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DOCKET NO. 56544

APPLICATION OF ENTERGY TEXAS, INC. TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR	§ § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**APPLICATION OF ENTERGY TEXAS, INC. TO ADJUST ITS
ENERGY EFFICIENCY COST RECOVERY FACTOR**

Entergy Texas, Inc. (“ETI” or “the Company”) files this Application to Adjust its Energy Efficiency Cost Recovery Factor (“EECRF”) under Public Utility Regulatory Act (“PURA”)¹ § 39.905 and 16 Texas Administrative Code (“TAC”) §§ 25.181 and 25.182. In support thereof, ETI shows the following:

I. BUSINESS ADDRESS AND AUTHORIZED REPRESENTATIVES

The business address of the Company is:

Entergy Texas, Inc.
350 Pine Street
Beaumont, Texas 77701

The business mailing address of the Company is:

Entergy Texas, Inc.
P.O. Box 2951
Beaumont, Texas 77704

The authorized representatives for the Company in this proceeding are:

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¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (“PURA”).

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ETI requests that all information and documents (orders, discovery, motions, etc.) related to this Application be served on Ms. Kennedy's office, as listed in the previous paragraph.

II. JURISDICTION

The Public Utility Commission of Texas ("Commission") has jurisdiction over ETI and the subject matter of this Application under PURA § 39.905 as implemented in 16 TAC §§ 25.181 and 25.182.

III. AFFECTED PERSONS

ETI provides service to approximately 512,000 customers in southeast Texas. ETI proposes to apply the revised EECRF requested herein to all of its retail electric customers that fall within the classes subject to the EECRF as detailed in Section IV below.

IV. DESCRIPTION OF APPLICATION

PURA § 39.905(b) and 16 TAC § 25.182 establish the mechanism under which an electric utility may recover costs associated with providing energy efficiency programs sufficient to achieve the utility's energy efficiency goal.² ETI is required to file an application not later than May 1 of each year to adjust its EECRF effective January 1 of the following year.³

² Under 16 TAC § 25.181(e), the "energy efficiency goal" is a percentage reduction of the annual growth in demand of an electric utility's residential and commercial customers, based on the energy savings achieved from the utility's energy efficiency programs. The energy efficiency goal is a 30% reduction of annual growth in demand up to four-tenths of 1% of its summer weather-adjusted peak demand. However, pursuant to 16 TAC § 25.181(c)(1)(D), the Company's goal cannot be lower than the prior year's goal.

³ See 16 TAC § 25.182(d)(8).

Through this Application, the Company seeks to adjust its EECRF for 2025 to recover \$10,522,323, reflecting the following five components: (a) the estimated 2025 energy efficiency program costs of the Company's forecasted energy efficiency program budget amount of \$8,746,010; (b) a performance bonus of \$3,232,686 for 2023 program achievements; (c) evaluation, measurement, and verification costs of \$93,735 to be collected in 2025; (d) a \$1,590,892 refund for the over-recovery of 2023 program costs, including \$89,785 in interest; and (e) \$3,150 for Cities'⁴ rate case expenses and \$37,634 for ETI's rate case expenses in Docket No. 54938, the Company's 2023 EECRF Application. The requested EECRF adjustment would result in a \$0.02 per month increase to a residential customer's bill, assuming a monthly usage of 1,000 kWh, or a 0.02% increase based on ETI's charges currently approved by the Commission. The requested revised EECRF rates would be as follows:

<u>Rate Class</u>	<u>EECRF</u>
Residential	\$0.000943 per kWh
Small General Service	\$0.000822 per kWh
General Service	\$0.000783 per kWh
Large General Service	\$0.000738 per kWh
Large Industrial Power Service	
Industrial Transmission Customers Only	\$0.000000 per kWh
Other than Industrial Transmission Customers	(\$0.000160) per kWh
Lighting	\$0.000001 per kWh

In support of ETI's Application, ETI submits the Direct Testimonies of Mark Delavan and Jay Andrew Lewis, Jr., and their associated exhibits and workpapers. Mr. Delavan's testimony presents the projected costs of the Company's energy efficiency programs for the 2025 program year, the actual costs of the Company's energy efficiency programs for the 2023 program year,

⁴ "Cities" cumulatively refers to the Cities of Anahuac, Beaumont, Bridge City, Cleveland, Conroe, Dayton, Groves, Houston, Huntsville, Liberty, Montgomery, Navasota, Nederland, Oak Ridge North, Orange, Panorama Village, Pine Forest, Pinehurst, Port Arthur, Port Neches, Roman Forest, Rose City, Shenandoah, Silsbee, Sour Lake, Splendora, Vidor, West Orange, and Willis. *See Cities' Motion to Intervene*, Docket No. 54938 (May 16, 2023).

and the performance bonus calculation associated with the Company's 2023 programs. Mr. Delavan's testimony also demonstrates that these costs are reasonable and consistent with 16 TAC §§ 25.181 and 25.182.

Mr. Lewis's testimony presents the calculation of the 2023 over-recovery amounts, including interest, as well as the adjusted EECRF rates. He further sponsors revised Rider EECRF, which is the rate schedule that contains the adjusted EECRF rates. Mr. Lewis also supports the Company's request to recover affiliate expenses, including the affiliate expenses associated with ETI's 2023 EECRF proceeding.

Additionally, two affidavits accompany this Application to further support the expenses incurred in connection with ETI's 2023 EECRF proceeding: (1) the affidavit of Erika N. Garcia, which supports the reasonableness of ETI's external rate case expenses; and (2) the affidavit of Molly Mayhall Vandervoort, which supports the reasonableness of the Cities' rate case expenses.

V. NOTICE AND PROTECTIVE ORDER

The Company will provide notice of this proceeding consistent with 16 TAC § 25.182(d)(13) within seven days of the Application filing date and will file an affidavit attesting to the completion of notice within 14 days after this Application is filed. The form of the notice to be provided is included as Attachment A to this Application.

The Company also requests that the Commission's standard protective order be adopted in this proceeding to govern the disclosure of protected materials and highly sensitive protected materials.

VI. CONCLUSION AND REQUESTED RELIEF

In light of the foregoing, as well as the accompanying testimony, exhibits, and attachments, ETI requests that the Commission (1) approve the Company's proposed notice; (2) enter the Commission's standard protective order; (3) approve the Company's proposed EECRF adjustment

to be effective January 1, 2025; and (4) grant the Company such other relief to which it may be entitled.

Respectfully submitted,

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By: Laura B. Kennedy
Laura Bradshaw Kennedy

ATTORNEYS FOR ENTERGY TEXAS, INC.

Application of Entergy Texas, Inc. to Adjust Its Energy Efficiency Cost Recovery Factor

On May 1, 2024, Entergy Texas, Inc. (“ETI” or “the Company”) filed an Application to Adjust its Energy Efficiency Cost Recovery Factor (“EECRF”) (the “Application”). The Application was filed with the Public Utility Commission of Texas (“Commission”), pursuant to Public Utility Regulatory Act § 39.905 and 16 Texas Administrative Code §§ 25.181 and 25.182. In its Application, ETI requested that its adjusted EECRF become effective January 1, 2025. All Texas retail customers that fall within the classes subject to the EECRF, and listed below, would be affected by approval of the Company’s Application.

The Company is seeking to adjust its EECRF to recover \$10,522,323, which reflects the following five components: (a) estimated 2025 energy efficiency program costs of the Company’s forecasted energy efficiency program budget amount of \$8,746,010; (b) a performance bonus of \$3,232,686 for 2023 program achievements; (c) evaluation, measurement, and verification costs of \$93,735 to be collected in 2025; (d) a \$1,590,892 refund for the over-recovery of 2023 program costs, including \$89,785 in interest; and (e) \$3,150 for Cities’ rate case expenses and \$37,634 for ETI’s rate case expenses in Docket No. 54938, the Company’s 2023 EECRF Application. The requested EECRF adjustment would result in a \$0.02 per month increase to a residential customer’s bill, assuming a monthly usage of 1,000 kWh, or a 0.02% increase based on ETI’s charges currently approved by the Commission. The requested revised EECRF rates would be as follows:

<u>Rate Class</u>	<u>EECRF</u>
Residential	\$0.000943 per kWh
Small General Service	\$0.000822 per kWh
General Service	\$0.000783 per kWh
Large General Service	\$0.000738 per kWh
Large Industrial Power Service	
Industrial Transmission Customers Only	\$0.000000 per kWh
Other than Industrial Transmission Customers	(\$0.000160) per kWh
Lighting	\$0.000001 per kWh

Persons with questions or who want more information on this petition may contact ETI by calling (409) 981-2000 during normal business hours. A complete copy of this filing is available by email request to trc@entergy.com. The Commission will review ETI's Application, establish an intervention deadline for interested persons, and determine whether ETI's Application should be approved. The Commission's proceeding to review ETI's Application has been assigned Docket No. 56544. Persons who wish to intervene in or comment upon these proceedings, or obtain further information, should contact the Public Utility Commission of Texas, P.O. Box 13326, Austin, Texas 78711-3326, or call the Commission's Office of Consumer Protection at 512-936-7120 or 1-888-782-8477. All requests to intervene should include your email address, fax number (if available), or other information so that the Commission may provide electronic service. Hearing and speech-impaired individuals with text telephones (TTY) may contact the Commission at 512-936-7136 or use Relay Texas (toll-free) 1-800-735-2989. All communications should refer to Docket No. 56544.

DOCKET NO. 56544

**APPLICATION OF ENTERGY
TEXAS, INC. TO ADJUST ITS ENERGY
EFFICIENCY COST RECOVERY
FACTOR**

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**PUBLIC UTILITY COMMISSION

OF TEXAS**

DIRECT TESTIMONY

OF

MARK R. DELAVAN

ON BEHALF OF

ENTERGY TEXAS, INC.

MAY 2024

ENTERGY TEXAS, INC.
DIRECT TESTIMONY OF MARK R. DELAVAN
DOCKET NO. 56544

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EXHIBITS

Exhibit MRD-1	2024 Energy Efficiency Plan and Report
Exhibit MRD-2	List of Energy Efficiency Measures and Their Estimated Useful Life
Exhibit MRD-3	2023 Program Sponsors/Implementors Receiving >5% of Program Incentives (Confidential)
Exhibit MRD-4	Consumer Price Index and Revised Cost Caps
Exhibit MRD-5	Directly Assigned Costs by Rate Class for Program Year 2023
Exhibit MRD-6	Projected Evaluation, Measurement, and Verification Costs for Program Year 2025
Exhibit MRD-7	Projected Costs by Rate Class for Program Year 2025
Exhibit MRD-8	Bonus Calculation for Program Year 2023
Exhibit MRD-9	Cost-Benefit Calculations for Program Year 2023
Exhibit MRD-10	2023 Administrative Costs Detail

1 I. WITNESS INTRODUCTION AND QUALIFICATIONS

2 Q1. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

3 A. My name is Mark R. Delavan. I am employed by Entergy Texas, Inc. ("ETI" or the
4 "Company") as an Account Service Manager I. My business address is 2107
5 Research Forest Drive, The Woodlands, TX 77380.

6

7 Q2. FOR WHOM ARE YOU TESTIFYING?

8 A. I am testifying on behalf of ETI.

9

10 Q3. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND
11 AND PROFESSIONAL EXPERIENCE.

12 A. I have a Bachelor's degree in Mechanical Engineering from John Brown University
13 and a Master of Science from University of Tulsa. In addition, I am a Certified
14 Energy Manager through the Association of Energy Engineers.

15 I have worked for ETI for over 6 years and have helped manage ETI's
16 energy efficiency programs. I am also responsible for the financial, energy savings,
17 and regulatory quality assurance for the Company's energy efficiency programs.

18

19 Q4. PLEASE DESCRIBE YOUR CURRENT JOB RESPONSIBILITIES AS THEY
20 CONCERN ENERGY EFFICIENCY PROGRAMS.

21 A. I am responsible for developing, implementing, and managing ETI's energy
22 efficiency programs in Texas. As part of my job description, I work closely with
23 the various vendors and participants in ETI's energy efficiency programs. I am a

1 member and former chair of the Electric Utility Marketing Managers of Texas,
2 which is an association of electric utilities working to achieve the goal for energy
3 efficiency established under Section 39.905 of the Public Utility Regulatory Act
4 (“PURA”).

5 The energy efficiency programs that I manage include the Commercial
6 Solutions Market Transformation Program (“MTP”), the Residential Solutions
7 MTP, and the Load Management Standard Offer Program (“SOP”). In addition, I
8 am charged with developing ETI’s energy efficiency savings goals and the budget
9 requirements necessary to achieve those goals.

10

11 Q5. WAS THIS TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT
12 SUPERVISION?

13 A. Yes.

14

15 Q6. DO YOU SPONSOR ANY EXHIBITS?

16 A. Yes, I sponsor the exhibits listed in the Table of Contents to my testimony.

17

18 II. PURPOSE OF TESTIMONY

19 Q7. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS
20 PROCEEDING?

21 A. The purpose of my Direct Testimony is to support the Company’s request to adjust
22 its Energy Efficiency Cost Recovery Factor (“EECRF”). In this proceeding, I
23 present the Company’s Energy Efficiency Plan and Report (“EEPR”) as Exhibit

1 MRD-1 and provide Direct Testimony in support of the actual and projected costs
2 that form the basis of the requested adjustments in EECRF rates.

3 Exhibit MRD-1 describes the Company's 2023 energy efficiency programs
4 and the results of those programs. It also discusses the Company's current energy
5 efficiency program portfolio, projections for next year, and the circumstances and
6 market conditions that support the reasonableness of the Company's programs and
7 projections. Exhibit MRD-1 also includes a projection of the annual growth in
8 demand, an estimate of the energy and peak demand reduction savings to be
9 obtained through each of the Company's energy efficiency programs, a description
10 of the customer classes targeted by the energy efficiency programs, and the
11 proposed annual budget required to implement the programs for each eligible class
12 of customers.

13
14 III. ENERGY EFFICIENCY UNDER THE COMMISSION'S RULES

15 Q8. HOW IS ENERGY EFFICIENCY DEFINED UNDER THE COMMISSION'S
16 RULES?

17 A. The term "energy efficiency," as defined by the Public Utility Commission of Texas
18 ("Commission") in 16 TAC § 25.181(c)(12), is as follows:

19 Improvements in the use of electricity that are achieved through
20 customer facility or customer equipment improvements, devices,
21 processes, or behavioral or operational changes that produce
22 reductions in demand or energy consumption with the same or
23 higher level of end-use service and that do not materially degrade
24 existing levels of comfort, convenience, and productivity.

