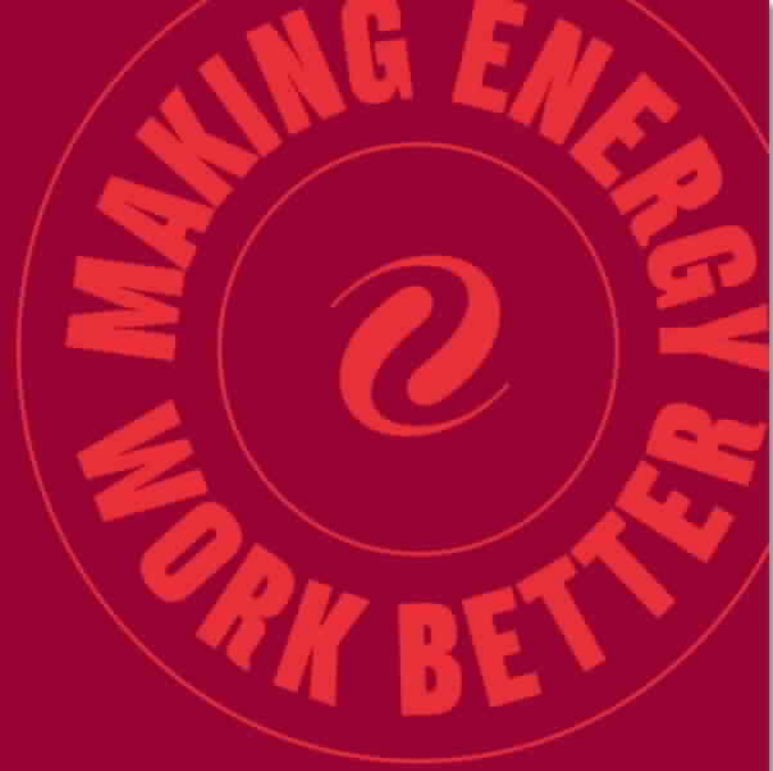
- Residential Codes and Standards Market Transformation Program
- School Education Kit Market Transformation Program

Please do not hesitate to contact me should you have any questions or require additional information.

Sincerely,

/s/ Amy Blackwell Hayes

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SOUTHWESTERN PUBLIC SERVICE COMPANY'S RESIDENTIAL CODES MARKET TRANSFORMATION PROGRAM

October 7, 2025

RESIDENTIAL CODES MARKET TRANSFORMATION PROGRAM

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RESIDENTIAL CODES MARKET TRANSFORMATION PROGRAM

PROGRAM OVERVIEW

The Residential Codes Market Transformation Program pro-actively encourages and supports jurisdictions to ensure compliance with the latest state-wide or locally-adopted building codes for the residential market. Support is designed to meet each jurisdiction where they are in the code adoption and implementation cycle, and work to build relationships with architects, builders, and city officials. Communities are given tools and resources to help them realize the economic and energy performance benefits of energy efficient buildings.

Resources and training are provided to assist with barriers such as limited code staff time, how to ensure compliance, misinformation about the costs and benefits, and homebuilder awareness and knowledge about how to meet the new codes efficiently and cost effectively. The Company commenced offering this support in 2022 as an R&D effort to improve the performance of newly constructed homes using an innovative and highly cost-effective approach. After successful feedback during the R&D phase, the Company launched a full program in 2024.

Specific strategies may include: one on one support for local officials, the development of technical documents, marketing materials available through various channels, and trainings designed to support awareness and implementation of the statewide energy code in Company's electric service territory.

Additional residential strategies may include on-site training in homes under construction to review building elements required to meet the energy code.

The Company will engage with impacted parties through its third-party implementer. Training and classes will be offered virtually and in-person, as possible. Training and classes will also be recorded and archived for reference. In order to track engagement, the Company's vendor will collect basic information on session attendees, such as their role, employer, and work area.

PROGRAM OBJECTIVES

The program is designed to educate and inform jurisdictions about local or state-wide residential building codes. It provides support, resources, trainings, and technical documents that help with code compliance.

GOALS, BUDGETS, AND SAVINGS PROJECTIONS

SPS's Residential Codes program became a full offering in SPS's portfolio in PY 2024. The budget will be primarily made up of administrative and third-party expenses. Material costs include producing collateral in support of outreach and training or procuring updated code books for code officials in Company service territory.

RESIDENTIAL CODES MARKET TRANSFORMATION PROGRAM

The 2025 and 2026 budget and goals anticipated for this program are below.

