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DOCKET NO.

APPLICATION OF SOUTHWESTERN§PUBLIC UTILITY COMMISSIONPUBLIC SERVICE COMPANY TO§ADJUST ITS ENERGY EFFICIENCY§COST RECOVERY FACTOR§OF TEXAS

DIRECT TESTIMONY of MICHAEL F. LEWIS

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(filename: LewisEECRFDirect.docx; Total Pages: 69)

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	Meaning
Commission	Public Utility Commission of Texas
EECRF	Energy Efficiency Cost Recovery Factor
EESP	Energy Efficiency Service Provider
EM&V	Evaluation, Measurement, and Verification
EUL	Estimated Useful Life
kW	kilowatt
kWh	kilowatt-hour
LED	Light Emitting Diode
MTP	Market Transformation Program
MW	megawatt
MWh	megawatt-hour
PURA	Public Utility Regulatory Act
РҮ	Program Year
R&D	Research and Development
SOP	Standard Offer Program
SPS	Southwestern Public Service Company, a New Mexico corporation
TAC	Texas Administrative Code
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	Description
MFL-1	SPS's Amended 2024 Energy Efficiency Plan and Report (<i>Filename:</i> Attachment MFL-1.doc)
MFL-2	Costs per kW and kWh for 2021-2025 (<i>Filename:</i> Attachment MFL-2.xls)
MFL-3(CONF)	Energy Efficiency Service Providers in PY 2023 Receiving 5% or More of Incentive Payments (<i>Filename:</i> Attachment MFL-3(CONF).pdf)
MFL-4	Master Estimated Useful Life Spreadsheet of Technical Reference Manual 9.0 (<i>Filename:</i> Attachment MFL-4.xlsx)

DIRECT TESTIMONY OF MICHAEL F. LEWIS

1		I. WITNESS IDENTIFICATION AND QUALIFICATIONS							
2	Q.	Please state your name and business address.							
3	A.	My name is Michael F. Lewis. My business address is 414 Nicollet Mall, 401-6,							
4		Minneapolis, MN 55401.							
5	Q.	On whose behalf are you testifying in this proceeding?							
6	A.	I am filing testimony on behalf of Southwestern Public Service Company, a New							
7		Mexico corporation ("SPS") and wholly-owned electric utility subsidiary of Xcel							
8		Energy Inc. ("Xcel Energy").							
9	Q.	By whom are you employed and in what position?							
10	Α.	I am employed by Xcel Energy Services Inc. ("XES"), the service company							
11		subsidiary of Xcel Energy, as a C&I Energy Efficiency Business Solutions &							
12		Result Manager.							
13	Q.	Please describe your duties as a C&I Energy Efficiency Business Solutions &							
14		Result Manager.							
15	Α.	As a C&I Energy Efficiency Business Solutions & Result Manager, I manage the							
16		strategic planning and implementation of energy efficiency products across							
17		multiple jurisdictions to meet short-term regulatory and long-term resource							
18		planning goals. My responsibilities include:							
19 20 21		 strategic leadership of product teams, accountability to product goal attainment and tracking and reporting in New Mexico, Texas, Minnesota, North Dakota, South Dakota, and Colorado; 							
22 23		 overseeing Product Portfolio Managers, Channel Managers, and Marketing Assistants; 							

- interpreting customer requirements and motivations to implement energy efficiency measures; and
 - determining market research requirements for team products focusing on short-term challenges, long-term planning, and product evaluation.
- 5 Q. Please describe your educational background.
- 6 A. I graduated from Capella University with a bachelor's degree in business
 7 administration.
- 8 Q. Please describe your professional experience.
- 9 A. I have been employed by XES for twenty years in multiple roles including Billing
- 10 Analyst, Load Management Analyst, Demand Management Associate Product
- 11 Portfolio Manager, Advanced Grid Customer Solutions Product Portfolio
- 12 Manager, C&I Senior Product Portfolio Manager, and Strategic Segment Team
- 13 Lead. In March 2024, I was promoted to my current position as C&I Energy
- 14 Efficiency Business Solutions & Result Manager.
- 15 Q. Have you testified or filed testimony before any regulatory authorities?
- 16 A. No.
- 17

1		II. <u>SUMMARY AND RECOMMENDATIONS</u>
2	Q.	What is the scope of your testimony in this proceeding?
3	Α.	In my testimony, I:
4 5		(1) describe the energy efficiency programs that SPS will offer in Program Year ("PY") 2025;
6 7		(2) quantify the projected costs for the PY 2025 energy efficiency programs and demonstrate that those costs are reasonable;
8 9		(3) demonstrate the costs and achievements are consistent with previous years' costs and achievements;
10		(4) demonstrate that SPS has complied with the administrative cost caps;
11 12		(5) provide the Estimated Useful Life ("EUL") for each measure in each program;
13 14		(6) discuss the bidding and engagement process that SPS undertakes for contracting with energy efficiency service providers ("EESP");
15 16 17		(7) identify the EESPs with whom SPS does business, including each EESP that was paid 5% or more of the incentive payments made by SPS in PY 2023; and
18		(8) discuss SPS's energy and demand savings achievements for PY 2023.
19	Q.	Please summarize the recommendations in your testimony.
20	Α.	SPS offers an array of energy efficiency programs, available to all eligible Texas
21		customers in accordance with 16 Texas Administrative Code ("TAC") § 25.181. I
22		recommend the Public Utility Commissin of Texas ("Commission") find that for
23		PY 2025, the costs of those energy efficiency programs are reasonable, as
24		evidenced by the cost-effectiveness test discussed by SPS witness P. Grant
25		Gervais and by comparison to costs in prior years. SPS has a transparent process
26		for engaging eligible EESPs and for approving payments to those EESPs after

1		they complete approved projects. Finally, SPS projects that it will exceed its
2		energy and demand goals in PY 2025.
3	Q.	Are Attachments MFL-1, MFL-2, and MFL-4 true and correct copies of the
4		documents they are represented to be?
5	Α.	Yes.
6	Q.	Was Attachment MFL-3(CONF) prepared by you or under your direct
7		supervision and control?
8	А.	Yes.

1 III. PY 2025 ENERGY EFFICIENCY AND LOAD MANAGEMENT 2 PROGRAMS

- 3 Q. To whom will SPS offer energy efficiency and load management programs in
 4 PY 2025?
- A. In PY 2025, SPS will make energy efficiency programs available to all eligible
 customers, which are defined in 16 TAC § 25.181(c)(11) as residential and
 commercial customers.

8 Q. How does 16 TAC § 25.181 distinguish between commercial and industrial 9 customers?

10 Α. 16 TAC § 25.181(c)(4) defines a commercial customer as a "non-residential 11 customer taking service at a point of delivery at a distribution voltage under an 12 electric utility's tariff during the prior program year or a non-profit customer or 13 government entity, including an educational institution." 16 TAC § 25.181(c)(30) 14 defines an industrial customer as a "for-profit entity engaged in an industrial 15 process taking electric service at transmission voltage, or a for-profit entity 16 engaged in an industrial process taking electric service at distribution voltage that 17 qualifies for a tax exemption under Tax Code § 151.317 and has submitted an 18 identification notice under subsection (u) of this section."

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Q. What customers are eligible for SPS's energy efficiency programs?

- A. The following categories of customers are eligible to participate in SPS's energy
 efficiency programs:
 - Residential;
 - Residential Hard-To-Reach;

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- Small Commercial; and
- Large Commercial.

3 Q. Are all customers within those categories considered eligible customers?

A. No. 16 TAC § 25.181(u) allows industrial customers receiving service at
distribution voltage to opt out of participation in the energy efficiency programs if
they possess a Texas tax exemption certificate and make a timely request to the
utility. Mr. Gervais discusses in his direct testimony the number of customers
who have opted out and the effect those customers have on SPS's energy
efficiency goals.

10 Q. What are SPS's PY 2025 energy efficiency goals?

A. As discussed in more detail by Mr. Gervais, SPS's 2025 demand reduction goal is
6.027 megawatts ("MW"), and its energy savings goal is 10,559 megawatt-hours
("MWh"). SPS projects, however, that it will achieve as much as 9.439 MW in
demand reductions and 16,678 MWh in energy savings because of the mix of
programs it plans to offer in PY 2025.

Q. Why is SPS offering a mix of programs that it expects will achieve higher
levels of demand and energy savings levels than its PY 2025 goals?

A. SPS's programs are designed to meet both the demand and energy goals, and so the offerings are broad enough to appeal to many different types of customers, thereby increasing customer participation in energy efficiency and load management programs. The energy efficiency programs benefit participating customers by reducing their monthly electric bills. In addition, the programs benefit both participants and non-participants by adding cost-effective components to SPS's resource mix. Therefore, all customers benefit when SPS
 exceeds the statutory minimum through cost-effective programs that do not
 exceed the cost caps.

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Have the Legislature and the Commission given any indication that they want utilities to exceed the minimum goals?

Yes. In Section 39.905(b)(2) of the Public Utility Regulatory Act ("PURA"),¹ the 6 Α. 7 Legislature directed the Commission to establish an incentive under PURA 8 § 36.204 "to reward utilities administering programs under this section that 9 exceed the minimum goals established by this section." (Emphasis added). 16 TAC § 25.181(d) provides that utilities "are encouraged to achieve demand 10 11 reduction and energy savings through a portfolio of cost-effective programs that 12 exceed each utility's energy efficiency goals while staying within the cost caps established in § 25.182(d)(7) of this title." (Emphasis added). 13

14 Q. Please provide a brief description of the energy efficiency and load

- 15 management programs that SPS proposes to offer customers in PY 2025.
- 16 A. To reach its projected demand and energy savings, SPS will offer the following
- 17 Standard Offer Programs ("SOPs") and Market Transformation Programs
- 18 ("MTPs"), as well as the Low-Income Weatherization Program, in PY 2025:
 - <u>Large Commercial SOP</u> Targets commercial customers with an annual single meter demand of at least 100 kW ("kilowatt") or aggregate meter demand of at least 250 kW. Incentives are paid to project sponsors based on verified deemed savings for a wide range of measures installed in new or retrofit applications. Examples include incentives for cooling, custom projects, heat pumps, lighting, motors, and new construction.

⁺ PURA is codified at Tex. Util. Code Ann. §§ 11.001–66.016.

meter demand less than 100 kW or aggregate metered demand of less than 2 3 250 kW. This offering utilizes a third-party implementer who provides services and support such as energy efficiency audits to quantify and 4 5 qualify project opportunities, as well as assistance with identifying and 6 managing potential installers. 7 Residential SOP - Targets residential single-family and multi-family • customers by providing incentives for cooling, heat pumps, duct sealing, 8 insulation, water heating, Energy Star appliances, Energy Star windows, 9 air infiltration reduction, and photovoltaic upgrades. 1011 Home Lighting MTP – Promotes the installation of high efficiency light emitting diode ("LED") bulbs to mass market customers. Incentives are 12 provided at the point of sale through buy-down efforts coordinated with 13 14 retail outlets. Refrigerator Recycling MTP - Designed to decrease the number of 15 inefficient primary or secondary refrigerators and freezers in residential 16 households within SPS's service territory. The program reduces energy 17 usage by allowing customers to dispose of their operable, but inefficient 18 appliances in an environmentally safe and convenient manner. SPS has 19 contracted with a third-party implementer to pick-up and recycle 20inefficient refrigerators or freezers at no cost to the customer. Customers 21 22 will also receive a \$50 rebate check and free pick-up and recycling of their 23 old refrigerator or freezer. 24 <u>Smart Thermostat MTP</u> – Designed to provide customers discounts on ENERGY STAR® Connected Thermostats. 25 The thermostats will be 26 available through Xcel Energy's online storefront, which is owned and operated by an independent third party. An instant rebate will be applied 27 at the point of sale to qualifying customers, which can be combined with 28 manufacturer-sponsored discounts to lower the purchase price further. All 29 SPS residential customers will be eligible to participate in this upstream 30 31 offering, with a limit of two thermostat discounts per customer. Residential HVAC MTP- Approved in 2023 and targets residential 32 • customers and participating HVAC contractors in the service area to 33 provide incentives to customers who want to purchase efficient HVAC 34 systems. The proposed program will be run by a third-party implementer. 35 The customer will receive an instant rebate when they purchase the 36 37 equipment, and the contractor will also receive an incentive for the installation of the equipment. 38 39 Hard-to-Reach SOP - Targets customers with an annual household 40 income at or below 200% of federal poverty guidelines. The program

Small Commercial MTP - Targets commercial customers with a single

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pays incentives for measures such as energy efficient showerheads,
 insulation, duct sealing, cooling, solar screens, water heating, and LED
 lighting.

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- <u>Hard-to-Reach Food Bank MTP</u> Approved in PY 2023, the Hard-to-Reach Food Bank program is designed to help income qualified customers save money by providing free energy efficiency measures through local food bank distribution sites. SPS is working with its third-party lighting implementer to provide roughly 25,000 lighting kits that will be distributed through local food shelves. Each kit consists of a four-pack of LEDs as well as a LED night light. Giving away free LED lighting kits provides customers an easy start into implementing energy efficiency in their home.
- Low-Income Weatherization MTP Provides funding to not-for-profit
 community action and government agencies to provide weatherization
 services to residential SPS customers who meet current Department of
 Energy income eligibility guidelines.
- Load Management SOP Targets businesses that can reduce demand during peak summer months. Participating project sponsors (customers or third-party sponsors) to provide on-call, voluntary curtailment of electricity consumption during peak demand periods in return for incentive payments.
- 22 <u>Retro-Commissioning MTP</u> - Targets non-residential customers interested • 23 in learning more about their energy usage and willing to commit to recommended energy saving activities on a timely basis. The program 24 25 includes a systematic evaluation of the customer's buildings and systems, implementation of low-cost and no-cost measures to improve system 26 27 operation, and recommendations of larger energy efficiency upgrades. 28 The retro-commissioning services are fully paid by the program and 29 additional incentives may be available to participating customers.
- 30 <u>Residential Codes MTP</u> - Pro-actively encourages and supports jurisdictions to ensure compliance with the latest state-wide building 31 codes for the residential market. The program is designed to meet each 32 jurisdiction where they are in the code adoption and implementation cycle. 33 and work to build relationships with Architects, Builders, and City 34 Officials. Communities are given tools and resources to help them realize 35 36 the economic and energy performance benefits of energy efficient buildings. Resources and training are provided to assist with barriers such 37 38 as limited code staff time, how to ensure compliance, misinformation 39 about the costs and benefits and homebuilder awareness and knowledge 40about how to meet the new codes efficiently and cost effectively.