1 Q9. HOW IS ENERGY EFFICIENCY MEASURED UNDER THE COMMISSION'S
2 RULES?

3 A. 16 TAC § 25.181 requires that energy efficiency is to be measured by the energy
4 savings and peak demand reduction. Energy savings is defined in 16 TAC
5 § 25.181(c)(18) as “[a] quantifiable reduction in a customer’s consumption of
6 energy that is attributable to energy efficiency measures, usually expressed in kWh
7 or MWh.” Peak demand reduction is defined in 16 TAC § 25.181(c)(45) as
8 “[r]eduction in demand on the utility’s system at the times of the utility’s summer
9 peak period or winter peak period.”
10

11 Q10. WHAT ARE THE REQUIRED ENERGY EFFICIENCY GOALS UNDER THE
12 COMMISSION’S RULES?

13 A. Pursuant to 16 TAC § 25.181(e), the Commission’s required “energy efficiency
14 goal” for electric utilities is a percentage reduction of the average annual growth in
15 demand of the electric utility’s residential and commercial customers. Under the
16 rule, the energy efficiency goal is a 30% reduction of annual growth in demand up
17 to four-tenths of 1% of the summer weather-adjusted peak demand. For 2025, the
18 30% annual growth calculation resulted in 12,609 kW and the 0.4% peak demand
19 calculation resulted in 10,959 kW. These results were lower than the current
20 demand goal of 17,410 kW set in 2023. In accordance with the “ratchet”
21 requirements of 16 TAC § 25.181(e)(1)(D), a utility’s demand reduction goal in
22 any year cannot be lower than its goal for the prior year. Therefore, ETI’s demand

1 reduction goal for 2025 will be set at 17,410 kW. This calculation can be found in
2 Table 1 of Exhibit MRD-1.

3 The energy savings goal is calculated under 16 TAC § 25.181(e)(4) by
4 applying a 20% conservation load factor against the utility's demand reduction
5 goal. Since ETI's demand goal is 17,410 kW, the energy savings goal for ETI for
6 2025 is 30,502,295 kWh. This calculation can be found in Table 1 of Exhibit
7 MRD-1.

8

9 Q11. HOW MAY A UTILITY ACHIEVE ITS ENERGY EFFICIENCY GOALS
10 UNDER THE COMMISSION'S RULES?

11 A. Pursuant to 16 TAC § 25.181(d), utilities are encouraged to achieve demand
12 reduction and energy savings through a portfolio of cost-effective programs that
13 exceed each utility's energy efficiency goals while staying within the cost caps
14 established in 16 TAC § 25.182(d)(7). An energy efficiency program is deemed to
15 be cost-effective if the cost of the program to the utility is less than or equal to the
16 benefits of the program. The present value of the program benefits is calculated
17 over the projected life of the measures installed or implemented under the program.

18

19 Q12. WHAT TYPES OF ENERGY EFFICIENCY MEASURES ARE ALLOWED IN
20 A UTILITY'S ENERGY EFFICIENCY PROGRAM, AND WHAT IS THE
21 ESTIMATED USEFUL LIFE OF EACH MEASURE?

22 A. The term "energy efficiency measures" is defined in 16 TAC § 25.181(c)(14) as
23 "[e]quipment, materials, and practices, including practices that result in behavioral

1 or operational changes, implemented at a customer's site on the customer's side of
2 the meter that result in a reduction at the customer level and/or on the utility's
3 system in electric energy consumption, measured in kWh, or peak demand,
4 measured in kW, or both."

5 The types of measures allowed in a utility's 2023 energy efficiency
6 programs are listed in Exhibit MRD-2. The source for this list is the Texas Resource
7 Manual ("TRM"), Version 10.0, which is discussed further below. A revised TRM,
8 Version 11.0, became effective January 1, 2024.

9 The Estimated Useful Life ("EUL") of a measure is defined in 16 TAC
10 § 25.181(c)(19) as the "number of years until 50% of the installed measures are still
11 operable and providing savings and is used interchangeably with the term 'measure
12 life.'" The EUL determines the period of time over which the benefits of the energy
13 efficiency measure are expected to accrue.

14
15 Q13. HAVE ANY ELIGIBLE CUSTOMERS OPTED OUT OF THE ENERGY
16 EFFICIENCY PROGRAMS PURSUANT TO 16 TAC § 25.181(U)?

17 A. Yes. A few eligible customers have opted out of the program pursuant to 16 TAC
18 § 25.181(u). The load of these opt-out customers has been removed from the
19 calculation of average load growth as reflected in Table 4 of my Exhibit MRD-1,
20 and their billing determinants have been removed from the rate calculations
21 presented in the testimony of Company witness Jay Andrew Lewis, Jr.

1 In preparing ETI's EECRF Application in 2023,¹ ETI discovered that
2 certain industrial opt-outs were not implemented from 2021 to 2023 due to an
3 administrative oversight. ETI provided the impacted customers a refund in the form
4 of a bill credit in April 2023 that was reflected on their May 2023 bills. A true-up
5 of program year 2023 is included in ETI's instant EECRF application.²

6
7 Q14. WAS THE DEMAND REDUCTION GOAL ADJUSTED TO REMOVE ANY
8 LOAD THAT IS LOST DUE TO INDUSTRIAL CUSTOMER "OPT OUTS"
9 THAT ARE PERMITTED IN 16 TAC § 25.181(U)?

10 A. Yes, ETI's demand reduction goal has been adjusted to remove load that is lost as
11 a result of the opt-out notices received from industrial customers pursuant to 16
12 TAC § 25.181(u). See the column titled "Industrial Opt Out" in Exhibit MRD-01,
13 Table 4.

14
15 IV. 2023 PROGRAM YEAR ENERGY EFFICIENCY PROGRAMS

16 Q15. WHAT ENERGY EFFICIENCY PROGRAMS DID ETI OFFER DURING THE
17 2023 PROGRAM YEAR?

18 A. ETI implements an array of energy efficiency programs each year that reasonably
19 consider the market conditions, maturity of programs, and regulatory requirements.
20 In 2023, ETI offered five energy efficiency programs: the Commercial Solutions

¹ Docket No. 54938, Application (May 1, 2023).

² See Exhibit JAL-1.

1 MTP, the Load Management SOP, the Residential SOP, the Residential Solutions
2 MTP, and the Hard-to-Reach SOP.

3

4 Q16. PLEASE DESCRIBE THE ENERGY EFFICIENCY PROGRAMS THAT THE
5 COMPANY IMPLEMENTED IN 2023.

6 A. Exhibit MRD-1 provides information on each of ETI's energy efficiency programs
7 for 2023, including a list of all programs in Table 2, energy and demand savings
8 for each program, the costs associated with each energy efficiency program, and a
9 description of the benefits of each program.

10

11 Q17. DURING THE 2023 PROGRAM YEAR, WHAT REDUCTIONS IN PEAK
12 DEMAND AND ENERGY DID ETI ACHIEVE THROUGH ITS ENERGY
13 EFFICIENCY PROGRAMS?

14 A. As shown in Table 8 of Exhibit MRD-1, ETI achieved a demand reduction,
15 calculated at the meter, of 22,699 kW and energy savings of 42,850,452 kWh
16 during program year 2023, exceeding the goals of 15,697 kW and 27,500,598 kWh.
17 Table 8 of Exhibit MRD-1 also provides a breakdown of the projected and actual
18 peak demand reduction and energy savings for each program.

19

20 Q18. WHAT WAS ETI'S APPROVED BUDGET TO ACHIEVE ITS ENERGY
21 EFFICIENCY GOALS FOR THE 2023 PROGRAM YEAR?

22 A. As shown in Table 10, Exhibit MRD-1, ETI's approved budget to achieve its 2023
23 energy efficiency goals was \$8,024,564.

1 Q19. WHAT WERE ETI'S ACTUAL COSTS TO REACH ITS ENERGY
2 EFFICIENCY GOALS IN PROGRAM YEAR 2023?

3 A. As shown in Table 10, Exhibit MRD-1, ETI's actual costs in 2023 totaled
4 \$7,583,311; roughly \$441,253 less than the forecasted costs. I discuss the reasons
5 why the costs were lower than expected in Question 47 below.

6

7 Q20. DO THE COMMISSION RULES LIMIT THE EXPENDITURES THAT A
8 UTILITY MAY RECOVER FOR ITS ENERGY EFFICIENCY PROGRAMS?

9 A. Yes. 16 TAC § 25.182(d)(7) sets cost caps on the amount that can be charged to
10 customers for energy efficiency programs.

11

12 Q21. DID ETI EXCEED THE COST CAPS SET OUT IN 16 § 25.182(D)(7) IN 2023?

13 A. No. As I explain in more detail in Section VI of my testimony, ETI did not exceed
14 the cost caps set out in 16 TAC § 25.182(d)(7) in 2023.

15

16 Q22. HOW MANY PROJECT SPONSORS AND PROGRAM IMPLEMENTERS
17 PARTICIPATED IN ETI'S ENERGY EFFICIENCY PROGRAMS IN 2023 AND
18 WHICH ONES RECEIVED 5% OR MORE OF THE PROGRAM INCENTIVES?

19 A. There were 32 Project Sponsors and Program Implementers who participated in
20 ETI's energy efficiency programs in 2023. The names of the Project Sponsors and
21 Program Implementers are listed in Exhibit MRD-3. Information regarding the
22 amounts and percentage received per program for Project Sponsors and Program

1 Implementers receiving 5% or more of program incentives is presented in the
2 confidential version of Exhibit MRD-3.

3

4 V. EECRF FOR 2025

5 Q23. DOES ETI CURRENTLY HAVE AN EECRF IN PLACE?

6 A. Yes. ETI's current EECRF was approved in Docket No. 54938³ to recover a total
7 of \$9,696,210. In the Order, this amount included: (a) \$8,282,923 for ETI's
8 estimated 2024 energy efficiency program costs, (b) \$2,739,855 for the
9 performance bonus for 2022 program achievements, (c) \$93,735 in Evaluation,
10 Measurement, and Verification ("EM&V") expenses to be collected in 2024; (d) a
11 refund of \$1,452,939 for the over-recovery of 2022 program costs, including
12 \$18,385 in interest; and (e) \$3,770 for Cities' rate-case expenses and \$28,867 for
13 ETI's rate-case expenses in Docket No. 53517. ETI began collecting revenues
14 under the current tariff on January 1, 2024.

15

16 Q24. PLEASE DESCRIBE THE REQUESTED EECRF FOR 2025.

17 A. ETI is requesting that its 2025 EECRF be set to recover \$10,522,323, which is
18 comprised of five parts: (a) \$8,746,010 for ETI's estimated 2025 energy efficiency
19 program costs; (b) \$3,232,686 for the performance bonus for 2023 program
20 achievements; (c) \$93,735 for EM&V expenses to be collected in 2025; (d) a refund
21 of \$1,590,892 for the over-recovery of 2023 program costs, including \$89,785 in

³ *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 54938, Order (Nov. 3, 2023).

1 interest; and (e) \$3,150 for Cities' rate-case expenses and \$37,634 for ETI's rate-
2 case expenses in Docket No. 54938. The costs components included in the 2025
3 EECRF are shown in ETI witness Mr. Lewis's Exhibit JAL-3, including additional
4 detail regarding the over-recovery of 2023 program costs.

5

6 Q25. HOW WERE THE PROPOSED 2025 EECRF RATES CALCULATED?

7 A. Company witness Mr. Lewis describes the calculation of the proposed 2025
8 EECRF rates in his Direct Testimony.

9

10 Q26. DOES THE COMPANY'S PROPOSED EECRF FOR 2025 ACHIEVE THE
11 REQUIRED ENERGY EFFICIENCY GOAL AND COMPLY WITH THE COST
12 CAPS?

13 A. Yes. Under the Company's request, ETI projects that it can achieve the required
14 energy efficiency goal in 2025 and comply with the prescribed cost caps under the
15 Commission rule.

16

17 A. Verification and Allocation of Costs and Revenues

18 Q27. HOW DID THE COMPANY TRACK AND ALLOCATE ITS 2023 COSTS AND
19 REVENUES?

20 A. Table 10 in Exhibit MRD-1 shows all of the 2023 costs. My Exhibit MRD-5 shows
21 the 2023 costs that were directly assigned to specific rate classes. All costs that
22 were incurred by a particular rate class were assigned to that rate class.

1 All incentive costs, both cash payments to customers and the costs of
2 services provided to customers, were tracked by ETI and/or its vendors so that the
3 costs of the incentives could be assigned to the rate class of the customer who
4 received the incentive payment or service. In that way, all incentive costs were
5 directly assigned to the rate class that received services under the program.

6 Additionally, administrative costs were directly allocated to programs to the
7 extent reasonably possible and, consistent with 16 TAC § 25.181(g), any portion of
8 the administrative costs that was not directly assignable to a specific program was
9 allocated among the programs in proportion to the program incentive costs. Table
10 10 of Exhibit MRD-1 shows total 2023 administrative costs per program, and
11 Exhibit MRD-5 shows those costs directly allocated to rate classes.

12 Research and Development (“R&D”) costs were allocated among the
13 programs in proportion to the program incentive costs. Page 5 of Mr. Lewis’s
14 Exhibit JAL-1 shows the allocation of the R&D costs to the rate classes.

15 ETI began work to design a pilot program using R&D funds from the 2023
16 EECRF called “Demand Solutions.” The purpose of this pilot program is to build a
17 residential load management program that can curtail multiple devices. In 2023,
18 \$134,916 of R&D was allocated to the Residential Solutions MTP for the Demand
19 Solutions pilot program. The Demand Solutions pilot program launched in July
20 2023 and ran three events over the summer months. The program was able to save
21 84 kW by changing the setpoint of connected smart thermostats. Customer
22 enrollment remained open through the end of 2023.

ETI has continued to accept enrollments for the Demand Solutions pilot program in 2024 for the 2024 summer curtailment season. ETI also increased the potential curtailment device capacity from 750 devices to 5,000 devices.

The costs of ETI's 2023 EECRF proceeding were related to all programs and rate classes and were therefore allocated across all programs in proportion to the program incentive costs (see Table 10 of Exhibit MRD-1) before being allocated to the rate class or classes that received services under that program as shown on page 5 of Mr. Lewis's Exhibit JAL-1.

As further detailed below, EM&V costs were allocated to the programs pursuant to the methodology recommended by the State's EM&V evaluation team, and the Company then allocated the costs to the rate classes that received services under each program in proportion to the rate class's share of that program's incentive costs.

Revenues for 2023 were tracked by rate class and are identified by ETI witness Mr. Lewis in his Exhibit JAL-1 (Page 4 of 6) and Exhibit JAL-4.

B. Incentive Costs

Q28. HOW MUCH DID THE COMPANY INCUR FOR INCENTIVE COSTS IN 2023?

