

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF EL PASO ELECTRIC)
COMPANY’S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)**

Case No. 24-00154-UT

**EL PASO ELECTRIC COMPANY,)
Applicant.)**

EXECUTIVE SUMMARY

El Paso Electric Company’s (“EPE”) *Application for Approval of Its 2025-2027 Energy Efficiency and Load Management Plan, Utility Incentive, and Revised Rate No. 17- Efficient Use of Energy Recovery Factor* seeks approval of its proposed Energy Efficiency and Load Management (“EE/LM”) Plan for continuation of EPE’s Energy Efficiency Programs (“Programs”), with one modification, and proposed Program budgets for plan years 2025-2027 (“EE/LM Plan”), 2025-2027 Utility incentive mechanism, and revisions to Rate No. 17 - Efficient Use of Energy Recovery Factor rate rider (“Rate No. 17 - EUERF”). EPE additionally seeks Commission approval to add an avoided emissions benefit to the cost effectiveness test. EPE files its Application pursuant to the New Mexico Efficient Use of Energy Act (“EUEA”), NMSA 1978, Sections 62-17-1 et seq., as amended, and the New Mexico Public Regulation Commission’s (“NMPRC” or “Commission”) Energy Efficiency Rule, 17.7.2 NMAC (“Rule”).

EPE requests recovery of the proposed EE/LM Plan annual budgets, based on three to five percent of EPE’s eligible historical 2023 total retail revenues. This resulted in a base annual budget range of \$6,604,915 to \$7,258,019. For program year 2025, EPE proposes a budget of \$6,604,915, which is 4.453 percent of EPE’s 2023 eligible retail revenues. For 2026 and 2027, EPE proposes

a budget of \$6,921,170 and \$7,258,019 for each program year, respectively. EPE requests approval to modify its proposed budgets for program years 2026 and 2027 based on actual 2024 and 2025 eligible retail revenues.

EPE seeks a variance from Rule 17.7.2.8(E) to refund the 2023 program year underage of \$1,917,236 through the proposed Rate No. 17 – EUERF rate rider.

EPE determined the cost-effectiveness of the EE/LM Plan portfolio based on the utility cost test (“UCT”), which is a standard that is met if the monetary costs that are borne by the public utility and that are incurred to develop, acquire and operate energy efficiency or load management resources on a life-cycle basis are less than the avoided monetary costs associated with developing, acquiring and operating the associated supply-side resources. EPE’s 2025 EE/LM Plan Program portfolio meets the UCT with an overall UCT ratio of 1.36. Overall, EPE’s portfolio of programs achieves a total UCT ratio greater than 1.0. While some individual programs have a UCT less than 1.0, the UCT evaluates cost-effectiveness at the portfolio level. EPE believes that each of its proposed programs contributes important benefits, and therefore seeks reauthorization to continue each of its eleven existing Programs, with one modification to expand the Residential Lighting Program into the proposed Residential Products Program.

EPE also seeks approval to include the addition of an avoided emissions benefit to the cost effectiveness test. At the request of EPE, the statewide evaluator presented EPE with alternative cost-effectiveness results that included an avoided utility carbon emissions benefit. The emissions rate is sourced from EPE’s 2022 Corporate Sustainability Report¹, and the social cost of carbon is

¹ EPE 2022 Corporate Sustainability Report, p. 25.
<https://www.epelectric.com/files/html/Sustainability%20Report/2022%20Corporate%20Sustainability%20Report.pdf>.

sourced from the EPA’s 2023 Report on the Social Cost of Greenhouse Gases.^{2,3} EPE requested the alternative cost-effectiveness results from the statewide evaluator in response to recommendations made by stakeholders during the public advisory process conducted when developing the EE/LM Plan. The alternative cost effectiveness results increase the UCT of each proposed program and results in a 2025 EE/LM Plan Program portfolio overall UCT ratio of 2.06.

EPE selected its proposed portfolio of programs after investigating cost effective and achievable energy efficiency and load management resources available in its New Mexico service territory. EPE requests to continue all of its existing Programs that were approved in Case No. 21-00114-UT, with modifications to one program. EPE’s proposed 2025-2027 EE/LM Plan includes the following eleven EE/LM Programs:

- Smart Students Program,
- Residential Comprehensive Program,
- Residential Products Program, (modified and with a new name),
- ENERGY STAR® New Homes Program,
- Marketplace Program,
- Residential Load Management Program,
- EnergySaver Program,
- Energy\$mart Program,
- Commercial Comprehensive Program,
- SCORE Plus Program, and
- Commercial Load Management Program.

EPE additionally requests approval to continue the utility incentive mechanism approved in Case No. 21-00114-UT and requests a baseline utility incentive of 6.6 percent of program expenditures for 2025 through 2027. The proposed baseline utility incentive is \$435,924 annually. The annual utility incentive will be subject to a true-up based on actual expenses and energy

² EPA 2023 Report on the Social Cost of Greenhouse Gases, November 2023, Table ES.1, p. 4.
https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf.

³ The \$130 value is halfway between the 2020 and 2030 social cost values (in 2020 dollars) at a 2.5% discount rate. For this analysis, the social cost was converted from dollars per metric ton to dollars per short ton using a conversion factor of 0.9071847.

savings achieved each year. Finally, EPE proposes a revised EUERF of 3.9577 percent to recover the funding for the proposed EE/LM Plan and the utility incentive.

