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**Entergy Texas, Inc.**  
**2023 Energy Efficiency Plan and Report**  
**16 Tex. Admin. Code §§ 25.181 and 25.183**

**APRIL 3, 2023**

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Project No. 54470

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## Introduction

Entergy Texas, Inc. (ETI) presents this Energy Efficiency Plan and Report (EEPR) to comply with 16 Tex. Admin. Code (TAC) §§ 25.181 and 25.183, which together comprise 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:

- 25.181(e)(1) 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% of 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 under paragraph (2) of this subsection.

## **EEPR Organization**

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

- The Executive Summary highlights ETI’s plans for achieving its 2023 and 2024 projected energy efficiency savings goals.

### **Energy Efficiency Plan (EEP)**

- Section I describes ETI’s plan for its energy efficiency program portfolio. It details how each program will be implemented, discusses related informational and outreach activities, and introduces any programs not included in ETI’s previous EEP.
- Section II provides ETI’s targeted customer classes, specifying the size of each class and the method for determining those sizes.
- Section III presents ETI’s projected energy efficiency savings and goals for the prescribed planning period broken out by program for each customer class.
- Section IV provides ETI’s proposed energy efficiency budgets for the prescribed planning period broken out by program for each customer class.

### **Energy Efficiency Report (EER)**

- Section V presents ETI’s actual weather-adjusted demand savings goals and energy targets for the previous five years (2018-2022) with actual demand reduction and energy savings achieved.
- Section VI compares ETI’s projected energy and demand savings to its reported and verified savings by program for calendar years 2021 and 2022.
- Section VII presents ETI’s incentive and administrative expenditures for the previous five years (2018-2022) broken out by program for each customer class.
- Section VIII compares ETI’s actual program funding for 2022 compared to its 2022 budget broken out by program for each customer class.
- Section IX describes the results from ETI’s MTPs.
- Section X describes research and development costs and administrative costs.
- Section XI describes ETI’s current Energy Efficiency Cost Recovery Rider (EECRF).
- Section XII presents ETI’s revenue collection through the 2022 EECRF.
- Section XIII identifies the over/under-recovery of energy efficiency program costs.

**Acronyms** – A list of abbreviations for common terms used within this document.

### **Appendices**

- Appendix A – Reported kW and kWh savings broken out by county for each program.

## Executive Summary

The EEP portion of this EEPR details ETI’s plans to achieve its required reduction in its annual growth in demand of residential and commercial customers in 2023 and 2024. It also addresses the corresponding energy savings goal, which is calculated from ETI’s demand savings goal using a 20% capacity factor. The goals, budgets, and implementation plans that are included in this EEPR reflect the requirements of the EE Rule and lessons learned regarding energy efficiency service providers and customer participation in the various energy efficiency programs. A summary of annual goals and projected savings and budgets is presented in Table 1.

**Table 1: Summary of Goals, Projected Savings, and Projected Budgets<sup>1</sup>**

Calendar Year	Average Growth in Demand (kW at Source)	Peak Demand (kW at Source)	Goal Metric: 30% Growth (kW at Meter)	Goal Metric: 0.4% Peak Demand (kW at Meter)	Peak Demand Goal (kW at Meter)	Energy Goal (kWh at Meter)	Projected Demand Reduction (kW at Meter)	Projected Energy Savings (kWh at Meter)	Projected Budget (000’s)
2023	4,491	2,723,675	1,238	10,012	15,697	27,500,598	15,697	27,500,598	\$8,024
2024	63,150	3,019,554	17,410	11,099	17,410	30,502,295	17,410	30,502,295	\$8,377

Note: Goals are calculated by multiplying peak demand values at the source by the applicable goal metric (30% of growth or 0.4% of peak demand) and by the utility's line losses.

Example Goal Metric Calculation:  $(63,150 \text{ kW} \times 30\%) \times (1 - 0.081032 \text{ line losses}) = 17,410 \text{ kW}$

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 48371.

Example Goal Metric Calculation:  $(3,019,554 \text{ kW} \times 0.4\%) \times (1 - 0.081032 \text{ line losses}) = 11,099 \text{ kW}$

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 48371.

<sup>1</sup> The 2023 data in Table 1 above does not match the 2023 data in Table 1 in ETI’s 2022 EEPR because the Residential & Commercial Actual and Weather Adjusted Peak Demand at Source (kw) data for 2021 has been corrected in Table 4 of this 2023 EEPR in order to appropriately reflect industrial opt out customers’ demand data

# Energy Efficiency Plan

## I. 2023 Programs

### A. 2023 Program Portfolio

ETI plans to implement two MTPs and three SOPs in 2023: the Commercial Solutions MTP, Load Management SOP, the Residential SOP, the Residential Solutions MTP, and the Hard-to-Reach SOP. All these programs have been structured to comply with the applicable Public Utility Commission of Texas rules governing program design and evaluation.

These programs target broad market segments and specific market sub-segments that offer significant opportunities for cost-effective savings. ETI anticipates that targeted outreach to a broad range of service provider types will be necessary to meet the savings goals required by PURA § 39.905 on a continuing basis.

Table 2 below summarizes the programs and target markets.

**Table 2: 2023 Energy Efficiency Program Portfolios**

<b>Program</b>	<b>Target Market</b>	<b>Application</b>
Commercial Solutions MTP	Commercial	Retrofit; New Construction; Behavioral; Midstream
Load Management SOP	Commercial	Existing; Demand Response
Residential SOP	Residential	Retrofit
Residential Solutions MTP	Residential	New Construction; Retrofit; Online Marketplace; Demand Response
Hard-to-Reach SOP	Residential	Retrofit; Income Qualified

The programs listed in Table 2 are described in further detail below. ETI maintains a website containing links to the program manuals, all the requirements for project participation, and the forms required for project submission, at [http://www.energy-texas.com/energy\\_efficiency](http://www.energy-texas.com/energy_efficiency). This website will be the primary method of communication used to provide potential Project Sponsors with program updates and information.