A. As shown in Table 10 of Exhibit MRD-1, ETI's incentive costs for 2023 were \$6,846,112. I discuss the reasonableness of these costs in Section VI below.

1 Q29. HOW MUCH DOES THE COMPANY PROJECT TO SPEND ON INCENTIVE
2 COSTS IN 2025?

3 A. The Company's projected incentive payments for its 2025 programs are
4 \$7,986,250, which is reflected in Table 6 of Exhibit MRD-1. In addition, a
5 breakdown of the projected energy efficiency program costs by rate class is shown
6 in Exhibit MRD-7.

7

8 Q30. ARE THESE INCENTIVE PAYMENT COSTS REASONABLE?

9 A. Yes. In its request, the Company only includes incentive payments that meet the
10 definition of incentive payments under 16 TAC § 25.181(c)(29). In addition,
11 several Project Sponsors that work with ETI also work for other utilities and
12 provide feedback on many of the incentives being paid around the state.

13

14 C. Administrative Costs and R&D Costs

15 Q31. PLEASE DESCRIBE THE PROJECTED ADMINISTRATIVE COSTS FOR THE
16 COMPANY'S 2025 ENERGY EFFICIENCY PROGRAMS.

17 A. As shown in Table 6 of Exhibit MRD-1, the Company's projected administrative
18 costs for 2025 are \$759,760, which is \$9,610 below the approved budget for 2024.⁴

⁴ Question 31 administrative costs exclude EM&V costs of \$93,735 in Table 6 of Exhibit MRD-1. In Exhibit MRD-7, the total for Admin is shown as \$726,760 because R&D costs for all classes are listed in a separate column.

1 Q32. DO THE COMPANY'S PROJECTED 2025 COSTS INCLUDE ANY R&D
2 COSTS?

3 A. Yes. The Company has included \$183,000 in its proposed 2025 budget for R&D
4 costs. This amount first includes \$28,000 to reflect 20% of the costs for the
5 continued development of a database that is the repository of all ETI's energy
6 efficiency programs.⁵ The second amount includes \$150,000 to expand the Demand
7 Solutions to include additional types of curtailment devices and new curtailable
8 technologies. Some of these new technologies could include heat pump water
9 heaters, back-up generators, and batteries. The remainder of the R&D budget will
10 be used for continuing education for employees. Exhibit MRD-1 – Workpaper 2
11 provides the details of the R&D costs proposed for the 2025 program year.

12

13 Q33. DO THE COMPANY'S PROJECTED 2025 ADMINISTRATIVE COSTS
14 INCLUDE ALL COSTS FOR THE DISSEMINATION OF INFORMATION
15 AND OUTREACH?

16 A. Yes.

⁵ Pursuant to discussions with Commission Staff over the course of ETI's 2018 EECRF proceeding, Docket No. 47115, and as reflected in Errata No. 2 filed in that docket on July 13, 2018, ETI and Staff agreed to classify 80% of the costs of the database as administrative costs and 20% as R&D costs.

1 Q34. PLEASE DESCRIBE THE COMPANY'S ACTUAL ADMINISTRATIVE
2 COSTS FOR ITS 2023 ENERGY EFFICIENCY PROGRAMS.

3 A. Tables 9 and 10 of Exhibit MRD-1 show the Company's actual administrative costs
4 in 2023. The requested costs in this case include only costs that are recoverable
5 under 16 TAC § 25.181(g)(1). The administrative costs are comprised of costs that
6 are necessary and appropriate for successful program implementation. These costs
7 include Company labor costs charged to specific energy efficiency programs or in
8 support of the Company's programs in general, as well as information and outreach
9 programs designed to explain the Company's energy efficiency programs and
10 improve customer awareness of the programs and measures. For additional detail
11 regarding these costs, please see Exhibit MRD-10.

12

13 Q35. ARE THE COMPANY'S 2025 AND 2023 ADMINISTRATIVE COSTS
14 REASONABLE?

15 A. Yes, the administrative costs are reasonable. These costs are consistent with the
16 spending caps for administrative costs in the Commission's rules. Under 16 TAC
17 § 25.181(g), a utility may recover its administrative costs to the extent these costs
18 do not exceed 15% of the utility's total program costs, and the cumulative
19 administrative and R&D costs do not exceed 20% of the total program costs.⁶

⁶ Pursuant to 16 TAC § 25.181(g)(1)(G), the costs paid by a utility to Cities pursuant to PURA § 33.023(b) for Cities' EECRF proceeding costs are not included in the administrative caps, and pursuant to 16 TAC § 25.181(o)(10)(B), EM&V costs do not count against the utility's cost caps or administrative spending caps.

1 ETI's projected 2025 administrative costs total \$726,760 or 8.22% of total
2 projected 2025 program year costs identified in Table 6 of Exhibit MRD-1. The
3 projected R&D costs equal \$183,000 or 2.07% of total program costs. The
4 combined total of administrative and R&D costs equals \$909,760 or 10.29% of
5 total program costs. The projections are consistent with the Commission cap on
6 administrative costs as well as the historic levels of costs the Company has incurred
7 to manage its energy efficiency programs.

8 The Company's actual 2023 administrative costs are also consistent with
9 the Commission cap on administrative spending. Including the ETI costs of its 2023
10 EECRF proceeding, the 2023 administrative costs equal \$474,984 or 6.26% of total
11 program costs. The R&D costs equal \$165,330 or 2.18% of total program costs.
12 The combined total of administrative and R&D costs equals \$640,314 or 8.44% of
13 total program costs. Because the actual and projected amounts are under the
14 prescribed caps, the Company's administrative and R&D costs are reasonable.

15

16 Q36. ARE THE COMPANY'S TOTAL 2025 PROJECTED ENERGY EFFICIENCY
17 COSTS REASONABLE?

18 A. Yes. The projected costs of the Company's energy efficiency programs are
19 developed based on the experience of myself and my energy efficiency team with
20 input from our consultants and vendors.

D. EM&V Program and Costs

Q37. PLEASE DESCRIBE THE STATEWIDE EM&V PROGRAM AND ITS REVIEW OF ETI'S ENERGY EFFICIENCY PROGRAMS.

A. Under 16 TAC § 25.181(o)(3), the Commission selects an entity to act as its EM&V contractor and conduct evaluation activities. The EM&V contractor operates under the Commission's supervision and oversight and offers independent analysis to the Commission in order to assist in making decisions in the public interest.

With the oversight of the Commission Staff and the assistance of utilities and other parties, the EM&V contractor evaluates specific programs and the portfolio of programs for each utility. EM&V objectives include: (1) documenting the impacts of the utilities' individual energy efficiency and load management portfolios, comparing their performance with established goals, and determining cost-effectiveness; (2) providing feedback for the Commission, Commission Staff, utilities, and other stakeholders on program portfolio performance; and (3) providing input into the utilities' and Electric Reliability Council of Texas ("ERCOT") planning activities.

Another major objective of the EM&V contractor is to develop a TRM. The TRM contains existing deemed savings measures, standard EM&V protocols, and workpapers used to develop the TRM. The TRM is available to the public and can be found on the Commission's Interchange under Project No. 38578.⁷

⁷ *Energy Efficiency Implementation Project Under 16 TAC § 25.181*, Project No. 38578.

1 The contractor's evaluation of ETI's 2023 programs has been completed
2 and ETI accepted all of the EM&V adjustments. ETI's 2023 programs were all
3 determined to be cost effective, with the average cost effectiveness rate of 3.65, as
4 shown in Exhibit MRD-9.⁸

5

6 Q38. WHAT ARE ETI'S EM&V COSTS AND HOW WERE THE EM&V COSTS
7 ALLOCATED TO THE RATE CLASSES?

8 A. Tetra Tech, the EM&V contractor for 2023, bills ETI monthly for ETI's portion of
9 the statewide EM&V program. ETI's costs in 2023 for the EM&V contractor's
10 review of ETI's 2022 energy efficiency programs totaled \$93,735 as shown in
11 Table 10 of Exhibit MRD-1.

12 Tetra Tech is the EM&V contractor for 2025 and its contract was awarded
13 from January 2021 to December 2024. The total statewide EM&V costs are
14 \$1,803,806 and ETI's percentage allocation is 5.1965%, or \$93,735.⁹ The
15 allocations by program are shown in my Exhibit MRD-6. The allocations to rate
16 classes are shown in my Exhibit MRD-7 (for the projected EM&V costs) and Mr.
17 Lewis's Exhibit JAL-1, page 5 (for the historical 2023 EM&V costs).

⁸ In Exhibit MRD-9 on tab Step 2 Results Calculator, the benefit-cost ratio is showing an error in cell X275 because the Connected Thermostat measure under the Hard-To-Reach SOP had no direct incentive payment allocated to this measure which results in the formula dividing by zero.

⁹ Any differences between this number and the number reported in Table 6 of the EEPR are due to rounding.

E. 2023 EECRF Proceeding Costs

Q39. DOES THE COMPANY'S REQUESTED EECRF FOR 2025 INCLUDE COSTS FOR AN EECRF PROCEEDING CONDUCTED PURSUANT TO 16 TAC § 25.181(d)?

A. Yes. Pursuant to 16 TAC § 25.182(d)(3), the Company's requested EECRF for 2025 includes costs for last year's EECRF proceeding, Docket No. 54938.

Q40. WHAT COSTS FOR LAST YEAR'S EECRF PROCEEDING ARE INCLUDED IN THE COMPANY'S REQUEST?

A. The costs for the prior EECRF proceeding were \$37,634. The Cities' costs for last year's proceeding were \$3,150. The reasonableness of ETI's EECRF proceeding costs that are charges from its service company affiliate (Entergy Services, LLC) is supported by the Direct Testimony of Mr. Lewis. The reasonableness of ETI's non-affiliate charges for last year's EECRF proceeding is supported by the affidavit of Erika N. Garcia, Director of Regulatory Affairs for ETI, which is included with the Company's application. The reasonableness of Cities' charges for last year's EECRF proceeding is supported by the affidavit of Cities' attorney Molly Mayhall Vandervoort, which is also included with the Company's application.

F. Bonus Calculation

Q41. DOES THE COMPANY'S PROPOSED EECRF FOR 2025 INCLUDE A PERFORMANCE BONUS BASED ON ETI'S 2023 PROGRAMS? IF SO, PLEASE EXPLAIN.

A. Yes. Pursuant to 16 TAC § 25.182(e), ETI shall be awarded a performance bonus for its 2023 energy efficiency programs, and ETI has calculated the bonus amount to be \$3,232,686. The bonus calculation is shown in Exhibit MRD-8 and was calculated consistent with the Commission's rule.

Q42. IS THE PERFORMANCE BONUS AMOUNT CONSISTENT WITH THE REQUIREMENT UNDER 16 TAC § 25.182(e) THAT THE BONUS NOT EXCEED 10% OF THE UTILITY'S TOTAL NET BENEFITS?

A. Yes. The requested bonus of \$3,232,686 is consistent with the Commission's rule, as shown in Exhibit MRD-8.

VI. REASONABLENESS OF 2023 COSTS

Q43. WHAT WERE THE COSTS INCURRED BY ETI FOR ENERGY EFFICIENCY PROGRAMS IN 2023?

A. Table 10 of Exhibit MRD-1 shows the costs incurred by ETI in 2023 by cost category.

1 Q44. WERE THE COSTS IDENTIFIED IN TABLE 10 OF EXHIBIT MRD-1
2 REASONABLE AND NECESSARY TO ACHIEVE THE COMPANY'S GOALS
3 TO REDUCE DEMAND AND ENERGY GROWTH?

4 A. Yes, the costs incurred were reasonable and necessary to achieve the prescribed
5 goals to reduce demand and energy growth. The goals and projected costs were
6 approved by the Commission. The Company's processes and procedures ensured
7 that the costs to achieve the goals were reasonable and necessary. The Company's
8 testimony in this proceeding provides details about the Company's programs and
9 costs for 2023 and includes a copy of the Company's EEPR as well.

10 Moreover, the program costs met the cost effectiveness standard definition
11 in 16 TAC § 25.181(d), which states "an energy efficiency program is deemed to
12 be cost-effective if the cost of the program to the utility is less than or equal to the
13 benefits of the program." The cost effectiveness calculations for the 2023 programs
14 are presented in Exhibit MRD-9. Because all of ETI's programs' costs are less than
15 or equal to the benefits of those programs, they are deemed to be cost effective by
16 rule.

1 Q45. DID THE COSTS INCURRED IN 2023 COMPLY WITH 16 TAC § 25.182(d)?

2 A. Yes. The costs incurred in 2023 were reasonable and necessary for ETI in providing
3 a portfolio of cost-effective energy efficiency programs that comply with 16 TAC
4 § 25.182(d), including the cost caps of 16 TAC § 25.182(d)(7).

5

6 Q46. PLEASE EXPLAIN THE COST CAPS RELEVANT TO ETI FOR ITS 2025
7 ENERGY EFFICIENCY PROGRAM COSTS.

8 A. The cost caps, under 16 TAC § 25.182(d)(7)(C), are “calculated to be the prior
9 period’s cost caps increased by a rate equal to the most recently available calendar
10 year’s percentage change in the South urban [Consumer Price Index (“CPI”)], as
11 determined by the Federal Bureau of Labor Statistics.” The increase in the CPI from
12 2022 to 2023 is shown in Exhibit MRD-4. Accordingly, for residential customers,
13 the cost cap applicable to the 2025 EECRF is \$0.001626 per kWh, and the
14 commercial cost cap is \$0.001017 per kWh. As shown by Company witness Mr.
15 Lewis, the Company’s proposed EECRF rates are consistent with the cost caps.

16

17 Q47. DID ANY OF THE ACTUAL 2023 PROGRAM COSTS VARY BY MORE
18 THAN TEN PERCENT FROM THE PROJECTED PROGRAM COSTS?

19 A. Yes. There was one program where the projected budget and actual total funds
20 expended varied by more than ten percent: Load Management SOP (31%).

21 Expenses under the Load Management SOP were lower than projected due
22 to participating customers not curtailing at the level committed when called-upon.

1 The program budgeted for 10.9 MW of curtailment but only 9.5 MW of curtailment
2 were realized.

3

4 Q48. WHAT PROCESSES DID ETI HAVE IN PLACE TO ENSURE THE
5 REASONABLENESS OF COSTS?

6 A. ETI regularly monitored market conditions to ensure the reasonableness of its
7 program offerings and costs. In addition, ETI has used Requests for Proposals
8 ("RFPs") for its programs to make sure it is achieving the best program delivery
9 and a reasonable price for Program Implementers. ETI plans to continue using RFPs
10 as a check on its programs and program costs. ETI ran the RFP process in 2021 to
11 select implementors for the Residential and Commercial Market Transformation
12 Programs. TRC Companies was awarded the Residential Solutions MTP and
13 CLEAResult Consulting, Inc. was awarded the Commercial Solutions MTP. Both
14 contracts began on January 1, 2022.