1		The above programs are discussed in more detail in Section 1 of the
2		Amended 2024 Energy Efficiency Plan and Report ("EEPR"), which is provided
3		as Attachment MFL-1. ²
4	Q.	Is SPS proposing any new programs in PY 2025 or to change the design of
5		any of its existing programs?
6	A.	No. SPS is not proposing any new program in PY 2025 nor to change the design
7		or delivery of any existing programs that will be continuing in 2025.
8		

 $^{^2}$ The workpapers presented by SPS witness P. Grant Gervais in Attachment PGG-6(USB) to his direct testimony provide the base calculations for the EEPR.

1 IV. **REASONABLENESS OF PY 2025 ENERGY EFFICIENCY PROGRAM** 2 COSTS

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3 Q.

Is a utility required to demonstrate that its energy efficiency and load management costs are reasonable?

- 5 Α. Yes, subsection (d)(12) of 16 TAC § 25.182 requires a utility to show that the 6 costs to be recovered through the Energy Efficiency Cost Recovery Factor 7 ("EECRF") are "reasonable estimates of the costs necessary to provide energy 8 efficiency programs and to meet or exceed the utility's energy efficiency 9 goals...." I demonstrate that the PY 2025 costs and the projections of those costs 10 are reasonable. Mr. Gervais demonstrates that SPS's PY 2025 programs will be
- 11 cost effective.

12 Q. What costs may a utility include in its EECRF?

- 13 Α. 16 TAC § 25.182(d)(1)(A) states that an EECRF shall be calculated to recover 14 four elements of a utility's costs:
- 15 (1) forecasted annual energy efficiency program expenditures;
- (2) the preceding year's over- or under-recovery, which includes interest and 16 municipal and utility EECRF rate case expenses; 17
- (3) any performance bonus earned under 16 TAC § 25.182(e); and 18
- 19 (4) Evaluation, Measurement, and Verification ("EM&V") costs allocated to the utility by the Commission. 20
- 21 О.
- What amounts comprise the forecasted energy efficiency program
- 22 expenditures for PY 2025?
- 23 Α. The forecasted annual energy efficiency program expenditures are comprised of 24 projected incentive payments, administrative costs, research and development
- 25 ("R&D"), and EM&V costs.

- 1 Q. What are incentive payments?
- A. 16 TAC § 25.181(c)(29) defines an "incentive payment" as the payment made by
 an electric utility to an EESP, an end-use customer, or a third-party contractor to
 implement and attract customers to energy efficiency programs, including
 standard offer, market transformation, and self-delivered programs. 16 TAC §
 25.181(f) provides the requirements applicable to incentive payments by a utility.
- 7 Q. Are the proposed incentive payments reasonable?
- 8 A. Yes. As described in more detail by Mr. Gervais, SPS's incentive costs are 9 projected to be lower than the avoided costs prescribed by 16 TAC § 25.181, and 10 thus are cost effective and reasonable.
- 11 Q. What are administrative costs?
- 12 A. Administrative costs include all reasonable and necessary costs incurred by a
- 13 utility in carrying out its responsibilities under 16 TAC § 25.181(g)(1), including,
- 14 among other things:
- (1) conducting informational activities designed to explain the SOPs and
 MTPs to EESPs, retail electric providers, and vendors;
- 17 (2) providing informational programs to improve customer awareness of 18 energy efficiency programs and measures;
- (3) reviewing and selecting energy efficiency programs in accordance with 16
 TAC § 25.181;
- (4) providing regular and special reports to the Commission, including reports
 of energy and demand savings; and
- (5) carrying out any other activities that are necessary and appropriate for successful program implementation.
- 25 In addition, 16 TAC § 25.182(d)(10)(I) includes "affiliate costs and EECRF
- 26 proceeding expenses" as a part of a utility's administrative costs.

1 Q. What are R&D costs?

- A. Typically, R&D costs are those costs incurred to develop and test new energy
 efficiency programs.
- 4 Q. Will the administrative cost for the programs offered in PY 2025 be lower
 5 than the 15% cap?
- A. Yes. As shown in Table 7 of Attachment MFL-1, the total administrative cost for
 the programs in PY 2025 is projected to be \$477,019. That is 9.58% of the total
 projected portfolio costs. The \$477,019 includes direct program administration
 and general program administration costs.
- 10 Q. Will the cost of R&D be lower than the 10% cap in the rule?
- 11 A. Yes. The forecasted cost of R&D for PY 2025 is \$160,000, as shown in Table 7
- of Attachment MFL-1, which is approximately 3.21% of the 2025 actual portfoliospending.
- 14 Q. Do the administrative costs and the R&D costs together add up to less than
 15 20% of total program costs?
- 16 A. Yes. The total of administrative and R&D costs is \$637,019, which is
 17 approximately 12.79% of total portfolio costs.
- 18 Q. What are EM&V costs?
- 19 A. EM&V costs are the costs allocated to SPS by the Commission for the efforts
- 20 undertaken by the independent program evaluator to update the deemed savings in
- 21 the Technical Reference Manual and to review yearly program performance.

О.

- Is SPS seeking recovery of any EM&V amounts in its EECRF?
- A. Yes. Total EM&V costs for PY 2024 projected by the third-party evaluator,
 TetraTech, were \$52,415, and SPS expects these to remain the same for PY 2025.
- 4 Q. Has SPS included these types of forecasted energy efficiency program costs
 5 in its EECRF request?
- A. Yes. As shown on Table 7 of Attachment MFL-1, SPS has included the incentive
 payments that it will make under SOP, MTP and Low-Income programs as well
 as the costs of administering those programs. In addition, SPS has included
 administrative, R&D, and EM&V costs in its EECRF request. As discussed by
- 10 Mr. Gervais, SPS is following the Commission Staff guidance for PY 2025.
- Q. What is SPS's projected PY 2025 energy efficiency and load management
 program budget?
- A. As shown on Table 7 of Attachment MFL-1, SPS projects total program
 expenditures of \$4,977,309 for PY 2025.
- 15 Q. What are the costs of SPS's individual programs in PY 2025?
- A. Table MFL-1 below reflects SPS's forecasted costs of its 2025 energy efficiency
 and load management programs. This table also is included in Attachment MFL-
- 18 1 as Table 7.
- 19

2025	<u>Inc</u>	centives	<u>Admin</u>	<u>R&D</u>	 EM&V	To	tal Budget
Commercial	\$1	945,200	\$ 92,277	\$ -	\$ -	\$	2,037,477
Commercial SOP	\$	390,200	\$ 48,878	\$ -	\$ -	\$	439,078
Retro-Commissioning MTP	\$	900,000	\$ -	\$ -	\$ -	\$	900,000
Load Management SOP	\$	225,000	\$ 33,683	\$ -	\$ -	\$	258,683
Small Commercial MTP	\$	400,000	\$ 5,966	\$ -	\$ -	\$	405,966
Home Lighting MTP	\$	30,000	\$ 3,750	\$ -	\$ -	\$	33,750
Residential	\$ 1	,227,400	\$ 131,226	\$ -	\$ -	\$	1,358,626
Residential SOP	\$	272,400	\$ 27,898	\$ -	\$ -	\$	300,298
Home Lighting MTP	\$	570,000	\$ 71,250	\$ -	\$ -	\$	641,250
Smart Thermostat MTP	\$	5,000	\$ 1,000	\$ -	\$ -	\$	6,000
Refrigerator Recycling MTP	\$	110,000	\$ 15,000	\$ -	\$ -	\$	125,000
Residential HVAC MTP	\$	200,000	\$ 10,927	\$ -	\$ -	\$	210,927
Residential Codes MTP	\$	70,000	\$ 5,150	\$ -	\$ -	\$	75,150
Hard-to-Reach	<u></u> \$ 1	115,275	\$ 29,398	\$ -	\$ -	\$	1,144,673
Hard-to-Reach SOP	\$	385,275	\$ 20,656	\$ -	\$ -	\$	405,931
Hard-to-Reach Food Bank	\$	200,000	\$ 8,742	\$ -	\$ -	\$	208,742
Low-Income Weatherization	\$	530,000	\$ -	\$ -	\$ -	\$	530,000
Research & Development	\$	-	\$ -	\$ 160,000	\$ -	\$	160,000
General Administration	\$	-	\$ 224,119	\$ -	\$ -	\$	224,119
Evaluation, Measurement & Verification	\$	-	\$ -	\$ -	\$ 52,415	\$	52,415
Rider Expenses	\$	-	\$ -	\$ -	\$ -	\$	-
Grand Total	\$ 4	,287,875	\$ 477,019	\$ 160,000	\$ 52,415	\$	4,977,309

Table MFL-1: Proposed 2025 Budget

2 Q. What are SPS's energy efficiency and load management program cost 3 estimates based upon?

The cost estimates for SPS's energy efficiency programs are based upon the 4 A. 5 historical levels of administrative and incentive costs that SPS incurred to implement these programs, as well as adjustments to account for changing market 6 7 conditions and the program offering mix. For programs that are relatively new to 8 SPS's product portfolio, SPS relied on Xcel Energy's experience in other service 9 territories to determine the expected costs to operate those programs. In addition, 10 SPS reviews the incentive costs of similar programs offered by other Texas 11 utilities and on forecasts made by Frontier Associates, which administers and coordinates a number of these programs for Texas utilities. 12

- Q. How do SPS's forecasted energy efficiency costs for PY 2025 compare to
 energy efficiency costs in prior years?
- A. As reflected in Attachment MFL-2,³ SPS's forecasted energy efficiency total
 costs in PY 2025 are similar to PY 2023 on a dollar-per-kW and dollar-perkilowatt hour ("kWh") basis. The Commission approved the PY 2023 costs in
 Docket No. 53540. Thus, the forecasted overall program incentive and
 administrative forecasts for PY 2025 compare favorably to what the Commission
 approved for PY 2023.
- 9 Q. To support the recovery of energy efficiency costs, 16 TAC § 25.182(d)(11)(I)
 10 includes consideration of how a utility's forecasted energy efficiency costs
 11 compare to costs in other markets with similar conditions. Can SPS provide
 12 a comparison with other markets?
- 13A.Although it can be difficult to compare specific markets, the Annual Statewide14Portfolio Report for PY 2022 shows that the SPS Commercial Sector Benefit/Cost15Ratio is 3.4 compared to a statewide average of 4.8. For the Residential Sector,16SPS's Benefit/Cost Ratio was 4.4 compared to the statewide average of 3.6. This17data suggests that SPS program costs are comparable to offerings across the State.

³ The "total costs" for the Commercial, Residential, and Hard-to-Reach line items include only direct program administration and incentives. The "total costs" for the Totals line item includes all program incentive, program administration, general administration, EM&V, and R&D costs for that PY. EECRF expenses and performance bonus costs are excluded from the calculation.

V. ENERGY EFFICIENCY SERVICE PROVIDERS

- 2 Q. What do you discuss in this section of your testimony?
- A. I discuss SPS's bidding and engagement process for contracting with EESPs,
 including a list of all EESPs that participated in the utility's programs and
 contractors paid with funds collected through the EECRF, as required by 16 TAC
 § 25.182(d)(10)(K). I also discuss the portion of 16 TAC § 25.182(d)(10)(H) that
 requires the utility to identify each EESP receiving more than 5% of the utility's
 overall incentive payments and the percentage of the utility's incentives received
 by those providers.

10 Q. Please describe SPS's bidding and engagement process for contracting in 11 SPS's SOPs.

12 Α. For the Residential SOP, Hard-to-Reach SOP, and Large Commercial SOP, SPS's bidding and engagement process for contracting with EESPs is the same as past 13 14 years. SPS posts its program manuals and budgets for the upcoming program 15 year online, and potential EESPs are invited to apply. If the EESPs apply and 16 meet the requisite criteria, they are approved as participants and are eligible to 17 sponsor projects that qualify for incentive payments. When the EESP identifies a 18 potential project, it submits a request, which SPS reviews and evaluates to 19 determine whether it satisfies the program requirements. If the qualifications are met, then SPS approves the project and enters into a standard contract with the 20 21 EESP to undertake the work. Upon completion of the project, including any 22 inspections or verifications, SPS will process and remit payment for the invoice to the EESP. 23

1 SPS also offers a Load Management SOP, which also posts a budget and 2 program manual online. However, EESPs do not participate in this program. 3 Instead, individual customers nominate load reductions into the program and, if they deliver on those nominations, are paid a standard incentive for the delivered 4 5 load. In some cases, customers may deliver more or less than the nominated load; 6 however, the customer will still receive the same standard incentive payment only 7 upon the load delivered. Upon calculation and verification of the customer's load 8 reduction, SPS will process and remit payment to the customer.

9

Q. How does the bidding and engagement process work for MTPs?

10 SPS's Retro-Commissioning, Low-Income Weatherization, Home Lighting, and Α. 11 Small Commercial MTPs utilize third-party implementation in lieu of EESPs or 12 direct customer involvement. As defined in 16 TAC § 25.181(c)(37), MTPs are 13 "strategic programs intended to induce lasting structural or behavioral changes in the market...." The third-party implementer is typically acquired through a 14 15 competitive solicitation and regularly invoices SPS with the costs associated with delivering the program. For each program, SPS develops a budget with incentives 16 17 for demand and energy savings that are provided to the implementer upon 18 completion of a project. Completion of a project may require measurement and 19 verification to be completed before payment is made.

Q. Please identify all EESPs that participated in SPS's energy efficiency programs.

A. My Attachment MFL-3(CONF) lists all of the EESPs that participated in PY 2023
programs.

О.

Did any EESP receive more than 5% of SPS's overall incentive payments?

A. Yes. Nine EESPs, which are identified on Attachment MFL-3(CONF), received
more than 5% of SPS's overall incentive payments.