## ***B. Existing Programs***

### **1. Commercial Solutions MTP**

#### **a) Program Design**

The Commercial Solutions MTP (COM SOL MTP) offers technical support and incentives for a suite of offerings that help eligible customers overcome market barriers to adopt energy efficiency measures. Using a combination of utility staff, third-party program implementer expertise, and a local network of qualified contractors, ETI helps non-residential customers identify energy efficiency opportunities, complete projects, and capture savings for the program. This approach is flexible depending on customer, project type, and market sector to effectively reach and deliver energy savings to the broadest audience possible. The COM SOL MTP program includes:

- A Commercial Solutions component designed to target small, medium, and large for-profit commercial customers in the service territory (this includes midstream and contractor direct install components);
- A “Schools Concerned with Reducing Energy” (SCORE) component to target local K-12 public school districts, universities, and colleges in the service territory (including a Continuous Energy Improvement (CEI) component driving behavioral changes in public schools);
- A City Smart component to target local, state, and federal governmental customers in the service territory;
- Prescriptive and custom measures to address both standard and unique opportunities for energy savings;
- A midstream point-of-sale lighting and HVAC component through local wholesale distributors to achieve long-term coincident peak demand reduction and annual energy savings; and
- A commercial CoolSaver HVAC tune-up component to target small businesses, non-profits, and school districts to promote HVAC equipment health and peak summer demand savings.

#### **b) Implementation Process**

With this program offering, ETI will target the following customers for program participation:

- Small, medium, and large commercial and small industrial businesses;
- Rural and urban public K-12 school districts, colleges, and universities;
- Government entities including cities, counties, state, and federal organizations; and
- Non-profit and institutional businesses such as religious institutions, private schools, and healthcare providers.

#### **c) Outreach Activities**

To market the availability of this program, ETI:

- Engages its third-party implementer, CLEAResult Consulting, Inc., to provide for outreach and training on the program;
- Meets with customers to explain the benefits of the program and the necessary information needed to begin or continue participation;
- Participates in regional or area outreach opportunities;
- Attends appropriate industry-related meetings to generate awareness and interest; and
- Promotes awareness of the program through the Company’s website, social media, email blasts, radio promotions, and print media.

## **2. Load Management SOP**

### **a) Program Design**

The Load Management (LM SOP) provides demand reduction opportunities to a small group of qualified commercial customers served by ETI and pays incentives to the customers for verifiable demand reductions. Each participant must participate in one scheduled curtailment and up to four unscheduled curtailments during the program year.

### **b) Implementation Process**

ETI recruits appropriate and qualified commercial customers to participate in the LM SOP. This program requires the examination of actual demand savings, operating characteristics, program design, long-range planning, and overall measure and program acceptance by the targeted customers. During the implementation process, ETI makes potential customers aware that, if the customer plans to use backup generation when curtailed, ETI assumes that their generators adhere to both state and federal guidelines for emissions.

### **c) Outreach Activities**

To market the availability of this program, ETI:

- Targets several large commercial customers during the program year;
- Conducts workshops to explain elements such as responsibilities of the customers, project requirements, incentive information, and the application and reporting process; and
- Promotes awareness of its energy efficiency programs by rolling out new program promotions through its website, social media, email blasts, radio promotions, and print media.

### **3. Residential SOP**

#### **a) Program Design**

The Residential SOP (RES SOP) targets ETI's residential customers. Participating Project Sponsors receive incentive payments for installing pre-approved measures that provide verifiable demand and energy savings. Project Sponsors are encouraged to install comprehensive measures in their projects, and only retrofit projects qualify for incentive payments. Deemed savings are accepted and widely used by Project Sponsors to measure and verify savings for projects submitted in this program. The incentives will be offered at the standard incentive rate to encourage the implementation of this measure.

In 2023, the RES SOP will also deploy two sub-programs. The first is an A/C tune-up program that gives contracts to Project Sponsors that have access to licensed HVAC contractors. The A/C tune-up program is referred to as the CoolSaver program and is implemented by CLEARResult Consulting, Inc. The second is a Multifamily HVAC Retrofit program that assists in replacing all outdated HVAC equipment with energy efficient heat pumps at apartment complexes. Apartment complexes are selected through an application process provided by ENERCHOICE, LLC.

#### **b) Implementation Process**

ETI will continue implementing its RES SOP by allowing eligible Project Sponsors to apply for projects meeting the minimum program requirements. The program information is on ETI's RES SOP website and is updated frequently with participating Project Sponsor information and the incentives available for installing eligible measures. In 2023, ETI selected nine Project Sponsors to participate in the RES SOP to allow for the appropriate administrative control and visibility of Project Sponsors. The funding awarded to each Project Sponsor should increase the chances that there will be Project Sponsors working in ETI's service territory throughout the entire year and that available funds will not be exhausted by mid-year.

#### **c) Outreach Activities**

To market the availability of this program, ETI:

- Utilizes mass email 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;
- Conducts workshops as necessary to explain elements such as responsibilities of the Project Sponsor, project requirements, incentive information, and the application and reporting process; and
- Promotes awareness of its energy efficiency programs by rolling out new program promotions through its website, social media, email blasts, radio promotions, and print media.

#### 4. Entergy Residential Solutions MTP

##### a) Program Design

The Entergy Solutions High Performance Homes MTP (NEW HOMES MTP)<sup>2</sup> has been combined with the A/C Distributor MTP (DIST PROD MTP) into the Residential Solutions MTP (RES SOL MTP) for increased administrative efficiency and flexibility. Under the combined MTP, incentives are paid to builders and contractors for installing certain measures in new and existing construction applications that provide verifiable demand and energy savings. TRC Companies is the implementing contractor for the RES SOL MTP.

The NEW HOMES MTP portion of the RES SOL MTP helps promote the new construction of higher efficiency homes in ETI's service territory. The program pays incentives to the builder that installed the higher energy efficiency equipment. The program requires the involvement of a third-party rating service to verify the home meets the current energy efficiency code in Texas, which is the 2015 International Energy Conservation Code (IECC 2015). Further, the program provides incentives for builders and contractors who exceed the IECC 2015 with the ultimate aim of promoting construction to ENERGY STAR<sup>®</sup> standards.