15 ETI is currently conducting an RFP for the Commercial Solutions MTP and
16 the Residential Solutions MTP. Contracts for both programs will be a four-year
17 term to begin on January 1, 2025 and conclude on December 31, 2028. ETI
18 anticipates that it will award contracts for the RFP in summer 2024.

19

20 Q49. WHAT PROCESSES DID ETI HAVE IN PLACE TO MONITOR THE COSTS?

21 A. ETI regularly monitored costs through its review of monthly Program Implementer
22 invoices and reports and via a budgeting system. The energy efficiency team holds
23 monthly meetings to discuss current expenditures as well as planned expenditures

1 for the current year such as special promotions or trade show participation. ETI
2 reviews costs charged to energy efficiency project codes to identify any costs that
3 should not be associated with the programs.

4

5 Q50. HAS ETI IMPROVED ITS PROCESSES OVER THE YEARS BASED ON ITS
6 EXPERIENCE WITH PROCURING ENERGY EFFICIENCY SERVICES?

7 A. Yes. ETI has continued to make strides in customer validation, program marketing,
8 and program accounting. ETI utilizes a process of tracking R&D spending to help
9 with reporting the cost effectiveness of pilot programs. ETI continues to make
10 advancements with integrating customer validation with ETI's contracted Program
11 Implementors so that they can more easily verify eligible customers for energy
12 efficiency programs and increase accuracy of reporting. ETI continues to update a
13 residential and commercial programs products and services flyer for use by ETI
14 employees to refer ETI customers to energy efficiency or other programs to meet
15 the customers' needs. Process improvements such as these helped to continue to
16 ensure the reasonableness of the 2023 programs, as well as future years' programs.

17

18 Q51. HAS THE COMPANY'S EXPERIENCE ALSO HELPED TO ENSURE THAT
19 COSTS RECOVERED THROUGH THE EECRF HAVE BEEN REASONABLE?

20 A. Yes. ETI manages its program costs based on over 20 years of knowledge and
21 experience within the Texas market and the surrounding service territories. The
22 program costs and incentives offered for 2023 were consistent with the offering of
23 similar programs of other utilities and were necessary to encourage participation

1 levels high enough to achieve the energy and demand goals set up by the
2 Commission at reasonable costs.

3

4

VII. CONCLUSION

5 Q52. DO YOU BELIEVE THE COSTS THAT ETI SEEKS TO INCLUDE IN ITS
6 EECRF FOR 2025 INCLUDE REASONABLE ACTUAL AND ESTIMATED
7 COSTS NECESSARY TO PROVIDE ENERGY EFFICIENCY PROGRAMS
8 AND TO MEET THE UTILITY'S GOALS UNDER THIS SECTION?

9 A. Yes. The program costs associated with providing a quality energy efficiency
10 program under ETI's request are reasonable and necessary and meet the cost
11 effectiveness provisions found in the energy efficiency rule.

12

13 Q53. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

14 A. Yes, at this time.

Entergy Texas, Inc.
2024 Energy Efficiency Plan and Report
16 Tex. Admin. Code §§ 25.181 and 25.183

APRIL 1, 2024

Project No. 56003

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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 2024 and 2025 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 (2019-2023) 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 2022 and 2023.
- Section VII presents ETI's incentive and administrative expenditures for the previous five years (2019-2023) broken out by program for each customer class.
- Section VIII compares ETI's actual program funding for 2023 compared to its 2023 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 2023 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 2024 and 2025. 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

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)
2024	63,150	3,019,554	17,410	11,099	17,410	30,502,295	17,410	30,502,295	\$8,377
2025	45,601	2,972,608	12,609	10,959	17,410	30,502,295	17,410	30,502,295	\$8,840

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: $(45,601 \text{ kW} \times 30\%) \times (1 - 0.078320 \text{ line losses}) = 12,609 \text{ kW}$

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 53719.

Example Goal Metric Calculation: $(2,972,608 \text{ kW} \times 0.4\%) \times (1 - 0.078320 \text{ line losses}) = 10,959 \text{ kW}$

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 53719.

Energy Efficiency Plan

I. 2024 Programs

A. 2024 Program Portfolio

ETI plans to implement two MTPs and three SOPs in 2024: the Commercial Solutions MTP, the 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: 2024 Energy Efficiency Program Portfolios

Program	Target Market	Application
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. 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, and non-profit 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 customers;
- Rural and urban public K-12 school districts, colleges, and universities;
- Government entities including cities, counties, state, and federal organizations; and
- Non-profit 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, 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 three unscheduled curtailments. A maximum of four curtailment events per customer location can be called 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 ETI's website, email blasts, 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.

In 2024, ETI will also deploy two sub-programs as part of the RES SOP. 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 CLEAResult Consulting, Inc. The second is a Multifamily HVAC Retrofit program that assists in replacing 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. ETI updates the program information on its RES SOP website frequently, including providing participating Project Sponsor information and the incentives available for installing eligible measures. In 2024, ETI selected nine Project Sponsors to participate in the RES SOP.

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, and print media.

4. Entergy Residential Solutions MTP

a) Program Design

The Entergy Solutions High Performance Homes MTP (NEW HOMES MTP) 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, distributors, 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 installs the higher energy efficiency equipment. The program requires the involvement of a third-party rating service to verify that the homes meet the current energy efficiency code in Texas (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® standards or higher.

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 customers.

The Residential Marketplace launched in 2023 as part of the RES SOL MTP offering. This marketplace offers residential customers the option to purchase energy efficient products (smart thermostats, advanced power strips, ENERGY STAR® air purifiers, and smart plugs) to give customers an opportunity to reduce their energy consumption. In 2024, ETI expanded the Residential Marketplace to include additional smart thermostat manufacturers. ETI has also begun to offer a smart home device called "Sense Home Energy Monitor." This device provides energy-use data, including details regarding the energy use of individual appliances.

As part of the RES SOL MTP, ETI included a pilot residential load management program in program year 2023, Demand Solutions (DEM SOL), that utilized residential smart thermostats to reduce load during peak events. The program was implemented by TRC Companies and utilizes Energy Hub to run the load curtailments. Energy Hub provides 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 may be called during the Program Year and the events may last between one to four hours. Curtailments 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. Customers may opt out of events by manually adjusting the thermostat setpoint during the event.

Going into 2024, the DEM SOL program device capacity was increased from 750 devices to 5,000 devices and includes two new smart thermostat manufacturers: Google Nest and ecobee.

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. ETI frequently updates the program information on ETI's website 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 worked with TRC Companies to launch the Residential Marketplace in program year 2023. Customers can use this website to purchase from a collection of different pre-approved energy efficiency products. TRC Companies keeps track of all sales and energy savings and invoices ETI for reimbursement.

For the DEM SOL program, residential customers can apply for the program through their networked, smart thermostat manufacturer. Energy Hub is able to gather the responses and ETI will conduct a customer validation to only include ETI residential customers. Residential customers who participate in the program are eligible for incentive payment on an annual basis. Incentive payments are 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 requirements, 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, 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. Most of the distributors and manufacturers that service ETI's territory participate in multiple utilities' programs. 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.

The Residential Marketplace program can be accessed on ETI's website. The Residential Marketplace program is marketed through a targeted social media campaign to reach residential customers in ETI's territory.

The DEM SOL program will be marketed through networked, smart thermostat manufacturer emails and smart phone applications. These marketing emails and applications will direct the ETI customer to a program enrollment site.

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 2024, 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 2024, the HTR SOP will also deploy 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 2024, ETI selected nine Project Sponsors to participate in the HTR SOP.

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, and print media.

C. New Programs for 2025

ETI is seeking to expand the DEM SOL program in 2025. The growth of this program will include adding more smart thermostats and expanding into other curtailable technologies. Some of these new technologies could include heat pump water heaters, back-up generators, and batteries. ETI will request \$150,000 in Research & Development (R&D) budget to explore new curtailable technologies for the DEM SOL program in 2025.

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 Classes¹

Customer Class	Number of Customers
Commercial	53,017
Residential	450,506
Hard to Reach	63,071

¹ Commercial and Residential figures based on actual historical ETI data as of December 31, 2023; Hard-To-Reach figure based on 14.0% of Residential customers. Percentage rate was obtained from the US Census Bureau American Community Survey, Table S1701, 2022: 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 2023 resulted in no change to the demand and energy goals.

The five-year average for growth from 2019 to 2023 was 45,601 kW. Using the goal metric calculation of 30% of growth at the meter, the demand goal is 12,609 kW. The weather-adjusted summer peak demand at the source for 2023 was 2,972,608 kW. Using the goal metric calculation of 0.4% of peak demand at the meter, the demand goal is 10,959 kW. Using the 20% conservation load factor calculation, the energy goal is 22,090,648 kWh. However, in accordance with the “ratchet requirements” of 16 TAC § 25.181(e)(1)(D), a utility’s demand goal for any particular year cannot be less than its goal for the preceding year. Therefore, ETI’s demand and energy goals for 2025 will remain the same as 2024. The demand and energy goals for 2025 will be 17,410 kW and 30,502,295 kWh.

Table 5 presents the demand and energy goals for years 2024 and 2025. This table also shows the breakdown in goals by energy efficiency program.

Table 4: Annual Growth in Demand and Energy Consumption²

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			
2018	3,534,157	3,579,455	2,690,306	2,741,604	19,612,291,900	19,256,202,352	11,615,486,722	11,259,397,171	1,421	10,802	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	4,153,459	3,997,047	3,129,020	2,972,608	21,860,193,885	21,487,737,762	13,557,979,056	13,185,522,933	927	-46,946	NA
2024	NA	NA	NA	NA	NA	NA	NA	NA	750	NA	63,150
2025	NA	NA	NA	NA	NA	NA	NA	NA	1,843	NA	45,601

² 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. 2018 is the year that has been corrected. 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)

2024	Projected Savings	
Customer Class and Program	kW	kWh
Commercial	13,268	21,713,164
Commercial Solutions MTP	4,935	21,704,831
Load Management SOP	8,333	8,333
Residential	2,924	6,596,621
Residential SOP	1,415	2,741,249
Residential Solutions MTP	1,509	3,855,372
Hard-To-Reach	1,218	2,192,510
Hard-To-Reach SOP	1,218	2,192,510
Total Annual Projected Savings	17,410	30,502,295
2025	Projected Savings	
Customer Class and Program	kW	kWh
Commercial	13,435	21,713,331
Commercial Solutions MTP	4,935	21,704,831
Load Management SOP	8,500	8,500
Residential	2,757	6,596,454
Residential SOP	1,415	2,741,249
Residential Solutions MTP	1,342	3,855,205
Hard-To-Reach	1,218	2,192,510
Hard-To-Reach SOP	1,218	2,192,510
Total Annual Projected Savings	17,410	30,502,295

IV. Program Budgets

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

2024	Incentives	Admin	Total Budget
Commercial	\$3,060,519	\$278,697	\$3,339,216
Commercial Solutions MTP	\$2,735,519	\$246,197	\$2,981,716
Load Management SOP	\$325,000	\$32,500	\$357,500
Residential	\$3,073,034	\$276,573	\$3,349,607
Residential SOP	\$1,875,000	\$168,750	\$2,043,750
Residential Solutions MTP	\$1,198,034	\$107,823	\$1,305,857
Hard-To-Reach	\$1,380,000	\$179,100	\$1,559,100
Hard-To-Reach SOP	\$1,380,000	\$179,100	\$1,559,100
R&D	\$0	\$35,000	\$35,000
EM&V	\$0	\$93,735	\$93,735
Total Annual Budgets	\$7,513,553	\$863,105	\$8,376,659
2025	Incentives	Admin	Total Budget
Commercial	\$3,256,250	\$263,710	\$3,519,960
Commercial Solutions MTP	\$2,850,000	\$246,210	\$3,096,210
Load Management SOP	\$406,250	\$17,500	\$423,750
Residential	\$3,175,000	\$280,550	\$3,455,550
Residential SOP	\$1,975,000	\$170,500	\$2,145,500
Residential Solutions MTP	\$1,200,000	\$110,050	\$1,310,050
Hard-To-Reach	\$1,405,000	\$182,500	\$1,587,500
Hard-To-Reach SOP	\$1,405,000	\$182,500	\$1,587,500
R&D	\$150,000	\$33,000	\$183,000
EM&V	\$0	\$93,735	\$93,735
Total Annual Budgets	\$7,986,250	\$853,495	\$8,839,745

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 (2019-2023) 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)³**

Calendar Year	Actual Weather Adjusted Demand Goal (kW)	Actual Weather Adjusted Energy Goal (kWh)	Actual Demand Reduction (kW) [1]	Actual Energy Savings (kWh) [1]
<u>2023</u>	15,697	27,500,598	24,538	46,093,588
<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

[1] Actual Demand and Energy Savings are reported at the Source.

Example based on 2023 Actual Savings:

Demand 22,699 x (1+0.078320) = 24,538

Energy 42,850,452 x (1+0.076798) = 46,093,588

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 53719.

³ 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, 2024.

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

Table 8: Projected versus Reported and Verified Savings for 2022 and 2023 (at Meter)⁴

2022	Projected Savings		Reported and Verified Savings	
Customer Class and Program	kW	kWh	kW	kWh
Commercial	11,697	18,363,798	14,238	32,178,059
Commercial Solutions MTP	4,697	18,323,798	7,319	32,171,140
Load Management SOP	7,000	40,000	6,919	6,919
Residential	3,000	7,036,800	3,573	10,234,090
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
Hard-to-Reach	1,000	2,100,000	1,836	4,198,051
Hard-to-Reach SOP	1,000	2,100,000	1,836	4,198,051
Total	15,697	27,500,598	19,647	46,610,200
2023	Projected Savings		Reported and Verified Savings	
Customer Class and Program	kW	kWh	kW	kWh
Commercial	10,988	18,975,413	17,179	30,350,291
Commercial Solutions MTP	3,988	18,961,413	7,714	30,285,204
Load Management SOP	7,000	14,000	9,465	65,087
Residential	3,767	6,875,150	3,800	9,421,599
Residential SOP	1,319	2,406,302	2,286	4,521,787
Residential Solutions MTP	2,449	4,468,847	1,514	4,899,812
Hard-to-Reach	942	1,650,036	1,720	3,078,562
Hard-to-Reach SOP	942	1,650,036	1,720	3,078,562
Total	15,697	27,500,598	22,699	42,850,452

⁴ Savings include interim impact findings from EM&V. Final savings will be reported in ETT's Energy Efficiency Cost Recovery Factor application to be filed no later than May 1, 2024.