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PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)**

Case No. 24-00154-UT

**EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)**

**EL PASO ELECTRIC COMPANY’S APPLICATION FOR APPROVAL OF
2025-2027 PLAN, 2025-2027 UTILITY INCENTIVE AND REVISED
RATE NO. 17- EUERF**

El Paso Electric Company (“EPE”) hereby files its Application for approval of its proposed Energy Efficiency and Load Management (“EE/LM”) Plan for continuation of EPE’s Energy Efficiency Programs (“Programs”), with one modification, and proposed Program budgets for plans year 2025-2027 (“EE/LM Plan”), 2025-2027 utility incentive, and revisions to Rate No. 17 - Efficient Use of Energy Recovery Factor rate rider (“Rate No. 17 - EUERF”). EPE files its Application pursuant to the New Mexico Efficient Use of Energy Act (“EUEA”), NMSA 1978, Sections 62-17-1 et seq. and the New Mexico Public Regulation Commission’s (“NMPRC” or “Commission”) Energy Efficiency Rule, 17.7.2 NMAC (“Rule”). EPE’s EE/LM Plan is supported by the Direct Testimonies of EPE witnesses Victor H. Silva, Derek R. Neumann, and Adrian Hernandez. EPE’s Advice Notice No. 302, requesting approval of its Revised Rate No. 17 - EUERF effective January 1, 2025, is being filed concurrently with this Application. EPE requests approval by the Commission of its Application, including the addition of an avoided emissions benefit to the cost effectiveness test, together with all other approvals, authorization, and actions that

may be required for implementation thereof in accordance with the EUEA, the Rule, and the New Mexico Public Utility Act (“PUA”), NMSA 1978, Section 62-3-1 et seq.

In support of this Application, EPE states the following:

1. EPE is certified and authorized to conduct the business of providing public utility service within the State of New Mexico, is a public utility subject to the jurisdiction of the Commission under the PUA, and is a wholly-owned subsidiary of Sun Jupiter, LLC.

2. EPE generates, transmits and distributes electricity through an interconnected system to customers in southern New Mexico and Texas. EPE owns, operates, leases or controls the plant, property and facilities used by it for the generation, transmission, distribution, sale or furnishing of electricity to or for the public within New Mexico and Texas.

3. EPE’s principal business address and telephone number for its New Mexico service area are:

El Paso Electric Company
100 N. Stanton Street
El Paso, Texas 79901
(915) 543-5711

4. Service of all notices, pleadings and other documents related to this Application should be made as follows:

Michelle A. Pedroza
Regulatory Case Manager
El Paso Electric Company
100 N. Stanton Street
El Paso, Texas 79901
(915) 543-4378

Nancy B. Burns
Deputy-General Counsel
El Paso Electric Company
300 Galisteo Street, Suite 206
Santa Fe, New Mexico 87501
(505) 982-7391

In addition, pleadings and other documents should be emailed to the following electronic addresses:

nancy.burns@epelectric.com
epe_reg_mgmt@epelectric.com
kolson@montand.com
aharris@montand.com
tpacheco@montand.com

5. EPE's current portfolio of Programs and budgets was approved by the Commission in NMPRC Case No. 21-00114-UT.¹

6. Concurrent with the filing of this Application and in accordance with the Rule, EPE has filed its 2024 Annual Report for Energy Efficiency Programs for the 2023 Program Year ("2024 Annual Report") in NMPRC Case No. 21-00114-UT, the docket in which the 2022 Programs were approved. The 2024 Annual Report includes the statewide independent evaluator's report, *Evaluation of the 2023 El Paso Electric Energy Efficiency Programs*, prepared by EcoMetric Consulting LLC.

7. EPE proposes to include in its 2025-2027 EE/LM Plan the following cost-effective Portfolio of Programs:

Educational Smart Students® Program
Residential Residential Comprehensive Program Residential Products Program ENERGY STAR® New Homes Program Residential Load Management Program MarketPlace Program
Low Income EnergySaver Program EnergySmart Program
Commercial Commercial Comprehensive Program SCORE Plus Program Commercial Load Management Program

¹ NMPRC Case No. 21-00114-UT, Final Order Adopting Recommended Decision (November 30, 2022) (hereinafter "Final Order").

The EUEA requires public utilities to obtain Commission approval of proposed Programs prior to implementation. NMSA 1978, Section 62-17-5. EPE seeks approval to implement the proposed Programs, together with the proposed Program budgets. EPE also offers assistance in accordance with Rule 17.7.2 NMAC to Large Customers choosing to pursue their own energy efficiency efforts.

8. The proposed 2025-2027 EE/LM Plan seeks continuation of the programs approved by the Commission Case No. 21-00114-UT Final Order, with one proposed program modification, revising the Residential Lighting Program to the proposed Residential Products Program.

9. The proposed EE/LM Plan considers input solicited from interested parties, including, among others, the Attorney General of New Mexico (“AG”), the Energy, Minerals and Natural Resources Department (“EMNRD”), Coalition for Clean Affordable Energy (“CCAEE”), the City of Las Cruces, and Commission Staff. Specifically, among other recommendations, this input included adding an avoided emissions benefit to the cost effectiveness test to more accurately reflect program benefits which EPE has presented for Commission consideration and approval in this Application.

10. The EUEA Section 62-17-5 provides public utilities an opportunity to earn a profit on cost-effective energy efficiency and load management resource development that is financially more attractive to the utility than supply-side utility resources.

11. EPE is seeking approval to continue to recover the performance-based utility incentive approved by the Commission in Case No. 21-00114-UT for the 2025-2027 EE/LM Plan. Specifically, EPE requests recovery of a baseline utility incentive of \$435,924 for each year of the EE/LM Plan (2025-2027) which will be subject to true-up

based on actual expenses and savings achieved for the EE/LM Plan. EPE's utility incentive request is consistent with Rule 17.7.2.8(L) and Section 62-17-5(F).

12. EPE has reconciled its 2023 Plan Year Expenditures and Collections, including 2023 utility incentive. EPE seeks approval of this reconciliation which resulted in the following:

(a) an underage of \$1,917,236, which EPE proposes to include in its proposed EUERF for 2025;

(b) a 2023 plan year utility incentive in the amount of \$371,536 based on actual verified 2023 program costs and achieved savings; and

(c) \$211,956 of base rate administration costs not recovered through Rate No. 17-EUERF.