The DIST PROD MTP portion of the RES SOL MTP helps promote the installation of higher efficiency air conditioning and variable speed pool pumps for residential customers throughout ETI's service territory. The program pays incentives to select regional air conditioning and pool pump distributors to reduce the cost of the higher efficiency rated equipment to the local dealers with the goal that the dealer will pass the reduced cost along to the customers.

The Residential Marketplace<sup>3</sup> is scheduled to launch in 2023 as part of the RES SOL MTP program offering. The program was scheduled to launch as a pilot program in 2022, but the launch was delayed to 2023. This marketplace will offer residential customers the option to purchase energy efficient products (smart thermostats, advanced power strips, ENERGY STAR<sup>®</sup> air purifiers, and smart plugs) to give customers an opportunity to reduce their energy consumption.

The RES SOL MTP will have a pilot Residential Load Management program in program year 2023 that will utilize residential smart thermostats to reduce load during peak events. The program will be implemented by TRC Companies and utilize Energy Hub to run the load curtailments. Energy Hub will provide curtailment software to enroll customers in the program and call on customers to curtail load during peak events. A maximum of 15 events per thermostat can be called during the program and the events will last between one to four hours. Curtailments will take place during the Summer Peak (1:00 p.m. to 7:00 p.m. during the months of June, July, August, and September (excluding weekends and federal holidays)). During a curtailment event, the customer's HVAC system setpoint is modified to reduce the system's energy consumption for the duration of the event. Pre-cooling strategies may be incorporated to minimize customer discomfort during the disruption, though customers may opt out of events by manually adjusting the thermostat setpoint during the event.

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<sup>2</sup> The NEW HOMES MTP was historically called ENTERGY SOL MTP.

<sup>3</sup> The Residential Marketplace program was previously referred to as the Online Marketplace Pilot program in ETI's 2022 EEPR.

### **b) Implementation Process**

Any eligible builder or contractor may apply for a home to participate in the NEW HOMES MTP portion of the RES SOL MTP. The program information on ETI's website is updated frequently to reflect the list of participating builders and contractors.

For the DIST PROD MTP portion of the RES SOL MTP, any participating A/C or pool pump distributor or manufacturer may submit a qualifying batch of invoices to ETI for incentive payment after an inspection of a random sampling of invoices from each distributor is completed by either ETI or a third-party inspector.

ETI is working with TRC Companies to launch the Residential Marketplace in program year 2023. Customers will be able to use this website to purchase from a collection of different pre-approved energy efficiency products. TRC Companies will keep track of all sales and energy savings and invoice ETI for reimbursement.

For the Residential Load Management Pilot program, residential customers will be able to apply for the program through their networked, smart thermostat manufacturer. Energy Hub will be able to gather the responses and ETI will conduct a customer validation to only include ETI customers. Residential customers who participate in the program are eligible for incentive payment on an annual basis. Incentive payments will be made for signing up for the program annually.

### **c) Outreach Activities**

To market the availability of this program to builders, ETI:

- Utilizes mass email notifications to keep potential builders and contractors interested and informed;
- Works with local code enforcement officials to make sure they understand the need for builders and contractors to follow the requirements of the IECC 2015 and identify common efforts to bypass the code;
- Maintains a website with detailed builder eligibility, end-use measures, incentives, procedures, and application forms;
- Attends appropriate industry-related meetings to generate awareness and interest;
- Participates in state-wide outreach activities;
- Conducts workshops as necessary to explain responsibilities of the builder or contractors, project requirements, incentive information, and the application and reporting process; and
- Promotes the awareness of its energy efficiency programs by rolling out program promotions through its website, social media, email blasts, radio promotions, and print media.

To market the availability of the program to A/C and pool pump distributors, ETI attends local dealer meetings to educate the dealer population on how to complete the forms and how to participate in the program. Additionally, ETI's program implementer, TRC Companies, leverages its current A/C distributor and pool pump manufacturer contacts from a similar program with another utility to also enroll distributors in ETI's program. Most of the distributors and manufacturers that service ETI's territory participate in multiple utilities' programs.

The Residential Marketplace program will be placed on ETI's energy efficiency website and marketed through a targeted social media campaign to reach residential customers in ETI's territory.

The Residential Load Management Pilot program will be marketed through networked, smart thermostat manufacturer emails. These marketing emails will direct the ETI customer to a site for program enrollment. Energy Hub will use this data to create a list of ETI customers.

## **5. Hard-To-Reach SOP**

### **a) Program Design**

The Hard-To-Reach SOP (HTR SOP) targets low-income customers who receive service from ETI with an income at or below 200% of the federal poverty level. Participating Project Sponsors receive incentive payments for installing eligible retrofit measures that provide verifiable demand and energy savings. For 2023, ETI will continue to provide incentives to Project Sponsors for installing Air Infiltration in addition to previously employed measures. The incentives will be offered at the standard incentive rate to encourage the implementation of this measure. In 2023, the HTR SOP will also deploy the two sub-programs in RES SOP: an A/C tune-up program (which gives contracts to Project Sponsors that have access to licensed HVAC contractors) and the Multifamily HVAC Retrofit program (which assists in replacing all outdated HVAC equipment with energy efficient heat pumps at apartment complexes). The A/C tune-up program is referred to as the CoolSaver program and is implemented by CLEAResult Consulting, Inc. The Multifamily HVAC Retrofit program is implemented by ENERCHOICE, LLC.

### **b) Implementation Process**

ETI will continue implementing its HTR SOP such that any eligible Project Sponsor may apply for a project that meets the minimum program requirements. The program information on ETI's HTR SOP website is updated frequently with participating Project Sponsor information and the incentives available for installing eligible measures. In 2023, ETI selected nine Project Sponsors to participate in the HTR SOP in order to allow for the appropriate administrative control and visibility of Project Sponsors. By limiting the number of Project Sponsors allowed to participate in the program, ETI believes that there will be sufficient funds available to keep Project Sponsors working in ETI's service territory throughout the entire year and that program funding will not be exhausted by mid-year.

