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Texas-New Mexico Power Company
2021 Energy Efficiency Plan and Report
16 Tex. Admin. Code §§ 25.181, 25.182, and 25.183

March 31, 2021

Project No. 51672



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Introduction

Texas-New Mexico Power Company (“TNMP”) presents this Energy Efficiency Plan and Report (“EEPR”) to comply with 16 Tex. Admin. Code §§ 25.181, 25.182, and 25.183 (“TAC”), which are the sections of the Energy Efficiency Rule (“EE Rule”) implementing Public Utility Regulatory Act (“PURA”) § 39.905. As mandated by this section of PURA, the EE Rule requires that each investor-owned electric utility achieve the following minimum goals through market-based standard offer programs (“SOPs”), targeted market transformation programs (“MTPs”) or utility self-delivered programs:

“An electric utility shall administer a portfolio of energy efficiency programs to acquire, at a minimum, the following:

- (A) Beginning with the 2013 program year, until the trigger described in subparagraph (B) of this paragraph is reached, the utility shall acquire a 30% reduction of its annual growth in demand of residential and commercial customers.
- (B) If the demand reduction goal to be acquired by a utility under subparagraph (A) of this paragraph is equivalent to at least four-tenths of 1% its summer weather-adjusted peak demand for the combined residential and commercial customers for the previous program year, the utility shall meet the energy efficiency goal described in subparagraph (C) of this paragraph for each subsequent program year.
- (C) Once the trigger described in subparagraph (B) of this paragraph is reached, the utility shall acquire four-tenths of 1% of its summer weather-adjusted peak demand for the combined residential and commercial customers for the previous program year.
- (D) Except as adjusted in accordance with subsection (u) of this section, a utility’s demand reduction goal in any year shall not be lower than its goal for the prior year, unless the commission establishes a goal for a utility pursuant to paragraph (2) of this subsection.”

The EE Rule includes specific requirements related to the implementation of SOPs, MTPs, and utility self-delivered programs that control the manner in which investor-owned electric utilities must administer their portfolio of energy efficiency programs in order to achieve their mandated energy efficiency savings goals. TNMP’s EEPR is intended to describe how TNMP intends to meet its statutory savings goals through implementation of energy efficiency programs in a manner that complies with PURA § 39.905 and the EE Rule. The following section provides a description of the information contained in each of the subsequent sections and appendix.

Energy Efficiency Plan and Report Organization

This EEPR consists of an executive summary, twelve sections, and an appendix.

Executive Summary

- The Executive Summary highlights TNMP's reported achievements for 2020 and TNMP's plans for achieving its 2021 and 2022 projected energy efficiency savings goals.

Energy Efficiency Plan

- Section I describes TNMP's program portfolio. It details how each program will be implemented, discusses related informational and outreach activities, and provides an introduction to any programs not included in TNMP's previous EEPR.
- Section II presents TNMP's projected energy efficiency savings for the prescribed planning period broken out by program for each customer class.
- Section III describes TNMP's proposed energy efficiency budgets for the prescribed planning period broken out by program for each customer class.

Energy Efficiency Report

- Section IV documents TNMP's actual weather-adjusted demand savings goals and energy targets for the previous five years (2016-2020).
- Section V compares TNMP's projected energy and demand savings to its reported and verified savings by program for calendar years 2019 and 2020.
- Section VI documents TNMP's incentive and administration expenditures for the previous five years (2016-2020) broken out by program for each customer class.
- Section VII compares TNMP's actual program funding for 2020 compared to its 2021 budget broken out by program for each customer class.
- Section VIII describes the results from TNMP's MTPs.
- Section IX reports on Research & Development and Administration Costs.
- Section X details TNMP's current EECRF, collection, and future filing.
- Section XI reflects TNMP revenue collection through the 2020 EECRF.
- Section XII breaks out the over/under-recovery of energy efficiency program costs.

Acronyms

Glossary

Appendix

- Reported kW and kWh Savings broken out by county for each program.

VI. Historical Program Expenditures

This section documents TNMP's incentive, administration, R&D, and EM&V¹³ expenditures for the previous five years (2016-2020) broken out by program for each customer class.

Table 9: Historical Program Incentive and Administration Expenditures for 2016 through 2020¹⁴

	2020			2019				2018			
	Incent	Admin	EM&V	Incent	Admin	R&D	EM&V	Incent	Admin	R&D	EM&V
Commercial	1,645,202	157,802	28,886	1,589,671	181,833	50,245	29,705	1,710,181	166,898	24,622	24,583
Small Business MTP	320,816	30,857	6,920	422,913	48,375	13,367	6,090	438,203	42,764	6,309	3,647
SCORE/CitySmart MTP	467,912	45,005	7,952	451,995	51,701	14,286	7,262	406,338	60,456	8,919	8,550
Commercial Solutions MTP	665,417	64,002	10,641	571,545	65,376	18,065	11,402	619,490	39,655	5,850	9,736
Load Management SOP	191,057	17,937	3,374	143,218	16,382	4,527	4,951	246,150	24,022	3,544	2,650
Residential	1,825,252	265,595	21,448	1,467,051	274,201	46,369	21,020	1,728,041	270,581	24,879	22,618
High-Performance Homes MTP	414,670	38,931	8,368	254,205	29,077	8,035	7,443	399,946	39,031	5,758	4,438
Residential SOP	1,410,582	226,664	13,080	1,212,846	245,124	38,335	10,143	1,214,261	220,441	17,482	13,359
REP Pilot MTP							3,434	113,834	11,109	1,639	4,821
Hard-to-Reach	817,737	143,690	7,989	943,716	198,043	29,828	6,621	846,030	167,063	12,181	9,090
Hard-to-Reach SOP	401,849	64,572	4,240	323,984	55,308	10,240	4,543	349,988	63,538	5,039	5,732
Low Income Weatherization	415,889	79,118	3,749	619,733	142,735	19,588	2,078	496,042	103,525	7,142	3,358
Research & Development										128,000	
Energy Education Program										128,000	
Total Annual Expenditures	4,288,191	567,088	58,323	4,000,438	654,077	126,442	57,346	4,284,252	604,541	189,682	56,291

¹³ EM&V actual expenditures were allocated based on allocation factors provided by the EM&V contractor.

¹⁴ 2020 budget found at Table 10 in the current EEPR; 2019 budget defined in Project No. 50666; 2018 budget defined in Project No. 49297.