13. The total funding amount for the proposed Programs for plan years 2025-2027 is based on not less than three percent and not more than five percent of EPE's historical 2023 total retail kilowatt-hour revenues. Section 62-17-6(A).

14. EPE requests approval of a variance from Rule 17.7.2.8(E) to authorize EPE to carry forward EPE's 2023 program year underage and refund it through the proposed Rate No. 17 - EUERF rate rider.

15. The EUEA requires no less than five percent reduction of total 2020 retail kilowatt-hour sales over the period of 2021 to 2025. EPE's total sales to applicable customer classes was 1,577,457,302 kWh in 2020. Accordingly, EPE's EUEA cumulative savings by 2025 is required to be 78,872,865 kWh. At the time of the filing of this Application, EPE anticipates achieving 97.5 percent its 2021-2025 energy level targets.

(a) EPE's proposed annual Program budgets for the EE/LM Plan is

calculated at three to five percent funding level of 2023 revenues for customer classes that are subject to the EUERF for program years 2021 through 2025. This resulted in a base annual budget range of \$6,604,915 to \$7,258,019. The proposed budget for program year 2025 is \$6,604,915.

(b) Because EPE intends to refund the 2023 underage in the EUERF instead of adding it to the 2025 Plan Year budget, the budget will not be affected by the underage.

(c) Because the current Rule sets a three-year cycle for EUEA plan application filing, EPE will modify its 2026 and 2027 Program budgets based on actual 2024 and 2025 revenues.

(d) Within each plan year of the approved 2025-2027 EE/LM Plan, EPE will shift funding among Programs and will adjust plan year expenditures within the ten percent authorized by the Rule, thereby modifying approved EE/LM budgets to align plan year expenditures with required plan year funding requirements.

(e) Consistent with the EUEA and the Rule, EPE will reconcile authorized EE/LM Plan collections and expenditures, including utility incentive amounts, and overages or underages, on an annual basis. EPE will report this annual reconciliation, as well as plan year and expected next plan year budget adjustments, in its Annual Report filed with the Commission.

(f) EPE will monitor its authorized EE/LM Plan expenditures and collections, as well as annual revenues and required funding levels. If required, EPE will take appropriate action to revise its Rate No. 17 - EUERF and/or to request any variances or approvals under the Rule to modify approved Programs and budgets before its next

scheduled plan application filing in 2027.

16. The EUEA in Section 62-17-6 authorizes cost recovery of all Program costs and incentives through a tariff rider set forth in EPE's Rate No. 17 - EUERF. EPE seeks approval to change its current rate rider factor through an advice notice filing, consistent with the Commission's approvals for EPE's EE/LM Plan program budgets and incentives, as adjusted for any necessary true-ups.

17. EPE's current monthly percentage-of-bill rate rider under Rate No. 17 - EUERF is 3.3844 percent for affected customer classes, not to exceed \$75,000 per year for any customer. If EPE's EE/LM Plan program budgets and incentives are approved for the initial 12-month recovery period, EPE has estimated that its Rate No. 17 - EUERF percentage-of-bill rate factor, including reconciliation amounts, would increase to approximately 3.9577 percent. EPE's proposed Rate No. 17 - EUERF rate rider will result in EPE collecting costs within the cost caps and funding requirements contained in the EUEA.

18. If EPE's Application is approved, for a typical residential customer using a monthly average of 700 kilowatt-hours, a Rate No. 17 - EUERF of 3.9577 percent of pre-tax bills would represent \$2.66 of the monthly bill. This is an increase of \$0.39 over the current EUERF charge of \$2.28, or a 0.6 percent increase relative to the current bill.

19. EPE's proposed form of Notice contains a statement of typical bill impacts for the affected rate classes based on EPE's requested Program budgets and incentives. EPE's proposed Notice is attached hereto (Attachment A).

20. EPE is filing the Direct Testimonies and Exhibits of Victor H. Silva, Derek R. Neumann, and Adrian Hernandez in support of its EE/LM Plan and related budgets;

proposed incentives, and proposed changes to Rate No. 17 - EUERF rate rider. The Direct Testimonies and Exhibits explain how EPE has met the Rule's applicable criteria and requirements, as well as the requirements of the Commission's Final Order in Case No. 21-00114-UT.

21. As indicated on the Certificate of Service attached hereto, EPE has mailed a copy of its Application and supporting Direct Testimonies and Exhibits to the AG, EMNRD, CCAE, parties to EPE's most recent general rate case (NMPRC Case No. 20-00104-UT), and other interested parties.

22. Pursuant to the requirements of 17.1.2.10 NMAC, Applications for New Rates, EPE is attaching to the following documents to the Application:

- (a) EPE's Proposed Notice to Customers (Attachment A); and
- (b) a copy of EPE's Advice Notice No. 302, Table of Contents, and Rate No. 17 - EUERF (Attachment B).

22. Pursuant to 17.1.2.10(B)(2)(d) NMAC, EPE has fully complied with all Commission final orders in each of EPE's cases decided during the preceding five years, as evidenced by EPE's annual informational filing.