### **c) Outreach Activities**

To market the availability of this program, ETI:

- Utilizes mass email 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;
- Conducts workshops as necessary to explain elements such as responsibilities of the Project Sponsor, project requirements, incentive information, and the application and reporting process; and

- Promotes awareness of its energy efficiency programs by rolling out new program promotions through its website, social media, email blasts, radio promotions, and print media.

### *C. New Programs for 2024*

In 2024, ETI will continue to market the programs described in this report to residential customers and seek to improve customer participation.

## II. Customer Classes

Table 3 below identifies the customer classes targeted by ETI’s energy efficiency programs and specifies the size of each class.

**Table 3: Summary of Customer Classes<sup>4</sup>**

<i>Customer Class</i>	<i>Number of Customers</i>
<i>Commercial</i>	52,305
<i>Residential</i>	438,933
<i>Hard-To-Reach</i>	62,328

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<sup>4</sup> Commercial and Residential figures based on actual historical ETI data as of December 31, 2022; Hard-To-Reach figure based on 14.2% of Residential customers. Percentage rate was obtained from the US Census Bureau American Community Survey, Table S1701, 2021: ACS 1-Year Estimates Subject Tables.

### III. Projected Energy Efficiency Savings and Goals

As prescribed by 16 TAC § 25.181(e), a utility’s demand goal is specified as a percentage of its historical five-year average growth in demand and the corresponding energy savings goal is determined by applying a 20% conservation load factor to the applicable demand goal. Table 4 presents historical annual growth in demand for the previous five years that is used to calculate demand and energy goals. The weather-adjusted data for 2022 resulted in a change to the demand and energy goals.

The five-year average for growth from 2018 to 2022 was 63,150 kW. Using the goal metric calculation of 30% of growth at the meter, the demand goal is 17,410 kW. The weather adjusted peak demand at the source for 2022 was 3,019,554 kW. Using the goal metric calculation of 0.4% of peak demand at the meter, the demand goal is 11,099 kW. Using the 20% conservation load factor calculation, the energy goal is 30,502,295 kWh. The demand and energy goals for 2024 will be 17,410 kW and 30,502,295 kWh.

Table 5 presents the demand and energy goals for years 2023 and 2024. This table also shows the breakdown in goals by energy efficiency program.

**Table 4: Annual Growth in Demand and Energy Consumption<sup>5</sup>**

Calendar Year	Peak Demand at Source (kW)				Energy Consumption at Meter (kWh)				Industrial Opt Out (kW)	Growth (kW)	Average Growth (kW)
	Total System		Residential & Commercial		Total System		Residential & Commercial				
	Actual	Weather Adjusted	Actual	Weather Adjusted	Actual	Weather Adjusted	Actual	Weather Adjusted	At source	Weather Adjusted	Weather Adjusted
2017	3,468,265	3,525,483	2,646,584	2,703,802	18,619,957,598	18,930,151,255	11,062,075,723	11,372,269,380	1,421	2,582	NA
2018	3,534,157	3,579,455	2,699,306	2,744,604	19,612,291,900	19,256,202,352	11,615,486,722	11,259,397,174	1,421	40,802	NA
2019	3,634,264	3,634,264	2,781,052	2,781,052	19,538,240,683	19,350,300,168	11,387,210,651	11,199,270,136	3,330	36,448	NA
2020	3,708,061	3,890,578	2,710,900	2,893,417	19,452,864,015	19,270,964,119	11,174,638,619	11,356,538,516	3,591	112,365	NA
2021	3,703,710	3,750,424	2,676,961	2,723,675	20,319,695,355	20,359,046,609	10,989,074,281	11,028,425,535	10,502	-169,742	NA
2022	3,950,190	4,008,892	2,960,852	3,019,554	21,937,374,989	21,627,964,520	12,872,624,346	12,563,213,877	11,690	295,879	NA
2023	NA	NA	NA	NA	NA	NA	NA	NA	11,391	NA	4,491
2024	NA	NA	NA	NA	NA	NA	NA	NA	711	NA	63,150

<sup>5</sup> In past EEPs, data in this table had been rounded off to MW and MWh instead of kW and kWh. In updating the table for this year’s EEP to present data in kW and kWh, ETI also identified and made minor corrections to the historical data, which ETI plans to use in calculating its demand and energy goals on a going-forward basis. The years that have been corrected were years 2017 and 2018. Additionally, the Residential & Commercial Actual and Weather Adjusted Peak Demand at Source (kw) data for 2021 has been corrected in Table 4 due to incomplete industrial opt out customers’ demand data reflected in ETI’s 2022 EEP.

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

<b>2023</b>	<b>Projected Savings</b>	
<b>Customer Class and Program</b>	<b>kW</b>	<b>kWh</b>
<b>Commercial</b>	<b>10,988</b>	<b>18,975,413</b>
Commercial Solutions MTP	3,988	18,961,413
Load Management SOP	7,000	14,000
<b>Residential</b>	<b>3,767</b>	<b>6,875,150</b>
Residential SOP	1,319	2,406,302
Residential Solutions MTP	2,449	4,468,847
<b>Hard-To-Reach</b>	<b>942</b>	<b>1,650,036</b>
Hard-To-Reach SOP	942	1,650,036
<b>Total Annual Projected Savings</b>	<b>15,697</b>	<b>27,500,598</b>
<b>2024</b>	<b>Projected Savings</b>	
<b>Customer Class and Program</b>	<b>kW</b>	<b>kWh</b>
<b>Commercial</b>	<b>13,268</b>	<b>21,713,164</b>
Commercial Solutions MTP	4,935	21,704,831
Load Management SOP	8,333	8,333
<b>Residential</b>	<b>2,924</b>	<b>6,596,621</b>
Residential SOP	1,415	2,741,249
Residential Solutions MTP	1,509	3,855,372
<b>Hard-To-Reach</b>	<b>1,218</b>	<b>2,192,510</b>
Hard-To-Reach SOP	1,218	2,192,510
<b>Total Annual Projected Savings</b>	<b>17,410</b>	<b>30,502,295</b>