4 Q. Why did those EESPs receive more than 5% of SPS's overall incentive 5 payments?

- 6 Α. Four of these EESPs completed a high volume of commercial projects that 7 included measures such as LED lighting conversions, high efficiency HVAC replacements, and stronger than anticipated retail sales. One of the EESPs 8 9 facilitated weatherization improvements and other energy efficient measures to 10 hard-to-reach customers, which produced high levels of customer participation and energy savings. One of the EESPs overspent due to project timing and 11 12 building the pipeline for 2024. In all of these cases, high levels of participation or 13 projects, as well as large energy savings resulted in incentive payments above 5% 14 of the total incentive payments paid by SPS.
- Q. Did the payment of more than 5% of the overall incentive payment budget to
 those EESPs leave SPS with a shortfall to pay for other potential projects?
- 17 A. No. All projects submitted from participating EESPs were approved and paid for
- 18 in PY 2023.
- 19

1		VI. <u>ESTIMATED USEFUL LIVES</u>
2	Q.	What do you address in this section of your testimony?
3	A.	I address the EUL of each measure in SPS's energy efficiency programs.
4	Q.	How does 16 TAC § 25.181 define the EUL of an energy efficiency measure?
5	Α.	16 TAC § 25.181(c)(19) defines EUL as the "number of years until 50% of
6		installed measures are still operable and providing savings" The definition
7		further notes that the term EUL is used interchangeably with the term "measure
8		life." In effect, the EUL determines the period of time over which the benefits of
9		the energy efficiency measure are expected to accrue.
10	Q.	Please identify the EUL of each measure that SPS employs for its energy
11		efficiency programs.
12	Α.	Please refer to Attachment MFL-4, which contains the EUL Master Table
13		approved by the Commission for PY 2023 projects. The EULs for measures
14		offered in PY 2025 can be found on <u>https://texasefficiency.com/trm-docs/#trm11</u> .
15		

VII. ENERGY AND DEMAND SAVINGS ACHIEVEMENTS FOR PY 2023

2

4

1

2 3

Q. How did SPS's projected energy and demand savings compare to its reported/verified savings for PY 2023?

A. In 2023, SPS achieved 8.56 MW of reduction in demand and 20,072,981 MWh of
energy savings, which were 142% and 190%, respectively, of SPS's demand goal
of 6.027 MW and energy savings goal of 10,559 MWh. The table below shows a
further breakdown of SPS's projected energy and demand savings compared to its
reported savings in PY 2023. This table is also shown in Section VI of
Attachment MFL-1.

11

Table MFL-2: PY 2023 Demand and Energy Savings

2023	Projected Savings		Reported/Verified Saving			
	kW	kWh	kW	kWh		
Commercial	7,730	10,884,000	5,233	9,237,643		
Commercial SOP	1,020	3,826,000	684	3,746,110		
Retro-commissioning MTP	900	3,969,000	678	2,635,099		
Load Management SOP	5,000	20,000	3,275	3,275		
Small Commercial MTP	220	1,000,000	277	1,214,970		
Home Lighting MTP	590	2,069,000	319	1,638,189		
Residential	2,690	9,255,000	1,942	6,530,636		
Residential SOP	400	900,000	305	863,996		
Home Lighting MTP	2,000	7,000,000	1,630	5,520,111		
Smart Thermostat MTP	-	600,000	-	92,202		
Refrigerator Recycling MTP	50	395,000	7	54,327		
Residential HVAC MTP	240	360,000	-	-		
Residential Codes MTP	-	-	N/A	N/A		
Hard-to-Reach	1,650	5,875,000	1,383	4,304,702		
Hard-to-Reach SOP	500	1,310,000	355	944,058		
Hard-to-Reach Food Bank	900	3,800,000	-	-		
Low-Income Weatherization	250	765,000	350	872,817		
Total Annual Savings Goals	12.070	26.014.000	8.558	20.072.981		

¹²

13 Q. Were there any circumstances in SPS's service area that affected SPS's

14

ability to achieve its Commission-approved goals in PY 2023?

1 A. No.

2 Q. Did SPS spend the full amount that it was authorized to spend for energy 3 efficiency programs in PY 2023?

4 Α. No. As shown in Table 11 of Attachment MFL-1, SPS had a total projected budget of \$4,523,959 in PY 2023 and spent \$4,834.832 in that year. The majority 5 of this spending was on incentives. SPS spent 88% of total spending on 6 7 incentives, which is 107% of its budget forecast. SPS spent 6% of total spending on administrative expenses. Excluding rate-case expenses, SPS spent 66% of its 8 9 2023 administrative budget forecast. As discussed in Section VI of Mr. Gervais's 10 testimony, SPS continues to be well below the cost caps outlined in 16 TAC § 25.181(g). 11

12 Q. In conclusion, what do you recommend regarding SPS's EECRF request in 13 this proceeding?

- 14 A. For the reasons described in my testimony, I recommend the Commission find
 15 that for PY 2025, the costs of SPS's energy efficiency programs are reasonable.
- 16 Q. Does this conclude your pre-filed direct testimony?
- 17 A. Yes.

AFFIDAVIT

)))

STATE OF MINNESOTA	
COUNTY OF HENNIPIN	

MICHAEL F. LEWIS, first being sworn on his oath, states:

I am the witness identified in the preceding prepared direct testimony. I have read the testimony and the accompanying attachments and am familiar with their contents. Based upon my personal knowledge, the facts stated in the testimony are true. In addition, in my judgment and based upon my professional experience, the opinions and conclusions stated in the testimony are true, valid, and accurate.

MICHAEL F. LEWIS

Subscribed and sworn to before me this $\frac{24}{24}$ day of April, 2024 by MICHAEL F. LEWIS.



Notary Public, State of Minnesota

My Commission Expires: January 31, 2025

CERTIFICATE OF SERVICE

I certify that on May 1, 2024, this instrument was filed with the Public Utility Commission of Texas, and a true and correct copy of it was served on the Staff of the Public Utility Commission of Texas, all parties who participated in SPS's most recently completed EECRF proceeding, Docket No. 54949; SPS's most recently completed baserate proceeding, Docket No. 54634; and to the state agency that administers the federal weatherization program, which is the Texas Department of Housing and Community Affairs by electronic mail.

/<u>s/ Dee_Hooley____</u>

Southwestern Public Service Company Amended 2024 Energy Efficiency Plan and Report

Substantive Rules §§ 25.181, 25.182, and 25.183

May 1, 2024

Project No. 56003



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Introduction

Southwestern Public Service Company ("SPS") presents this Amended Energy Efficiency Plan and Report ("EEPR") to comply with 16 Tex. Admin. Code ("TAC") §§ 25.181, 25.182, and 25.183 (collectively referred to herein as the "EE Rules"), which are the Public Utility Commission of Texas's ("Commission") rules implementing Public Utility Regulatory Act ("PURA") § 39.905.¹ As mandated by this section of PURA, 16 TAC § 25.181(e)(1) 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:

- A utility shall acquire a 30% reduction of its annual growth in demand of residential and commercial customers.
- A utility may have a different demand reduction goal if the demand reduction goal of 30% of its annual growth in demand is equivalent to at least four-tenths of 1% of its summer weather-adjusted peak demand for the combined residential and commercial customers. This is also known as the "trigger."
- Once the trigger is satisfied, 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.

⁺ PURA is codified at Tex. Util. Code Ann. §§ 11.001–66.016.

Energy Efficiency Plan and Report Organization

This EEPR consists of an executive summary and two main components: the Energy Efficiency Plan ("EEP") and the Energy Efficiency Report ("EER").

• The Executive Summary highlights SPS's reported achievements for 2023 and SPS's plans for achieving its 2024 and 2025 projected energy efficiency savings goals.

Energy Efficiency Plan

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

Energy Efficiency Report

- Section V documents SPS's actual weather-adjusted demand savings goals and energy targets for the previous five years (2019-2023).
- Section VI compares SPS's projected energy and demand savings to its reported and verified savings by program for calendar years 2022 and 2023.
- Section VII documents SPS's incentive and administration expenditures for the previous five years (2019-2023) broken out by program for each customer class.
- Section VIII compares SPS's actual program expenditures for 2023 to its 2023 budget categorized by program for each customer class.
- Section IX describes the results from SPS's MTPs.
- Section X details SPS's current Energy Efficiency Cost Recovery Factor ("EECRF") collection.
- Section XI reflects revenue SPS collected through the 2023 EECRF.
- Section XII breaks out the over/under-recovery of energy efficiency program costs.

Appendices

 Appendix A – Reported kilowatt ("kW") and kilowatt-hour ("kWh") savings listed by county for each program.

Executive Summary

SPS submits this EEPR to comply with the EE Rules for Program Years ("PY") 2024 and 2025. The EEP portion of this EEPR details SPS's efforts to achieve reductions in peak demand and energy use among its residential and commercial customers. For PYs 2024 and 2025, SPS has developed energy efficiency portfolios designed to meet goals prescribed by 16 TAC § 25.181.

EEP Summary

Table 1 shows SPS's goal(s) calculations for PYs 2024 and 2025.² SPS's PY 2024 Demand and Energy goals were approved in Commission Docket No. 54949.

Calendar Year	2024	2025
5-Year Average Peak Demand (MW)	(15.278)	(44.257)
Goal Metric: 0.4% Peak Demand (MW)	5.934	5.757
Demand Goal (MW)	6.027	6.027
Goal Metric: 0.4% Peak Energy (MWh)	10,397	10,087
Energy Goal (MWh)	10,559	10,559
Budget ³	\$4,545,219	\$4,977,309

Table 1: Summary of Goals, Projected Savings, and Projected Budgets (at Meter)

² All megawatt ("MW") and megawatt hour ("MWh") figures in Table 1 are given "at Meter."

³ Projected Budget amounts are set forth in Table 7.

In 2019, SPS met the demand goal trigger described in 16 TAC § 25.181(e)(1)(B). Because the trigger has been met, SPS calculated its demand reduction goal for PY 2025 using four-tenths of 1% of its summer weather-adjusted five-year average (2019-2023) peak demand for the combined residential and commercial customers. This calculation yields a goal metric of 5.654 MW, which is lower than SPS's PY 2023 goal of 6.027 MW. Therefore, in accordance with 16 TAC § 25.181(e)(1)(D), SPS is using its previous year's goal of 6.027 MW for PY 2025.

The "Energy (MWh) Goal" is calculated from the demand goal using a 20% conservation load factor, as mandated in 16 TAC § 25.181(e)(4). Thus, the "Energy (MWh) Goal" is 20% of the product of the "Demand Goal (MW)" and 8,760 (the number of hours in a typical year).

SPS will implement the following SOP and MTP programs in 2024:

- Large Commercial SOP;
- Small Commercial MTP;
- Load Management SOP;
- Retro-Commissioning MTP;
- Residential SOP;
- Smart Thermostat MTP;
- Refrigerator Recycling MTP;
- Home Lighting MTP;
- Hard-to-Reach SOP;
- Low-Income Weatherization SOP;
- Residential HVAC MTP;
- Hard-to-Reach Food Bank MTP; and
- Residential Codes MTP.

The projected savings, budgets, and implementation plans included in this EEPR comply with the EE Rules and incorporate lessons learned from energy efficiency service providers ("EESP") and customer participation in the various energy efficiency programs. The projected savings reported in this document assume that all the available funds for energy efficiency programs are reserved by contractors and/or for self-delivered MTPs and expended energy efficiency projects.

EER Summary

The EER portion of this EEPR demonstrates that in 2023, SPS achieved 8,558 kW of reduction in demand and 20,072,981 kWh of energy savings, which equals 142% and 190%, respectively, of SPS's demand goal of 6,027 kW and energy savings goal of 10,559,329 kWh.

The expenditures for these 2023 programs were \$4,834,832,⁴ which was 107% of SPS's budget. To meet the goal of a four-tenths of 1% reduction in the summer weather-adjusted peak demand through energy efficiency, SPS implemented: the Large Commercial SOP; Small Commercial MTP; the Load Management SOP; the Retro-Commissioning MTP; the Residential SOP for single- and multi-family residences; the Smart Thermostat MTP; the Refrigerator Recycling MTP; the Home Lighting MTP; the Hard-to-Reach SOP for low-income, single- and multi-family residences; the Low-Income Weatherization SOP; the Residential HVAC MTP; the Hard-to-Reach Food Banks MTP; and Residential Codes MTP. Table 2 below compares the 2023 projected savings and budget to the reported savings as well as actual expended funds for 2023.

Table 2: Summary	of 2023 Projected Savin	ngs and Budget, Repor	rted Savings, and Expended
Funds			

Calendar Year	2023
Demand Goal (MW)	6,027
Energy Goal (MWh)	10,559
Projected MW Savings	12.07
Projected MWh Savings	26,014
Reported/Verified MW Savings	8.56
Reported/Verified MWh Savings	20,073
Total Funds Budgeted	\$4,523,959
Total Funds Expended	\$4,834,832

⁴ This number includes costs associated with all 2022 Evaluation, Measurement, and Verification ("EM&V") activities and SPS's 2023 EECRF expenses.
Energy Efficiency Plan

I. 2024 and 2025 Programs

A. Program Portfolios

PURA § 39.905 and 16 TAC § 25.181 establish peak demand reduction goals and program guidelines for investor-owned electric utilities in Texas. SPS is committed to offering cost-effective energy efficiency programs to ensure that its Texas retail customers are offered the same energy efficiency services that are available to consumers in other areas of the state.

This EEP reflects SPS's continued commitment to provide its customers with energy efficiency opportunities. For PY 2024, SPS proposes to offer multiple SOPs, multiple MTPs, and a weatherization program to its residential and commercial customer classes to meet the requirements under the EE Rules. The following EEP outlines SPS's planned efforts to encourage its residential and commercial customers to participate in its energy efficiency programs, including a discussion of proposed programs, budgets, and program impact estimates.

Table 3 below summarizes SPS's PY 2024 programs and targeted customer classes. SPS is not proposing any new programs for 2025.

Program	Target Customer Class	Application				
Large Commercial SOP	Large Commercial	Retrofit; New Construction				
Small Commercial MTP	Small Commercial	Retrofit; New Construction				
Load Management SOP	Commercial	Curtailable Load				
Retro-Commissioning MTP	Large Commercial	Retrofit				
Residential SOP	Residential	Retrofit; New Construction				
Smart Thermostat MTP	Residential	Buydown				
Refrigerator Recycling MTP	Residential	Retrofit				
Home Lighting MTP	Residential/Small Commercial	Buydown				
Hard-to-Reach SOP	Residential Hard-to-Reach	Retrofit				
Low-Income Weatherization SOP	Low-Income	Retrofit				
Residential HVAC MTP	Residential	Retrofit				
Hard-to-Reach Food Banks MTP	Residential Hard-to-Reach	Retrofit				
Residential Codes MTP	Residential	Codes				

9

Table 3: 2024 Energy Efficiency Program Portfolio

The programs listed in

Table 3 are described in further detail below. SPS also maintains a website describing all the requirements for project participation, the forms required for project submission, and the current available funding. That website, which can be accessed at <u>http://www.xcelefficiency.com/</u>, is the primary method by which SPS communicates with potential project sponsors about program updates and information.

Administrative and Research Costs for 2024 and 2025

SPS's administrative costs are incurred to support the development and implementation of its programs, as well as the regulatory compliance requirements associated with PURA § 39.905 and 16 TAC § 25.181. The costs include but are not limited to employee labor and loading costs, employee travel expenses, the purchase of supplies, updating program databases, and legal costs. SPS monitors these costs on an ongoing basis and will make regular corrections to administrative spending, wherever possible, to ensure cost-effectiveness and regulatory compliance.