Year	Projected Budget	Projected kW	Projected kWh
2025	\$75,150	0	196,000
2026	\$75,000	0	196,000

INCENTIVE STRUCTURE

This program does not offer any direct incentives.

ELIGIBILITY & MEASURES

To be eligible for the program, participants must be a jurisdiction in SPS's service territory with building codes oversight

MEASUREMENT & VERIFICATION (M&V)

SPS will use the applicable version of the Texas TRM to calculate program savings for review and approval by the Public Utility Commission of Texas and its statewide evaluation, measurement, and verification (EM&V) contractor.

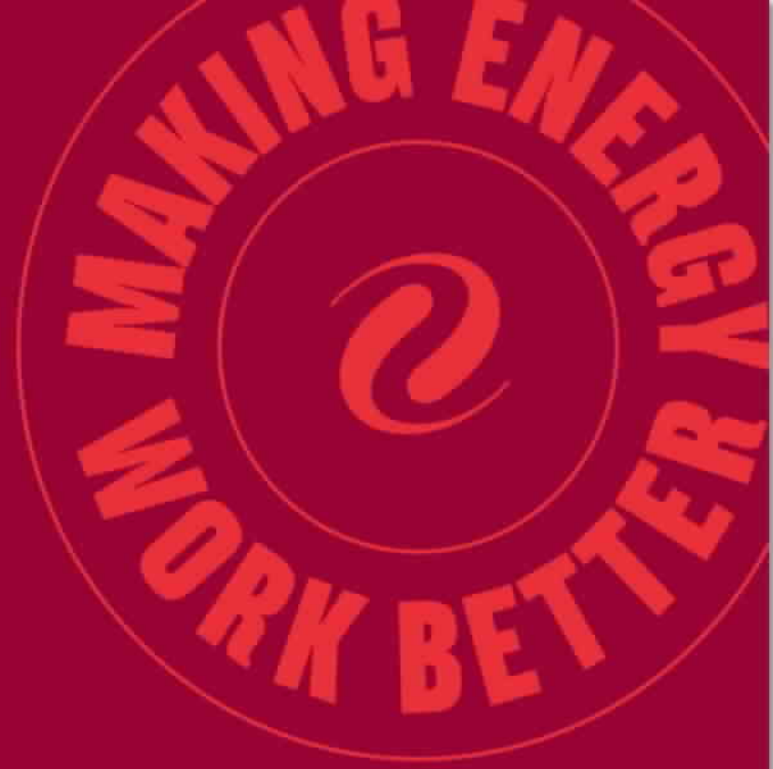
SPS conducts the required TRM calculations using the data collected by the program implementer, as well as data acquired by a third-party research team through surveys, panels, or construction industry data sets.

PROGRAM PROCESSES

A third-party implementer connects with code officials in our service territory. They learn about the needs and challenges each specific community faces. Over the next few months, the implementer goes through and develops helpful materials, organizes webinars and trainings, and checks in from time to time to address anything else that might have come up. The approach is designed to meet jurisdictions where they are at and delivery a semi-customized product based on their needs.

PROMOTIONS

SPS promotes this program with its vendors and through code officials, builders, energy raters, realtors, and other affiliated industry professionals in its service territory. The Company will recruit for attendees at related trade shows and events



SOUTHWESTERN PUBLIC SERVICE COMPANY'S SCHOOL EDUCATION KITS MARKET TRANSFORMATION PROGRAM

October 7, 2025

SCHOOL EDUCATION KITS MARKET TRANSFORMATION PROGRAM

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SCHOOL EDUCATION KITS MARKET TRANSFORMATION PROGRAM

PROGRAM OVERVIEW

The School Education Kits Market Transformation Program is a turnkey educational program that combines energy efficiency curriculum for teachers with easy-to-install energy efficiency and water-saving measures for students to install at home. The School Education Kits program offers a multi-component kit that combines classroom activities and in-home projects primarily to fifth grade students and their parents to teach energy and water conservation. The program offers additional conservation education to high school students and through community outreach. The kits include energy saving and water conservation measures that students implement at home with their families, including LED bulbs, a high-efficiency showerhead, and faucet aerators.

SPS provides the program at no cost and targets its primary product to students in its Texas service area with this annual program. The program offers electric savings, supports state education standards, and educates the next generation of energy consumers on how to be energy efficient. Additional low-cost incentives are offered to encourage students to return their Home Energy Worksheets, which help ensure installation of the provided measures and help determine installation rates. Marketing and outreach communications are implemented by the program vendor and consist of email and direct mail to teachers at eligible schools.