#### IV. Program Budgets

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

<b>2023</b>	<b>Incentives</b>	<b>Admin</b>	<b>Total Budget</b>
<b>Commercial</b>	<b>\$3,050,074</b>	<b>\$324,207</b>	<b>\$3,374,281</b>
Commercial Solutions MTP	\$2,695,824	\$288,707	\$2,984,531
Load Management SOP	\$354,250	\$35,500	\$389,750
<b>Residential</b>	<b>\$2,891,626</b>	<b>\$313,897</b>	<b>\$3,205,523</b>
Residential SOP	\$1,802,716	\$199,311	\$2,002,027
Residential Solutions MTP	\$1,088,910	\$114,586	\$1,203,496
<b>Hard-To-Reach</b>	<b>\$1,057,593</b>	<b>\$125,037</b>	<b>\$1,182,630</b>
Hard-To-Reach SOP	\$1,057,593	\$125,037	\$1,182,630
<b>R&amp;D</b>	<b>\$130,896</b>	<b>\$37,500</b>	<b>\$168,396</b>
<b>EM&amp;V</b>	<b>\$0</b>	<b>\$93,438</b>	<b>\$93,438</b>
<b>Total Annual Budgets</b>	<b>\$7,130,189</b>	<b>\$894,079</b>	<b>\$8,024,268</b>
<b>2024</b>	<b>Incentives</b>	<b>Admin</b>	<b>Total Budget</b>
<b>Commercial</b>	<b>\$3,060,519</b>	<b>\$278,697</b>	<b>\$3,339,216</b>
Commercial Solutions MTP	\$2,735,519	\$246,197	\$2,981,716
Load Management SOP	\$325,000	\$32,500	\$357,500
<b>Residential</b>	<b>\$3,073,034</b>	<b>\$276,573</b>	<b>\$3,349,607</b>
Residential SOP	\$1,875,000	\$168,750	\$2,043,750
Residential Solutions MTP	\$1,198,034	\$107,823	\$1,305,857
<b>Hard-To-Reach</b>	<b>\$1,380,000</b>	<b>\$179,100</b>	<b>\$1,559,100</b>
Hard-To-Reach SOP	\$1,380,000	\$179,100	\$1,559,100
<b>R&amp;D</b>	<b>\$0</b>	<b>\$35,000</b>	<b>\$35,000</b>
<b>EM&amp;V</b>	<b>\$0</b>	<b>\$93,735</b>	<b>\$93,735</b>
<b>Total Annual Budgets</b>	<b>\$7,513,553</b>	<b>\$863,105</b>	<b>\$8,376,659</b>

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

Table 7 presents ETI’s demand and energy reduction goals for the previous five years (2018-2022) calculated in accordance with 16 TAC § 25.181 and actual demand reduction and energy savings achieved.

**Table 7: Historical Demand and Energy Savings Goals and Achievements  
(at the Meter, except as noted)<sup>6</sup>**

<b>Calendar Year</b>	<b>Actual Weather Adjusted Demand Goal (kW)</b>	<b>Actual Weather Adjusted Energy Goal (kWh)</b>	<b>Actual Demand Reduction (kW) [1]</b>	<b>Actual Energy Savings (kWh) [1]</b>
<u>2022</u>	15,697	27,500,598	21,239	50,137,893
<u>2021</u>	15,500	27,156,000	22,277	61,827,532
<u>2020</u>	15,500	27,156,000	21,629	48,282,450
<u>2019</u>	15,500	27,156,000	22,595	47,945,445
<u>2018</u>	15,500	27,156,000	21,153	51,740,286

[1] Beginning with 2018, Actual Demand and Energy Savings are reported at the Source.

Example based on 2022 Actual Savings:

Demand  $19,647 \times (1+0.081032) = 21,239$

Energy  $46,610,200 \times (1+0.075685) = 50,137,893$

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 48371.

<sup>6</sup> Savings include interim impact findings from Evaluation, Measurement, and Verification (EM&V). Final savings will be reported in ETI’s Energy Efficiency Cost Recovery Factor application to be filed no later than May 1, 2023.

## VI. Projected, Reported, and Verified Demand and Energy Savings

**Table 8: Projected versus Reported and Verified Savings for 2021 and 2022 (at Meter)<sup>7</sup>**

<b>2021</b>	<b>Projected Savings</b>		<b>Reported and Verified Savings</b>	
<b>Customer Class and Program</b>	<b>kW</b>	<b>kWh</b>	<b>kW</b>	<b>kWh</b>
<b>Commercial</b>	<b>10,460</b>	<b>15,608,000</b>	<b>13,660</b>	<b>36,636,450</b>
Commercial Solutions MTP	3,750	15,568,000	6,644	36,629,435
Load Management SOP	6,710	40,000	7,015	7,015
<b>Residential</b>	<b>3,940</b>	<b>8,060,000</b>	<b>5,202</b>	<b>16,059,515</b>
Residential SOP	2,140	5,836,000	1,602	7,298,167
Residential Solutions MTP	1,800	2,224,000	3,600	8,761,348
<b>Hard-to-Reach</b>	<b>1,100</b>	<b>3,488,000</b>	<b>1,745</b>	<b>4,781,393</b>
Hard-to-Reach SOP	1,100	3,488,000	1,745	4,781,393
<b>Total</b>	<b>15,500</b>	<b>27,156,000</b>	<b>20,607</b>	<b>57,477,358</b>
<b>2022</b>	<b>Projected Savings</b>		<b>Reported and Verified Savings</b>	
<b>Customer Class and Program</b>	<b>kW</b>	<b>kWh</b>	<b>kW</b>	<b>kWh</b>
<b>Commercial</b>	<b>11,697</b>	<b>18,363,798</b>	<b>14,238</b>	<b>32,178,059</b>
Commercial Solutions MTP	4,697	18,323,798	7,319	32,171,140
Load Management SOP	7,000	40,000	6,919	6,919
<b>Residential</b>	<b>3,000</b>	<b>7,036,800</b>	<b>3,573</b>	<b>10,234,090</b>
Residential SOP	1,000	3,236,000	1,981	4,992,150
Residential Solutions MTP	2,000	3,800,800	1,592	5,241,940
<b>Hard-to-Reach</b>	<b>1,000</b>	<b>2,100,000</b>	<b>1,836</b>	<b>4,198,051</b>
Hard-to-Reach SOP	1,000	2,100,000	1,836	4,198,051
<b>Total</b>	<b>15,697</b>	<b>27,500,598</b>	<b>19,647</b>	<b>46,610,200</b>

<sup>7</sup> Savings include interim impact findings from EM&V. Final savings will be reported in ETI's Energy Efficiency Cost Recovery Factor application to be filed no later than May 1, 2023.