Table 9 Continued¹⁵

	2017				2016			
	Incent	Admin	R&D	EM&V	Incent	Admin	R&D	EM&V
Commercial	1,553,697	143,269	34,510	31,671	1,833,623	168,492	34,586	22,338
Small Business MTP	367,728	33,372	8,168	5,218	508,604	46,047	9,593	4,203
Commercial Solutions MTP	472,319	42,864	10,491	11,069	588,470	53,278	11,100	8,892
SCORE/CitySmart MTP	567,691	51,519	12,609	10,093	470,019	42,554	8,865	7,946
Load Management SOP	145,960	15,513	3,242	5,291	266,530	26,613	5,027	1,297
Residential	1,833,197	293,270	40,718	17,097	1,782,381	284,744	33,619	18,397
High-Performance Homes MTP	373,039	33,854	8,286	4,719	387,858	35,328	7,316	3,498
Residential SOP	1,314,981	246,240	29,208	10,465	1,267,249	237,892	23,903	14,899
Efficiency Connection MTP	35,241	3,198	783	1,913	19,035	1,723	359	
CoolSaver Pilot	109,935	9,977	2,442					
Education Kits					108,238	9,799	2,042	
Hard-to-Reach	825,122	152,942	18,327	5,490	744,102	145,734	14,035	10,519
Hard-to-Reach SOP	299,747	46,888	6,658	3,123	309,685	58,135	5,841	7,103
Low Income Weatherization	525,375	106,054	11,669	2,367	434,417	87,599	8,194	3,416
Research & Development			128,000	2,033				
Energy Education Program			128,000	2,033				
Total Annual Expenditures	4,212,016	589,481	221,555	56,291	4,360,106	598,970	82,240	51,254

¹⁵ 2017 budget defined in Project No. 48146; 2016 budget defined in Project No. 46907

VII. Program Funding for Calendar Year 2020

As shown in **Table 10**, TNMP spent a total of \$4,855,278.97, not including EM&V costs, on all of its energy efficiency programs in 2020 to meet the Commission & PURA's mandated budget. The total forecasted budget for 2020 was \$5,363,796.

Funds for achieving the energy efficiency goal will be collected in each utility's EECRF. Each utility shall track its energy efficiency expenditures separately from other expenditures and report these in their annual energy efficiency report.

Table 10: Program Funding for Calendar Year 2020

	Total Projected Budget	Numbers of Customers Participating	Actual Funds Expended (Incentives)	Actual Funds Expended (Admin) ¹⁶	Total Funds Expended	Funds Remaining	% change ¹⁷
Commercial	1,974,123	240	1,645,202	157,802	1,803,004	171,121	42%
Open for Small Business MTP	505,403	105	320,816	30,857	351,673	153,729	30%
SCORE/CitySmart MTP	537,680	34	467,912	45,005	512,917	24,762	5%
Commercial Solutions MTP	694,620	57	665,417	64,002	729,419	-34,799	-5%
Load Management	236,425	44	191,057	17,937	208,994	27,431	12%
Residential	2,227,091	2,280	1,825,252	265,595	2,090,847	136,244	16%
High-Performance Homes	510,269	646	414,670	38,931	453,602	56,667	11%
Residential SOP	1,716,822	1,634	1,410,582	226,664	1,637,246	79,577	5%
Hard-to-Reach	1,162,577	683	817,737	143,690	961,427	201,150	31%
Hard-to-Reach SOP	491,318	456	401,849	64,572	466,421	24,897	5%
Low Income Weatherization	671,259	227	415,889	79,118	495,007	176,253	26%
Total Annual Expenditures	5,363,796	3,203	4,288,191	567,088	4,855,279	508,518	89%
EM&V					58,323		

¹⁶ Excludes EM&V and municipal rate case expenses.

¹⁷ For all program expenditures that decreased from the total projected budget by more than 10%, the funds were not fully subscribed in the program. For all program expenditures that increased from the total projected budget by 10%, the funds not spent in other programs in the same customer class were reallocated so they could be spent to reach TNMP's savings goal.

TNMP's 2020 targeted low income program met the requirements in the EE Rule, whereby "annual expenditures for the targeted low income energy efficiency program are not less than 10% of the utilities energy efficiency budget for the program year" as detailed in **Table 11** below:

Table 11: Meeting Low Income Weatherization Expenditure Requirement

2020 Total Expenditures	LIW Expenditures	% of Expenditures
\$4,855,279	\$495,007	10%

VIII. Market Transformation Program Results

Open for Small Business MTP (Open MTP)

TNMP retained CLEAResult in 2013 to broaden participation in the commercial sector to include more small business customers. Open MTP is a program designed to offer contractor and customer education on energy efficiency technologies, equip participating contractors with the tools they need to succeed in generating revenue from projects in the small business market, and offer substantial incentive rates needed to move small (≤ 200 kW peak demand) businesses to install energy efficient products such as high efficiency lighting and refrigeration measures. In 2019, air infiltration was included as a "no cost" measure and made up over 1/2 of the savings achieved. The same trend continued in 2020 as small businesses didn't have money to spend on other measures due to the effects COVID-19, and for 2021 a "no cost" a/c tune-up is being added to help reach customers so they can still see some savings benefits from participation. The program overcomes market barriers by providing incentives to help pay for energy efficiency upgrades. In addition, Open MTP connects customers with participating contractors that are qualified to provide design and installation services for energy efficient technologies and any additional technical support as needed to make the customer comfortable with the implementation of efficiency measures in their facilities.

The program design is a contractor direct install model enabling market transformation at the contractor and customer level. The program is based on contractor engagement and furthermore provides a Proposal Generation Software Application ("Proposal App") to empower participating contractors and to streamline program participation. The Proposal App enables participating contractors to perform facility surveys for eligible measures, generate and submit Customer Proposals and obtain electronic customer signature. The program focuses on educating and training participating contractors to provide customer support and will provide direct customer assistance as needed.

In 2020, TNMP projected acquisition of 450 kW demand savings from this program. TNMP is reporting 465 kW. This includes 105 projects in five counties.

SCORE/CitySmart MTP

TNMP retained CLEAResult to offer the SCORE/CitySmart MTP in 2009 to schools and local government sectors. The program was designed to overcome obstacles to energy efficiency projects such as the institutional disconnect between the finance and facilities departments, the lack of firsthand experience with efficiency measures, limited budgets, and the lack of management decision-making processes necessary for identifying, prioritizing, and completing projects that will improve energy performance and reduce operating costs. The 2020 SCORE/CitySmart MTP continued to provide non-cash incentives such as building energy analysis (benchmarking), energy master planning seminars, technical assistance, communications support, and monetary incentives for the installation of documented energy efficiency measures that reduce peak demand and energy use. Due to the lack of spending in the Open program due to COVID-19, SCORE alternatively was able to put those funds to use while school districts took advantage of their closures to install measures. TNMP was able to fund more projects than initially reserved in the pipeline.