Research and Development ("R&D") costs include those costs for conducting studies and analyses to identify new programs or measures that enhance the energy efficiency or load management offerings and meet future energy and demand goals. For 2025, SPS is planning to continue research and test product strategies for the Codes & Standards program. This includes some research required to support compliance and attribution values specific to SPS for the residential measure that is already in implementation and may include additional research into the viability of a non-residential measure for proposal in a future TRM. SPS will also continue to allocate funding to research a School Education Kits program that targets fifth grade students in the SPS service territory. SPS will also continue to research the opportunity of adding a demand management option to its existing Residential Smart Thermostat Program.

B. Existing Programs for 2025

SPS will continue to offer the following pre-existing programs in 2025.

Large Commercial Standard Offer Program

The Large Commercial SOP targets commercial customers with single-meter demand of at least 100 kW or aggregate meter demand of at least 250 kW. Incentives are paid to project sponsors based on verified deemed savings for a wide range of measures installed in new or retrofit applications. Typical eligible measures include light emitting diode ("LED") lighting, lighting controls, commercial cooling and ventilation, commercial refrigeration enhancements, building envelope measures, and industrial process upgrades.

Small Commercial Market Transformation Program

The Small Commercial MTP is designed to assist small business customers with identifying and implementing cost-effective energy efficiency solutions for their workplace. Small business customers often encounter greater barriers to participation in energy efficiency programs that are not experienced by larger commercial and industrial ("C&I") customers. Often the two biggest barriers are lack of access to capital and a lack of information about what energy efficiency measures and strategies are the most cost-effective for the customer's individual situation. The Small Commercial MTP seeks to assist customers in overcoming these challenges by providing increased guidance throughout the decision-making process to help small business customers plan for, prioritize, and implement energy efficient measures. Successful program measures include LED lighting, lighting controls, and HVAC measures.

Load Management Standard Offer Program

The Load Management SOP was developed in 2012 in accordance with 16 TAC § 25.181, which authorizes participating project sponsors (customers or third-party sponsors) to provide on-call, voluntary curtailment of electricity consumption during peak demand periods in return for incentive payments. Incentives are based on verified demand savings that occur at SPS distribution sites taking primary or secondary service or at eligible institutional customers' sites. Customers are not required to produce a specific level of curtailed load, but they will receive payments for only the amount of load curtailed.

Retro-Commissioning Market Transformation Program

The Retro-Commissioning MTP is designed for identifying and implementing low-cost/no-cost measures, as well as capital projects to optimize and enhance existing facility systems by improving performance, reducing peak demand (kW), and saving energy (kWh). The program is flexible as to facility size, but caters to facilities with significant savings potential, which typically requires a minimum of 50,000 square feet of air-conditioned space.

Residential Standard Offer Program

The Residential SOP provides incentives to service providers for retrofit and new construction installations of residential measures that provide verifiable demand and energy savings. Successful measures include insulation, and LED lighting measures. This program has two components, one for single-family residences and one for multi-family residences. Incentives and savings are tracked separately for these components but are reported together in this EEPR.

Smart Thermostat Market Transformation Program

The Smart Thermostat MTP is designed to provide customers discounts on ENERGY STAR® Connected Thermostats through Xcel Energy's online storefront, which is owned and managed by an independent third party. An instant rebate will be applied at the point of sale to qualifying customers, which can be combined with manufacturer-sponsored discounts to lower the purchase price further. All SPS residential customers will be eligible to participate in this upstream offering, with a limit of two thermostat discounts per customer.

Refrigerator Recycling Market Transformation Program

The Refrigerator Recycling MTP is designed to decrease the number of inefficient refrigerators and freezers in the Company's service territory in an environmentally safe and compliant manner and, by doing so, achieve electric energy savings and peak demand reduction. Customers receive an incentive plus free pickup and disposal of their operable, inefficient refrigerator and freezer. A third-party implementer administers the product, including customer scheduling, pickup,

recycling, and rebating. This product is primarily marketed through email, bill onserts, and online/social media efforts.

Home Lighting Market Transformation Program

The Home Lighting MTP offers SPS's customers point-of-sale rebates to reduce the cost of purchasing new, efficient LED bulbs through qualifying retailers. Point-of-sale rebates occur when the bulb manufacturer, retailer, and SPS combine efforts and/or funds to offer instant rebates on a variety of bulb models, targeted mostly for residential use, enabling customers to purchase discounted LEDs without completing rebate forms. Since the program was rolled out in late 2016 as part of the Company's R&D effort, the program has become one of SPS's most cost effective and popular programs for retail customers.

Hard-to-Reach Standard Offer Program

Hard-to-Reach customers are defined by 16 TAC § 25.181(c)(27) as customers with an annual household income at or below 200% of federal poverty guidelines. The Hard-to-Reach SOP provides incentives for the comprehensive retrofit installations of a wide range of measures (ceiling insulation, duct sealing, air infiltration, LEDs, shower heads, and other) that reduce demand and save energy. This program is split into two segments, one for single-family residences and one for multi-family residences. Incentives and savings are tracked separately for these segments but are reported together in this EEPR.

Low-Income Weatherization Standard Offer Program

SPS's Low-Income Weatherization program is designed to cost-effectively reduce the energy consumption and energy costs of SPS's low-income customers. Under this program, one or more program implementers contract with not-for-profit community organizations and government agencies to provide weatherization services to SPS residential customers who meet the current Department of Energy income-eligibility guidelines. Implementation of SPS's Low-Income Weatherization program provides eligible residential customers appropriate weatherization measures and basic on-site energy education and satisfies the requirements of 16 TAC § 25.181(p).

Residential HVAC Market Transformation Program

The HVAC Market Transformation Program targets residential customers and participating HVAC contractors. The program seeks to install highly efficient HVAC equipment by influencing the dealers/contractors, distributors, and the customers The customer receives a rebate when they purchase qualifying equipment, and the contractor may also receive an incentive for the installation of the equipment. A third-party implementor will manage the program and assist the customers and HVAC contractors in the process of obtaining rebates and marketing of the program to all areas of TX SPS.

Hard-to-Reach Food Bank Market Transformation Program

The Hard-to-Reach Food Bank program is designed to help income qualified customers save money by providing free energy efficiency measures through local food bank distribution sites. SPS is working with a third-party administrator and our third-party home-lighting implementer to provide lighting kits that are distributed through local food banks. Each kit consists of a four-pack of LEDs as well as an LED night light. Giving away free LED lighting kits provides customers with an easy start into implementing energy efficiency in their home.

Residential Codes Market Transformation Program

The Residential Codes Market Transformation Program will pro-actively encourage and support jurisdictions to ensure compliance with the latest state-wide building codes for the residential market. Support will be designed to meet each jurisdiction where they are in the code adoption and implementation cycle, and work to build relationships with architects, builders, and city officials. Communities will be given tools and resources to help them realize the economic and energy performance benefits of energy efficient buildings. Resources and training will be provided to assist with barriers such as limited code staff time, how to ensure compliance, misinformation about the costs and benefits and homebuilder awareness and knowledge about how to meet the new codes efficiently and cost effectively.

C. New and Modified Programs for 2025

SPS is not proposing any new programs or modifications for 2025.

General Implementation Plan

Program Implementation

SPS will implement its energy efficiency programs in a non-discriminatory and cost-effective manner. For PYs 2024 and 2025, SPS intends to conduct programs using the following activity schedule:

- On January 11th, 2024, SPS conducted kick-off meetings for each program, and allowed sponsors to submit applications by January 19th for the 2024 PY, which were reviewed and accepted in the order of receipt.
- Throughout 2024, SPS has and will offer approved EESPs contracts to implement projects. After contract execution, the EESP may begin implementation and reporting of measures. All projects must be completed, and results reported to SPS before November 15, 2024. SPS will continue to inform the EESP community of pertinent news and updates by posting program notices on its energy efficiency website, offering local and Internet-based workshops (if necessary), and sending email notices to various energy service company associations.
- No later than January 1, 2025, SPS will announce its 2025 energy efficiency programs and open its website application pages to assist EESPs in preparing project applications for PY 2025. The application process gives sponsors feedback on whether projects are eligible and the level of incentives for which they may qualify.
- Throughout 2025, SPS will offer contracts to approved EESPs to implement energy efficiency projects. After contract execution, the EESP may begin implementation and reporting of measures. All projects must be completed, and results reported to SPS before November 15, 2025. SPS will continue to inform the EESP community of pertinent news and updates by posting program notices on its energy efficiency website, offering local and Internet-based workshops (if necessary), and sending email notices to various energy service company associations.
- During 2024 and 2025, the Small Commercial MTP, Load Management SOP, Retro-Commissioning MTP, Refrigerator Recycling MTP, Home Lighting MTP, Hard-to-Reach SOP, Low Income Weatherization, Residential HVAC MTP, and Residential

Codes MTP will utilize third-party program implementers who will conduct a wide range of activities to facilitate and enable customer participation in these programs.

Program Tracking

SPS uses an online database to track program activity in its SOPs. The online database is accessible to project sponsors, implementers, and administrators. All program data can be entered in real-time, capturing added customer information (class, location by county, and utility account), installed measures (quantity, deemed or measured, serial numbers, and paid incentives), authorized incentives, inspection results (including adjustments), invoice requests, and payments. The database allows SPS to guard against duplicate incentive requests to SPS's programs.

SPS uses separate databases to track program activity for the Load Management SOP, Retro-Commissioning MTP, Smart Thermostat MTP, Refrigerator Recycling MTP, Home Lighting MTP, and Residential Codes MTP programs. These databases are managed by the third-party implementers for the programs.

Measurement and Verification

Many of the projects implemented under these programs will report demand and energy savings utilizing "deemed savings estimates" reviewed by the Independent Evaluator and approved by the Commission. If deemed savings have not been approved for a particular installation, such savings will be reported using an approved measurement and verification approach as allowed under 16 TAC § 25.181(o).

The International Performance Measurement and Verification Protocol will be used in the following situations:

- A Commission-approved deemed savings estimate is not available for the energy efficiency measures included in an eligible project; or
- An EESP has elected to follow the protocol because it believes that measurement and verification activities will result in a more accurate estimate of the savings associated with the project than would application of the Commission-approved deemed savings value.

Outreach and Research Activities

SPS anticipates that outreach to a broad range of EESPs and market segments will be necessary to meet the savings goals required by PURA § 39.905 and the EE Rules. SPS markets the availability of its programs by maintaining its website (http://www.xcelenergyefficiency.com/), which is the primary method of communication used to provide potential project sponsors with program updates and information. It contains detailed information regarding requirements for project participation, project eligibility, end-use measure eligibility, incentive levels, application procedures, and current available funding. All application forms required for project submission are available for download on the website.

SPS offers outreach workshops for the Residential and Hard-to-Reach SOPs. These workshops are held in person or via webinar. SPS invites air conditioning contractors, weatherization service providers, lighting vendors, big-box retailers, and national energy service companies to participate in the workshops. These workshops explain program elements, such as responsibilities of the project sponsor, project requirements, incentive information, and the application and reporting process. These workshops increase accessibility to EESPs who may work in several areas. SPS also offers workshops for the codes program, which includes city officials, builders and architects in order to promote building to the adopted code.

SPS participates in statewide outreach activities and attends industry-related meetings to generate awareness and interest in its energy efficiency programs.

SPS uses a mix of large C&I customer account management staff and third-party implementation staff to educate customers about the Large Commercial SOP, Load Management SOP, and Retro-Commissioning MTP. In 2024, the account management team and third-party implementation staff will continue their efforts to hold customer meetings and use marketing materials to explain the program and the requirements for participation.

II. Customer Classes

SPS targets the Commercial, Residential, and Hard-to-Reach customer classes with its energy efficiency programs. Table 4 summarizes the number of customers in each of the target customer

classes. The annual budgets are allocated to customer classes by examining historical program results, evaluating economic trends, and considering 16 TAC § 25.181(e)(3)(F), which states that no less than 5% of the utility's total demand goal should be achieved through programs for Hard-to-Reach customers. SPS has relied on historical achievements to determine the budget allocations for PYs 2024 and 2025. Although these guidelines have been set, the actual distribution of the budget must remain flexible based upon the response of the marketplace and the potential interest that a customer class may have in a specific program.

Customer Class	Qualifications	Number of Customers ⁵				
Commercial	< 69 kV service voltage	50,483				
Residential	All Residential	220,632				
Hard-to-Reach ⁶	Hard-To-Reach Income Requirement Residential subset	67,734				

Table 4: Summary of Customer Classes

III. Projected Energy Efficiency Savings and Goals

As prescribed by 16 TAC § 25.181(e)(3), SPS's 2024 demand reduction goal is calculated by applying four-tenths of 1% (0.004) to the five-year average (2019-2024) peak demand, for residential and commercial customers combined, at the meter. Table 5 provides the peak load data used to calculate the demand reduction projection for the demand goal for PY 2025, as required by the EE Rules. To calculate this goal, SPS applied an average line loss factor of 8.06%⁷ to the weather-normalized peak demand value for residential and commercial customers. SPS then removed the peak demand of opt-out customers from the residential and commercial peak demand values. SPS calculated the average peak demand for the combined residential and commercial customers for the previous five years (2019-2023). As shown in Table 5, during the previous five-year period, SPS has experienced an average summer weather-adjusted peak demand for the

⁵ Commercial and Residential number of customers reflect actual SPS customer counts as of December 2023. Hard-to-Reach customers were estimated based on the most recently available U.S. Census data. In 2022, 30.7% of Texans were below the 200% poverty threshold. <u>https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-06.html</u>.

⁶ Hard-to-Reach customer counts are a subset of the Residential customer counts.

 $^{^{7}}$ SPS's most recently approved line loss study can be found in Docket No. 54634. For purposes of the EEPR, SPS used a simple average of line losses for all levels from the source to the meter.

combined residential and commercial customers at the meter of 1,414 MW. SPS applied fourtenths of 1% (0.004) to the five-year average (2019-2023) peak demand resulting in a goal of 5.654 MW. Because this goal is lower than PY 2024's goal of 6.027 MW, SPS is using the previously approved goal for PY 2024 of 6.027 MW for PY 2025 in accordance with 16 TAC § 25.181(e)(1)(D).