## VII. Historical Program Expenditures

This section documents ETI's incentive and administration expenditures for the previous five years (2018-2022) broken out by program for each customer class.

**Table 9: Historical Program Incentive and Administrative Expenditures for 2018 through 2022 (in 000's)**

2018 through 2022	2022		2021		2020		2019		2018	
	Incent	Admin								
<b>Commercial</b>	<b>2,779</b>	<b>262</b>	<b>2,668</b>	<b>358</b>	<b>2,721</b>	<b>350</b>	<b>2,814</b>	<b>367</b>	<b>2,791</b>	<b>388</b>
Commercial (Commercial Solutions) MTP	2,579	236	2,463	314	2,569	309	2,587	319	2,603	345
Load Management SOP	200	26	205	45	152	41	228	48	189	42
<b>Residential</b>	<b>2,500</b>	<b>310</b>	<b>2,435</b>	<b>308</b>	<b>2,304</b>	<b>320</b>	<b>2,541</b>	<b>363</b>	<b>2,534</b>	<b>322</b>
Residential SOP	1,710	180	1,528	183	1,557	201	1,674	230	1,699	201
Residential Solutions MTP	790	130	907	125	747	120	866	133	NA	NA
Entergy Solutions High Performance Homes MTP	NA	NA	NA	NA	NA	NA	NA	NA	520	73
A/C Distributor MTP	NA	NA	NA	NA	NA	NA	NA	NA	315	47
<b>Hard-to-Reach</b>	<b>1,227</b>	<b>181</b>	<b>1,408</b>	<b>238</b>	<b>884</b>	<b>153</b>	<b>1,014</b>	<b>160</b>	<b>1,006</b>	<b>146</b>
Hard-to-Reach SOP	1,227	181	1,408	238	884	153	1,014	160	1,006	146
<b>Total Expenditures</b>	<b>6,506</b>	<b>753</b>	<b>6,512</b>	<b>904</b>	<b>5,909</b>	<b>823</b>	<b>6,369</b>	<b>890</b>	<b>6,332</b>	<b>855</b>

## VIII. Program Funding for Calendar Year 2022

**Table 10: Program Funding for Calendar Year 2022**

2022	Incentive Budget	Admin Budget	R&D Budget	EM&V Budget	Total Projected Budget	Number of Customers Participating or Installations	Actual Funds Expended (Incentives)	Actual Funds Expended - Admin (Not Including EM&V, or EECRF Proceeding Costs)	R&D Costs	Actual Funds Expended - EM&V (Admin)	Actual Funds Expended - Utility EECRF Proceeding Costs (Admin)	Actual Funds Expended - Cities EECRF Proceeding Costs (Admin)	Total Funds Expended	Funds Committed (Not Expended)	Funds Remaining (Not Committed)	10% Difference?
<b>Commercial</b>	\$ 3,106,522	\$ 341,244	\$ 20,669	\$ 51,828	\$ 3,520,262	264	\$ 2,779,271	\$ 181,061	\$ 14,999	\$ 51,828	\$ 12,332	\$ 1,610	\$ 3,041,101	\$ -	\$ 479,161	
Commercial Solutions MTP	\$ 2,731,022	\$ 288,707	\$ 17,486	\$ 43,533	\$ 3,080,749	256	\$ 2,579,105	\$ 165,390	\$ 13,919	\$ 43,533	\$ 11,443	\$ 1,494	\$ 2,814,885	\$ -	\$ 265,864	No
Load Management SOP	\$ 375,500	\$ 52,537	\$ 3,182	\$ 8,294	\$ 439,514	8	\$ 200,166	\$ 15,671	\$ 1,080	\$ 8,294	\$ 888	\$ 116	\$ 226,216	\$ -	\$ 213,298	49%
<b>Residential</b>	\$ 2,736,626	\$ 309,704	\$ 93,758	\$ 31,883	\$ 3,171,971	5,607	\$ 2,499,767	\$ 201,725	\$ 63,702	\$ 31,883	\$ 11,091	\$ 1,449	\$ 2,809,616	\$ -	\$ 362,355	
Residential SOP	\$ 1,802,716	\$ 179,311	\$ 10,861	\$ 24,881	\$ 2,017,769	1,540	\$ 1,710,233	\$ 137,410	\$ 9,230	\$ 24,881	\$ 7,588	\$ 991	\$ 1,890,334	\$ -	\$ 127,435	No
Residential Solutions MTP	\$ 933,910	\$ 130,393	\$ 82,898	\$ 7,002	\$ 1,154,202	4,067	\$ 789,533	\$ 64,315	\$ 54,472	\$ 7,002	\$ 3,503	\$ 458	\$ 919,282	\$ -	\$ 234,920	20%
<b>Hard-To-Reach</b>	\$ 1,057,593	\$ 125,037	\$ 7,573	\$ 20,381	\$ 1,210,585	934	\$ 1,227,044	\$ 147,936	\$ 6,622	\$ 20,381	\$ 5,444	\$ 711	\$ 1,408,139	\$ -	\$ (197,554)	
Hard-to-Reach SOP	\$ 1,057,593	\$ 125,037	\$ 7,573	\$ 20,381	\$ 1,210,585	934	\$ 1,227,044	\$ 147,936	\$ 6,622	\$ 20,381	\$ 5,444	\$ 711	\$ 1,408,139	\$ -	\$ (197,554)	-16%
<b>Total</b>	\$ 6,900,741	\$ 775,985	\$ 122,000	\$ 104,092	\$ 7,902,818	6,805	\$ 6,506,082	\$ 530,722	\$ 85,323	\$ 104,092	\$ 28,867	\$ 3,770	\$ 7,258,856	\$ -	\$ 643,962	

Per 16 TAC § 25.181(l)(2)(Q), please note that there were three programs where the projected budget and actual total funds expended varied by more than ten percent: Load Management SOP (49%), Residential Solutions (20%), and Hard-To-Reach SOP (-16%).