The SCORE/CitySmart MTP has created change that can be tracked among partners, service providers, engineers, designers, and architects. This change has been achieved by assisting participants to identify energy efficiency opportunities, make informed financial decisions, successfully install energy-saving projects in their facilities and provide Press Releases to promote accomplishments. In fact, many of the program partners have not previously considered improving their facilities' energy performance. Furthermore, the SCORE/CitySmart MTP has enrolled participants that had previously been unable to participate due to various barriers including lack of time, resources, and knowledge to complete the application process. The program has been effective in educating local contractors, architects, and engineers about newer, more cost-effective and energy efficient technologies for their customers. The service provider component has been an integral part of developing long-term relationships and impact in the marketplace.

Tracking Success

Pursuant to 16 TAC § 25.181, as part of the 2009 Texas SCORE/CitySmart MTP, TNMP completed a baseline study of Texas schools and local governments. The primary objective of this study was to document the current status of energy use, key equipment, practices, and management within school and local government participants in TNMP's service territory. While the study confirmed that energy

efficiency interest may not be a significant market barrier, financing, internal management and lack of energy efficiency education are all significant barriers. Many respondents noted they lack the time and procurement process to implement efficiency improvements, as well as the awareness of and familiarity with energy efficient technologies. Given the significant monetary and non-monetary barriers present in the marketplace, both resource acquisition and market transformation programs are needed.

In 2020, TNMP projected acquisition of 685 kW demand savings from this program. TNMP is reporting 680 kW, including participation by 34 projects in seven counties.

Commercial Solutions MTP

TNMP retained CLEAResult to offer the Commercial Solutions component in 2009 to broaden program participation in commercial sectors. In 2012, TNMP separated the CS MTP from the SCORE/CitySmart MTP. The program was designed to overcome obstacles to energy efficiency projects such as the institutional disconnect between the finance and facilities departments, the lack of firsthand experience with efficiency measures, limited budgets, and the lack of management decision-making processes necessary for identifying, prioritizing, and completing projects that will improve energy performance and reduce operating costs. The 2020 CS MTP provided non-cash incentives such as technical assistance and communications support as well as monetary incentives for the installation of documented energy efficiency measures that reduce peak demand and energy use.

Tracking Success

The CS MTP has created change that can be tracked among partners, service providers, engineers, designers, and architects. This change has been achieved by assisting participants to identify energy efficiency opportunities, make informed financial decisions, successfully install energy-saving projects in their facilities and provide Press Releases to promote accomplishments. Furthermore, the CS MTP has enrolled participants that had previously been unable to participate due to various barriers including lack of time, resources and knowledge to complete the application process. The program has been effective in educating local contractors, architects, and engineers about newer, more cost-effective and energy efficient technologies for their participants. The service provider component has been an integral part of developing long-term relationships and impact in the marketplace.

In 2020, TNMP projected acquisition of 644 kW demand savings from this program. TNMP is reporting 1,135 kW. This included 57 projects in eleven counties.

High-Performance Homes MTP

The primary objective of the High-Performance Homes program has been to achieve peak demand reductions and/or energy savings through increased sales of ENERGY STAR® certified and High-Performance qualified homes. Additionally, the program is designed to condition the market so that consumers are aware of and demand ENERGY STAR® certified and High-Performance qualified homes, and that builders have the technical capacity to supply them.

TNMP has retained ICF Resources (ICF) to implement the program. Pursuant with 16 TAC § 25.181, as part of the 2015 HPH MTP, ICF completed a baseline study of the residential new construction market. The primary objective of this study was to analyze and demonstrate standard construction practices do not meet the current statewide energy code. The results of the study augmented the HPH MTP by quantifying the current new home construction market, and results have been used to generate a TBRH to be used in conjunction with the 2015 IECC code to incentivize builders to comply with higher efficiency baseline.

In 2020, the program continued to offer a midstream path to capture HVAC savings from new construction homes that did qualify for the whole house path.

ENERGY STAR® has recognized TNMP's accomplishments in the ENERGY STAR® Homes Program by awarding it the ES Outstanding Achievement Award in 2004-2008 and the Leadership in Housing Award for 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, and 2020. TNMP was also recognized by ENERGY STAR by becoming a Partner of the Year award winner for program years 2015, 2016 and Sustained Excellence in 2017, 2018, 2019, and 2020.

In 2020, TNMP incentivized 646 homes, resulting in 509 kW of reduced demand and 1,275,835 kWh of energy savings.

Low Income Weatherization

In 2020, TNMP partnered with 3 agencies to provide services under the single family portion of the program and issued an RFP to provide services to the multifamily sector. TNMP struggled to reach participants in the multifamily sector during COVID-19 due to both lack of funds for projects, as well as supply chain delays.

The 2020 program pushed beyond the normal November 30th deadline to meet the required 10% spend of the total energy efficiency budget, resulting in 130 single family homes weatherized, and 97 multifamily units served, producing a savings of 391 kW and 543,117 kWh in seven counties.

IX. Research & Development and Administration Cost Reporting

Research & Development (“R&D”)

R&D costs for the 2020 portfolio were pre-paid in 2019 to preserve the budget for employee education and research projects that may have developed during the year. Due to COVID-19 restrictions, there was no employee travel and limited resources, so no projects were undertaken.

Administration Costs

Administration costs for the 2020 portfolio include, but are not limited to, outsourced program administration, marketing, energy efficiency employees’ payroll, EUMMOT, costs associated with regulatory filings, and EM&V admin outside of the actual cost associated with the EM&V contractor.

Generally, such costs benefit the entire portfolio with costs being directly assigned, where possible, to the specific program requiring such costs. Any costs (or portions thereof) which are not directly assignable to a specific program are allocated among the programs in proportion to the program incentive costs.

X. Current Energy Efficiency Cost Recovery Factor (“EECRF”)

TNMP filed its Application for Approval of an Energy Efficiency Cost Recovery Factor on May 29, 2020. The application and supporting documents are available for download from the PUCT Interchange under Docket No. 50894. Rates charged per class are billed per kWh monthly:

- Residential Service = \$0.001224
- Secondary Service Less than or Equal to 5kW = \$0.003114
- Secondary Service Greater than 5kW = \$0.000832
- Primary Service = \$0.00008
- Lighting = \$0.000015

The EECRF was filed, approved, and is being collected from Jan 1 – Dec 31, 2021. Rates went into effect March 1, 2021. TNMP will be filing for 2022 EECRF recovery by June 1, 2021.

XI. Revenue Collected through EECRF (2020)

Revenue Collected

TNMP collected \$5,497,080.90 from January 1, 2020 through December 31, 2020.

XII. Over/Under-recovery of Energy Efficiency Program Costs

TNMP had an over-recovery of \$119,770¹⁸ for the 2020 program year, including its rate case expenses of \$57,289.02 for processing Docket No. 50894. TNMP will true-up this amount, by rate class, in the 2022 EECRF filing.