VII. Historical Program Expenditures

This section documents ETT's incentive and administration expenditures for the previous five years (2019-2023) broken out by program for each customer class.

**Table 9: Historical Program Incentive and Administrative Expenditures
for 2019 through 2023 (in 000's)**

2019 through 2023	2023		2022		2021		2020		2019	
	Incent	Admin	Incent	Admin	Incent	Admin	Incent	Admin	Incent	Admin
Commercial	2,842	216	2,779	262	2,668	358	2,721	350	2,814	367
Commercial (Commercial Solutions) MTP	2,595	184	2,579	236	2,463	314	2,569	309	2,587	319
Load Management SOP	247	32	200	26	205	45	152	41	228	48
Residential	2,900	405	2,500	310	2,435	308	2,304	320	2,541	363
Residential SOP	1,836	155	1,710	180	1,528	183	1,557	201	1,674	230
Residential Solutions MTP	1,064	250	790	130	907	125	747	120	866	133
Hard-to-Reach	1,104	116	1,227	181	1,408	238	884	153	1,014	160
Hard-to-Reach SOP	1,104	116	1,227	181	1,408	238	884	153	1,014	160
Total Expenditures	6,846	737	6,506	753	6,512	904	5,909	823	6,369	890

VIII. Program Funding for Calendar Year 2023

Table 10: Program Funding for Calendar Year 2023

2023	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?
Commercial	\$3,050,974	\$324,207	\$11,895	\$52,981	\$3,439,157	264	\$2,841,961	\$133,270	\$12,625	\$52,981	\$15,623	\$1,308	\$3,057,787	\$0	\$381,370	
Commercial Solutions MTP	\$2,695,821	\$288,707	\$10,593	\$39,010	\$3,034,134	256	\$2,595,088	\$118,076	\$11,529	\$39,010	\$14,265	\$1,191	\$2,779,162	\$0	\$254,972	No
Load Management SOP	\$354,250	\$35,500	\$1,303	\$13,971	\$405,023	8	\$246,893	\$15,191	\$1,097	\$13,971	\$1,357	\$114	\$278,625	\$0	\$126,398	31%
Residential	\$2,891,626	\$313,897	\$151,913	\$34,035	\$3,391,471	5,607	\$2,900,084	\$205,850	\$147,800	\$34,035	\$15,942	\$1,334	\$3,305,045	\$0	\$86,426	
Residential SOP	\$1,802,716	\$199,311	\$7,313	\$15,289	\$2,024,609	1,540	\$1,835,359	\$120,299	\$8,156	\$15,289	\$10,092	\$845	\$1,991,211	\$0	\$33,389	No
Residential Solutions MTP	\$1,088,910	\$114,586	\$144,600	\$18,775	\$1,366,871	4,067	\$1,064,724	\$84,851	\$139,644	\$18,775	\$5,850	\$490	\$1,313,334	\$0	\$53,037	No
Hard-to-Reach	\$1,057,593	\$125,037	\$4,588	\$6,719	\$1,193,937	934	\$1,104,048	\$98,231	\$4,905	\$6,719	\$6,069	\$508	\$1,220,479	\$0	-\$26,543	
Hard-to-Reach SOP	\$1,057,593	\$125,037	\$4,588	\$6,719	\$1,193,937	934	\$1,104,048	\$98,231	\$4,905	\$6,719	\$6,069	\$508	\$1,220,479	\$0	-\$26,543	No
Total	\$6,999,293	\$763,141	\$168,396	\$93,735	\$8,024,564	6,805	\$6,846,112	\$437,350	\$165,330	\$93,735	\$37,634	\$3,150	\$7,583,311	\$0	\$441,253	

Per 16 TAC § 25.181(l)(2)(Q), please note that there was one program where the projected budget and actual total funds expended varied by more than ten percent: Load Management SOP (31%).

Costs under the Load Management SOP were lower than projected due to reduced participation in the program. The program budgeted for 10.9 MW but only achieved 9.5 MW in curtailment savings.

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.

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 2023, this sub-program achieved 1,831 kW and 8,048,930 kWh in reported and verified savings.

The Commercial CoolSaver sub-program was part of the COM SOL MTP in 2023. This sub-program provided HVAC tune-ups for non-residential customers that ranged in tonnage from 1.5 tons to 25 tons. The program saw success in implementing tune-ups for rural school districts and government facilities that led to other energy efficiency projects in COM SOL MTP. Some of these additional projects were for roofing retrofits, lighting retrofits, and new construction projects. The Commercial CoolSaver program achieved 768 tune-ups and created 1,151 kW and 1,920,346 kWh in savings in 2023.

RES SOL MTP

The RES SOL MTP in 2023 included three components: the NEW HOMES MTP, the DIST PROD MTP, and the Residential Marketplace. For 2023, the RES SOL MTP achieved a total of 1,514 kW and 4,899,812 kWh in reported and verified savings.

The NEW HOMES MTP provides the attributes of an ENERGY STAR[®] Homes new construction program. In this program, savings are driven predominantly by prescriptive efficiency measures that can be implemented at the time of construction and realized for the lifetime of the home. Savings and incentives are tabulated based on the energy efficiency equipment installed. Home Energy Rating System raters provide professional assessments on these new homes and include them in their national database, RESNET. The incentives, paid to the home builder, 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.

The Residential Marketplace provides residential customers the opportunity to purchase energy efficiency equipment at a discount. ETI contracted with TRC Companies to build and manage the

Residential Marketplace website. The marketplace provides customers discounts for smart plugs, smart thermostats, advanced power strips and ENERGY STAR rated air purifiers.

X. Research and Development and Administrative Costs

ETI, along with Frontier Energy, continues to develop a database that serves as a single repository for ETI's energy efficiency program activities. 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 DEM SOL program under the RES SOL MTP in 2023. ETI contracted with TRC Companies to utilize the Energy Hub curtailment platform. This platform allows for aggregating multiple curtailment devices, including but not limited to thermostats, batteries, and electric vehicle (EV) chargers. For the initial effort, ETI focused on building a network of residential smart thermostats that could be used to curtail residential energy usage during the summer peak period. These costs included setting up the Energy Hub platform for ETI, creating the marketing material for the smart thermostat manufacturers, enrolling customers into the program, and calculating the curtailment results.

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 2023, 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 1, 2023 in Docket No. 54938.⁵ The revised EECRF was approved for recovery of \$9,696,210, and ETI implemented the revised rider on January 1, 2024.

XII. Revenue Collected through EECRF (2023)

ETI's 2023 EECRF revenues as of December 31, 2023 were \$13,485,682.

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

ETI had an over-recovery of its 2023 energy efficiency programs of \$1,501,107, which should be refunded in the 2025 EECRF.

⁵ *Application of Entergy Texas, Inc. to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 54938, Order (Nov. 3, 2023).

Acronyms

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, collectively 16 TAC §§ 25.181 and 25.183
EECRF	Energy Efficiency Cost Recovery Factor
HTR	Hard-To-Reach
EM&V	Evaluation, Measurement and Verification
LM	Load Management
MTP	Market Transformation Program
PURA	Public Utility Regulatory Act
R&D	Research & Development
RES	Residential
SCORE	Schools Concerned with Reducing Energy
SOP	Standard Offer Program
TAC	Texas Admin. Code

Appendix

Appendix A: Reported Demand and Energy Reduction by County 2023 Update⁶

Residential SOP			
County	Savings kW	Savings KWh	Incentives
CHAMBERS	5.96	13,895	\$5,295
HARDIN	216.57	420,579	\$193,597
HARRIS	1.27	2,151	\$1,072
JEFFERSON	1,215.56	2,346,279	\$1,075,098
LIBERTY	50.80	124,950	\$20,472
MADISON	1.42	3,087	\$1,286
MONTGOMERY	311.00	679,066	\$177,395
ORANGE	179.90	388,889	\$133,120
SAN JACINTO	3.43	8,712	\$1,000
TYLER	38.80	81,751	\$30,275
WALKER	261.44	452,428	\$197,250
TOTAL	2,286.15	4,521,787	\$1,835,859

Hard to Reach SOP			
County	Savings kW	Savings KWh	Incentives
CHAMBERS	9.14	16,886	\$5,693
GALVESTON	0.71	1,309	\$463
HARDIN	157.83	274,964	\$101,857
HARRIS	1.45	2,249	\$901
JEFFERSON	1,064.17	1,893,593	\$681,121
LIBERTY	8.41	15,108	\$5,282
MADISON	1.19	1,875	\$744
MONTGOMERY	170.80	305,876	\$114,021
ORANGE	134.18	237,848	\$85,862
SAN JACINTO	0.71	2,053	\$452
TYLER	2.70	4,527	\$1,728
WALKER	168.35	322,275	\$105,923
TOTAL	1,719.63	3,078,562	\$1,104,048

⁶ 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, 2024.

Residential Solutions MTP			
County	Savings kW	Savings KWh	Incentives
BRAZOS	15.00	34,760	\$6,812
BURLESON	0.00	3,576	\$230
CILAMBERS	12.32	50,918	\$8,489
FAJES	0.00	2,512	\$165
GALVESTON	0.00	19,072	\$1,205
GRIMES	4.83	24,412	\$3,810
HARDIN	37.00	150,040	\$24,348
HARRIS	8.00	24,060	\$3,765
JEFFERSON	53.29	380,240	\$44,697
LIBERTY	48.37	164,944	\$23,335
LIMESTONE	0.00	2,512	\$165
MADISON	1.37	6,186	\$1,105
MILAM	0.00	1,192	\$90
MONTGOMERY	1,283.05	3,770,820	\$696,525
ORANGE	34.08	163,715	\$21,104
POLK	0.00	2,384	\$165
ROBERTSON	0.02	7,622	\$452
SAN JACINTO	0.04	2,566	\$194
TRINITY	0.00	10,728	\$795
TYLER	0.00	8,344	\$575
WALKER	16.93	69,209	\$10,115
TOTAL	1,514.28	4,899,812	\$848,141

Commercial Solutions MTP			
County	Savings kW	Savings KWh	Incentives
Chambers	12.14	49,934	\$2,040
Grimes	92.84	424,208	\$21,395
Hardin	71.67	326,585	\$16,120
Harris	25.85	123,468	\$8,932
Jefferson	2,215.77	8,601,002	\$404,602
Leon	34.54	110,463	\$7,699
Liberty	171.02	675,719	\$31,925
Madison	856.62	3,255,024	\$37,081
Montgomery	1,932.61	8,659,434	\$430,145
Orange	608.72	1,792,419	\$88,351
Polk	0.09	430	\$75
Robertson	150.64	258,778	\$14,245
San Jacinto	100.00	315,528	\$19,655
Trinity	59.61	227,769	\$16,697
Tyler	11.13	43,437	\$2,304
Walker	1,370.41	5,421,007	\$147,998
TOTAL	7,713.69	30,285,204	\$1,249,264

Load Management SOP			
County	Savings kW	Savings KWh	Incentives
Burleson	3.63	24	\$65
Chambers	180.01	1,254	\$5,661
Galveston	0.78	6	\$25
Grimes	76.47	503	\$2,007
Hardin	123.39	831	\$3,330
Jefferson	3,014.23	20,321	\$88,220
Liberty	1,535.97	10,470	\$32,766
Limestone	5.66	41	\$65
Madison	53.95	372	\$1,494
Montgomery	2,881.08	20,104	\$80,329
Orange	717.55	4,852	\$21,272
Polk	1.75	8	\$57
Robertson	8.98	69	\$132
Trinity	9.24	58	\$130
Tyler	81.21	571	\$1,782
Walker	771.14	5,603	\$9,559
TOTAL	9,465.04	65,087	\$246,893

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

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)
2024	63,150	3,019,554	17,410	11,099	17,410	30,502,295	17,410	30,502,295	\$8,377
2025	45,601	2,972,608	12,609	10,959	17,410	30,502,295	17,410	30,502,295	\$8,840

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: $(45,601 \text{ kW} \times 30\%) \times (1 - 0.078320 \text{ line losses}) = 12,609 \text{ kW}$

The line loss number is based on the loss study in ETT's last completed rate case, Docket No. 53719.

Example Goal Metric Calculation: $(2,972,608 \text{ kW} \times 0.4\%) \times (1 - 0.078320 \text{ line losses}) = 10,959 \text{ kW}$

The line loss number is based on the loss study in ETT's last completed rate case, Docket No. 53719.

Demand Savings Goal: 12,609 kW
Energy Savings Goal: 22,090,648 kWh

Table 2: 2024 Energy Efficiency Program Portfolios

Program	Target Market	Application
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

Table 3: Summary of Customer Classes[1]

Customer Class	Number of Customers
Commercial	53,017
Residential	450,506
Hard to Reach	63,071

[1] Commercial and Residential figures based on actual historical ETI data as of December 31, 2023; Hard-To-Reach figure based on 14.0% of Residential customers. Percentage rate was obtained from the US Census Bureau American Community Survey, Table S1701, 2022: ACS 1-Year Estimates Subject Tables.

Table 4: Annual Growth in Demand and Energy Consumption[2]

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
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	4,153,459	3,997,047	3,129,020	2,972,608	21,860,193,885	21,487,737,762	13,557,979,056	13,185,522,933	927	-46,946	NA
2024	NA	NA	NA	NA	NA	NA	NA	NA	750	NA	63,150
2025	NA	NA	NA	NA	NA	NA	NA	NA	1,843	NA	45,601

[2] 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. 2018 is the year that has been corrected. 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)

2024	Projected Savings	
Customer Class and Program	kW	kWh
Commercial	13,268	21,713,164
Commercial Solutions MTP	4,935	21,704,831
Load Management SOP	8,333	8,333
Residential	2,924	6,596,621
Residential SOP	1,415	2,741,249
Residential Solutions MTP	1,509	3,855,372
Hard-To-Reach	1,218	2,192,510
Hard-To-Reach SOP	1,218	2,192,510
Total Annual Projected Savings	17,410	30,502,295
2025	Projected Savings	
Customer Class and Program	kW	kWh
Commercial	13,435	21,713,331
Commercial Solutions MTP	4,935	21,704,831
Load Management SOP	8,500	8,500
Residential	2,757	6,596,454
Residential SOP	1,415	2,741,249
Residential Solutions MTP	1,342	3,855,205
Hard-To-Reach	1,218	2,192,510
Hard-To-Reach SOP	1,218	2,192,510
Total Annual Projected Savings	17,410	30,502,295

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

2024	Incentives	Admin	Total Budget
Commercial	\$3,060,519	\$278,697	\$3,339,216
Commercial Solutions MTP	\$2,735,519	\$246,197	\$2,981,716
Load Management SOP	\$325,000	\$32,500	\$357,500
Residential	\$3,073,034	\$276,573	\$3,349,607
Residential SOP	\$1,875,000	\$168,750	\$2,043,750
Residential Solutions MTP	\$1,198,034	\$107,823	\$1,305,857
Hard-To-Reach	\$1,380,000	\$179,100	\$1,559,100
Hard-To-Reach SOP	\$1,380,000	\$179,100	\$1,559,100
R&D	\$0	\$35,000	\$35,000
EM&V	\$0	\$93,735	\$93,735
Total Annual Budgets	\$7,513,553	\$863,105	\$8,376,659
2025	Incentives	Admin	Total Budget
Commercial	\$3,256,250	\$263,710	\$3,519,960
Commercial Solutions MTP	\$2,850,000	\$246,210	\$3,096,210
Load Management SOP	\$406,250	\$17,500	\$423,750
Residential	\$3,175,000	\$280,550	\$3,455,550
Residential SOP	\$1,975,000	\$170,500	\$2,145,500
Residential Solutions MTP	\$1,200,000	\$110,050	\$1,310,050
Hard-To-Reach	\$1,405,000	\$182,500	\$1,587,500
Hard-To-Reach SOP	\$1,405,000	\$182,500	\$1,587,500
R&D	\$150,000	\$33,000	\$183,000
EM&V	\$0	\$93,735	\$93,735
Total Annual Budgets	\$7,986,250	\$853,495	\$8,839,745

Table 7: Historical Demand and Energy Savings Goals and Achievements (at the Meter, except as noted)[3]

Calendar Year	Actual Weather Adjusted Demand Goal (kW)	Actual Weather Adjusted Energy Goal (kWh)	Actual Demand Reduction (kW) [1]	Actual Energy Savings (kWh) [1]
<u>2023</u>	15,697	27,500,598	24,538	46,093,588
<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

[1] Actual Demand and Energy Savings are reported at the Source.