		F	Pe <mark>ak</mark> Dema	ind (MW) @ Sou	lice		Ener	gy Consumptic	in (MWh) @	Meter]						
											Energy E	fficiency Goal Ca	culations	Previous Goal Metric			
	Total :	System		Residential 8	Commerc	ial	Total 5	Total System		Residential & Commercial							
Calendar Year	Actual	Actual Weather Adjusted	Actual	Actual Weather Adjusted	Opt-Out	Peak Demand @ Source Net Opt-outs	Actual	Actual Weather Adjusted	Actual	Actual Weather Adjusted	Peak Demand @ Meter (8.06% line losses beginning in 2023)	5-year Average Peak Demand @ Meter	Goal Metric: 0.4% Peak Demand at Meter	Load Growth at Meter	5 Year Average Growth at Meter	30% Growth at Meter	
2015	2,405	2,478	1,618	1,691	52	1,639	14,176,830	14,004,866	7,700,457	7,594,628	1,480	1,527	6.11	-7	-26.03	-7.81	
2016	2,499	2,449	1,727	1,677	43	1,634	14,102,258	13,905,333	7,575,714	7,445,437	1,475	1,525	6.10	-5	-1.63	-0.49	
2017	2,464	2,434	1,675	1,645	47	1,597	13,987,497	13,912,071	7,434,289	7,425,783	1,442	1,519	6.07	-33	-6.64	-1.99	
2018	2,583	2,567	1,848	1,832	51	1,781	14,444,653	14,100,463	7,802,680	7,526,316	1,608	1,506	6.02	169	-12.39	-3.72	
2019	2,483	2,510	1,702	1,729	37	1,692	14,182,667	13,944,983	7,542,542	7,372,666	1,528	1,457	5.94	-82	-21.52	-6.46	
2020	2,371	2,329	1,677	1,634	49	1,585	13,498,059	13,247,232	7,335,350	7,147,455	1,431	1,499	6.11	-98	41.89	12.57	
2021	2,271	2,196	1,580	1,504	10	1,494	14,145,895	13,982,923	7,632,057	7,013,178	1,349	1,507	6.14	-85	8.23	2.47	
2022	2,314	2,269	1,570	1,525	9	1,516	14,749,444	14,524,533	8,063,727	7,220,870	1,369	1,497	6.10	20	-9.91	-2.97	
2023	2,411	2,266	1,555	1,546	5	1,542	14,403,122	14,299,014	7,977,255	7,327,319	1,417	1,472	6.00	24	-26.00	-7.80	
2024	NA	NA	NA	1,642	NA	NA	NA	NA	NA	7,774,094	NA	1,457	5.93	93	-15.28	-4.58	
2025	NA	NA	NA	1,538	NA	NA	NA	NA	NA	7,990,297	NA	1,419	5.76	29	-44.26	-13.28	

Table 5: Annual Growth in Demand and Energy Consumption (at Meter)⁸

⁸ Line loss factors for 2023 were approved for SPS in Docket No. 54634.

For PYs 2024 and 2025, SPS developed budgets to meet the energy and demand goals in a costeffective manner, as prescribed by 16 TAC § 25.181. Details of these budgets, including the allocation of funds to specific programs, are given in Section IV.

SPS calculated the projected savings of its energy efficiency programs from these proposed budgets, using the cost per kW of demand reduction achieved in previous SPS programs and the budget allocation for each program. SPS then calculated the expected energy savings from the projected demand reductions using the average load factors from previous PYs (with adjustments for market conditions and other potential changes). Table 6 shows the projected demand and energy savings broken out by program.

Table 6: Projected Demand and Energy Savings Broken Out by Program for Each Customer Class (at Meter)

2024	Projected Savings						
	MW	MWh					
Commercial	7.28	9,328					
Commercial SOP	1.02	3,826					
Retro-Commissioning MTP	0.90	3,969					
Load Management SOP	5.00	20					
Small Commercial MTP	0.22	1,000					
Home Lighting MTP	0,14	513					
Residential	1.12	4,079					
Residential SOP	0,36	810					
Home Lighting MTP	0.47	1,718					
Smart Thermostat MTP	-	600					
Refrigerator Recycling MTP	0.05	395					
Residential HVAC MTP	0.24	360					
Residential Codes MTP	-	196					
Hard-to-Reach	1.04	3,271					
Hard-to-Reach SOP	0.45	1,180					
Hard-to-Reach Food Bank	0.34	1,326					
Low-Income Weatherization	0.25	765					
Total Annual Projected Savings	9.44	16,678					
2025	Projected Savings						
	MW	MWh					
Commercial	6.48	8,553					
Commercial SOP	0.70	3,900					
Retro-Commissioning MTP	0.70	2,500					
Load Management SOP	4.50	18					
Small Commercial MTP	0.23	1,100					
Home Lighting MTP	0,35	1,035					
Residential	1,80	5,161					
Residential SOP	0,38	850					
Home Lighting MTP							
	1,16	3,465					
Smart Thermostat MTP	1,16	3,465 100					
Smart Thermostat MTP Refrigerator Recycling MTP	1.16 - 0.03	3,465 100 190					
Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP	1.16 - 0.03 0.24	3,465 100 190 360					
Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP	1.16 - 0.03 0.24 -	3,465 100 190 360 196					
Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach	1.16 - 0.03 0.24 - 1.35	3,465 100 190 360 196 4,150					
Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP	1.16 - 0.03 0.24 - 1.35 0.50	3,465 100 190 360 196 4,150 1,300					
Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach Food Bank	1.16 - 0.03 0.24 - 1.35 0.50 0.50	3,465 100 190 360 196 4,150 1,300 2,000					
Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach Food Bank Low-Income Weatherization	1.16 - 0.03 0.24 - 1.35 0.50 0.50 0.35	3,465 100 190 360 196 4,150 1,300 2,000 850					

IV. Program Budgets

2024	Incentives		<u>Admin</u>		<u>R&D</u>	Ī	EM&V	<u>Total Budget</u>		
Commercial	\$ 1 855 064	\$	90 362	\$	_	\$	_	\$	1 945 426	
Commercial SOP	\$ 390,200	ŝ	47 454	ŝ	_	ŝ	-	ŝ	437 654	
Retro-Commissioning MTP	\$ 800,000	ŝ	-	ŝ	_	ŝ	-	ŝ	800.000	
Load Management SOP	\$ 250,500	ŝ	36.336	ŝ	_	ŝ	-	ŝ	286,836	
Small Commercial MTP	\$ 400,000	ŝ	5 793	ŝ	-	ŝ	-	ŝ	405 793	
Home Lighting MTP	\$ 14.364	ŝ	780	ŝ	_	ŝ	-	ŝ	15.144	
Residential	\$ 1.020.311	ŝ	70.659	ŝ	_	ŝ	-	ŝ	1 090 970	
Residential SOP	\$ 272.400	ŝ	27.086	ŝ	-	ŝ	-	ŝ	299 486	
Home Lighting MTP	\$ 272.911	ŝ	14 820	ŝ	_	ŝ	-	ŝ	287 731	
Smart Thermostat MTP	\$ 30,000	ŝ	3.899	ŝ	-	ŝ	-	ŝ	33,899	
Refrigerator Recycling MTP	\$ 175,000	\$	9 246	\$	_	\$	-	ŝ	184 246	
Residential HVAC MTP	\$ 200,000	\$	10 609	\$	-	\$	-	\$	210 609	
Residential Codes MTP	\$ 70,000	\$	5.000	\$	-	\$	-	\$	75.000	
Hard-to-Reach	\$ 1.050.275	\$	28.541	\$	-	\$	-	\$	1.078.816	
Hard-to-Reach SOP	\$ 385.275	\$	20.054	\$	-	\$	_	\$	405.329	
Hard-to-Reach Food Bank	\$ 200,000	\$	8.487	ŝ	_	\$	-	\$	208.487	
Low-Income Weatherization	\$ 465.000	\$	-	\$	-	\$	-	\$	465.000	
Research & Develonment	\$ -	\$	-	\$	160.000	\$	-	\$	160.000	
General Administration	\$ -	\$	217 591	s	-	\$	_	\$	217 591	
Evaluation. Measurement & Verification	\$-	ŝ	-	ŝ	-	ŝ	52 415	ŝ	52 415	
Rider Expenses	\$- \$-	s S	_	ŝ	_	\$	-	s.	-	
Crand Total	<u> </u>	 γ		 γ	160.000	φ •	52 415	 γ	4 545 210	
	3 3,720,000	3	+07,10+	3	100,000	3	529415	3	+,0+0,217	
2025	<u>Incentives</u>	-	Admin		<u>R&D</u>	<u>]</u>	EM&V	T	otal Budget	
2025 Commercial	<u>Incentives</u> \$ 1.945,200		<u>Admin</u> 92,277	\$	<u>R&D</u>	<u> </u> \$	<u>em&v</u> -	<u> </u>	2,037,477	
2025 Commercial Commercial SOP	<u>Incentives</u> \$ 1,945,200 \$ 390,200	\$ \$	Admin 92,277 48,878	\$	<u>R&D</u> - -		<u>EM&V</u> - -	<u> </u>	2,037,477 439,078	
2025 Commercial Commercial SOP Retro-Commissioning MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000	\$ \$ \$	Admin 92,277 48,878	\$	<u>R&D</u> - - -		<u>EM&V</u> - - -	<u>T</u> \$ \$ \$	2,037,477 439,078 900,000	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000	\$ \$ \$ \$	Admin 92,277 48,878 - 33,683	\$ \$ \$	<u>R&D</u> - - - -	<u> </u> \$ \$ \$ \$	E <u>M&V</u> - - - -	<u>T</u> \$ \$ \$ \$	2,037,477 439,078 900,000 258,683	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000	***	Admin 92,277 48,878 - 33,683 5,966	\$ \$ \$ \$	<u>R&D</u> - - - - - -	<u> </u> \$ \$ \$ \$ \$	<u>EM&V</u> - - - - -	<u>T</u> \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000	- 	Admin 92,277 48,878 - 33,683 5,966 3,750	\$ \$ \$ \$ \$ \$ \$	<u>R&D</u> - - - - - - -	<u>ا</u> \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - -	<u>T</u> \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400	\$ \$ \$ \$ \$ \$	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226	\$ \$ \$ \$ \$	<u>R&D</u> - - - - - - - - -		EM&V - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400	\$ \$ \$ \$ \$ \$ \$ \$ \$	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898	* * * * * *	<u>R&D</u> - - - - - - - - - - - -		EM&V - - - - - - - - - - - -	<u>T</u> \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400 \$ 570,000	* * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250	* * * * * * * *	<u>R&D</u> - - - - - - - - - - - - - - -	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - -	<u>T</u> \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400 \$ 570,000 \$ 5,000	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000	* * * * * * * * *	<u>R&D</u> - - - - - - - - - - - - - - - - - - -	<u>ا</u> * * * * * * * * * * * *	EM&V - - - - - - - - - - - - - - - - - - -	T * * * * * * * * * *	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400 \$ 272,400 \$ 570,000 \$ 5,000 \$ 110,000	* * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	<u>R&D</u>	L * * * * * * * * * * * * * * * *	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400 \$ 272,400 \$ 570,000 \$ 5,000 \$ 110,000 \$ 200,000	* * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927	* * * * * * * * * * *	<u>R&D</u>	_ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	<u>T</u> \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 1,227,400 \$ 272,400 \$ 570,000 \$ 110,000 \$ 200,000 \$ 70,000	* * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150	* * * * * * * * * * * *	<u>R&D</u>	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach	<u>Incentives</u> \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400 \$ 570,000 \$ 5,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 1,115,275	* * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398	* * * * * * * * * * * * * *	<u>R&D</u>	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 570,000 \$ 5,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 1,115,275 \$ 385,275	* * * * * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656	* * * * * * * * * * * * * * *	<u>R&D</u>	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach Food Bank	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 30,000 \$ 1,227,400 \$ 272,400 \$ 570,000 \$ 570,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 1,115,275 \$ 385,275 \$ 200,000	* * * * * * * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656 8,742	* * * * * * * * * * * * * * * *	<u>R&D</u>	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931 208,742	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach Food Bank Low-Income Weatherization	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 272,400 \$ 570,000 \$ 5,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 385,275 \$ 200,000 \$ 530,000	* * * * * * * * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656 8,742 -	* * * * * * * * * * * * * * * * * * *	<u>R&D</u>	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931 208,742 530,000	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach Food Bank Low-Income Weatherization Research & Development	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 272,400 \$ 570,000 \$ 570,000 \$ 110,000 \$ 200,000 \$ 1,115,275 \$ 385,275 \$ 200,000 \$ 530,000	* * * * * * * * * * * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656 8,742 - -	* * * * * * * * * * * * * * * * * * * *	<u> </u>		EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2,037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931 208,742 530,000 160,000	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach SOP Hard-to-Reach Food Bank Low-Income Weatherization Rescarch & Development General Administration	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 272,400 \$ 570,000 \$ 570,000 \$ 5,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 1,115,275 \$ 385,275 \$ 200,000 \$ 530,000 \$ -	***********	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656 8,742 - 224,119	* * * * * * * * * * * * * * * * * * * *	. ℝ&D - - - - - - - - - - - - - - - - - - -	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	<u>T</u> \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931 208,742 530,000 160,000 224,119	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach SOP Hard-to-Reach Food Bank Low-Income Weatherization Research & Development General Administration Evaluation, Measurement & Verification	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 272,400 \$ 570,000 \$ 570,000 \$ 570,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 1,115,275 \$ 385,275 \$ 200,000 \$ 530,000 \$ - \$ - \$ - \$ - \$ -	* * * * * * * * * * * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656 8,742 - 224,119 -	* * * * * * * * * * * * * * * * * * * *	R&D	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931 208,742 530,000 160,000 224,119 52,415	
2025 Commercial Commercial SOP Retro-Commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP Hard-to-Reach SOP Hard-to-Reach Food Bank Low-Income Weatherization Research & Development General Administration Evaluation, Measurement & Verification Rider Expenses	Incentives \$ 1,945,200 \$ 390,200 \$ 900,000 \$ 225,000 \$ 400,000 \$ 225,000 \$ 400,000 \$ 272,400 \$ 570,000 \$ 570,000 \$ 570,000 \$ 110,000 \$ 200,000 \$ 70,000 \$ 1,115,275 \$ 385,275 \$ 200,000 \$ 530,000 \$ - \$ - \$ - \$ - \$ - \$ - \$ -	* * * * * * * * * * * * * * * * * * * *	Admin 92,277 48,878 - 33,683 5,966 3,750 131,226 27,898 71,250 1,000 15,000 10,927 5,150 29,398 20,656 8,742 - - 224,119 - -	* * * * * * * * * * * * * * * * * * * *		\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	EM&V - - - - - - - - - - - - - - - - - - -	T \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	2.037,477 439,078 900,000 258,683 405,966 33,750 1,358,626 300,298 641,250 6,000 125,000 210,927 75,150 1,144,673 405,931 208,742 530,000 160,000 224,119 52,415	

Energy Efficiency Report

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

Table 8 documents SPS'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.