¹⁸ Over-recovery amount includes a true-up to the EM&V projected costs collected through rates as approved in Docket No. 50894.

Acronyms

C&I	Commercial and Industrial
CCET	Center for the Commercialization of Electric Technologies
DR	Demand Response
DSM	Demand Side Management
EEP	Energy Efficiency Plan, which was filed as a separate document prior to April 2009
EEPR	Energy Efficiency Plan and Report
EER	Energy Efficiency Report, which was filed as a separate document prior to April 2009
EE Rule	Energy Efficiency Rule, 16 Tex. Admin. Code § 25.181 and § 25.183
EM&V	Evaluation, Measurement and Verification
ERCOT	Electric Reliability Council of Texas
HTR	Hard-To-Reach
M&V	Measurement and Verification
MTP	Market Transformation Program
PUCT	Public Utility Commission of Texas
REP	Retail Electrical Provider
RES	Residential
SCORE	Schools Conserving Resources
SOP	Standard Offer Program

Glossary

Please refer to 16 TAC § 25.181(c) for a full list of definitions.

Appendix

Reported Demand and Energy Reduction by County 2020

Open for Small Business MTP		
County	kW	kWh
Bosque	25	84,476
Denton	404	795,187
Galveston	22	77,983
Hood	5	14,127
Somervell	9	33,639
Total	465	1,005,413

Commercial Solutions MTP		
County	kW	kWh
Brazoria	35	112,563
Coryell	11	58,466
Denton	778	3,132,466
Fannin	2	8,315
Fort Bend	6	43,745
Galveston	262	1,019,433
Hill	9	35,155
Montague	15	62,839
Pecos	10	39,666
Rains	3	10,114
Reeves	3	10,656
Total	1,135	4,533,418

SCORE/CitySmart MTP		
County	kW	kWh
Brazoria	93	404,505
Denton	271	901,410
Galveston	144	520,833
Hamilton	51	157,943
Red River	44	139,371
Winkler	12	67,934
Young	65	210,241
Total	680	2,402,237

Load Management SOP		
County	kW	kWh
Bosque	2,056	2,056
Brazoria	1,918	1,918
COLLIN	1	1
Coryell	23	23
Denton	98	98
Galveston	472	472
Reeves	242	242
Winkler	194	194
Total	5,004	5,004

High-Performance Homes MTP		
County	kW	kWh
Brazoria	45	113,485
Denton	19	45,721
Galveston	445	1,116,629
Total	509	1,275,835

Residential SOP		
County	kW	kWh
Archer	23	54,765
Bosque	110	183,196
Clay	57	93,213
Collin	336	588,201
Comanche	150	226,330
Coryell	70	113,843
Denton	219	360,422
Fannin	68	105,607
Franklin	2	2,896
Galveston	396	637,123
Grayson	164	251,969
Hamilton	61	96,003
Hill	66	113,049
Hood	16	25,430
Hunt	173	318,445
Jack	135	206,582
Lamar	14	22,201
Mclennan	1	1,683
Montague	63	94,089
Palo Pinto	16	24,587
Rains	115	204,021
Red River	78	122,077
Reeves	500	863,650
Terrell	249	433,796
Titus	51	82,124
Ward	37	53,083
Winkler	347	513,785
Young	85	122,079
Total	3,602	5,914,248

Hard-to-Reach SOP		
County	kW	kWh
Archer	4	10,007
Bosque	9	13,426
Clay	43	75,442
Comanche	22	25,714
Coryell	10	12,853
Galveston	227	360,754
Hamilton	26	40,500
Hill	5	5,585
Hunt	4	6,789
Montague	19	33,237
Rains	102	186,843
Reeves	108	175,423
Terrell	51	85,393
Titus	23	39,143
Ward	3	5,068
Winkler	15	17,705
Young	12	19,103
Total	681	1,112,985

Low Income Weatherization		
County	kW	kWh
Brazoria	178	235,918
Cooke	1	1,029
Denton	120	177,002
Fannin	3	4,076
Galveston	78	108,286
Grayson	6	9,304
Hunt	4	7,503
Total	391	543,117

Executive Summary

The Energy Efficiency Plan (“The Plan”) details TNMP’s plan to achieve the required demand savings reduction, as determined by the Final Order in Docket No. 50894, by December 31, 2021.

The annual demand goal for energy efficiency savings pursuant to 16 TAC § 25.181(e)(1)(C) is calculated by applying the percentage goal to the utility’s summer weather-adjusted five-year average peak demand for the combined residential and commercial customers. As shown by the data in **Table 4**, a four-tenths of 1% goal would be 5.2 MW, which is less than the amount of energy efficiency to be acquired for the most recent preceding year. Therefore, for 2021, TNMP has planned to achieve a goal of 5.44 MW.

The Plan also addresses the corresponding energy savings goal of 9,531 MWh, which is calculated from the demand savings goal using a 20% conservation load factor.

The goals, budgets, and implementation plans included in The Plan are designed to: 1) comply with requirements of the EE Rule; 2) incorporate results and recommendations included in the Annual Statewide Portfolio Evaluation, Measurement, and Verification Report by the Evaluation, Measurement and Verification (“EM&V”) contractor; 3) consider lessons learned regarding energy efficiency service providers; 4) evaluate other ERCOT distribution utilities’ results; 5) reflect the effects of economic factors; and 6) enable customer participation in the various energy efficiency programs.

The Energy Efficiency Report (“The Report”) demonstrates TNMP’s successful 2020 implementation of its energy efficiency portfolio of SOPs and MTPs, as required by PURA § 39.905. These programs met and exceeded TNMP’s efficiency savings goals by procuring 12.466 MW in demand savings and 16,792 MWh in energy savings. The 2020 TNMP portfolio included the Residential and Hard-to-Reach Standard Offer Programs, and High-Performance Homes Market Transformation Program, as well as the SCORE/CitySmart, Commercial Solutions, and Open for Small Business Market Transformation Programs, the Load Management Standard Offer Program and Low Income Weatherization Program.

A summary of annual goals and budgets is presented in **Table 1**.