Example based on 2023 Actual Savings:

Demand $22,699 \times (1+0.078320) = 24,538$

Energy $42,850,452 \times (1+0.076798) = 46,093,588$

The line loss number is based on the loss study in ETI's last completed rate case, Docket No. 53719.

[3] 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, 2024.

Table 8: Projected versus Reported and Verified Savings for 2022 and 2023 (at Meter) [4]

2022		Projected Savings		Reported and Verified Savings	
Customer Class and Program		kW	kWh	kW	kWh
Commercial		11,697	18,363,798	14,238	32,178,059
Commercial Solutions MTP		4,697	18,323,798	7,319	32,171,140
Load Management SOP		7,000	40,000	6,919	6,919
Residential		3,000	7,036,800	3,573	10,234,090
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
Hard-to-Reach		1,000	2,100,000	1,836	4,198,051
Hard-to-Reach SOP		1,000	2,100,000	1,836	4,198,051
Total		15,697	27,500,598	19,647	46,610,200
2023		Projected Savings		Reported and Verified Savings	
Customer Class and Program		kW	kWh	kW	kWh
Commercial		10,988	18,975,413	17,179	30,350,291
Commercial Solutions MTP		3,988	18,961,413	7,714	30,285,204
Load Management SOP		7,000	14,000	9,465	65,087
Residential		3,767	6,875,150	3,800	9,421,599
Residential SOP		1,319	2,406,302	2,286	4,521,787
Residential Solutions MTP		2,449	4,468,847	1,514	4,899,812
Hard-to-Reach		942	1,650,036	1,720	3,078,562
Hard-to-Reach SOP		942	1,650,036	1,720	3,078,562
Total		15,697	27,500,598	22,699	42,850,452

[4] Savings include interim impact findings from EM&V. Final savings will be reported in ETT's Energy Efficiency Cost Recovery Factor application to be filed no later than May 1, 2024.

Table 9: Historical Program Incentive and Administrative Expenditures for 2019 through 2023 (in 000's)

2019 through 2023	2023		2022		2021		2020		2019	
	Incent	Admin	Incent	Admin	Incent	Admin	Incent	Admin	Incent	Admin
Commercial	2,842	216	2,779	262	2,668	358	2,721	350	2,814	367
Commercial (Commercial Solutions) MTP	2,595	184	2,579	236	2,463	314	2,569	309	2,587	319
Load Management SOP	247	32	200	26	205	45	152	41	228	48
Residential	2,900	405	2,500	310	2,435	308	2,304	320	2,541	363
Residential SOP	1,836	155	1,710	180	1,528	183	1,557	201	1,674	230
Residential Solutions MTP	1,064	250	790	130	907	125	747	120	866	133
Hard-to-Reach	1,104	116	1,227	181	1,408	238	884	153	1,014	160
Hard-to-Reach SOP	1,104	116	1,227	181	1,408	238	884	153	1,014	160
Total Expenditures	6,846	737	6,506	753	6,512	904	5,909	823	6,369	890

Table 10: Program Funding for Calendar Year 2023

2023	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?
Commercial	\$3,050,074	\$324,207	\$11,895	\$52,981	\$3,439,157	264	\$2,841,981	\$133,270	\$12,625	\$52,981	\$15,623	\$1,308	\$3,057,787	\$0	\$381,370	
Commercial Solutions MTP	\$2,695,824	\$288,707	\$10,593	\$39,010	\$3,034,134	256	\$2,595,088	\$118,076	\$11,529	\$39,010	\$14,265	\$1,194	\$2,779,162	\$0	\$254,972	No
Load Management SOP	\$354,250	\$35,500	\$1,303	\$13,971	\$405,023	8	\$246,893	\$15,194	\$1,097	\$13,971	\$1,357	\$114	\$278,625	\$0	\$126,398	31%
Residential	\$2,891,626	\$313,897	\$151,913	\$34,035	\$3,391,471	5,607	\$2,900,084	\$205,850	\$147,800	\$34,035	\$15,942	\$1,334	\$3,305,045	\$0	\$86,426	
Residential SOP	\$1,802,716	\$199,311	\$7,313	\$15,260	\$2,024,600	1,540	\$1,835,859	\$120,999	\$8,156	\$15,260	\$10,092	\$845	\$1,991,211	\$0	\$33,389	No
Residential Solutions MTP	\$1,088,910	\$114,586	\$144,600	\$18,775	\$1,366,871	4,067	\$1,064,224	\$84,851	\$139,644	\$18,775	\$5,850	\$490	\$1,313,834	\$0	\$53,037	No
Hard-To-Reach	\$1,057,593	\$125,037	\$4,588	\$6,719	\$1,193,937	934	\$1,104,048	\$98,231	\$4,905	\$6,719	\$6,069	\$508	\$1,220,479	\$0	-\$26,543	
Hard-to-Reach SOP	\$1,057,593	\$125,037	\$4,588	\$6,719	\$1,193,937	934	\$1,104,048	\$98,231	\$4,905	\$6,719	\$6,069	\$508	\$1,220,479	\$0	-\$26,543	No
Total	\$6,999,293	\$763,141	\$168,396	\$93,735	\$8,024,564	6,805	\$6,846,112	\$437,350	\$165,330	\$93,735	\$37,634	\$3,150	\$7,583,311	\$0	\$441,253	

Exhibit MRD-01 - Workpaper 02
Breakdown of PY2025 R&D Budget

Program Year 2025	R&D Incentive	R&D Admin	R&D Budget
P3 Database Improvement	\$0	\$28,000	\$28,000
Training	\$0	\$5,000	\$5,000
Demand Solutions Expansion	\$150,000	\$0	\$150,000
Total:	\$150,000	\$33,000	\$183,000

Exhibit MRD-2

Estimated Useful Life Values (EULs)				
Sector	TRM Measure	Energy Efficiency Measure	EUL (years)	TRM Version
Custom	NA	Custom	NA	NA
2 Residential	2.1.1	General Service LED Lamps: ≤ 17,500 hour rated life	16	10.0
2 Residential	2.1.1	General Service LED Lamps: > 17,500 hour rated life	20	10.0
2 Residential	2.1.2	Specialty LED Lamps: < 17,500 hour rated life	16	10.0
2 Residential	2.1.2	Specialty LED Lamps: > 17,500 hour rated life	20	10.0
2 Residential	2.1.3	LED Nightlights	8	10.0
2 Residential	2.2.1	Air Conditioner (AC) and Heat Pump (HP) Tune-Ups	5	10.0
2 Residential	2.2.2	Central HPs without SEER2 Ratings	15	10.0
2 Residential	2.2.3	Mini-Split HPs without SEER2 Ratings	15	10.0
2 Residential	2.2.4	Central and Mini-Split ACs and HPs with SEER2 Ratings: ACs	18	10.0
2 Residential	2.2.4	Central and Mini-Split ACs and HPs with SEER2 Ratings: HPs	15	10.0
2 Residential	2.2.5	Room Air Conditioners (RAC)	10	10.0
2 Residential	2.2.6	Packaged Terminal HPs (PTHP)	15	10.0
2 Residential	2.2.7	Ground Source Heat Pumps (GSHP)	24	10.0
2 Residential	2.2.8	Large Capacity Split System and Packaged ACs and HPs - HPs	15	10.0
2 Residential	2.2.8	Large Capacity Split System and Packaged ACs and HPs - GSHPs	20	10.0
2 Residential	2.2.9	Evaporative Cooling	15	10.0
2 Residential	2.2.10	Connected Thermostats	11	10.0
2 Residential	2.2.11	Smart Thermostat Load Management	1	10.0
2 Residential	2.2.12	Duct Sealing	18	10.0
2 Residential	2.3.1	Air Infiltration	11	10.0
2 Residential	2.3.2	Ceiling Insulation	25	10.0
2 Residential	2.3.3	Attic Encapsulation	25	10.0
2 Residential	2.3.4	Wall Insulation	25	10.0
2 Residential	2.3.5	Floor Insulation	25	10.0
2 Residential	2.3.6	Radiant Barriers	25	10.0
2 Residential	2.3.7	Cool Roofs	15	10.0
2 Residential	2.3.8	Solar Screens	10	10.0
2 Residential	2.3.9	Windows	25	10.0
2 Residential	2.3.10	Storm Windows	20	10.0
2 Residential	2.4.1	Water Heater Installations - Electric Tankless and Fuel Substitution (Gas and Electric Tankless)	20	10.0
2 Residential	2.4.1	Water Heater Installations - Electric Tankless and Fuel Substitution (Gas Storage)	11	10.0
2 Residential	2.4.2	Heat Pump Water Heaters (HPWH)	13	10.0
2 Residential	2.4.3	Solar Water Heaters	15	10.0
2 Residential	2.4.4	Water Heater Tank Insulation	7	10.0
2 Residential	2.4.5	Water Heater Pipe Insulation	13	10.0
2 Residential	2.4.6	Faucet Aerators	10	10.0
2 Residential	2.4.7	Low-Flow Showerheads (LFSH)	10	10.0
2 Residential	2.4.8	Showerhead Temperature Sensitive Restrictor Valves (TSRV)	10	10.0
2 Residential	2.4.9	Tub Spout and Showerhead TSRVs	10	10.0
2 Residential	2.4.10	Water Heater Temperature Setback	2	10.0
2 Residential	2.5.1	Ceiling Fans	10	10.0
2 Residential	2.5.2	Clothes Washers	11	10.0
2 Residential	2.5.3	Clothes Dryers	16	10.0
2 Residential	2.5.4	Dishwashers	15	10.0
2 Residential	2.5.5	Refrigerators	16	10.0
2 Residential	2.5.6	Freezers	22	10.0
2 Residential	2.5.7	Refrigerator/Freezer Recycling	8	10.0
2 Residential	2.5.8	Air Purifiers	9	10.0
2 Residential	2.5.9	Pool Pumps	10	10.0
2 Residential	2.5.10	Advanced Power Strips (APS)	10	10.0
2 Residential	2.5.11	Electric Vehicle Supply Equipment (EVSE)	10	10.0
2 Residential	2.5.12	Induction Cooking	16	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - Halogen Lamps	1.5	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - High-Intensity Discharge (HID) Lamps	15	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - Integrated-Ballast Cold Cathode Fluorescent Lamps (CCFL)	4.5	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - Integrated-Ballast Compact Fluorescent Lamps (CFL)	2.5	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - Integral Light Emitting Diode (LED) Lamps	9	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - LED Fixtures	15	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - LED Corn Cob Lamps	15	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - LED Tubes (TLED)	15	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - Modular CFL and CCFL Fixtures	15	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - T8 and T5 Linear Fluorescent Lamps	15	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - New Construction Interior Fixtures & Controls	14	10.0
3 Non-Residential	2.1.1	Lamps and Fixtures - New Construction Exterior Fixtures	15	10.0
3 Non-Residential	2.1.2	Lighting Controls - Occupancy Sensors	10	10.0
3 Non-Residential	2.1.2	Lighting Controls - Daylighting Controls	10	10.0
3 Non-Residential	2.1.2	Lighting Controls - Time Clocks	10	10.0
3 Non-Residential	2.1.2	Lighting Controls - Tuning Controls	10	10.0
3 Non-Residential	2.1.2	Lighting Controls - New Construction Interior Fixtures & Controls	14	10.0
3 Non-Residential	2.1.3	Exterior Photocell and Timeclock Repair	1	10.0
3 Non-Residential	2.1.4	LED Traffic Signals - 8" and 12" Red, Green, and Yellow Balls	6	10.0
3 Non-Residential	2.1.4	LED Traffic Signals - 8" and 12" Red, Green, and Yellow Arrows	6	10.0
3 Non-Residential	2.1.4	LED Traffic Signals - Large (16" x 18") Pedestrian Signals	5	10.0