Calendar Year	Actual Weather- Adjusted Demand Goal (MW)	Actual Weather- Adjusted Energy Goal (MWh)	Actual Demand Reduction (MW)	Actual Energy Savings (MWh)
2023	6.03	10,559	8.56	20,073
2022	6.03	10,559	8.43	18,883
2021	6.03	10,559	10,06	25,411
2020	5,99	10,502	11,67	25,663
2019	5,49	9,627	9,57	23,328

Table 8: Historical Demand and Energy Savings Goals and Achievements (at the Meter)

VI. Projected Versus Reported and Verified Demand and Energy Savings

This section documents SPS's projected savings and its reported and verified savings for PYs 2022 and 2023. Table 9 shows the savings for SOPs and MTPs. In 2023, SPS's programs produced 8,558 kW of demand savings at the meter or 142% of the statutory goal of 6,027 kW. Taking into account line losses approved in Docket No. 54634, SPS's 2023 programs produced 9.31 MW of demand savings at the source.

2022	Project	ed Savings	Reported/Verified Savings				
	kW	kWh	kW	kWh			
Commercial	7,972	10,884,491	4,568	6,298,054			
Commercial SOP	1,015	3,825,600	309	1,447,635			
Retro-Commissioning MTP	900	3,969,231	483	2,411,458			
Load Management SOP	5,250	21,000	3,282	3,282			
Small Commercial MTP	220	1,000,000	124	552,035			
Home Lighting MTP	587	2,068,660	370	1,883,644			
Residential	2,724	9,969,536	2,305	7,783,824			
Residential SOP	709	1,811,020	436	1,175,830			
Home Lighting MTP	1,965	6,925,516	1,858	6,281,114			
Smart Thermostat MTP	-	838,200	-	240,284			
Refrigerator Recycling MTP	50	394,800	11	86,596			
Residential HVAC MTP	N/A						
Residential Codes MTP	N/A						
Hard-to-Reach	750	2,074,850	1,559	4,800,647			
Hard-to-Reach SOP	500	1,309,850	1,211	3,757,797			
Hard-to-Reach Food Bank	-						
Low-Income Weatherization	250	765,000	348	1,042,850			
Total Annual Savings Goals	11,446	22,928,877	8,432	18,882,525			
2023	Project	ed Savings	Reported/V	erified Savings			
2023	Project kW	ed Savings kWh	Reported/V kW	erified Savings kWh			
2023 Commercial	Project kW 7,730	ted Savings kWh 10,884,000	Reported/V kW 5,233	erified Savings kWh 9,237,643			
2023 Commercial Commercial SOP	Project kW 7,730 1,020	ed Savings kWh 10,884,000 3,826,000	Reported/V kW 5,233 684	erified Savings kWh 9,237,643 3,746,110			
2023 Commercial Commercial SOP Retro-commissioning MTP	Project kW 7,730 1,020 900	ted Savings kWh 10,884,000 3,826,000 3,969,000	Reported/V kW 5,233 684 678	erified Savings kWh 9,237,643 3,746,110 2,635,099			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP	Project kW 7,730 1,020 900 5,000	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000	Reported/V kW 5,233 684 678 3,275	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP	Project kW 7,730 1,020 900 5,000 220	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000	Reported/V kW 5,233 684 678 3,275 277	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP	Project kW 7,730 1,020 900 5,000 220 590	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000	Reported/V kW 5,233 684 678 3,275 277 319	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential	Project kW 7,730 1,020 900 5,000 220 590 2,690	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 -	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 -	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000 395,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50 50 240	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000 395,000 360,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7 7	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327			
2023 Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50 240 -	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000 395,000 360,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7 7 - 7	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327 - N/A			
2023 Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential SOP Home Lighting MTP Smart Thermostat MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50 240 - 1,650	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000 395,000 360,000 - 5,875,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7 7 - N/A 1,383	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327 - N/A 4,304,702			
2023 Commercial Commercial SOP Retro-commissioning MTP Load Management SOP Small Commercial MTP Home Lighting MTP Residential Residential SOP Home Lighting MTP Smart Thermostat MTP Refrigerator Recycling MTP Refrigerator Recycling MTP Residential HVAC MTP Residential Codes MTP Hard-to-Reach Hard-to-Reach SOP	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50 240 - 1,650 500	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000 395,000 360,000 - 5,875,000 1,310,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7 7 - 7 7 - N/A 1,383 355	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327 - N/A 4,304,702 944,058			
2023Commercial SOPRetro-commissioning MTPLoad Management SOPSmall Commercial MTPHome Lighting MTPResidentialResidential SOPHome Lighting MTPSmart Thermostat MTPRefrigerator Recycling MTPResidential HVAC MTPResidential Codes MTPHard-to-ReachHard-to-Reach SOPHard-to-Reach Food Bank	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50 240 - 1,650 500 900	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 7,000,000 395,000 360,000 - 5,875,000 1,310,000 3,800,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 - 7 7 7 - 7 7 7 - 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327 - N/A 4,304,702 944,058 -			
2023Commercial SOPRetro-commissioning MTPLoad Management SOPSmall Commercial MTPHome Lighting MTPResidentialResidential SOPHome Lighting MTPSmart Thermostat MTPRefrigerator Recycling MTPResidential HVAC MTPResidential Codes MTPHard-to-ReachHard-to-Reach SOPHard-to-Reach Food BankLow-Income Weatherization	Project kW 7,730 1,020 900 5,000 220 590 2,690 400 2,000 - 50 240 - 1,650 500 900 250	ted Savings kWh 10,884,000 3,826,000 3,969,000 20,000 1,000,000 2,069,000 9,255,000 900,000 7,000,000 600,000 395,000 360,000 - 5,875,000 1,310,000 3,800,000 765,000	Reported/V kW 5,233 684 678 3,275 277 319 1,942 305 1,630 - 7 7 - 7 7 - 7 7 - 7 355 355	erified Savings kWh 9,237,643 3,746,110 2,635,099 3,275 1,214,970 1,638,189 6,530,636 863,996 5,520,111 92,202 54,327 - N/A 4,304,702 944,058 - 872,817			

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Table 9: Projected versus Reported/Verified Savings for 2022 and 2023 (at Meter)

VII. Historical Program Expenditures

This section documents SPS's incentive and administrative expenditures for the previous five years (2019-2023) broken out by program for each customer class. Table 10 shows expenditures for SOPs and MTPs.

Program		2023				2022			2021				2020				2019			
	11 (ncent. 000s)	Ac (0	lmin 00s)	- ћ (1cent. 000s)	A. (0	dmin 100s)	- Ц (1cent. 000s):	A ((dmin (000s)	min Ince Os) (000		Admin (000s)		Incent. (000s)		Admin (000s)	
Commercial	\$	1,948	\$	44	\$	1,332	\$	61	\$	1,795	\$	49	\$	1,627	\$	61	\$	1,684	\$	43
Large Commercial SOP	\$	381	\$	32	\$	258	\$	34	\$	387	\$	36	\$	218	\$	35	\$	231	\$	27
Small Commercial SOP	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Retro-Commissioning MTP	\$	949	\$	-	\$	670	\$	-	\$	922	\$	-	\$	947	\$	-	\$	869	\$	-
Load Management SOP	\$	156	\$	12	\$	204	\$	26	\$	199	\$	12	\$	246	\$	21	\$	171	\$	13
Small Commercial MTP	\$	415	\$	-	\$	182	\$	-	\$	270	\$	-	\$	198	\$	-	\$	400	\$	-
Home Lighting MTP	\$	47	\$	-	\$	18	\$	1	\$	16	\$	1	\$	17	\$	5	\$	13	\$	2
Residential	\$	1,343	\$	73	\$	788	\$	72	\$	639	\$	70	\$	947	\$	134	\$	875	\$	78
Residential SOP	\$	288	\$	36	\$	415	\$	34	\$	297	\$	46	\$	597	\$	35	\$	568	\$	27
Home Lighting MTP	\$	900	\$	25	\$	338	\$	26	\$	298	\$	14	\$	329	\$	91	\$	251	\$	39
Smart Thermostat MTP	\$	3	\$	1	\$	10	\$	2	\$	23	\$	7	\$	9	\$	-	\$	1	\$	-
Refrigerator Recycling MTP	\$	37	\$	10	\$	24	\$	10	\$	21	\$	4	\$	13	\$	7	\$	55	\$	11
Residential HVAC MTP	\$	116	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Residential Codes MTP	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Hard-to-Reach	\$	1,108	\$	37	\$	1,205	\$	10	\$	1,137	\$	38	\$	952	\$	35	\$	918	\$	27
Hard-to-Reach SOP	\$	396	\$	36	\$	758	\$	10	\$	685	\$	38	\$	491	\$	35	\$	497	\$	27
Hard-to-Reach Food Bank	\$	195	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Low-Income Weatherization	\$	195	\$	1	\$	447	\$	-	\$	452	\$	-	\$	461	\$	-	\$	421	\$	-
Research & Development	\$	-	\$	-	\$	-	\$	98	\$	-	\$	20	\$	-	\$	24	\$	-	\$	16
General Administration	\$	-	\$	105	\$	-	\$	148	\$	-	\$	142	\$	-	\$	136	\$	-	\$	148
Evaluation, Measurement &	\$	-	\$	-	\$	-	\$	34	\$	-	\$	33	\$	-	\$	31	\$	-	\$	34
Verification	4		-	20	đ			1.5			4	1.5			<i>•</i>		4			
Kider Expenses	3	-	\$	20	3	-	\$	17	\$	-	3	17	\$	-	\$	23	3	-	\$	27
Total Expenditures	\$	4,399	\$	278	\$	3,325	\$	440	\$	3,570	\$	369	\$	3,526	\$	444	\$	3,477	\$	374

Table 10:	Historical Program	Incentive and	Administrative E	Expenditures f	for 2019	through 2023 ⁹

⁹ 2023 expenditures from Docket No. 54949; 2022 expenditures from Docket No. 53540; 2021 expenditures from Project No. 52949, 2020 expenditures from Project No. 51672; 2019 expenditures from Project No. 50666; 2018 expenditures from Project No. 49297.

VIII. Program Funding for Calendar Year 2023

As shown in Table 11, SPS spent a total of \$4,834,832¹⁰ on its energy efficiency programs in 2023, which is \$519,113 more than SPS's 2023 approved budget of \$4,315,719.

	Tot	al		Ac	tual Funds	Act	ual Funds			Budget and	
	Pro	jected		Ex	pended	Exp	ended	Τò	tal Funds	Expenditure	
Customer Segment and Program	Budget P		Participants	(In	centives)	(Ad	min)	Ex	pended	Variance	
Commercial & Industrial	\$	1,946,075	24,763	\$	1,948,238	\$	44,083	\$	1,992,321	102%	
Large Commercial SOP	\$	436,272	307	\$	381,008	\$	32,429	\$	413,437	95%	
Retro-commissioning MTP	\$	800,000	25	\$	948,786	\$	-	\$	948,786	119%	
Load Management SOP	\$	285,778	7	\$	156,412	\$	11,654	\$	168,066	59%	
Small Commercial MTP	\$	405,624	104	\$	414,683	\$	-	\$	414,683	102%	
Home Lighting MTP	\$	18,402	24,320	\$	47,350	\$	-	\$	47,350	257%	
Residential	\$	1,076,398	462,193	\$	1,343,236	\$	72,603	\$	1,415,838	132%	
Residential SOP	\$	298,697	857	\$	287,975	\$	36,344	\$	324,318	109%	
Home Lighting MTP	\$	349,639	461,210	\$	899,645	\$	25,219	\$	924,865	265%	
Smart Thermostat MTP	\$	33,785	54	\$	2,850	\$	1,467	\$	4,317	13%	
Refrigerator Recycling MTP	\$	183,976	72	\$	36,555	\$	9,573	\$	46,127	25%	
Residential HVAC MTP	\$	210,300	-	\$	116,211	\$	-	\$	116,211	55%	
Residential Codes MTP		N/A	N/A	\$	-	\$	-	\$	-	N/A	
Hard-to-Reach	\$	1,077,985	931	\$	1,107,809	\$	36,945	\$	1,144,755	106%	
Hard-to-Reach SOP	\$	404 ,745	891	\$	396,265	\$	36,345	\$	432,610	107%	
Hard-to-Reach Food Bank	\$	208,240	20	\$	194,936	\$	-	\$	194,936	94%	
Low-Income Weatherization	\$	465,000	20	\$	516,609	\$	600	\$	517,209	111%	
Research & Development	\$	160,000		\$	-	\$	105,074	\$	105,074	66%	
General Administration	\$	211,253		\$	-	\$	104,906	\$	104,906	50%	
Evaluation, Measurement & Verification	\$	52,248		\$	-	\$	52,248	\$	52,2 4 8	NA	
EECRF Rider Expenses	\$	-		\$	-	\$	19,691	\$	19,691	NA	
Total	\$	4,523,959	487,887	\$	4,399,283	\$	435,549	\$	4,834,832	107%	

 Table 11: Program Funding for Calendar Year 2023

Pursuant to 16 TAC § 25.181(1)(2)(Q), SPS is required to provide an explanation of annual program spending variance from budgets if the variance exceeds a positive or negative 10%. In 2023, 7 programs met this criterion:

- The Retro-Commissioning MTP program overspent its budget but underdelivered on savings in 2023. The lower realized savings were due to the timing of project closings for 2023 and an underdeveloped pipeline. Thus, a portion of the budget was spent building the pipeline and interest in the program for 2024.
- The Load Management SOP program was below the budgeted spend in 2023 and did not meet its savings target. Several factors contributed to this including the loss of one

¹⁰ This number includes SPS's direct program costs, as well as indirect programs costs including R&D, EM&V, and EECRF rate case expenses.

participant, which represented approximately 20% of the SOP program's past enrollment, and the program was only called once during its season. Additionally, the company introduced a rule to disincentivize underperformance in 2023 that reduced the incentive amount if the participant did not meet 70% or more of their contracted load reduction. This was met with varying results between participants and will remain in 2024.