Table 1: Summary of Goals, Projected Savings, and Projected Budgets¹

Calendar Year	0.4% Peak Demand Goal	Peak Demand (MW) Goal ²	Energy (MWh) Goal	Projected Demand Savings (MW)	Projected Energy Savings (MWh)	Projected Budget (000's)
2021	5.2	5.44	9,531	10.47	14,202	\$5,463
2022	5.2	5.42	9,496	9.597	13,057	\$4,958

In order to obtain the goal, TNMP proposes to implement the following standard offer and market transformation programs:

- Open for Small Business MTP
- SCORE/CitySmart MTP
- Commercial Solutions MTP
- Load Management SOP
- High-Performance Homes MTP
- Residential SOP
- Hard-to-Reach SOP
- Low Income Weatherization

Energy Efficiency Plan

I. 2021 Programs

A. 2021 Program Portfolio

TNMP plans to implement eight SOPs and MTPs. These programs have been structured to comply with the rules governing program design and evaluation in 16 TAC § 25.181(h), (i), (j), and (k). Each of these programs target both broad market segments and specific market sub-segments that offer significant opportunities for cost-effective savings. TNMP anticipates that targeted outreach to a broad range of service provider types will be necessary in order to meet the savings goals required by PURA § 39.905 on a continuing basis. **Table 2 (a)** summarizes the programs and target markets.

¹ 0.4% Peak Demand Goal numbers are calculated from Table 4; Peak Demand Goal was established in Docket No.50894; Projected Savings are from Table 5; and Projected Budget from Table 6. All MW and MWh figures in this Table are given “at Meter.”

² Includes the effects of industrial opt-outs, as defined in 16 TAC § 25.181(u).

Table 2 (a): 2021 Energy Efficiency Program Portfolio

Programs	Target Market	Application
Open for Small Business MTP	Commercial <200kW	Retrofit
SCORE/CitySmart MTP	Schools, Government	Retrofit; New Construction
Commercial Solutions MTP	Commercial >200kW	Retrofit; New Construction
Load Management SOP	Commercial	Load Management
High-Performance Homes MTP	Residential	New Construction
Residential SOP	Residential	Retrofit
Hard-to-Reach SOP	Residential Income-qualified	Retrofit
Low Income Weatherization	Residential Income-qualified	Retrofit

TNMP maintains a website containing the requirements for project participation, forms required for project submission, and the links to databases containing the current available funding at tnmpefficiency.com. This website will be the primary method of communication used to provide potential project sponsors (“Project Sponsors”) for the energy efficiency projects with program updates and information. **Table 2 (b)**, lists the links for all Program Manuals.

Table 2 (b): 2021 Energy Efficiency Program Manuals

Programs	Program Manuals
Open for Small Business MTP	http://tnmpefficiency.com/downloads/2021/2021_Small_Business_Program_Manual.pdf
SCORE/CitySmart MTP	http://tnmpefficiency.com/downloads/2021/2021_SCORE_Program_Manual.pdf
Commercial Solutions MTP	http://tnmpefficiency.com/downloads/2021/2021_Commercial_Solutions_Program_Manual.pdf
Load Management SOP	http://tnmpefficiency.com/downloads/2021/03/TNMP_2021_LM_Program_Manual.pdf
High-Performance Homes MTP	http://tnmpefficiency.com/downloads/2021/02/Program_Guide.pdf
Residential SOP	http://tnmpefficiency.com/downloads/2021/2021_Program_Manual.pdf
Hard-to-Reach SOP	http://tnmpefficiency.com/downloads/2021/2021_Program_Manual.pdf
Low Income Weatherization	http://tnmpefficiency.com/downloads/2021/2021_TNMP_LIW_Manual.pdf

B. Existing Programs

Open for Small Business MTP (“Open MTP”)

Program Design

Although TNMP’s existing Commercial Solutions program has successfully engaged larger customers and contractors to install energy efficiency projects, the program has encountered additional barriers for small business customer participation. Since these customers do not typically engage in energy efficiency projects, the contractor community does not market to them as actively as larger customers. As a result, many small commercial customers do not participate in programs, and thus do not benefit from energy efficiency programs.

Implementation Process

TNMP continues to contract with CLEAResult as the implementer to provide the energy efficiency and demand reduction design and solutions for the Open MTP throughout the 2021 program year. Under this program, TNMP helps small commercial customers that do not have the in-house capacity or expertise to: 1) identify, evaluate, and undertake efficiency improvements to their completion; 2) properly evaluate energy efficiency proposals from vendors; and/or 3) understand how to leverage energy savings to finance projects within their financial planning processes. Small-sized customers (<200 kW) tend to implement smaller projects with lower savings which creates program cost-effectiveness challenges to providing one-on-one technical assistance to this market. The Open MTP will provide the direct support, tools, and training necessary to contractors to pursue small commercial customers.

Outreach Activities

The program targets small commercial customers based on premise demand. All commercial customer premises with a peak annual billing demand less than 200 kW are eligible for the program. TNMP plans to leverage small business associations, government agencies, and service providers to serve these customers.

SCORE/CitySmart MTP (“SCORE/CitySmart MTP”)

Program Design

TNMP implemented the energy-smart schools and cities market transformation program in 2008, as envisioned by Texas 79th Legislature’s Senate Bill 712 and approved by the Public Utility Commission of Texas (“Commission” or “PUCT”).

The SCORE/CitySmart MTP provides energy efficiency and demand reduction solutions for schools and local government customers. The program is designed to help educate and assist these customers in lowering their energy use by facilitating the integration of energy efficiency into their short and long term planning, budgeting, and operational practices.

Implementation Process

TNMP continues its contract with CLEAResult as the implementer to offer participation to school districts and government entities in its service territory. The program facilitates the identification of potential demand and energy savings opportunities, general operating characteristics, long-range energy efficiency planning, and overall measure and program acceptance by the targeted customer participants.

Outreach Activities

TNMP markets the availability of this program in the following manner:

- Contracts with a third-party implementer to conduct outreach and planning activities;
- Targets a number of customer participants;
- Conducts workshops for program participants and industry professionals as necessary to explain elements of the program, such as responsibilities of the participants, project requirements, incentive information, and the application and reporting process;
- Participates in regional outreach activities as may be necessary; and
- Attends appropriate industry-related meetings to generate awareness and interest.

Commercial Solutions MTP (“CS MTP”)

Program Design

TNMP began implementing the CS MTP in 2010 as part of the SCORE/CitySmart MTP, as envisioned by Texas 79th Legislature’s Senate Bill 712 and approved by the PUCT. TNMP’s CS MTP targets commercial customers (other than local government entities and schools) who do not have the in-house capacity or expertise to: 1) identify, evaluate, and undertake efficiency improvements; 2) properly evaluate energy efficiency proposals from vendors; and/or 3) understand how to leverage their energy savings to finance projects. Incentives are paid to customers served by TNMP for certain eligible energy efficiency measures that are installed in new or retrofit applications resulting in savings as defined by the Texas Technical Reference Manual (“TRM”).

Implementation Process

TNMP continues its contract with CLEAResult as implementer to target a number of commercial customers meeting the program participation parameters. The CS MTP facilitates the identification of demand and energy savings opportunities, general operating characteristics, long-range energy efficiency planning, and overall measure and program acceptance by the targeted customer participants.