3 Non-Residential	2.1.4	LED Traffic Signals - Small (12" x 12") Pedestrian Signals	5	10.0
3 Non-Residential	2.2.1	Air Conditioner (AC) and Heat Pump (HP) Tune-Ups	5	10.0
3 Non-Residential	2.2.2	Split-System/Packaged ACs and HPs	15	10.0
3 Non-Residential	2.2.3	Chillers (Screw, Scroll, and Reciprocating)	20	10.0
3 Non-Residential	2.2.3	Chillers (Centrifugal)	25	10.0
3 Non-Residential	2.2.4	Packaged Terminal ACs and HPs (PTAC/PTHP)	15	10.0
3 Non-Residential	2.2.4	Room Air Conditioners (RAC)	10	10.0
3 Non-Residential	2.2.5	Computer Room Air Conditioners (CRAC)	15	10.0
3 Non-Residential	2.2.6	Computer Room Air Handlers (CRAH) - Premium Efficiency Motors	15	10.0
3 Non-Residential	2.2.6	Computer Room Air Handlers (CRAH) - HVAC VFDs	15	10.0
3 Non-Residential	2.2.7	HVAC Variable Frequency Drives (VFD)	15	10.0
3 Non-Residential	2.2.8	Condenser Air Evaporative Pre-Cooling	10	10.0
3 Non-Residential	2.2.9	High-Volume Low-Speed (HVLS) Fans	9	10.0
3 Non-Residential	2.2.10	Small Commercial Evaporative Cooling	15	10.0
3 Non-Residential	2.2.11	Small Commercial Smart Thermostats	11	10.0
3 Non-Residential	2.3.1	Cool Roofs	15	10.0
3 Non-Residential	2.3.2	Window Treatments	10	10.0
3 Non-Residential	2.3.3	Entrance and Exit Door Air Infiltration	11	10.0
3 Non-Residential	2.4.1	Combination Ovens	12	10.0
3 Non-Residential	2.4.2	Electric Convection Ovens	12	10.0
3 Non-Residential	2.4.3	Commercial Dishwashers - Under Counter	10	10.0
3 Non-Residential	2.4.3	Commercial Dishwashers - Stationary Single Tank Door	15	10.0
3 Non-Residential	2.4.3	Commercial Dishwashers - Single Tank Conveyor	20	10.0
3 Non-Residential	2.4.3	Commercial Dishwashers - Multiple Tank Conveyor	20	10.0
3 Non-Residential	2.4.3	Commercial Dishwashers - Pot, Pan, and Utensil	10	10.0
3 Non-Residential	2.4.4	Hot Food Holding Cabinets (HFHC)	12	10.0
3 Non-Residential	2.4.5	Electric Fryers	12	10.0
3 Non-Residential	2.4.6	Electric Steam Cookers	12	10.0
3 Non-Residential	2.4.7	Ice Makers	8.5	10.0
3 Non-Residential	2.4.8	Demand Controlled Kitchen Ventilation (DCKV)	15	10.0
3 Non-Residential	2.4.9	Pre-Rinse Spray Valves (PRSV)	5	10.0
3 Non-Residential	2.4.10	Vacuum-Sealing and Packaging Machines	10	10.0
3 Non-Residential	2.5.1	Door Heater Controls	12	10.0
3 Non-Residential	2.5.2	Electronically Commutated Motors (ECM) Evaporator Fan Motors	15	10.0
3 Non-Residential	2.5.3	Electronic Defrost Controls	10	10.0
3 Non-Residential	2.5.4	Evaporator Fan Controls	16	10.0
3 Non-Residential	2.5.5	Night Covers for Open Refrigerated Display Cases	5	10.0
3 Non-Residential	2.5.6	Solid and Glass Door Reach-Ins	12	10.0
3 Non-Residential	2.5.7	Strip Curtains for Walk-In Refrigerated Storage	4	10.0
3 Non-Residential	2.5.8	Zero-Energy Doors for Refrigerated Cases	12	10.0
3 Non-Residential	2.5.9	Door Gaskets for Walk-In and Reach-In Coolers and Freezers	3	10.0
3 Non-Residential	2.5.10	High Speed Doors for Cold Storage	5	10.0
3 Non-Residential	2.6.1	Central Domestic Hot Water (DHW) Controls	15	10.0
3 Non-Residential	2.6.2	Showerhead Temperature Sensitive Restrictor Valves (TSRV)	10	10.0
3 Non-Residential	2.6.3	Tub Spout and Showerhead TSRVs	10	10.0
3 Non-Residential	2.7.1	Vending Machine Controls	5	10.0
3 Non-Residential	2.7.2	Lodging Guest Room Occupancy Sensor Controls	10	10.0
3 Non-Residential	2.7.3	Pump-Off Controllers	15	10.0
3 Non-Residential	2.7.4	Pool Pumps	10	10.0
3 Non-Residential	2.7.5	Computer Power Management	3	10.0
3 Non-Residential	2.7.6	Premium Efficiency Motors	15	10.0
3 Non-Residential	2.7.7	Electric Vehicle Supply Equipment (EVSE)	10	10.0
3 Non-Residential	2.7.8	VFDs for Water Pumping	12.5	10.0
3 Non-Residential	2.7.9	Steam Trap Repair and Replacement - Standard Steam Traps	6	10.0
3 Non-Residential	2.7.9	Steam Trap Repair and Replacement - Venturi Steam Traps	20	10.0
3 Non-Residential	2.7.10	Hydraulic Gear Lubricants	10	10.0
3 Non-Residential	2.7.11	Hydraulic Oils	10	10.0
3 Non-Residential	2.7.12	Hand Dryers	10	10.0
4 Measurement & Verification	2.1.1	Air Conditioning Tune-Ups	5	10.0
4 Measurement & Verification	2.1.2	Ground Source Heat Pumps (GSHP)	20	10.0
4 Measurement & Verification	2.1.3	Variable Refrigerant Flow (VRF) Systems	15	10.0
4 Measurement & Verification	2.2.1	Residential New Construction	23	10.0
4 Measurement & Verification	2.2.2	Smart Home Energy Management Systems (SHEMS)	10	10.0
4 Measurement & Verification	2.3.1	Residential Energy Code Compliance	23	10.0
4 Measurement & Verification	2.4.1	Non-Residential Solar Photovoltaics (PV)	30	10.0
4 Measurement & Verification	2.4.2	Residential Solar Photovoltaics (PV)	30	10.0
4 Measurement & Verification	2.4.3	Solar Shingles	20	10.0
4 Measurement & Verification	2.4.4	Solar Attic Fans	15	10.0
4 Measurement & Verification	2.5.1	Behavioral Measures	1	10.0
4 Measurement & Verification	2.5.2	Air Compressors Less than 75 hp	10	10.0
4 Measurement & Verification	2.5.3	Nonresidential M&V: Custom	10	10.0
4 Measurement & Verification	2.5.3	Nonresidential M&V: Retrocomissioning (RCx)	5	10.0
4 Measurement & Verification	2.5.3	Nonresidential M&V: Advanced Controls and Sensors	10	10.0
4 Measurement & Verification	2.5.4	Thermal Energy Storage (TES)	15	10.0
4 Measurement & Verification	2.6.1	Residential Load Curtailment	1	10.0
4 Measurement & Verification	2.6.2	Non-Residential Load Curtailment	1	10.0

Exhibit MRD-3

Project Sponsor Payments >5%

Admin

386 - Other Contract Work

FRONTIER ENERGY INC

TETRA TECH INC

Exhibit MRD-3

Project Sponsor Payments >5%

Residential SOP

386 - Other Contract Work

BLU CONTRACTOR LLC

ECOENERGY CONSERVATION GROUP LLC

ENERCON RESOURCES INC

INVESTMENT BY ORMENO DBA HOME SAVE

JAVIER A RODRIGUEZ DBA CONERGY

JOHN SANTALA

RUBICON CONSTRUCTION GROUP LLC

TWO RIVERS ENERGY SERVICES

YOUR VALLEY WEATHERIZATION LLC

Exhibit MRD-3

Project Sponsor Payments >5%

Hard-to Reach SOP

386 - Other Contract Work

BLU CONTRACTOR LLC

ECOENERGY CONSERVATION GROUP LLC

ENERCON RESOURCES INC

INVESTMENT BY ORMENO DBA HOME SAVE

JAVIER A RODRIGUEZ DBA CONERGY

JOHN SANTALA

RUBICON CONSTRUCTION GROUP LLC

TWO RIVERS ENERGY SERVICES

YOUR VALLEY WEATHERIZATION LLC

Exhibit MRD-3

Project Sponsor Payments >5%

Commercial Solutions

386 - Other Contract Work

CENTRIX ENERGY PARTNERS

CLEARRESULT INC

Exhibit MRD-3

Project Sponsor Payments >5%

Residential Solutions MTP

386 - Other Contract Work

DR HORTON TEXAS LTD

LENNAR HOMES OF TEXAS LAND AND

TRC ENGINEERS INC

HDP LTD DBA HUNTON DISTRIBUTION

SUN WHOLESALE SUPPLY INC

Exhibit MRD-3

Project Sponsor Payments >5%

Load Management SOP

386 - Other Contract Work

JEFFERSON COUNTY TX

LONE STAR COLLEGE SYSTEM DISTRICT

LOWER NECHES VALLEY AUTHORITY

MARKET BASKET

WAL-MART STORES TEXAS LLC

Exhibit MRD-4
Cost Caps Calculation

CPI - South Urban Index

Year	Annual	% Change	Source
2011	218.6		
2012	223.2	2.115105%	
2013	226.7	1.558399%	
2014	230.6	1.689742%	http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2015	230.1	-0.175665%	http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2016	232.7	1.105800%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2017	237.5	2.047300%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2018	242.7	2.224000%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2019	246.3	1.453400%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2020	248.6	0.964000%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2021	261.3	5.075600%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2022	283.7	8.576500%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2023	296.4	4.496800%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0

Cost Caps

	Res Cap \$/kWh		Comm Cap \$/kWh	
2013	\$ 0.001200	\$	0.000750	<i>per EE Rule Section (f)(7)(E)</i>
2014	\$ 0.001225	\$	0.000766	<i>escalated based on most recent data at the time in which the 2014 costs were set -- they do not plan to recalculate this number.</i>
2015	\$ 0.001244	\$	0.000778	<i>escalated based on most recent data - 2015 cost cap as confirmed in docket 42449, Item 37, Therese Harris's testimony, page 11.</i>
2016	\$ 0.001266	\$	0.000791	Hard-wired values (no calculation or rounding, based on revised EE Rule, docket 46388)
2017	\$ 0.001266	\$	0.000791	Hard-wired values (no calculation or rounding, based on revised EE Rule, docket 46388)
2018	\$ 0.001277	\$	0.000799	Hard-wired values (with calculation based on docket 46388)
2019	\$ 0.001303	\$	0.000815	Calculated based on docket 46388
2020	\$ 0.001332	\$	0.000833	Calculated in line with 46388; based on new EE Rule under docket 48692
2021	\$ 0.001351	\$	0.000845	Calculated in line with 46388; based on EE Rule under docket 48692
2022	\$ 0.001364	\$	0.000853	Calculated in line with 46388; based on EE Rule under docket 48692
2023	\$ 0.001433	\$	0.000896	Calculated in line with 46388; based on EE Rule under docket 48692
2024	\$ 0.001556	\$	0.000973	Calculated in line with 46388; based on EE Rule under docket 48692
2025	\$ 0.001626	\$	0.001017	Calculated in line with 46388; based on EE Rule under docket 48692

Source: Sec. 25.182 EECRF (d)(7)(C): For the 2019 program year and thereafter, the residential and commercial cost caps shall be calculated to be the prior period's cost caps increased or decreased by a rate equal to the calendar year's percentage change in the South urban CPI, as determined by the Federal Bureau of Labor Statistics.

Consumer Price Index for All Urban Consumers (CPI-U)
Original Data Value

Series Id:	CUUR0300SA0,CUUS0300SA0
Not Seasonally Adjusted	
Series Title:	All items in South urban, all urban consumers, not
Area:	South
Item:	All items
Base Period:	1982-84=100
Years:	2014 to 2024

[illegible]

CPI for All Urban Consumers (CPI-U)
Original Data Value

Series Id: CUUR0300SA0,CUUS0300SA0

Not Seasonally Adjusted

Series Title: All items in South urban, all urban consumers, not

Area: South

Item: All items

Base Period: 1982-84=100

Years: 2013 to 2023

[illegible]

CPI for All Urban Consumers (CPI-U)

Series Id: CUUR0300SA0,CUUS0300SA0

Not Seasonally Adjusted

Series Title: All items in South urban, all urban consumers, not seasonally adjusted

Area: South

Item: All items

Base Period: 1982-84=100

Years: 2012 to 2022

[illegible]

CPI for All Urban Consumers (CPI-U)
Original Data Value

Series Id: CUUR0300SA0,CUUS0300SA0

Not Seasonally Adjusted

Series Title: All items in South urban, all urban consumers, not

Area: South

Item: All items

Base Period: 1982-84=100

Years: 2011 to 2021

[illegible]

CPI for All Urban Consumers (CPI-U)
Original Data Value

Series Id: CUUR0300SA0,CUUS0300SA0
Not Seasonally Adjusted
Series Title: All items in South urban, all urban consumers, not seasonally adjusted
Area: South
Item: All items
Base Period: 1982-84=100
Years: 2010 to 2020

[illegible]

CPI-All Urban Consumers (Current Series)
Original Data Value

Series Id:	CUUR0300SA0,CUUS0300SA0
Not Seasonally Adjusted	
Series Title:	All items in South urban, all urban consumers, not
Area:	South
Item:	All items
Base Period:	1982-84=100
Years:	2009 to 2019

[illegible]

CPI-All Urban Consumers (Current Series)

Series Id: CUUR0300SA0,CUUS0300SA0

Not Seasonally Adjusted

Series Title: All items in South urban, all urban consumers, not seasonally adjusted

Area: South

Item: All items

Base Period: 1982-84=100

Years: 2008 to 2018

[illegible]

Consumer Price Index - All Urban Consumers
Original Data Value

Series Id: CUUR0300SA0,CUUS0300SA0
Not Seasonally Adjusted
Area: South urban
Item: All items
Base Period: 1982-84=100
Years: 2006 to 2016

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2006	191.5	191.8	192.8	194.7	195.5	196.3	197.0	197.1	195.8	194.7	194.3	194.8	194.7	193.8	195.6
2007	195.021	195.950	197.904	199.618	200.804	201.675	201.571	201.041	201.697	202.155	203.437	203.457	200.361	198.495	202.226
2008	204.510	205.060	206.676	208.085	210.006	212.324	213.304	212.387	212.650	210.108	205.559	203.501	208.681	207.777	209.585
2009	204.288	205.343	206.001	206.657	207.265	209.343	208.819	209.000	208.912	209.292	209.738	209.476	207.845	206.483	209.206
2010	210.056	210.020	211.216	211.528	211.423	211.232	210.988	211.308	211.775	212.026	211.996	212.488	211.338	210.913	211.764
2011	213.589	214.735	217.214	218.820	219.820	219.318	219.682	220.471	220.371	219.969	219.961	219.469	218.618	217.249	219.987
2012	220.497	221.802	223.314	224.275	223.356	223.004	222.667	223.919	225.052	224.504	223.404	223.109	223.242	222.708	223.776
2013	223.933	225.874	226.628	226.202	226.289	227.148	227.548	227.837	227.876	227.420	226.811	227.082	226.721	226.012	227.429
2014	227.673	228.664	230.095	231.346	231.762	232.269	232.013	231.611	231.762	231.131	229.845	228.451	230.552	230.302	230.802
2015	226.855	227.944	229.337	229.957	230.886	232.026	231.719	231.260	230.913	230.860	230.422	229.581	230.147	229.501	230.793
2016	229.469	229.646	230.977	231.975	232.906	233.838	233.292	233.561	234.069	234.337	234.029	234.204	232.692	231.469	233.915