Costs under the Load Management SOP were lower than projected due to reduced participation in the program. The program budgeted for 11.5 MW but only achieved 6.9 MW in curtailment savings.

Costs under the Residential Solutions MTP were also lower than projected. In response to Evaluation, Measurement, and Verification (EM&V) guidance for new homes evaluation, the NEW HOMES MTP decoupled high energy end use from the whole home measure to more aggressively incentivize specific end uses where builders experienced challenges meeting high efficiency conditions, such as HVAC systems. While more effective at promoting specific technologies, there was a net decrease in total realized savings when the new savings methodology was adopted. Additionally, ETI raised the bar to participate by requiring builders to subscribe to the Residential Energy Services Network Home Energy Rating System (RESNET HERS) Standards, a rating system that is more rigorous than current building codes. This new RESNET standard assures ETI homes are demonstrably more efficient than a typical code-minimum home. The DIST PROD program also saw lower participation than past years.

The Hard-To-Reach SOP program exceeded its projected budget due to two factors: the Multifamily HVAC Retrofit program and Entergy Texas' Energy Efficiency Sweep. The Multifamily HVAC Retrofit program focused solely on Hard-To-Reach customers.

Entergy Texas organized an Energy Efficiency Sweep with Habitat for Humanity in Beaumont in 2022. At this event, eight contractors provided energy efficiency measures for the whole neighborhood.

## **IX. Market Transformation Program Results**

### **COM SOL MTP**

The primary objective of the COM SOL MTP is to provide a conduit for ETI's commercial customers to install more energy efficient measures in their facilities, both new and existing. CLEAResult Consulting, Inc. was hired to provide expertise in working with customers to ensure customers are installing the most cost-effective energy efficient measures by providing equipment recommendations, engineering oversight, and consultations. Under the SCORE component of the COM SOL MTP, school districts and governmental entities targeted by the program have had great success in reducing their demand and energy consumption. Program participants are touting the value of the program and recommending participation to others.

In addition, CLEAResult Consulting, Inc. continues to have success working with several schools and businesses to control costs by using behavioral measures and techniques. This sub-program is referred to as the CEI program. For 2022, this sub-program achieved 850 kW and 6,276,611 kWh in reported and verified savings.

A new sub-program called Commercial CoolSaver was launched as a pilot as part of the COM SOL MTP in 2022. This sub-program provided HVAC tune-ups for small commercial customers that ranged in tonnage from 1.5 tons to 25 tons. The program saw success in implementing tune-ups for rural school districts that led to other energy efficiency projects at the schools. Some of these additional projects were for roofing retrofits, lighting retrofits, and new construction projects. The Commercial CoolSaver program achieved 630 tune-ups and created 1,973 kW and 3,028,328 kWh in savings in 2022.

### **RES SOL MTP**

The RES SOL MTP in 2022 included two components: the NEW HOMES MTP and the DIST PROD MTP. For 2022, the RES SOL MTP achieved a total of 1,592 kW and 5,241,940 kWh in reported and verified savings.

The NEW HOMES MTP provides the attributes of an ENERGY STAR<sup>®</sup> Homes new construction program. In this program, savings are driven predominantly by specific measures where efficiencies installed at the time of construction can be realized for the lifetime of the home. The program uses a list of prescriptive measures where the savings and incentive are tabulated based on the energy efficiency equipment installed and paid to the home builder. HERS raters provide professional assessments on these new homes and include them in their national database RESNET. The incentives are designed to bridge the gap between the costs of standard efficiency models and higher efficiency models. The program implementer, TRC Companies, provides training opportunities for local Code Enforcement Officials to learn about the energy efficiency codes and how to apply them.

The DIST PROD MTP portion of the RES SOL MTP promotes the installation of higher efficiency air conditioning and pool pumps for residential customers throughout ETI's service territory. ETI pays selected air conditioning distributors and pool pump distributors incentives to reduce the cost

of equipment with higher efficiency rates with the goal that the dealer will pass the reduced cost along to their customers.

## **X. Research and Development and Administrative Costs**

ETI, along with Frontier Energy, continues to develop a database that serves as the repository of all its energy efficiency program activities. The database allows the EM&V contractor the opportunity to access all the data from ETI's energy efficiency programs from one database. Previously, ETI had data housed in three different locations. As part of this project, a dashboard was developed that allows Program Managers to see results from their programs; program pipelines from start to completion; savings goals and projections; and budget totals in a real-time environment. Each year, ETI incurs some costs to obtain updates and enhancements to the database.

ETI incurred R&D spending for the development of the Residential Marketplace under the RES SOL MTP in 2022. These costs include the development of the website and compiling ETI's IT security requirements for launching an online marketplace.

ETI's Administrative Costs consist of employee salaries and benefits, EM&V costs incurred by both the State's contractor and ETI, EECRF proceeding costs, marketing and advertising costs, Electric Utility Marketing Managers of Texas (EUMMOT) fees, employee expenses used for training, Quality Assurance/Quality Control activities on program results from third parties, and cost of attending local energy efficiency conferences. In 2022, some additional administrative costs were incurred by CLEAResult Consulting, Inc. for supporting the residential CoolSaver A/C tune-up program and ENERCHOICE, LLC for supporting the Multifamily HVAC Retrofit program.