The CS MTP provides energy efficiency and demand reduction solutions to TNMP's larger commercial customers.

Outreach Activities

TNMP markets the availability of this program in the following manner:

- Contracts with a third-party implementer to conduct outreach and planning activities;
- Targets a number of customer participants;
- Conducts workshops for program participants and industry professionals as necessary to explain elements of the program, such as responsibilities of the participants, project requirements, incentive information, and the application and reporting process;
- Participates in regional outreach activities as may be necessary; and
- Attends appropriate industry-related meetings to generate awareness and interest.

Load Management Standard Offer Program

Program Description

The TNMP Load Management Standard Offer Program ("SOP") was launched in 2009 in accordance with 16 TAC § 25.181, which authorizes participating Project Sponsors (customers or third-party sponsors) to provide on-call, voluntary curtailment of electric consumption during peak demand periods in return for incentive payments. Incentives are based on verified demand savings that occur at TNMP distribution sites, or at eligible institutional customers' sites, as a result of calls for curtailment. Customers are not required to produce a specific level of curtailed load but will only receive payments for the lesser of the amount of curtailed load produced or contracted.

Implementation process

Implementation of this program will be directly through customers and third-party entities representing customers at distribution level within the TNMP service territory. In 2021, the program

will continue to initiate a maximum number of five curtailments, including one annual Scheduled Curtailment of one-to-two hour's duration and a maximum of four Unscheduled Curtailments of one-to-four hour's duration each.

Outreach Activities

TNMP plans to market the availability of the program in the following manner:

- Utilizes mass electronic mail (e-mail) notifications to keep potential participants interested and informed; and
- Maintain program information on the company website.

High-Performance Homes MTP (“HPH MTP”)

Program design

The High-Performance Homes program promotes the construction and certification of new ENERGY STAR® certified and High-Performance qualified homes. This voluntary program provides financial incentives and other types of assistance to production and custom homebuilders who commit to construct homes within the TNMP service territory that meet High-Performance specifications. To be eligible for participation, homes must achieve at least a five percent (5%) kWh savings over the Texas Baseline Reference Home (TBRH) established by the PUCT in the TRM Version 8.0 for Program Year 2021, Volume 4: Measurement & Verification Protocols. The Rater's primary responsibility is to work with homebuilders to facilitate the construction of ENERGY STAR® certified and High-Performance homes that meet the performance requirements for the program. For 2021, the program design continues to include an HVAC midstream portion of the program to include smaller home builders. The incentives are paid to the homebuilders that install high efficiency HVAC systems in newly constructed homes.

Implementation process

TNMP continues its contract with ICF to implement the HPH MTP, whereby any eligible builder may submit an application for a home meeting the requirements. The program information on TNMP's website reflects eligibility requirements.

Outreach Activities

TNMP markets the availability of its programs in the following manner:

- Contracts with third-party implementer to conduct outreach and planning activities;

- Utilizes mass electronic mail (e-mail) notifications to keep potential builders interested and informed;
- Maintains a website with detailed builder eligibility, incentives, and process; and
- Participates in statewide outreach activities, as may be available.

Residential Standard Offer Program (“RES SOP”)

Program Design

The RES SOP targets residential customers whose maximum demand is less than 100 kW. Incentives are paid to Project Sponsors for certain eligible measures installed in retrofit applications which provide verifiable demand and energy savings. Incentives are paid to Project Sponsors for certain eligible measures installed in retrofit applications as defined in the Texas TRM.

Implementation Process

TNMP continues implementation of its RES SOP whereby any eligible Project Sponsor may submit an application for a project meeting the minimum requirements. The program information on TNMP’s website is updated to reflect participating Project Sponsors and incentive amounts that are available.

Outreach Activities

TNMP markets the availability of its programs in the following manner:

- Utilizes mass electronic mail (e-mail) notifications to keep potential Project Sponsors interested and informed;
- Maintains a website with detailed project eligibility, end-use measures, incentives, procedures, and application forms;
- Attends appropriate industry-related meetings to generate awareness and interest;
- Participates in statewide outreach activities as may be available; and
- Conducts workshops as necessary to explain elements such as responsibilities of the Project Sponsor, project requirements, incentive information, and the application and reporting process.

Hard-To-Reach Standard Offer Program (“HTR SOP”)

Program Design

The HTR SOP targets low income customers, defined as a household income at or below 200% of the federal poverty guidelines, or who meet certain other qualifications. Incentives are paid to

Project Sponsors for certain eligible measures installed in retrofit applications as defined in the Texas TRM.

Implementation Process

TNMP continues implementation of its HTR SOP, whereby any eligible Project Sponsor may submit an application for a project meeting the minimum requirements. The program information on TNMP's website is updated annually to reflect participating Project Sponsors and the program database reflects incentive amounts that are available.

Outreach Activities

TNMP markets the availability of its programs in the following manner:

- Utilizes mass electronic mail (e-mail) notifications to keep potential Project Sponsors interested and informed;
- Maintains a website with detailed project eligibility, end-use measures, incentives, procedures and application forms;
- Attends appropriate industry-related meetings to generate awareness and interest;
- Participates in statewide outreach activities, as may be available; and
- Conducts workshops as necessary to explain elements such as responsibilities of the Project Sponsor, project requirements, incentive information, and the application and reporting process.

Low Income Weatherization Program

Program Design

Each unbundled transmission and distribution utility shall include in its energy efficiency plan a targeted low income energy efficiency program as described by PURA § 39.903(f)(2). The Low Income Weatherization Program targets TNMP's low income residential customers who: a) meet the Department of Energy's income eligibility guidelines, defined as at or below 200% of the federal poverty level; b) are connected to TNMP's electric system; and c) have been qualified through the Service Providers guidelines. Effective in 2011, S.B. 1434 required that no less than 10% of the total energy efficiency portfolio budget be expended on Low Income Weatherization. The program has been designed to identify non-traditional agencies to reach a broader audience.

Implementation Process

TNMP continues to contract with Frontier Energy (Frontier) to provide marketing and education to local government organizations and not-for-profit agencies for single family homes. Frontier

contracts with the not-for-profit community action and government agencies (i.e. low income advocates) to provide weatherization services to eligible single family residential TNMP customers.

The agencies select measures to be installed based on the savings-to-investment (“SIR”) ratio, which evaluates cost-effectiveness using the present value of the measure’s lifetime energy savings divided by the installation costs. Agencies receive payment for the measure installation costs, plus an administrative fee of 8%, and up to the maximum allowable expenditure of \$7,541 per home. Energy savings are defined in the Texas TRM. Eligible measures include, but are not limited to:

- Attic insulation
- Central AC replacement
- Infiltration control
- Solar screens
- Wall insulation

Additionally, TNMP contracts with EnerChoice LLC (EnerChoice) to reach the multifamily market through a competitive bidding process. EnerChoice issues a request for proposal through which service providers identify potential multifamily projects and submit bids for heating, ventilation and air conditioning (HVAC) system change outs.