- The Home Lighting MTP program overachieved on savings and spend in 2023. The program experienced stronger than anticipated retail sales despite a reduction in rebates which resulted in the program being over budget.
- The Smart Thermostat MTP program ended the year below budgeted spend in spite of marketing campaigns aimed at highlighting the benefits of this technology and the ease of participating in the program. SPS intends to adjust its future marketing campaigns frequency and messaging to effectively advertise smart thermostats and increase participation in the program.
- The Refrigerator Recycling program did not achieve its forecasted goals or spending in 2023. During Q1 and Q2, the program was on track to meet its forecasted goals and spend, but the program's sole implementer unexpectedly went out of business in Q3. The program had to be paused for the rest of the year while a new implementer was selected and onboarded. Future marketing efforts will focus on informing customers that the program is back up and running and increasing general program awareness.
- The Residential HVAC MTP program was below the budgeted spend for 2023 due to the program not getting up and running until the second half of the year. This is due to the process of going out to bid with sourcing for this new program as well as contracting and onboarding the new implementer.
- The Low-Income Weatherization program exceeded the 2023 budget due to high participation. The high participation numbers were attributable to an Amarillo Church that is an implementer that offers the Low-Income Weatherization program to its members. Many members of the church participated in 2023.

IX. Market Transformation Program Results

SPS launched its Small Commercial MTP in January 2017. In 2023, SPS completed 15 projects. This program has proven to be effective at increasing participation amongst small commercial customers which was the focus for this offering. The small commercial program had a variety of projects completed to a diverse group of customers including Rodeo arenas, banks, and storage facilities.

SPS launched its Retro-Commissioning MTP in April 2013. In 2023, SPS completed 25 projects. The Retro-Commissioning MTP focused on larger commercial projects including several schools in the Texas Panhandle as well as colleges, and churches. SPS expects additional, similar projects to be completed in 2024.

SPS launched its Smart Thermostat MTP on January 1, 2020. In the program's fourth year as a program, SPS sold 66 Thermostats. The Smart Thermostats are sold on the SPS store front online marketplace where they are available for customers to purchase. SPS did not meet its forecasted goal in the Smart Thermostat program, but more marketing efforts will be made to achieve greater reduction goals in the future.

SPS launched its Refrigerator Recycling MTP on January 1, 2019. In the program's fifth year as a program, SPS recycled 72 old refrigerators within the service territory.

SPS launched its Home Lighting MTP in January 2017. The program continued to see strong performance despite dropping rebates due to the change in baseline for LED A-line bulbs.

SPS launched the Residential HVAC MTP in 2023 with Frontier Energy running the program. The program did not get started until the 3rd quarter of the year. There were no savings to report for 2023, just program administrative costs.

SPS Hard to Reach Food Banks MTP Program had a total of 285 Xcel Energy customers participate. Xcel Energy partnered with various Food Bank locations across the Texas Panhandle and passed out LED bulbs and a nightlight to customers. This program was a great success for SPS that was well-received by our customers. SPS expects this program to continue to have great success in the future.

X. 2023 Energy Efficiency Cost Recovery Factor (EECRF)

On August 24, 2023, in Docket No. 54949, the Commission approved SPS's 2023 EECRF to recover a total of \$4,854,410 in expenses associated with its 2023 energy efficiency programs, effective January 1, 2024.

Table 12:2023 EECRF Rates

Rate Schedule	\$/kWh
Residential Service	\$0.001284
Small General Service	\$0.000810
Secondary General Service	\$0.000507
Primary General Service	\$0.000728
Small Municipal and School Service	\$0.002047
Large Municipal Service	\$0.000212
Large School Service	\$0.003198

XI. Revenue Collected through EECRF (2023)

SPS collected \$6,475,341.31 through its 2023 EECRF, which became effective January 1, 2023.

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

SPS recovered \$147,285 less than actual PY 2023 expenses approved in Docket No. 54949, as shown in Table 14 below.

Table 13: Over/Under Recovery (2023)

2023 Program Costs	\$ 4,715,544
2022 EM&V costs	\$ 52,248
2021 Net Over Recovery	\$ (383,199)
2021 Rate Case Expenses (D. 48324)	\$ 16,813
2021 Performance Bonus	\$ 2,173,626
Total	\$ 6,622,383
EECRF Recovery	\$ (6,475,097)
Net (Over) Under Recovery	\$ 147,285

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Acronyms

C&I	Commercial and Industrial		
Commission	Public Utility Commission of Texas		
EECRF	Energy Efficiency Cost Recovery Factor		
EEP	Energy Efficiency Plan		
EEPR	Energy Efficiency Plan and Report		
EER	Energy Efficiency Report		
EE Rules	Energy Efficiency Rules, 16 Tex. Admin. Code §		
	§25.181, 25.182 and § 25.183		
EESP	Energy Efficiency Service Provider		
EM&V	Evaluation, Measurement, and Verification		
kW	kilowatt		
kWh	kilowatt hour		
LED	Light Emitting Diode		
МТР	Market Transformation Program		
MW	Megawatt		
MWh	Megawatt hour		
PURA	Public Utility Regulatory Act		
РҮ	Program Year		
R&D	Research & Development		
SOP	Standard Offer Program		
SPS	Southwestern Public Service Company		
ТАС	Texas Administrative Code		

APPENDIX A: REPORTED DEMAND AND ENERGY REDUCTION BY COUNTY 2023

Large Commercial SOP			
County	# of Premises	kW	kWh
Bailey	21	63	363,567
Carson	2	2	8,773
Deaf Smith	4	12	47,160
Garza	1	4	14,838
Gray	42	135	690,789
Hale	4	9	19,915
Hockley	1	8	29,232
Potter	34	332	1,900,574
Randall	163	109	619,130
Wheeler	35	10	52,132
Total	307	684	3,746,110

Recommissioning MTP			
County	# of Premises	kW	kWh
Hale	3	151	516,978
Hutchinson	1	98	667,329
Moore	6	258	967,645
Ochiltree	7	25	64,121
Potter	6	141	405,136
Randall	2	5	13,890
Total	25	678	2,635,099

Load Management				
County	# of Premises	kW	kWh	
Hartley	2	943	943	
Hockley	1	1	1	
Parmer	2	807	807	
Potter	4	543	543	
Randall	3	252	252	
Yoakum	1	730	730	
Total	13	3,275	3,275	

Small Commercial MTP			
County	# of Premises	kW	kWh
Gray	19	3	11,123
Hockley	4	9	35,892
Potter	47	62	245,083
Randall	34	204	922,872
Total	104	277	1,214,970

Home Lighting MTP				
County	# of Premises ¹	kW	kWh	
Deaf Smith	1,320	232	220,216	
Gaines	1,260	197	186,606	
Garza	16	0	164	
Gray	1,649	331	314,626	
Hale	1,601	540	522,528	
Hockley	1,559	275	261,477	
Hutchinson	1,567	328	311,952	
Lamb	44	57	54,337	
Moore	1,533	292	277,409	
Potter	5,000	1,757	1,672,169	
Randall	6,985	4,449	4,234,557	
Total	22,534	8,458	8,056,041	
¹ Sum of bulbs sold and not individual premises.				

Residential SOP			
County	# of Premises	kW	kWh
Cochran	18	8	22,971
Deaf Smith	36	17	56,168
Gray	127	64	151,379
Hockley	150	63	174,846
Hutchinson	1	0	314
Lamb	22	18	65,396
Potter	148	62	196,111
Randall	355	73	196,811
Total	857	305	863,996

Hard-to-Reach SOP			
County	# of Premises	kW	kWh
Cochran	31	11	27,036
Deaf Smith	12	6	17,370
Gray	71	63	132,657
Hockley	149	51	127,941
Hutchinson	2	1	698
Lamb	10	4	11,817
Moore	4	2	6,158
Parmer	3	2	2,697
Potter	299	140	434,634
Randall	310	76	183,050
Total	891	355	944,058

Low-income Weatherization			
County	# of Premises	kW	kWh
Deaf Smith	66	14	23,118
Gray	7	2	2,971
Potter	181	325	826,867
Randall	60	9	19,861
Total	314	350	872,817

Refrigerator Recycling			
County	# of Premises	kW	kWh
Bailey	2	0	1,439
Briscoe	1	0	589
Castro	1	0	375
Gaines	1	0	355
Gray	3	0	3,343
Hale	2	0	1,631
Hockley	2	0	814
Hutchinson	1	0	1,179
Lamb	2	0	977
Lubbock	1	0	375
Moore	1	0	561
Oldham	2	0	1,348
Parmer	1	0	736
Potter	23	2	19,059
Randall	28	3	21,546
Total	71	7	54,327

Smart Thermostats			
County	# of Premises	kW	kWh
Dallam	1	-	1,397
Floyd	1	-	1,397
Gaines	1	-	1,397
Gray	2	-	2,794
Hemphill	1	-	1,397
Hutchinson	3	-	4,191
Limbscomb	1	-	1,397
Lubbock	1	-	1,397
Lynn	1	-	1,397
Potter	32	-	57,277
Randall	9	-	12,576
Terry	2	-	2,794
Yoakum	1	-	2,794
Total	56	-	92,205

Texas Food Bank Kits								
County	County # of Premises kW kWh							
Gray	4	97	357,446					
Hale	2	11	40,511					
Hockley	2	3	9,532					
Ochiltree	2	97	357,446					
Potter	10	470	1,722,891					
Total	20	678	2,487,826					

		2013 (<i>j</i>	3 (Actual) 2014 (Actual) 2018 (Actual)				2019 (Actual)				2021 (Actual)			2022 (Actual)				2023 (Actual)				2024 (Projected)				2025 (Projected)							
Customer Class	•	j/kW	\$	/kWh		\$/k₩	\$ i/k₩h	\$ ÿ∕k₩	\$ /kWh	\$	ï∕k₩	\$,	k₩h	\$	/kW	\$	/kWh	4	5/kW	4	5/kWh	\$	/kW	\$/	ƙWh	Ś	\$/kW	\$/	k₩h	\$	/kW	\$	ƙWh
Commercial	\$	206	\$	0.19	\$	258	\$ 0.13	\$ 277	\$ 0.17	\$	289	\$	0.13	\$	296	\$	0.15	\$	305	\$	0.22	\$	381	\$	0.22	\$	267	\$	0.21	\$	315	\$	0.24
Residential	\$	556	\$	0.21	\$	744	\$ 0.18	\$ 417	\$ 0.15	\$	362	\$	0.12	\$	303	\$	0.08	\$	373	\$	0.11	\$	729	\$	0.22	\$	974	\$	0.27	\$	757	\$	0.26
Hard-to-Reach	\$	890	\$	0.46	\$	1,1 9 6	\$ 0.36	\$ 971	\$ 0.40	\$	989	\$	0.42	\$	795	\$	0.26	\$	780	\$	0.25	\$	828	\$	0.27	\$	1,038	\$	0.33	\$	848	\$	0.28
Total	\$	426	\$	0.27	\$	485	\$ 0.20	\$ 405	\$ 0.20	\$	402	\$	0.17	\$	392	\$	0.16	\$	447	\$	0.20	\$	565	\$	0.24	\$	482	\$	0.27	\$	517	\$	0.28

Attachment MRL-3(CONF) Pages 1 through 1

Is Confidential Information

CONFIDENTIAL PROTECTED MATERIALS PROVIDED PURSUANT TO PROTECTIVE ORDER

Master Estimated Useful Life Spreadsheet of Technical Reference Manual 9.0

Estimated Usef	ul Life Valu	ues (EULs)
Sector	TRM Measure	Energy Efficiency Measure
Custom	NA	Custom
Residential	2.1.1	Res Energy Star General Service LED Lamps: ≤ 17,500 hour rated life
Residential	2.1.1	Res Energy Star General Service LED Lamps: >17,500 hour rated life
Residential	2.1.2	Res Specialty LED Lamps: < 17,500 hour rated life
Residential	2.1.2	Res Specialty LED Lamps: > 17,500 hour rated life
Residential	2.1.3	Res LED Nightlights
Residential	2.2.1	Res Air Conditioner (AC) and Heat Pump (HP) Tune-Ups
Residential	2.2.2	Res Central HPs without SEER2 Ratings
Residential	2.2.3	Res Mini-Split HPs without SEER2 Ratings
Residential	2.2.4	Res Central and Mini-Split ACs and HPs with SEER2 Ratings: ACs
Residential	2.2.4	Res Central and Mini-Split ACs and HPs with SEER2 Ratings: HPs
Residential	2.2.5	Res Room Air Conditioners (RAC)
Residential	2.2.6	Res Packaged Terminal HPs (PTHP)
Residential	2.2.7	Res Ground Source Heat Pumps (GSHP)
Residential	2.2.8	Res Large Capacity Split System and Packaged ACs and HPs - HPs
Residential	2.2.8	Res Large Capacity Split System and Packaged ACs and HPs - GSHPs
Residential	2.2.9	Res Evaporative Cooling
Residential	2.2.10	Res Connected Thermostats
Residential	2.2.11	Res Smart Thermostat Load Management
Residential	2.2.12	Res Duct Sealing
Residential	2.3.1	Res Air Infiltration
Residential	2.3.2	Res Ceiling Insulation
Residential	2.3.3	Res Attic Encapsulation
Residential	2.3.4	Res Wall Insulation
Residential	2.3.5	Res Floor Insulation
Residential	2.3.6	Res Radiant Barriers
Residential	2.3.7	Res Cool Roofs
Residential	2.3.8	Res Solar Screens
Residential	2.3.9	Res Windows
Residential	2.3.10	Res Storm Windows
Residential	2.4.1	Res Water Heater Installations - Electric Tankless and Fuel Substitution (Gas and Electric Tankless)
Residential	2.4.1	Res Water Heater Installations - Electric Tankless and Fuel Substitution (Gas Storage)
Residential	2.4.2	Res Heat Pump Water Heaters (HPWH)
Residential	2.4.3	Res Solar Water Heaters
Residential	2.4.4	Res Water Heater Tank Insulation
Residential	2.4.5	Res Water Heater Pipe Insulation
Residential	2.4.6	Res Faucet Aerators
Residential	2.4.7	Res Low-Flow Showerheads (LFSH)
Residential	2.4.8	Res Showerhead Temperature Sensitive Restrictor Valves (TSRV)
	-	

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EUL (years)	TRM Version
NA	NA
16.0	10.0
20.0	10.0
16.0	10.0
20.0	10.0
8.0	10.0
5.0	10.0
15.0	10.0
15.0	10.0
18.0	10.0
15.0	10.0
10.0	10.0
15.0	10.0
24.0	10.0
15.0	10.0
20.0	10.0
15.0	10.0
11.0	10.0
1.0	10.0
18.0	10.0
11.0	10.0
25.0	10.0
25.0	10.0
25.0	10.0
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25.0	10.0
15.0	10.0
10.0	10.0
25.0	10.0
20.0	10.0
20.0	10.0
11.0	10.0
13.0	10.0
15.0	10.0
7.0	10.0
13.0	10.0
10.0	10.0
10.0	10.0
10.0	10.0