WHEREFORE, EPE respectfully requests that the Commission, after such notice and hearing as it deems necessary, issue a Final Order in this case that:

- 1) Approves EPE's reconciliation of its 2023 Plan Year expenditures and collections including:
 - a) a 2023 underage in the amount of \$1,917,236.
 - b) a 2023 plan year utility incentive in the amount of \$371,536; and

c) a 2023 base rate administration costs of \$211,956 not recovered through Rate No. 17 - EUERF;

2) Approves EPE's proposed EE/LM Plan and budgets for 2025-2027 plan years including:

a) authority to modify 2026 and 2027 budgets based upon actual 2024 and 2025 revenues, respectively, and any overage/underage pursuant to the Rule; and

b) authority, within each plan year, to shift funding among Programs and to adjust plan year expenditure within the ten percent authorized by the Rule, to align plan year expenditures with the required plan year funding requirements;

3) Approves the addition of an avoided emissions benefit to the cost effectiveness test;

4) Approves EPE's proposed variance to accommodate a refund of the 2023 plan year underage;

5) Approves EPE's proposed utility incentive for the 2025-2027 plan years;

6) Approves EPE's proposed revisions to Rate No. 17 - EUERF to increase EPE's uniform percentage-of-bill rate rider factor; and,

7) Grants such other approvals as may be necessary or appropriate in accordance with the EUEA and Commission Rule.

Respectfully submitted,

By: /s/ *Nancy B. Burns*

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**ATTORNEYS FOR EL PASO
ELECTRIC COMPANY**

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RECOVERY FACTOR	)	
	)	
EL PASO ELECTRIC COMPANY,	)	
Applicant.	)	
_____	)	

NOTICE TO EPE CUSTOMERS

Notice is hereby given of the following matters pertaining to the above captioned case pending before the New Mexico Public Regulation Commission (“NMPRC” or “Commission”):

On July 29, 2024, El Paso Electric Company (“EPE”) filed its Application for proposed 2025-2027 Energy Efficiency and Load Management Programs (“EE/LM Programs”), 2025-2027 utility incentive, and revisions to EPE’s Rate No. 17 - Efficient Use of Energy Recovery Factor (“EUERF”) rate rider, pursuant to the New Mexico Efficient Use of Energy Act (“EUEA”), NMSA 1978, Sections 62-17-1 et seq. and the NMPRC Energy Efficiency Rule (“Rule”), 17.7.2 NMAC. If the proposed Program budgets and incentives were to be approved by the Commission, EPE estimates the proposed uniform percentage of bill rate rider under its Rate No. 17 - EUERF would be approximately 3.9577 percent. EPE requests that the Commission approve its Application and proposed tariff revisions together with all other approvals, authorization and actions that may be required for implementation.

Along with changes to various Program budgets and rebates for its existing residential and commercial Programs, EPE seeks reauthorization of the following energy efficiency programs, with one proposed program modification, revising the Residential Lighting Program to the

proposed Residential Products Program.

The proposed existing and modified programs are as follows:

- Smart Students[®] Program,
- Residential Comprehensive Program,
- Residential Products Program (modified and with a new name),
- ENERGY STAR[®] New Homes Program,
- Marketplace Program,
- Residential Load Management Program
- EnergySaver Program,
- Energy\$mart Program,
- Commercial Comprehensive Program,
- SCORE Plus Program, and
- Commercial Load Management Program.

The proposed 2025 program budget is \$6,604,915 and results in monthly charges that represent approximately 3.9577 percent of the average bill for each customer in the eligible customer classes. The EUERF charge would be paid in addition to the current charges that the customer is paying and will be collected through a line item charge on the customer's bill. EPE's average residential customer uses approximately 700 kilowatt-hours ("kWh") per month, and for that average use, a customer would pay approximately \$2.66 of the monthly bill. This is an increase of \$0.39 over the current EUERF charge of \$2.28, or a 0.6 percent increase relative to the total current bill. EPE's proposed EUERF factor is subject to the statutory dollar cap of \$75,000 per year for a customer, contained in the EUEA and Rule. If approved by the Commission, Rate No.

17 - EUERF would apply to those EPE service customer classes that are eligible to participate in the energy efficiency programs.

For informational purposes only, the following table shows typical EUERF bill impacts by rate class. These impacts are subject to change by the Commission based upon its findings in this case.

RATE 01 - RESIDENTIAL BILL COMPARISON BY kWh LEVEL (Annual Average)											
Total	1st Block	all other				Current			Proposed		Total Bill
						Pre EUERF	EUERF	Total Bill			
kWh	kWh	kWh							EUERF	Total Bill	Differ(%)
0	0	0				\$8.60	\$0.29	\$8.89	\$0.34	\$8.94	0.6%
100	100	0				\$16.77	\$0.57	\$17.34	\$0.66	\$17.44	0.6%
250	250	0				\$29.03	\$0.98	\$30.01	\$1.15	\$30.18	0.6%
500	500	0				\$49.46	\$1.67	\$51.14	\$1.96	\$51.42	0.5%
700	600	100				\$67.34	\$2.28	\$69.61	\$2.66	\$70.00	0.6%
750	600	150				\$71.81	\$2.43	\$74.24	\$2.84	\$74.66	0.6%
1000	600	400				\$95.45	\$3.23	\$98.68	\$3.78	\$99.23	0.6%
2000	600	1400				\$189.98	\$6.43	\$196.41	\$7.52	\$197.50	0.6%
RATE 03 - SMALL COMMERCIAL SERVICE (Annual Average)											
					Load	Current			Proposed		Total Bill
						Pre EUERF	EUERF	Total Bill			
kWh		kW			Factor				EUERF	Total Bill	Differ(%)
2,190		15			20%	\$337.79	\$11.43	\$349.23	\$13.37	\$351.16	0.6%
4,380		15			40%	\$427.03	\$14.45	\$441.48	\$16.90	\$443.93	0.6%
6,570		15			60%	\$516.26	\$17.47	\$533.74	\$20.43	\$536.70	0.6%
8,760		15			80%	\$605.50	\$20.49	\$625.99	\$23.96	\$629.46	0.6%
						\$0.00		\$0.00			
3,066		21			20%	\$466.46	\$15.79	\$482.25	\$18.46	\$484.93	0.6%
5,071		21			33%	\$548.16	\$18.55	\$566.71	\$21.69	\$569.86	0.6%
9,198		21			60%	\$716.32	\$24.24	\$740.57	\$28.35	\$744.67	0.6%
12,264		21			80%	\$841.25	\$28.47	\$869.72	\$33.29	\$874.55	0.6%
						\$0.00		\$0.00			
7,300		50			20%	\$1,088.37	\$36.83	\$1,125.20	\$43.07	\$1,131.44	0.6%
14,600		50			40%	\$1,385.82	\$46.90	\$1,432.72	\$54.85	\$1,440.67	0.6%
21,900		50			60%	\$1,683.27	\$56.97	\$1,740.24	\$66.62	\$1,749.89	0.6%
29,200		50			80%	\$1,980.72	\$67.04	\$2,047.75	\$78.39	\$2,059.11	0.6%