Outreach Activities

Low income advocates throughout TNMP’s service territory will be called upon to participate. Workshops, database training and updates to policies and procedures will take place annually, or as needed.

C. New Programs

There are no new programs for 2021.

D. Customer Classes

Customer classes targeted by TNMP’s energy efficiency programs are the Commercial, Hard-to-Reach, and Residential classes.

The annual demand goal will be allocated to customer classes by examining historical program results, evaluating economic trends, and considering 16 TAC § 25.181, which states that no less than 5% of the utility’s total demand goal should be achieved through programs for hard-to-reach

customers. **Table 3** summarizes the number of customers in each of the eligible customer classes, which was used to allocate funding on an equitable basis.

It should be noted, however, that the actual distribution of the goal and budget must remain flexible based upon the response of the marketplace, the potential interest that a customer class may have toward a specific program, and the overriding objective of meeting the legislative goal. TNMP will offer a portfolio of Standard Offer and Market Transformation Programs that will be available to all customer classes.

Table 3: Summary of Customer Classes

Customer Class	Number of Customers
Commercial	44,095
Residential	153,363
Hard to Reach	63,252

II. Projected Energy Efficiency Savings and Goals

The modified PURA § 39.905, effective September 1, 2011, changed the calculation used to determine TNMP's goal, stating that for an electric utility whose amount of energy efficiency to be acquired under this subsection is equivalent to at least four-tenths of 1% of the electric utility's summer weather-adjusted peak demand for residential and commercial customers in the previous calendar year, the minimum goal shall not be less than four-tenths of 1% of the utility's summer weather-adjusted peak demand for residential and commercial customers, adjusted for distribution industrial opt-out, by December 31 of each subsequent year; and the amount of energy efficiency to be acquired for the utility's residential and commercial customers for the most recent preceding year.

As shown in the data in **Table 4**, a four-tenths of 1% goal would be 5.2 MW for 2022, which is less than the amount of energy efficiency to be acquired for the most recent preceding year. For 2021, TNMP has planned to achieve a goal of 5.44 MW,³ and for 2022 TNMP has planned to achieve a goal of 5.42 MW.⁴

³ Goal defined in Docket No. 50894.

⁴ 16 TAC § 25.181(e)(1)(D) states that a utility's demand goal cannot be lower than its prior year's goal, except as adjusted in accordance with subsection (u).

Table 4 presents historical annual growth in demand for the previous five years that is used to calculate demand and energy goals. **Table 5** presents the projected demand and energy savings broken out by program for each customer class for 2021 and 2022. Projected savings for 2021 and 2022 reflect the budget allocations designed to meet TNMP’s goals required by PURA § 39.905.

Table 4: Annual Growth in Demand and Energy Consumption

Calendar Year	Peak Demand (MW) @ Source					Energy Consumption (MWh) @ Meter						Peak Demand (MW) @ Source		Peak Demand (MW) For Goal @ Meter		
	Total System		Residential & Commercial			Total System		Residential & Commercial				Residential & Commercial		Residential & Commercial		
	Actual	Weather Adjusted	Actual	Weather Adjusted	Opt-Out	Actual	Weather Adjusted	Actual	Weather Adjusted	Opt-Out	Net	Unadjusted Load	0.4% Peak Unadjusted Demand	T&D Loss Factor %	Adjusted Load	0.4% Peak Demand
(a)	(b) ⁵	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n) ⁶	(o)	(p)	(q)
2016	1,708	1,717	1,368	1,377	-19	8,741,755	8,829,767	5,859,233	5,947,245	(99,618)	5,847,627	1,357	5.3	6.30%	1,272	5.1
2017	1,737	1,739	1,407	1,408	-21	9,148,760	9,281,843	6,034,732	6,167,815	(129,138)	6,038,677	1,387	5.4	6.48%	1,297	5.1
2018	1,881	1,801	1,467	1,388	-29	10,071,002	9,994,163	6,483,278	6,406,439	(241,898)	6,164,541	1,359	5.4	6.54%	1,301	5.1
2019	1,965	1,930	1,512	1,477	-31	10,833,183	10,781,626	6,639,247	6,587,690	(282,289)	6,305,401	1,446	5.5	6.33%	1,360	5.2
2020	2,038	2,006	1,453	1,421	-52.05	11,433,155	11,459,453	6,575,549	6,601,848	(483,838)	6,118,010	1,369	5.53	5.28%	1,300	5.2

⁵ The columns (b) and (m) represent actual ERCOT settlement data for TNMP's service territory for the coincident peak for each year that was included in the four coincident peaks approved by the Commission for the ERCOT wholesale transmission matrix.

⁶ Deemed actual distribution loss factors used in the ERCOT settlement process which are calculated from the distribution loss coefficients submitted by DSPs and the ERCOT actual load + deemed actual transmission loss factors used in the ERCOT settlement process which are calculated based upon a linear interpolation or extrapolation using the on-peak and off-peak TLFs corresponding to the actual ERCOT system load (http://www.ercot.com/mktinfo/data_agg).

Table 5: Projected Demand and Energy Savings Broken Out by Program for Each Customer Class (at Meter)⁷

	2021	
Customer Class and Program	Demand Goal (kW)	Energy Goal (kWh)
Commercial	6,263	7,364,678
Open for Small Business MTP	450	1,356,365
SCORE/CitySmart MTP	680	2,433,013
Commercial Solutions MTP	870	3,562,452
Load Management SOP	4,263	12,848
Residential	2,966	6,230,473
High-Performance Homes MTP	535	1,423,588
Residential SOP	2,431	4,806,885
Hard-to-Reach	740	1,601,021
Hard-to-Reach SOP	228	840,311
Low Income Weatherization	512	760,710
Total Annual Projected Savings	9,969	15,196,172
	2022	
Customer Class and Program	Demand Goal (kW)	Energy Goal (kWh)
Commercial	6,579	6,606,284
Open for Small Business MTP	639	1,380,834
SCORE/CitySmart MTP	633	2,237,317
Commercial Solutions MTP	746	2,983,543
Load Management SOP	4,560	4,591
Residential	2,381	4,967,057
High-Performance Homes MTP	490	1,227,536
Residential SOP	1,891	3,739,521
Hard-to-Reach	637	1,483,658
Hard-to-Reach SOP	261	960,355
Low Income Weatherization	376	523,303
Total Annual Projected Savings	9,597	13,056,999

⁷ The projected savings in Table 5 for 2021 are based on the Statements of Work in place for 2021. The projected savings in Table 5 for 2022 are based on the cost/kW from 2020, as used to estimate future achievement inclusive of a 2% inflation rate, and assuming achievement of the savings precisely as allocated from the exact same measure-mix as in 2020, except the Residential and Hard-to-Reach SOPs, which have been adjusted to project changes per TRM 8.0. Historically, program funds are evaluated and reallocated as necessary among programs throughout the year, so it is highly likely that the actuals will differ from the projections.