Master Estimated Useful Life Spreadsheet of Technical Reference Manual 9.0

Sector TRM Measure Energy Efficiency Measure Residential 2.4.0 Res Tub Spoul and Showshieed TSRVs Residential 2.4.10 Hes Water Heator I Emperature Setback Residential 2.5.1 Res Cellip Zons Residential 2.5.2 Res Clubtes Washers Residential 2.5.3 Res Clubtes Washers Residential 2.5.4 Res Clubtes Washers Residential 2.5.5 Res Refigurators Residential 2.5.6 Res Refigurators Residential 2.5.6 Res Refigurators Residential 2.5.7 Res Refigurators Residential 2.5.7 Res Refigurators Residential 2.5.7 Res Refigurator Residential 2.5.8 Res Pool Purics Residential 2.5.1 Res Pool Purics Residential 2.5.1 Res Bedro Vehi de Supply Equipment (EVSE) Residential 2.5.1 Res Bedro Vehi de Supply Equipment (EVSE) Residential 2.5.1 Com Lamos and Futures - Inlegrated-Balast Cold Calhode Fluorescent Lamps (CCFL) </th <th>Estimated Useful</th> <th>Life Valu</th> <th>ies (EULs)</th>	Estimated Useful	Life Valu	ies (EULs)
Residential 2.4.9 Ref Tub Spout and Showerhead TSRVe Residential 2.4.10 Res Water Heater Temperature Setback Residential 2.5.1 Res Coling Form Residential 2.5.2 Res Coling Form Residential 2.5.3 Res Coling Substance Residential 2.5.6 Res Friegerators Residential 2.5.6 Res Friegerators Residential 2.5.7 Res Afrigorators Residential 2.5.6 Res Friegerators Residential 2.5.7 Res Refigurator/Freezer Recycling Residential 2.5.6 Res Friegerators Residential 2.5.1 Res Foro Pumpe Residential 2.5.1 Res Explore Power Strips (APS) Residential 2.5.11 Res Explore Power Strips (APS) Residential 2.5.12 Res Inductor Cooling Commercial 2.1.1 Com Lamps and Futures - Holgen Lamps Commercial 2.1.1 Com Lamps and Futures - Integratus Display (Cell Pubpe (IED) Lamps Commercial 2.1.1 Com Lamps and Futures - Integ	Sector	TRM Measure	Energy Efficiency Measure
Residential 24.10 Res Water Heater Temperature Setback Residential 25.1 Res Colling Fame Residential 25.3 Res Collings Dryms Residential 25.4 Res Collings Dryms Residential 25.5 Res Refrigorators Residential 25.6 Res Refrigorators Residential 25.7 Res Refrigorator Freezer Recycling Residential 25.6 Res Advanced Power String (APS) Residential 25.10 Res Advanced Power String (APS) Residential 25.11 Res Electro Vehicle Suppt Equipment (EVSE) Residential 25.11 Res Electro Vehicle Suppt Equipment (EVSE) Remeroal 21.1 Com Lames and Fixtures - Hildgate Lable Entitiegorated Eduals Coll Cathode Fluorescent Lamps (CCFL) Commeroal 21.1 Com Lames and Fixtures - LED	Residential	2.4.9	Res Tub Spout and Showerhead TSRVs
Residential 2.5.1 Ree Coling Fans Residential 2.5.2 Ree Colings Evadential 2.5.3 Residential 2.5.4 Ree Dishwashers Residential 2.5.5 Ree Refrequence Residential 2.5.6 Ree Frequence Residential 2.5.7 Ree Refrequence Residential 2.5.7 Ree Refrequence Residential 2.5.7 Ree Refrequence Residential 2.5.7 Ree Refrequence Residential 2.5.9 Ree Pool Pumps Residential 2.5.11 Ree Bedric Veh de Supply Equipment (EVSE) Residential 2.5.11 Ree Bedric Veh de Supply Equipment (EVSE) Residential 2.5.11 Ree Bedric Veh de Supply Equipment (EVSE) Commercial 2.1.1 Com Lamps and Fixtures - Hiegrated-Balast Color Entrops Commercial 2.1.1 Com Lamps and Fixtures - Hiegrated-Balast Color Entrops Commercial 2.1.1 Com Lamps and Fixtures - LED Con Loamps Commercial 2.1.1 Com Lamps and Fixtures - LED Con Loamps Commercial	Residential	2.4.10	Res Water Heater Temperature Setback
Residential 2.5.2 Res Clothes Washers Residential 2.5.3 Res Clothes Dyors Residential 2.5.4 Res Dishwashers Residential 2.5.5 Res Refrigerators Residential 2.5.6 Res Refrigerators Residential 2.5.7 Res Refrigerators Residential 2.5.8 Res Ar Purifiers Residential 2.5.9 Res Pole Furns Residential 2.5.10 Res Advanced Power Strips (APS) Residential 2.5.11 Res Eduction Cooking Commercial 2.5.12 Res Induction Cooking Commercial 2.1.1 Con Lamps and Fixtures - Hilgstrate-Ballast Cold Cathode Florescent Lamps (CCFL) Commercial 2.1.1 Com Lamps and Fixtures - Linegrate-Ballast Cold Cathode Florescent Lamps (CCFL) Commercial 2.1.1 Com Lamps and Fixtures - Linegrate-Ballast Cold Cathode Florescent Lamps (CCFL) Commercial 2.1.1 Com Lamps and Fixtures - Line Clore Cold Lamps (CCFL) Commercial 2.1.1 Com Lamps and Fixtures - Line Clore Cold Lamps (CCFL) Commercial 2.1.1 Com	Residential	2.5.1	Res Ceiling Fans
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Commercial2.1.3Com Exterior Photocell and Timeclock RepairCommercial2.1.4Com LED Traffic Signals - 8" and 12" Red, Green, and Yellow BallsCommercial2.1.4Com LED Traffic Signals - 8" and 12" Red, Green, and Yellow ArrowsCommercial2.1.4Com LED Traffic Signals - 8" and 12" Red, Green, and Yellow ArrowsCommercial2.1.4Com LED Traffic Signals - Large (16" x 18") Pedestrian SignalsCommercial2.1.4Com LED Traffic Signals - Small (12" x 12") Pedestrian SignalsCommercial2.2.1Com Air Conditioner (AC) and Heat Pump (HP) Tune-UpsCommercial2.2.2Com Split-System/Packaged ACs and HPsCommercial2.2.3Com Chillers (Screw, Scroll, and Reciprocating)	Commercial	2.1.2	Com Lighting Controls - New Construction Interior Fixtures & Controls
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Commercial 2.2.2 Com Split-System/Packaged ACs and HPs Commercial 2.2.3 Com Chillers (Screw, Scroll, and Reciprocating)	Commercial	2.2.1	Com Air Conditioner (AC) and Heat Pump (HP) Tune-Ups
Commercial 2.2.3 Com Chillers (Screw, Scroll, and Reciprocating)	Commercial	2.2.2	Com Split-System/Packaged ACs and HPs
	Commercial	2.2.3	Com Chillers (Screw, Scroll, and Reciprocating)

Attachment MFL-4 Page 2 of 4 Docket No.____

EUL (years)	TRM Version
10.0	10.0
2.0	10.0
10.0	10.0
11.0	10.0
16.0	10.0
15.0	10.0
16.0	10.0
22.0	10.0
8.0	10.0
9.0	10.0
10.0	10.0
10.0	10.0
10.0	10.0
16.0	10.0
1.5	10.0
15.0	10.0
4.5	10.0
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9.0	10.0
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10.0	10.0
14.0	10.0
1.0	10.0
6.0	10.0
6.0	10.0
5.0	10.0
5.0	10.0
5.0	10.0
15.0	10.0
20.0	10.0

Estimated Use	ful Life Valu	ies (EULs)
Sector	TRM Measure	Energy Efficiency Measure
Commercial	2.2.3	Com Chillers (Centrifugal)
Commercial	2.2.4	Com Packaged Terminal ACs and HPs (PTAC/PTHP)
Commercial	2.2.4	Com Room Air Conditioners (RAC)
Commercial	2.2.5	Com Computer Room Air Conditioners (CRAC)
Commercial	2.2.6	Com Computer Room Air Handlers (CRAH) - Premium Efficiency Motors
Commercial	2.2.6	Com Computer Room Air Handlers (CRAH) - HVAC VFDs
Commercial	2.2.7	Com HVAC Variable Frequency Drives (VFD)
Commercial	2.2.8	Com Condenser Air Evaporative Pre-Cooling
Commercial	2.2.9	Com High-Volume Low-Speed (HVLS) Fans
Commercial	2.2.10	Com Small Commercial Evaporative Cooling
Commercial	2.2.11	Com Small Commercial Smart Thermostats
Commercial	2.3.1	Com Cool Roofs
Commercial	2.3.2	Com Window Treatments
Commercial	2.3.3	Com Entrance and Exit Door Air Infiltration
Commercial	2.4.1	Com Combination Ovens
Commercial	2.4.2	Com Electric Convection Ovens
Commercial	2.4.3	Com Dishwashers - Under Counter
Commercial	2.4.3	Com Dishwashers - Stationary Single Tank Door
Commercial	2.4.3	Com Dishwashers - Single Tank Conveyor
Commercial	2.4.3	Com Dishwashers - Multiple Tank Conveyor
Commercial	2.4.3	Com Dishwashers - Pot, Pan, and Utensil
Commercial	2.4.4	Com Hot Food Holding Cabinets (HFHC)
Commercial	2.4.5	Com Electric Fryers
Commercial	2.4.6	Com Electric Steam Cookers
Commercial	2.4.7	Com Ice Makers
Commercial	2.4.8	Com Demand Controlled Kitchen Ventilation (DCKV)
Commercial	2.4.9	Com Pre-Rinse Spray Valves (PRSV)
Commercial	2.4.10	Com Vacuum-Sealing and Packaging Machines
Commercial	2.5.1	Com Door Heater Controls
Commercial	2.5.2	Com Electronically Commutated Motors (ECM) Evaporator Fan Motors
Commercial	2.5.3	Com Electronic Defrost Controls
Commercial	2.5.4	Com Evaporator Fan Controls
Commercial	2.5.5	Com Night Covers for Open Refrigerated Display Cases
Commercial	2.5.6	Com Solid and Glass Door Reach-Ins
Commercial	2.5.7	Com Strip Curtains for Walk-In Refrigerated Storage
Commercial	2.5.8	Com Zero-Energy Doors for Refrigerated Cases
Commercial	2.5.9	Com Door Gaskets for Walk-In and Reach-In Coolers and Freezers
Commercial	2.5.10	Com High Speed Doors for Cold Storage
Commercial	2.6.1	Com Central Domestic Hot Water (DHW) Controls

Attachment MFL-4 Page 3 of 4 Docket No._____

EUL (years)	TRM Version
25.0	10.0
15.0	10.0
10.0	10.0
15.0	10.0
15.0	10.0
15.0	10.0
15.0	10.0
10.0	10.0
9.0	10.0
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11.0	10.0
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8.5	10.0
15.0	10.0
5.0	10.0
10.0	10.0
12.0	10.0
15.0	10.0
10.0	10.0
16.0	10.0
5.0	10.0
12.0	10.0
4.0	10.0
12.0	10.0
3.U 5.0	10.0
5.0	10.0
15.0	10.0

Master Estimated Useful Life Spreadsheet of Technical Reference Manual 9.0

Sector	TRM Measure	Energy Efficiency Measure
Commercial	2.6.2	Com Showerhead Temperature Sensitive Restrictor Valves (TSRV)
Commercial	2.6.3	Com Tub Spout and Showerhead TSRVs
Commercial	2.7.1	Com Vending Machine Controls
Commercial	2.7.2	Com Lodging Guest Room Occupancy Sensor Controls
Commercial	2.7.3	Com Pump-Off Controllers
Commercial	2.7.4	Com Pool Pumps
Commercial	2.7.5	Com Computer Power Management
Commercial	2.7.6	Com Premium Efficiency Motors
Commercial	2.7.7	Com Electric Vehicle Supply Equipment (EVSE)
Commercial	2.7.8	Com VFDs for Water Pumping
Commercial	2.7.9	Com Steam Trap Repair and Replacement - Standard Steam Traps
Commercial	2.7.9	Com Steam Trap Repair and Replacement - Venturi Steam Traps
Commercial	2.7.10	Com Hydraulic Gear Lubricants
Commercial	2.7.11	Com Hydraulic Oils
Commercial	2.7.12	Com Hand Dryers
Measurement and Verification	2.1.1	M&V Air Conditioning Tune-Ups
Measurement and Verification	2.1.2	M&V Ground Source Heat Pumps (GSHP)
Measurement and Verification	2.1.3	M&V Variable Refrigerant Flow (VRF) Systems
Measurement and Verification	2.2.1	M&V Residential New Construction
Measurement and Verification	2.2.2	M&V Smart Home Energy Management Systems (SHEMS)
Measurement and Verification	2.3.1	M&V Residential Energy Code Compliance
Measurement and Verification	2.4.1	M&V Non-Residential Solar Photovoltaics (PV)
Measurement and Verification	2.4.2	M&V Residential Solar Photovoltaics (PV)
Measurement and Verification	2.4.3	M&V Solar Shingles
Measurement and Verification	2.4.4	M&V Solar Attic Fans
Measurement and Verification	2.5.1	M&V Behavioral Measures
Measurement and Verification	2.5.2	M&V Air Compressors Less than 75 hp
Measurement and Verification	2.5.3	Nonresidential M&V: Custom
Measurement and Verification	2.5.3	Nonresidential M&V: Retrocomissioning (RCx)
Measurement and Verification	2.5.3	Nonresidential M&V: Advanced Controls and Sensors
Measurement and Verification	2.5.4	M&V Thermal Energy Storage (TES)
Measurement and Verification	2.6.1	M&V Residential Load Curtailment
Measurement and Verification	2.6.2	M&V Non-Residential Load Curtailment

Attachment MFL-4 Page 4 of 4 Docket No.____

	TRM
EUL (years)	Version
10.0	10.0
10.0	10.0
5.0	10.0
10.0	10.0
15.0	10.0
10.0	10.0
3.0	10.0
15.0	10.0
10.0	10.0
12.5	10.0
6.0	10.0
20.0	10.0
10.0	10.0
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10.0	10.0
5.0	10.0
20.0	10.0
15.0	10.0
23.0	10.0
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23.0	10.0
30.0	10.0
30.0	10.0
20.0	10.0
15.0	10.0
1.0	10.0
10.0	10.0
10.0	10.0
5.0	10.0
10.0	10.0
15.0	10.0
1.0	10.0
1.0	10.0

The following files are not convertible:

Attachment MFL-2.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.