RATE 03 - SMALL COMMERCIAL ALTERNATE (Annual Average)										
kWh	kW				Current			Proposed		Total Bill
					Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)
500					\$69.09	\$2.34	\$71.42	\$2.73	\$71.82	0.6%
743					\$94.83	\$3.21	\$98.04	\$3.75	\$98.58	0.6%
2,000					\$227.98	\$7.72	\$235.70	\$9.02	\$237.00	0.6%
7,000					\$757.63	\$25.64	\$783.27	\$29.98	\$787.62	0.6%
RATE 04 - GENERAL SERVICE RATE - Secondary (Annual Average, 50 to 800 kW)										
kWh	kW			Load Factor	Current			Proposed		Total Bill
					Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)
7,300	50			20%	\$1,058.62	\$35.83	\$1,094.45	\$41.90	\$1,100.52	0.6%
14,600	50			40%	\$1,320.77	\$44.70	\$1,365.47	\$52.27	\$1,373.04	0.6%
21,900	50			60%	\$1,582.92	\$53.57	\$1,636.49	\$62.85	\$1,645.57	0.6%
29,200	50			80%	\$1,845.07	\$62.44	\$1,907.52	\$73.02	\$1,918.09	0.6%
					\$0.00		\$0.00			
17,082	117			20%	\$2,436.37	\$82.46	\$2,518.82	\$96.42	\$2,532.79	0.6%
37,463	117			44%	\$3,168.27	\$107.23	\$3,275.50	\$125.39	\$3,293.66	0.6%
51,246	117			60%	\$3,663.23	\$123.98	\$3,787.21	\$144.98	\$3,808.21	0.6%
68,328	117			80%	\$4,276.66	\$144.74	\$4,421.40	\$169.26	\$4,445.92	0.6%
					\$0.00		\$0.00			
73,000	500			20%	\$10,312.15	\$349.00	\$10,661.16	\$408.12	\$10,720.28	0.6%
146,000	500			40%	\$12,933.66	\$437.73	\$13,371.38	\$511.88	\$13,445.53	0.6%
219,000	500			60%	\$15,555.16	\$526.45	\$16,081.61	\$615.63	\$16,170.79	0.6%
292,000	500			80%	\$18,176.66	\$615.17	\$18,791.84	\$719.38	\$18,896.04	0.6%
RATE 04 - GENERAL SERVICE RATE - Primary (Annual Average, 50 to 800 kW)										
kWh	kW			Load Factor	Current			Proposed		Total Bill
					Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)
7,300	50			20%	\$1,000.28	\$33.85	\$1,034.13	\$39.59	\$1,039.86	0.6%
14,600	50			40%	\$1,260.38	\$42.66	\$1,303.04	\$49.88	\$1,310.26	0.6%
21,900	50			60%	\$1,520.49	\$51.46	\$1,571.95	\$60.18	\$1,580.67	0.6%
29,200	50			80%	\$1,780.60	\$60.26	\$1,840.86	\$70.47	\$1,851.07	0.6%
					\$0.00		\$0.00			
53,728	368			20%	\$7,168.37	\$242.61	\$7,410.98	\$283.70	\$7,452.07	0.6%
140,011	368			52%	\$10,242.72	\$346.65	\$10,589.38	\$405.38	\$10,648.10	0.6%
161,184	368			60%	\$10,997.14	\$372.19	\$11,369.32	\$435.23	\$11,432.37	0.6%
214,912	368			80%	\$12,911.52	\$436.98	\$13,348.50	\$511.00	\$13,422.52	0.6%
					\$0.00		\$0.00			
73,000	500			20%	\$9,728.71	\$329.26	\$10,057.97	\$385.03	\$10,113.74	0.6%
146,000	500			40%	\$12,329.78	\$417.29	\$12,747.06	\$487.98	\$12,817.75	0.6%
219,000	500			60%	\$14,930.84	\$505.32	\$15,436.16	\$590.92	\$15,521.76	0.6%
292,000	500			80%	\$17,531.90	\$593.35	\$18,125.25	\$693.86	\$18,225.76	0.6%
RATE 05 - IRRIGATION SERVICE RATE (Secondary, Annual Average)										
kWh	Horse Power	Equiv. kW		Load Factor	Current			Proposed		Total Bill
					Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)
438	7.5	6		10%	\$58.56	\$1.98	\$60.54	\$2.32	\$60.88	0.6%
876	7.5	6		20%	\$94.45	\$3.20	\$97.65	\$3.74	\$98.19	0.6%
1,752	7.5	6		40%	\$166.24	\$5.63	\$171.86	\$6.58	\$172.82	0.6%
2,628	7.5	6		60%	\$238.02	\$8.06	\$246.08	\$9.42	\$247.44	0.6%
					\$0.00		\$0.00			
2,409	40	33		10%	\$220.08	\$7.45	\$227.52	\$8.71	\$228.79	0.6%
4,282	40	33		18%	\$373.56	\$12.64	\$386.20	\$14.78	\$388.34	0.6%
9,636	40	33		40%	\$812.30	\$27.49	\$839.79	\$32.15	\$844.44	0.6%
14,454	40	33		60%	\$1,207.11	\$40.85	\$1,247.96	\$47.77	\$1,254.88	0.6%
					\$0.00		\$0.00			
15,111	250	207		10%	\$1,260.95	\$42.68	\$1,303.62	\$49.90	\$1,310.85	0.6%
30,222	250	207		20%	\$2,499.22	\$84.58	\$2,583.81	\$98.91	\$2,598.13	0.6%
60,444	250	207		40%	\$4,975.77	\$168.40	\$5,144.17	\$196.93	\$5,172.70	0.6%
90,666	250	207		60%	\$7,452.32	\$252.22	\$7,704.54	\$294.94	\$7,747.26	0.6%