Consumer Price Index - All Urban Consumers

Original Data Value

Source: http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0

Series Id: CUUR0300SA0,CUUS0300SA0

Not Seasonally Adjusted

Area: South urban

Item: All items

Base Period: 1982-84=100

Years: 2005 to 2015

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2005	183.6	184.7	185.9	187.3	187.3	187.8	188.5	189.4	192.0	192.5	190.7	190.1	188.3	186.1	190.5
2006	191.5	191.8	192.8	194.7	195.5	196.3	197.0	197.1	195.8	194.7	194.3	194.8	194.7	193.8	195.6
2007	195.021	195.950	197.904	199.618	200.804	201.675	201.571	201.041	201.697	202.155	203.437	203.457	200.361	198.495	202.226
2008	204.510	205.060	206.676	208.085	210.006	212.324	213.304	212.387	212.650	210.108	205.559	203.501	208.681	207.777	209.585
2009	204.288	205.343	206.001	206.657	207.265	209.343	208.819	209.000	208.912	209.292	209.738	209.476	207.845	206.483	209.206
2010	210.056	210.020	211.216	211.528	211.423	211.232	210.988	211.308	211.775	212.026	211.996	212.488	211.338	210.913	211.764
2011	213.589	214.735	217.214	218.820	219.820	219.318	219.682	220.471	220.371	219.969	219.961	219.469	218.618	217.249	219.987
2012	220.497	221.802	223.314	224.275	223.356	223.004	222.667	223.919	225.052	224.504	223.404	223.109	223.242	222.708	223.776
2013	223.933	225.874	226.628	226.202	226.289	227.148	227.548	227.837	227.876	227.420	226.811	227.082	226.721	226.012	227.429
2014	227.673	228.664	230.095	231.346	231.762	232.269	232.013	231.611	231.762	231.131	229.845	228.451	230.552	230.302	230.802
2015	226.855	227.944	229.337	229.957	230.886	232.026	231.719	231.260	230.913	230.860	230.422	229.581	230.147	229.501	230.793

Consumer Price Index - All Urban Consumers
Original Data Value

Series Id: CUUR0300SA0, CUUS0300SA0
Not Seasonally Adjusted
Area: South urban
Item: All items
Base Period: 1982-84=100
Years: 2004 to 2014

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2004	178.2	179.1	180.1	180.9	182.0	182.9	182.6	182.6	182.8	183.7	183.7	183.3	181.8	180.5	183.1
2005	183.6	184.7	185.9	187.3	187.3	187.8	188.5	189.4	192.0	192.5	190.7	190.1	188.3	186.1	190.5
2006	191.5	191.8	192.8	194.7	195.5	196.3	197.0	197.1	195.8	194.7	194.3	194.8	194.7	193.8	195.6
2007	195.021	195.950	197.904	199.618	200.804	201.675	201.571	201.041	201.697	202.155	203.437	203.457	200.361	198.495	202.226
2008	204.510	205.060	206.676	208.085	210.006	212.324	213.304	212.387	212.650	210.108	205.559	203.501	208.681	207.777	209.585
2009	204.288	205.343	206.001	206.657	207.265	209.343	208.819	209.000	208.912	209.292	209.738	209.476	207.845	206.483	209.206
2010	210.056	210.020	211.216	211.528	211.423	211.232	210.988	211.308	211.775	212.026	211.996	212.488	211.338	210.913	211.764
2011	213.589	214.735	217.214	218.820	219.820	219.318	219.682	220.471	220.371	219.969	219.961	219.469	218.618	217.249	219.987
2012	220.497	221.802	223.314	224.275	223.356	223.004	222.667	223.919	225.052	224.504	223.404	223.109	223.242	222.708	223.776
2013	223.933	225.874	226.628	226.202	226.289	227.148	227.548	227.837	227.876	227.420	226.811	227.082	226.721	226.012	227.429
2014	227.673	228.664	230.095	231.346	231.762	232.269	232.013	231.611	231.762	231.131	229.845	228.451	230.552	230.302	230.802

42449: Item 37, pages 10-11 of 12

17 Q. What is the percentage change in the South urban CPI to be used to calculate the
18 cost caps applicable for the 2015 program year?

19 A. The annual South urban CPI for 2012 was 223.242 and the annual South urban CPI for
20 2013 was 226.721, as shown in Exhibit TH-5. The annual percentage change is
21 1.5584%.

2 Q. What are the residential and commercial cost caps to be used in the current
3 EECRF?

4 A. Using the percentage change of 1.5584%, the residential cost cap for utilities
5 administering energy efficiency programs in accordance with PUC SUBST. R. 25.181 is
6 increased to \$0.001244 per kWh and the commercial cap is increased to \$0.000778 per
7 kWh.

CPI - South Urban Index

Year	Annual	% Change	Source
2011	218.6		
2012	223.2	2.12%	
2013	226.7	1.56%	
2014	230.6	1.69%	http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2015	230.1	-0.18%	http://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2016	232.7	1.11%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0
2017	237.5	2.05%	https://data.bls.gov/pdq/SurveyOutputServlet?series_id=CUUR0300SA0,CUUS0300SA0

Cost Caps

Res Cap Comm Cap

2017
2016

Source:

For historical purposes only

Please see yellow tab for calculation

recalculate this number.
rris's testimony, page 11.
e CPI South Urban Index) = "2017 caps as filed"
od's cost caps increased or decreased by a rate equal to the most recently available

Exhibit MRD-5**Actual 2023 Direct Costs***

Costs by Rate Class

	Direct Incentives	Direct Admin	Total
Residential	\$ 4,004,132	\$ 304,081	\$ 4,308,213
Small General Service	\$ 210,203	\$ 9,857	\$ 220,061
General Service	\$ 1,709,283	\$ 80,154	\$ 1,789,437
Large General Service	\$ 719,512	\$ 33,740	\$ 753,253
Large Industrial Power Service (non transmission)	\$ 202,982	\$ 9,518	\$ 212,500
Total	\$ 6,846,112	\$ 437,350	\$ 7,283,463

* Table 10 of Exhibit MRD-1

Row Labels	Sum of Sum of Incentive Total
SGS	\$110,661
TX_SGS	\$103,300
TX_SGS_U	\$132
TX_SGSM	\$5,624
TX_UMSM	\$1,605
GS	\$899,850
TX_GS1	\$405,558
TX_GS1_U	\$7,555
TX_GS3	\$495
TX_GS5	\$75
TX_GSM1	\$450,692
TX_GSM1_U	\$4,162
TX_GSM2	\$532
TX_GSM2_U	\$30
TX_GSS2	\$30,751
LGS	\$378,786
TX_LG1	\$368,238
TX_LG2	\$64
TX_LG3	\$5,770
TX_LGSM1	\$2,924
TX_LGSM2	\$1,790
LIPS	\$106,859
TX_LIP2	\$449
TX_LIP3	\$24,850
TX_LIP5	\$7,770
TX_LIP5B	\$801
TX_LIP7	\$1,690
TX_LIP7_U	\$52,015
TX_LIP7B	\$11,615
TX_LIP8	\$0
TX_LIPD7B	\$7,669
Grand Total	\$1,496,157

PART 1 - CASH + NON-CASH INCENTIVES PER RATE CLASS

RATE CLASS	CASH	NON-CASH	TOTAL INCENTIVES	CASH PERCENT
SGS	\$110,661	\$99,542	\$210,203	7.40%
GS	\$899,850	\$809,434	\$1,709,283	60.14%
LGS	\$378,786	\$340,726	\$719,512	25.32%
LIPS	\$106,859	\$96,122	\$202,982	7.14%
TOTAL:	\$1,496,157	\$1,345,824	\$2,841,981	100.00%

PART 2 - ADMIN PER RATE CLASS

Rate Class	Direct Admin
RES	\$ 304,081
SGS	\$ 9,857
GS	\$ 80,154
LGS	\$ 33,740
LIPS	\$ 9,518
TOTAL: \$	437,350

Table 10: Program Funding for Calendar Year 2023

2023	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?
Commercial	\$ 3,050,074	\$ 324,207	\$ 11,895	\$ 52,981	\$ 3,439,157	264	\$ 2,841,981	\$ 133,270	\$ 12,625	\$ 52,981	\$ 15,623	\$ 1,308	\$ 3,057,787	\$ -	\$ 381,370	
Commercial Solutions MIP	\$ 2,695,824	\$ 288,707	\$ 10,593	\$ 39,010	\$ 3,034,134	256	\$ 2,595,088	\$ 118,076	\$ 11,529	\$ 39,010	\$ 14,265	\$ 1,194	\$ 2,779,162	\$ -	\$ 254,972	No
Load Management SOP	\$ 354,250	\$ 35,500	\$ 1,303	\$ 13,971	\$ 405,023	8	\$ 246,893	\$ 15,194	\$ 1,097	\$ 13,971	\$ 1,357	\$ 114	\$ 278,625	\$ -	\$ 126,398	31%
Residential	\$ 2,891,626	\$ 313,897	\$ 151,913	\$ 34,035	\$ 3,391,471	5,607	\$ 2,900,084	\$ 205,850	\$ 147,800	\$ 34,035	\$ 15,942	\$ 1,334	\$ 3,305,045	\$ -	\$ 86,426	
Residential SOP	\$ 1,802,716	\$ 199,311	\$ 7,313	\$ 15,260	\$ 2,024,600	1,540	\$ 1,835,859	\$ 120,999	\$ 8,156	\$ 15,260	\$ 10,092	\$ 845	\$ 1,991,211	\$ -	\$ 33,389	No
Residential Solutions MIP	\$ 1,088,910	\$ 114,586	\$ 144,600	\$ 18,775	\$ 1,366,871	4,067	\$ 1,064,224	\$ 84,851	\$ 139,644	\$ 18,775	\$ 5,850	\$ 490	\$ 1,313,834	\$ -	\$ 53,037	No
Hard-To-Reach	\$ 1,057,593	\$ 125,037	\$ 4,588	\$ 6,719	\$ 1,193,937	934	\$ 1,104,048	\$ 98,231	\$ 4,905	\$ 6,719	\$ 6,069	\$ 508	\$ 1,220,479	\$ -	\$ (26,543)	
Hard-to-Reach SOP	\$ 1,057,593	\$ 125,037	\$ 4,588	\$ 6,719	\$ 1,193,937	934	\$ 1,104,048	\$ 98,231	\$ 4,905	\$ 6,719	\$ 6,069	\$ 508	\$ 1,220,479	\$ -	\$ (26,543)	No
Total	\$ 6,999,293	\$ 763,141	\$ 168,396	\$ 93,735	\$ 8,024,564	6,805	\$ 6,846,112	\$ 437,350	\$ 165,330	\$ 93,735	\$ 37,634	\$ 3,150	\$ 7,583,311	\$ -	\$ 441,253	

Program	Rate Class	Sum of kW Savings	Sum of kWh Savings	Sum of Incentive Total
Commercial Solutions	TX_GS1	1,262.41	6,076,450	\$217,344.35
Commercial Solutions	TX_GSM1	2,652.49	7,411,420	\$395,010.16
Commercial Solutions	TX_GSM1_U	8.16	30,975	\$1,656.15
Commercial Solutions	TX_GSM2	1.18	11,848	\$531.96
Commercial Solutions	TX_LG1	931.39	4,289,944	\$219,864.29
Commercial Solutions	TX_LIP3	95.59	242,838	\$21,000.00
Commercial Solutions	TX_LIP7_U	706.04	3,563,108	\$52,014.63
Commercial Solutions	TX_LIP7B	701.00	2,671,785	\$11,250.00
Commercial Solutions	TX_LIPD7B	25.32	66,974	\$7,669.48
Commercial Solutions	TX_SGS	343.14	1,169,098	\$78,005.78
Commercial Solutions	TX_SGSM	0.00	0	\$1,500.00
Commercial Load Management	TX_GS1	2,063.91	14,090	\$50,872.90
Commercial Load Management	TX_GSM1	1,376.16	9,934	\$33,016.75
Commercial Load Management	TX_GSS2	1,446.25	9,889	\$30,750.85
Commercial Load Management	TX_LG1	4,332.60	29,522	\$128,510.20
Commercial Load Management	TX_LGSM1	186.37	1,241	\$2,437.50
Commercial Load Management	TX_SGS	57.31	391	\$1,225.25
Commercial Load Management	TX_SGSM	2.44	20	\$79.30
Commercial Solutions - Lighting Midstream	TX_GS1	572.54	2,701,129	\$137,340.75
Commercial Solutions - Lighting Midstream	TX_GS1_U	45.30	215,564	\$7,555.00
Commercial Solutions - Lighting Midstream	TX_GS3	1.12	4,483	\$495.00
Commercial Solutions - Lighting Midstream	TX_GS5	0.32	1,294	\$75.00
Commercial Solutions - Lighting Midstream	TX_GSM1	89.00	370,371	\$22,665.00
Commercial Solutions - Lighting Midstream	TX_GSM1_U	9.33	50,767	\$2,506.00
Commercial Solutions - Lighting Midstream	TX_GSM2_U	0.23	1,061	\$30.00
Commercial Solutions - Lighting Midstream	TX_LG1	68.64	331,070	\$19,864.00
Commercial Solutions - Lighting Midstream	TX_LG2	0.21	1,164	\$64.25
Commercial Solutions - Lighting Midstream	TX_LG3	22.82	122,991	\$5,770.00
Commercial Solutions - Lighting Midstream	TX_LGSM1	2.09	8,399	\$486.00
Commercial Solutions - Lighting Midstream	TX_LGSM2	6.41	33,078	\$1,790.00
Commercial Solutions - Lighting Midstream	TX_LIP2	1.05	3,733	\$449.00
Commercial Solutions - Lighting Midstream	TX_LIP3	23.60	103,022	\$3,850.00
Commercial Solutions - Lighting Midstream	TX_LIP5	33.54	148,828	\$7,770.00
Commercial Solutions - Lighting Midstream	TX_LIP5B	1.27	5,525	\$801.25
Commercial Solutions - Lighting Midstream	TX_LIP7	6.18	27,030	\$1,690.00
Commercial Solutions - Lighting Midstream	TX_LIP7B	0.77	4,314	\$365.00
Commercial Solutions - Lighting Midstream	TX_LIP8	0.00	0	\$0.00
Commercial Solutions - Lighting Midstream	TX_SGS	113.03	530,516	\$24,069.00
Commercial Solutions - Lighting Midstream	TX_SGS_U	0.09	442	\$132.00
Commercial Solutions - Lighting Midstream	TX_SGSM	15.92	77,289	\$4,045.00
Commercial Solutions - Lighting Midstream	TX_UMSM	6.95	22,758	\$1,605.00
Total		17,212.17	30,364,357	\$1,496,156.80