III. Program Budgets

Table 6 presents total proposed budget allocations required to achieve the projected demand and energy savings shown in Table 5. The budget allocations are defined by the overall projected demand and energy savings, the avoided costs of capacity and energy in 16 TAC § 25.181, allocation of demand goals among customer classes, and the incentive levels by customer class. The budget allocations presented in Table 6 below are broken down by customer class, program, and the different budget categories: incentive payments, administration, research and development (“R&D”) and EM&V.

TNMP’s budget projections are designed to exceed the goal as encouraged by 16 TAC § 25.181(d), while staying within the cost caps established by 16 TAC § 25.182(d)(7). TNMP uses a historical estimate to project achievements, which does not account for other variables that would lower savings, in an attempt to still meet the goal. 16 TAC § 25.181(d) encourages TNMP to achieve demand reduction and energy savings through a portfolio of cost-effective programs that exceed each utility’s energy efficiency goals while staying within the cost caps. TNMP’s budget is designed to meet or exceed the goal established by Docket No. 50894 while remaining within the required cost caps.

Table 6: Proposed Annual Budget Broken Out by Program for Each Customer Class

2021	Incentives	Admin	R&D	Total Budget	EM&V⁸
Commercial	1,710,409	225,589	64,642	2,000,640	
Open for Small Business MTP	428,007	60,015	17,197	505,219	
SCORE/CitySmart MTP	458,688	64,142	18,380	541,210	
Commercial Solutions MTP	623,715	81,107	23,241	728,063	
Load Management SOP	200,000	20,324	5,824	226,148	
Residential	1,896,004	341,210	59,656	2,296,870	
High-Performance Homes MTP	449,897	36,074	10,337	496,308	
Residential SOP	1,446,107	305,136	49,319	1,800,562	
Hard-to-Reach	840,000	246,569	38,375	1,124,945	
Hard-to-Reach SOP	350,000	68,794	13,174	431,968	
Low Income Weatherization	490,000	177,776	25,201	692,977	
Total Budgets by Category	\$4,446,413	\$813,368	\$162,674	\$5,422,455	\$55,983
2022	Incentives	Admin	R&D	Total Budget	EM&V
Commercial	1,700,000	206,962	20,333	1,927,295	
Open for Small Business MTP	500,000	40,470	5,210	545,680	
SCORE/CitySmart MTP	500,000	59,026	4,831	563,857	
Commercial Solutions MTP	500,000	83,941	7,365	591,306	
Load Management SOP	200,000	23,525	2,927	226,452	
Residential	1,575,000	348,335	20,335	1,943,670	
High-Performance Homes MTP	450,000	51,060	5,898	506,958	
Residential SOP	1,125,000	297,275	14,437	1,436,712	
Hard-to-Reach	890,000	188,453	8,915	1,087,368	
Hard-to-Reach SOP	400,000	84,688	4,161	488,849	
Low Income Weatherization	490,000	103,765	4,755	598,520	
Total Budgets by Category	\$4,165,000	\$743,750	\$49,583	\$4,958,333	\$57,176

⁸ EM&V numbers reported are calendar year amounts.

Energy Efficiency Report

IV. Historical Demand Savings Goals and Energy Targets for Previous Five Years

This section documents TNMP's actual demand goals and energy targets for the previous five years (2016-2020).

Table 7: Historical Demand and Energy Savings Goals and Achievements (at the Meter)⁹

Calendar Year	Actual Demand Goal (MW)	Actual Energy Goal (MWh)	Actual Demand Reduction (MW)	Actual Energy Savings (MWh)
2020	5.44	9,531	12.466	16,792
2019	5.53	9,689	10.432	15,624
2018	5.61	9,829	13.764	17,204
2017	5.68	9,951	10.684	20,763
2016	5.74	10,056	12.253	21,716

⁹ Actual demand reduction at source for 2020 is 13.16 MW using the T&D loss factor from 2020 in Table 4. The calculation is as follows: 12.466 MW at meter * (1/(1-5.28% line losses)) = 13.16 MW at source.

V. Projected, Reported and Verified Demand and Energy Savings

Table 8: Projected versus Reported and Verified Savings for 2020 and 2019 (at Meter)

2020	Projected Savings¹⁰		Reported Savings¹¹	
Customer Class and Program	kW	kWh	kW	kWh
Commercial	6,500	8,337,895	7,284	7,946,072
Open for Small Business MTP	450	1,700,000	465	1,005,413
SCORE/CitySmart MTP	685	2,931,532	680	2,402,237
Commercial Solutions MTP	865	3,701,863	1,135	4,533,418
Load Management SOP	4,500	4,500	5,004	5,004
Residential	3,314	5,921,143	4,111	7,190,083
High-Performance Homes MTP	512	1,345,980	509	1,275,835
Residential SOP	2,801	4,575,163	3,602	5,914,248
Hard-to-Reach	896	1,395,779	1,072	1,656,102
Hard-to-Reach SOP	531	816,993	681	1,112,985
Low Income Weatherization	366	578,786	391	543,117
Total Annual Goals	10,710	15,654,818	12,466	16,792,256
2019	Projected Savings		Reported and Verified Savings¹²	
Customer Class and Program	kW	kWh	kW	kWh
Commercial	7,000	8,679,840	5,817	7,740,268
Open for Small Business MTP	450	2,000,000	633	1,779,305
SCORE/CitySmart MTP	685	2,580,972	664	2,078,372
Commercial Solutions MTP	865	4,093,868	853	3,871,584
Load Management SOP	5,000	5,000	3,667	11,007
Residential	2,564	7,018,876	3,468	5,984,270
High-Performance Homes MTP	663	1,552,946	434	983,393
Residential SOP	1,901	5,465,930	3,033	5,000,877
Hard-to-Reach	687	1,078,377	1,147	1,899,838
Hard-to-Reach SOP	282	492,377	520	868,287
Low Income Weatherization	405	586,000	627	1,031,552
Total Annual Goals	10,251	16,777,093	10,432	15,624,377

¹⁰ Projected Savings for 2020 as reported in the EEPR filed in Project No. 50666.

¹¹ Program savings have not been verified with EM&V.

¹² Program savings have been verified with EM&V.