## **XI. Current Energy Efficiency Cost Recovery Factor (EECRF)**

ETI filed an application for a revised EECRF rate schedule on May 2, 2022 in Docket No. 53517. The revised EECRF was approved for recovery of \$12,466,315, and ETI implemented the revised rider on January 1, 2023.

## **XII. Revenue Collected through EECRF (2022)**

ETI's 2022 EECRF revenues as of December 31, 2022 were \$12,837,905.87.

## **XIII. Over/Under-recovery of Energy Efficiency Program Costs**

ETI had an over-recovery of its 2022 energy efficiency programs of \$1,434,172, which should be refunded in the 2024 EECRF.

## Acronyms

<b>EEP</b>	Energy Efficiency Plan, which was filed as a separate document prior to April 2009
<b>EEPR</b>	Energy Efficiency Plan and Report
<b>EER</b>	Energy Efficiency Report, which was filed as a separate document prior to April 2009
<b>EE Rule</b>	Energy Efficiency Rule, collectively 16 TAC §§ 25.181 and 25.183
<b>EECRF</b>	Energy Efficiency Cost Recovery Factor
<b>HTR</b>	Hard-To-Reach
<b>EM&amp;V</b>	Evaluation, Measurement and Verification
<b>LM</b>	Load Management
<b>MTP</b>	Market Transformation Program
<b>PURA</b>	Public Utility Regulatory Act
<b>RES</b>	Residential
<b>SCORE</b>	Schools Concerned with Reducing Energy
<b>SOP</b>	Standard Offer Program
<b>TAC</b>	Texas Admin. Code

# Appendix

## Appendix A: Reported Demand and Energy Reduction by County 2022 Update<sup>8</sup>

Residential SOP			
County	Savings kW	Savings kWh	Incentives
Chambers	2.33	5,019	\$ 1,967
Grimes	2.32	4,893	\$ 2,135
Hardin	84.35	198,498	\$ 77,614
Harris	5.24	18,365	\$ 1,200
Jefferson	1,173.30	2,973,425	\$1,093,859
Liberty	10.62	20,670	\$ 8,992
Montgomery	378.13	965,239	\$ 261,444
Orange	134.14	333,238	\$ 122,775
Trinity	18.98	41,587	\$ 17,112
Tyler	3.47	7,582	\$ 2,966
Walker	167.91	423,634	\$ 120,169
<b>TO TAL</b>	<b>1,980.78</b>	<b>4,992,150</b>	<b>\$1,710,233</b>

Residential Solutions			
County	Savings kW	Savings kWh	Incentives
Chambers	19.35	65,110	\$ 5,048
Grimes	0.59	1,867	\$ 120
Hardin	8.26	23,426	\$ 2,460
Harris	0.78	1,524	\$ 263
Jefferson	23.57	62,089	\$ 9,703
Liberty	36.69	121,493	\$ 8,730
Madison	0.53	1,943	\$ 300
Montgomery	1,470.48	4,884,605	\$ 482,718
Orange	3.33	9,576	\$ 1,193
Trinity	0.66	1,634	\$ 225
Tyler	0.32	799	\$ 275
Walker	27.68	67,875	\$ 9,725
<b>TOTAL</b>	<b>1,592.24</b>	<b>5,241,940</b>	<b>\$ 520,758</b>

Commercial Solutions MIP			
County	Savings kW	Savings kWh	Incentives
Burleson	349.56	584,120	\$ 17,660
Chambers	0.03	168	\$ 6
Galveston	5.70	27,957	\$ 1,044
Grimes	55.62	215,967	\$ 14,652
Hardin	54.56	274,365	\$ 13,407
Harris	0.87	4,024	\$ 144
Jefferson	1,627.00	7,021,266	\$ 397,589
Leon	289.33	472,109	\$ 21,891
Liberty	74.00	505,543	\$ 17,449
Madison	247.45	3,463,799	\$ 9,505
Montgomery	2,358.56	12,850,874	\$ 593,922
Orange	630.48	1,494,988	\$ 65,337
Polk	1.96	4,232	\$ 552
Robertson	1.24	7,998	\$ 450
San Jacinto	18.30	73,222	\$ 3,300
Trinity	564.45	934,211	\$ 24,767
Tyler	14.80	69,553	\$ 3,537
Walker	1,025.49	4,166,745	\$ 78,311
<b>TOTAL</b>	<b>7,319.40</b>	<b>32,171,139</b>	<b>\$1,263,523</b>

Hard to Reach SOP			
County	Savings kW	Savings kWh	Incentives
Chambers	22.71	64,346	\$ 18,664
Hardin	28.91	64,342	\$ 19,123
Jefferson	936.07	2,340,942	\$ 570,628
Liberty	3.81	9,405	\$ 2,728
Montgomery	334.67	731,374	\$ 266,845
Orange	42.39	94,322	\$ 28,631
Trinity	4.34	8,459	\$ 2,726
Tyler	334.97	532,695	\$ 229,912
Walker	128.01	352,166	\$ 87,787
<b>TO TAL</b>	<b>1,835.88</b>	<b>4,198,051</b>	<b>\$1,227,044</b>

Load Management SOP			
County	Savings kW	Savings kWh	Incentives
Chambers	163.39	163	\$ 5,310
Grimes	62.07	62	\$ 325
Hardin	426.30	426	\$ 12,558
Jefferson	2,415.05	2,415	\$ 73,918
Liberty	398.20	398	\$ 12,846
Madison	29.39	29	\$ 325
Montgomery	2,827.55	2,828	\$ 81,939
Orange	553.58	554	\$ 11,530
Tyler	43.54	44	\$ 1,415
<b>TO TAL</b>	<b>6,919.07</b>	<b>6,919</b>	<b>\$ 200,166</b>

<sup>8</sup> The reported demand and energy reductions by county tables may not match up exactly with the tables above due to minor rounding discrepancies. Savings include interim impact findings from EM&V. Final savings will be reported in ETI's EECRF application to be filed no later than May 1, 2023.