Rate 7 - CITY AND COUNTY SERVICE (Annual Average, Secondary)											
kWh		kW		Load Factor	Current			Proposed		Total Bill	Differ(%)
					Pre EUERF	EUERF	Total Bill	EUERF	Total Bill		
1,460		10		20%	\$202.73	\$6.86	\$209.59	\$8.02	\$210.75		0.6%
2,920		10		40%	\$270.43	\$9.15	\$279.58	\$10.70	\$281.13		0.6%
4,380		10		60%	\$338.13	\$11.44	\$349.57	\$13.38	\$351.51		0.6%
5,840		10		80%	\$405.82	\$13.73	\$419.56	\$16.06	\$421.88		0.6%
					\$0.00		\$0.00				
3,796		26		20%	\$495.10	\$16.76	\$511.86	\$19.59	\$514.69		0.6%
6,475		26		34%	\$619.32	\$20.96	\$640.28	\$24.51	\$643.83		0.6%
11,388		26		60%	\$847.13	\$28.67	\$875.80	\$33.53	\$880.65		0.6%
15,184		26		80%	\$1,023.14	\$34.63	\$1,057.77	\$40.49	\$1,063.63		0.6%
					\$0.00		\$0.00				
14,600		100		20%	\$1,847.31	\$62.52	\$1,909.83	\$73.11	\$1,920.42		0.6%
29,200		100		40%	\$2,524.28	\$85.43	\$2,609.71	\$99.90	\$2,624.18		0.6%
43,800		100		60%	\$3,201.25	\$108.34	\$3,309.60	\$126.70	\$3,327.95		0.6%
58,400		100		80%	\$3,878.23	\$131.25	\$4,009.48	\$153.49	\$4,031.71		0.6%
RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Secondary, Annual Average)											
kWh					Current			Proposed		Total Bill	Differ(%)
					Pre EUERF	EUERF	Total Bill	EUERF	Total Bill		
1,000					\$92.50	\$3.13	\$95.63	\$3.66	\$96.16		0.6%
10,000					\$714.92	\$24.20	\$739.11	\$28.29	\$743.21		0.6%
14,751					\$1,043.48	\$35.32	\$1,078.80	\$41.30	\$1,084.78		0.6%
25,000					\$1,752.28	\$59.30	\$1,811.59	\$69.35	\$1,821.63		0.6%
50,000					\$3,481.22	\$117.82	\$3,599.04	\$137.78	\$3,619.00		0.6%
100,000					\$6,939.10	\$234.85	\$7,173.95	\$274.63	\$7,213.73		0.6%
RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Primary, Annual Average)											
kWh						Current			Proposed		Total Bill
						Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	
1,000						\$88.76	\$3.00	\$91.76	\$3.51	\$92.27	0.6%
10,000						\$677.55	\$22.93	\$700.48	\$26.82	\$704.36	0.6%
50,000						\$3,294.38	\$111.50	\$3,405.88	\$130.38	\$3,424.76	0.6%
164,275						\$10,770.34	\$364.51	\$11,134.86	\$426.26	\$11,196.60	0.6%
250,000						\$16,378.54	\$554.32	\$16,932.86	\$648.21	\$17,026.76	0.6%
500,000							\$1,107.84	\$1,107.84	\$1,295.50	\$34,029.25	2971.7%
RATE 9 - LARGE POWER SERVICE (Annual Averages, Secondary, above 800 kW)											
Total	13.32% On-Peak-S	86.68% Off-Peak-S	100.00% Off-Peak NS	Total	Load	Current			Proposed		Total Bill
kWh	kWh	kWh	kWh	kW	Factor	Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)
116,800	15,560	101,240	116,800	800	20%	\$16,166.12	\$547.13	\$16,713.24	\$639.81	\$16,805.92	0.6%
233,600	31,121	202,479	233,600	800	40%	\$19,960.67	\$675.55	\$20,636.22	\$789.98	\$20,750.66	0.6%
350,400	46,681	303,719	350,400	800	60%	\$23,755.18	\$803.97	\$24,559.15	\$940.16	\$24,695.34	0.6%
467,200	62,242	404,958	467,200	800	80%	\$27,549.74	\$932.39	\$28,482.13	\$1,090.34	\$28,640.07	0.6%
						\$0.00		\$0.00			
157,972	21,046	136,926	157,972	1082	20%	\$21,818.32	\$738.42	\$22,556.74	\$863.50	\$22,681.83	0.6%
315,944	42,091	273,853	315,944	1082	40%	\$26,950.40	\$912.11	\$27,862.51	\$1,066.62	\$28,017.02	0.6%
479,924	63,937	415,987	479,924	1082	61%	\$32,277.69	\$1,092.41	\$33,370.09	\$1,277.45	\$33,555.14	0.6%
631,888	84,182	547,706	631,888	1082	80%	\$37,214.60	\$1,259.49	\$38,474.09	\$1,472.84	\$38,687.44	0.6%
						\$0.00		\$0.00			
438,000	58,352	379,648	438,000	3000	20%	\$60,261.03	\$2,039.47	\$62,300.50	\$2,384.95	\$62,645.98	0.6%
876,000	116,703	759,297	876,000	3000	40%	\$74,490.48	\$2,521.06	\$77,011.53	\$2,948.11	\$77,438.59	0.6%
1,314,000	175,055	1,138,945	1,314,000	3000	60%	\$88,719.98	\$3,002.64	\$91,722.61	\$3,511.27	\$92,231.25	0.6%
1,752,000	233,407	1,518,593	1,752,000	3000	80%	\$102,949.48	\$3,484.22	\$106,433.70	\$4,074.43	\$107,023.91	0.6%