SPS and the third-party contractor will monitor schools in the Texas service area to determine if and when the program should be moved to another grade level to meet individual school district standards. The same content and kit measures would be provided, and the program would remain at that specific grade level for that school in subsequent years.

The School Education Kits will include measures such as:

- LED bulbs;
- High-efficiency showerheads;
- Kitchen aerators;
- Bathroom aerators;
- LED nightlights; and
- Classroom and at-home study materials
- Advanced power strips;
- LED bulbs;
- High-efficiency showerheads;
- Bathroom aerators;
- LED nightlights; and
- Classroom and at-home study materials

SCHOOL EDUCATION KITS MARKET TRANSFORMATION PROGRAM

The program provides direct-impact conservation as part of an education program through classroom activities, curriculum, at home workbooks, and materials. Students participate in class activities and at home with parents testing and installing energy efficiency devices. The kits include items for at home testing such as thermometers for measuring water temperature and flow bags to determine water flow rates for showers and faucets. The program builds awareness of energy conservation in children and provides energy efficiency programs to customers of all income levels.

The program will be marketed and administered by the third-party contractor. The third-party contractor assumes all responsibility for curriculum and kit development, outreach to teachers, delivery of materials, and participant survey. SPS pays a flat rate per kit to cover all services.

In addition, the third-party contractor will perform pre- and post-surveys to gather installation data on the program. These surveys will confirm installation of energy and water saving devices. These results will be used, along with deemed savings estimates, to determine the demand and energy savings from the kits based on students and teacher responses identifying the number of LEDs, high efficiency showerheads, and faucet aerators that were installed.

PROGRAM OBJECTIVES

This prescriptive program intends to provide direct impact savings, help to build awareness of energy conservation at a young age, and provide energy and water savings to customers of various income levels. It enables an educational product to have direct impacts on energy conservation, helps build awareness of energy conservation among children, and can impact customers at all income levels.

GOALS, BUDGETS, AND SAVINGS PROJECTIONS

The School Education Kits budget was developed based on SPS's participation goals, estimated kit costs, and historical budgets. A portion of the School Education Kits program budget will be paid to the third-party contractor for administration of the program. The remainder of the budget is designated for the cost of the measures in the kits, as well as internal labor to provide direction and oversight to the implementer, prepare and analyze data for reporting, and manage program expenditures.

Year	Projected Budget	Projected kW	Projected kWh
2026	\$366,000	900	3,727,035

SCHOOL EDUCATION KITS MARKET TRANSFORMATION PROGRAM

INCENTIVE STRUCTURE

The School Education Kits program does not pay a rebate but rather provides free energy efficiency curriculum and activity kits to participating classrooms.

ELIGIBILITY & MEASURES

To be eligible for the program, Schools must be within the Company's Texas service territory and receive electric service.

MEASUREMENT & VERIFICATION (M&V)

SPS will use the applicable version of the Texas TRM to calculate program savings for review and approval by the Public Utility Commission of Texas and its statewide evaluation, measurement, and verification (EM&V) contractor.

SPS has contracted with Frontier Energy to conduct the required TRM calculations using the data collected by the program implementer.

PROGRAM PROCESSES

Teachers may enroll through various means (i.e., phone, email, direct mail, or via the website). If the response to enrollment calls is insufficient, the third-party implementer will redesign the marketing materials and/or offer incentives to teachers to participate. Examples of incentives may be gift cards to select retailers. Upon enrollment, the teachers indicate to the third-party implementer the time during the school year at which they would like to use the product materials and will subsequently provide enrollment/participant numbers. The third-party implementer will send the teachers the School Education Kit materials in advance of the selected product date. Third-party implementer staff will remain in contact with the teachers via phone, email, and mail at various times throughout the product to provide support for the teachers and to request return of audit forms. Participants are provided with a toll-free number to call if they need help. The Company receives the results from participating schools in a summary report from the third-party implementer at the end of each school semester.

PROMOTIONS

The third-party contractor will manage all aspects of the School Education Kits program marketing and outreach activities. They will identify the schools that are within SPS's Texas service area and determine the approximate number of eligible teachers and students. They will send out customized marketing materials to help enroll the classrooms. The materials explain the program, while providing teachers with helpful tips to teach the energy efficiency curriculum to their students. Kits will also provide teachers with information about how and why SPS sponsors this program offering and the importance of conservation as part of their curriculum. SPS and the third-party contractor

SCHOOL EDUCATION KITS MARKET TRANSFORMATION PROGRAM

will continue to work together along with community organizations to determine the strategic approach for identifying schools. SPS and the third-party contractor also look for additional opportunities when available for cross promotion, outreach, or cost sharing.