RATE 9 - LARGE POWER SERVICE (Annual Averages, Primary, above 800 kW)											
Total	12.05% On-Peak-S	87.95% Off-Peak-S	100.00% Off-Peak NS	Total	Load	Current			Proposed		Total Bill
kWh	kWh	kWh	kWh	kW	Factor	Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)
116,800	14,070	102,730	116,800	800	20%	\$15,842.00	\$536.16	\$16,378.15	\$626.98	\$16,468.98	0.6%
233,600	28,140	205,460	233,600	800	40%	\$19,532.06	\$661.04	\$20,193.10	\$773.02	\$20,305.08	0.6%
350,400	42,210	308,190	350,400	800	60%	\$23,222.12	\$785.93	\$24,008.05	\$919.06	\$24,141.18	0.6%
467,200	56,280	410,920	467,200	800	80%	\$26,912.18	\$910.82	\$27,822.99	\$1,065.10	\$27,977.28	0.6%
						\$0.00		\$0.00			
254,040	30,602	223,438	254,040	1740	20%	\$34,301.65	\$1,160.91	\$35,462.56	\$1,357.56	\$35,659.21	0.6%
508,080	61,205	446,875	508,080	1740	40%	\$42,327.57	\$1,432.53	\$43,760.10	\$1,675.20	\$44,002.77	0.6%
853,445	102,808	750,637	853,445	1740	67%	\$53,238.66	\$1,801.81	\$55,040.47	\$2,107.03	\$55,345.68	0.6%
1,016,160	122,410	893,750	1,016,160	1740	80%	\$58,379.35	\$1,975.79	\$60,355.15	\$2,310.48	\$60,689.83	0.6%
						\$0.00					
438,000	52,763	385,237	438,000	3000	20%	\$59,045.50	\$1,998.34	\$61,043.84	\$2,336.84	\$61,382.35	0.6%
876,000	105,525	770,475	876,000	3000	40%	\$72,883.20	\$2,466.66	\$75,349.86	\$2,884.50	\$75,767.70	0.6%
1,314,000	158,288	1,155,712	1,314,000	3000	60%	\$86,720.95	\$2,934.98	\$89,655.94	\$3,432.16	\$90,153.11	0.6%
1,752,000	211,051	1,540,949	1,752,000	3000	80%	\$100,558.70	\$3,403.31	\$103,962.01	\$3,979.81	\$104,538.51	0.6%

Rate 11 - Municipal Street Lighting											
				Average	Current Base			Proposed		Total Bill	
				#lamps kWh	Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	Differ(%)	
7,000	L - MV 195 Watts			1 69	\$19.17	\$0.65	\$19.82	\$0.76	\$19.93	0.5%	
11,000	L - MV 275 Watts			1 98	\$23.25	\$0.79	\$24.04	\$0.79	\$24.04	0.0%	
20,000	L - MV 450 Watts			1 160	\$32.12	\$1.09	\$33.21	\$1.09	\$33.21	0.0%	
14,400	L - SV 193 Watts			1 69	\$19.23	\$0.65	\$19.88	\$0.65	\$19.88	0.0%	
23,200	L - SV 313 Watts			1 111	\$25.59	\$0.87	\$26.46	\$0.87	\$26.46	0.0%	
45,000	L - SV 485 Watts			1 173	\$34.42	\$1.16	\$35.58	\$1.16	\$35.58	0.0%	
	31W - 50W LED (Equi. to 150W HPS)				\$0.00		\$0.00				
	51W - 100W LED (Equi. to 250W HPS)				\$0.00		\$0.00				
14,000	L - HPS 193 Watts			1 69	\$22.71	\$0.77	\$23.47	\$0.77	\$23.47	0.0%	
23,200	L - HPS 313 Watts			1 111	\$29.07	\$0.98	\$30.06	\$0.98	\$30.06	0.0%	
45,000	L - SV 485 Watts			1 173	\$40.39	\$1.37	\$41.76	\$1.37	\$41.76	0.0%	
	31W - 50W LED (Equi. to 150W HPS)				\$0.00		\$0.00		N/A		
	51W - 100W LED (Equi. to 250W HPS)				\$0.00		\$0.00		N/A		
14,400	L - HPS 193 Watts			1 69	\$26.46	\$0.90	\$27.35	\$0.90	\$27.35	0.0%	
23,200	L - MV 313 Watts			1 69	\$32.11	\$1.09	\$33.19	\$1.09	\$33.19	0.0%	
45,000	L - HPS 485 Watts			1 173	\$41.94	\$1.42	\$43.36	\$1.42	\$43.36	0.0%	
	31W - 50W LED (Equi. to 150W HPS)				\$0.00		\$0.00		N/A		
	51W - 100W LED (Equi. to 250W HPS)				\$0.00		\$0.00		N/A		
14,400	L - SV 193 Watts			1 111	\$21.98	\$0.74	\$22.73	\$0.74	\$22.73	0.0%	
23,200	L - HPS 313 Watts			1 111	\$27.42	\$0.93	\$28.35	\$0.93	\$28.35	0.0%	
45,000	L - HPS 485 Watts			1 173	\$36.23	\$1.23	\$37.46	\$1.23	\$37.46	0.0%	
	31W - 50W LED (Equi. to 150W HPS)				\$0.00		\$0.00		N/A		
	51W - 100W LED (Equi. to 250W HPS)				\$0.00		\$0.00		N/A		
7,000	L - MV 195 Watts			1 69	\$8.31	\$0.28	\$8.59	\$0.28	\$8.59	0.0%	
20,000	L - MV 450 Watts			1 160	\$15.05	\$0.51	\$15.56	\$0.51	\$15.56	0.0%	
14,400	L - SV 175 Watts			1 62	\$7.79	\$0.26	\$8.05	\$0.26	\$8.05	0.0%	
19,800	L - SV 250 Watts			1 89	\$9.76	\$0.33	\$10.09	\$0.33	\$10.09	0.0%	
23,200	L - SV 313 Watts			1 111	\$11.41	\$0.39	\$11.80	\$0.39	\$11.80	0.0%	
33,000	L - SV 365 Watts			1 130	\$12.78	\$0.43	\$13.21	\$0.43	\$13.21	0.0%	
45,000	L - SV 485 Watts			1 173	\$15.94	\$0.54	\$16.48	\$0.54	\$16.48	0.0%	
	L - 21W-30W LED			1	\$0.00		\$0.00		N/A		
	L - 31W-40W LED			1 12	\$4.10	\$0.14	\$4.24	\$0.14	\$4.24	-0.1%	
	L - 41W-50W LED			1 16	\$4.37	\$0.15	\$4.51	\$0.15	\$4.51	0.1%	
	L - 51W-60W LED			1 19	\$4.63	\$0.16	\$4.78	\$0.16	\$4.78	0.1%	
	L - 61W-70W LED			1 23	\$4.88	\$0.17	\$5.05	\$0.17	\$5.05	-0.1%	
	L - 71W-80W LED			1 27	\$5.14	\$0.17	\$5.31	\$0.17	\$5.31	0.1%	
	L - 81W-90W LED			1 30	\$5.40	\$0.18	\$5.58	\$0.18	\$5.58	0.0%	
	L - 91W-100W LED			1 34	\$5.66	\$0.19	\$5.86	\$0.19	\$5.86	-0.1%	
	L - 101W-110W LED			1 37	\$5.92	\$0.20	\$6.12	\$0.20	\$6.12	0.1%	
	L - 111W-130W LED			1 43	\$6.32	\$0.21	\$6.53	\$0.21	\$6.53	0.0%	
	L - 131W-150W LED			1 50	\$6.84	\$0.23	\$7.07	\$0.23	\$7.07	0.0%	
	L - 151W-170W LED			1 57	\$7.36	\$0.25	\$7.61	\$0.25	\$7.61	0.0%	
	L - 171W-190W LED			1 64	\$7.88	\$0.27	\$8.15	\$0.27	\$8.15	0.0%	
	L - 191W-210W LED			1 71	\$8.39	\$0.28	\$8.68	\$0.28	\$8.68	0.0%	
	L - 211W-230W LED			1 78	\$8.92	\$0.30	\$9.22	\$0.30	\$9.22	0.0%	
	L - 231W-250W LED			1 85	\$9.43	\$0.32	\$9.75	\$0.32	\$9.75	0.0%	
	L - 251W-270W LED			1					N/A		

RATE 19 - SEASONAL AGRICULTURAL PROCESSING SERVICE (Annual Average)											
kWh		kW			Load Factor	Current			Proposed		Total Bill Differ(%)
						Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	
1,460		10			20%	\$193.30	\$6.54	\$199.84	\$7.65	\$200.95	0.6%
2,920		10			40%	\$362.56	\$12.27	\$374.83	\$14.35	\$376.91	0.6%
4,380		10			60%	\$531.83	\$18.00	\$549.82	\$21.05	\$552.87	0.6%
5,840		10			80%	\$701.09	\$23.73	\$724.81	\$27.75	\$728.83	0.6%
						\$0.00		\$0.00			
7,300		50			20%	\$870.35	\$29.46	\$899.80	\$34.45	\$904.79	0.6%
14,422		50			40%	\$1,696.02	\$57.40	\$1,753.42	\$67.12	\$1,763.14	0.6%
21,900		50			60%	\$2,562.97	\$86.74	\$2,649.71	\$101.43	\$2,664.40	0.6%
29,200		50			80%	\$3,409.27	\$115.38	\$3,524.66	\$134.93	\$3,544.20	0.6%
						\$0.00		\$0.00			
29,200		200			20%	\$3,409.27	\$115.38	\$3,524.66	\$134.93	\$3,544.20	0.6%
58,400		200			40%	\$6,794.51	\$229.95	\$7,024.46	\$268.91	\$7,063.42	0.6%
87,600		200			60%	\$10,179.74	\$344.52	\$10,524.27	\$402.88	\$10,582.63	0.6%
116,800		200			80%	\$13,564.98	\$459.09	\$14,024.07	\$556.86	\$14,101.84	0.6%
Rate 25 - Outdoor Recreational Lighting Service											
kWh						Current			Proposed		Total Bill Differ(%)
						Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	
0						\$20.89	\$0.71	\$21.60	\$0.83	\$21.72	0.6%
100						\$30.77	\$1.04	\$31.82	\$1.22	\$31.99	0.5%
500						\$70.31	\$2.38	\$72.69	\$2.78	\$73.10	0.6%
1,000						\$119.73	\$4.05	\$123.79	\$4.74	\$124.47	0.5%
2,508						\$268.79	\$9.10	\$277.89	\$10.64	\$279.43	0.6%
5,000						\$515.11	\$17.43	\$532.55	\$20.39	\$535.50	0.6%
10,000						\$1,009.34	\$34.16	\$1,043.50	\$39.95	\$1,049.28	0.6%
RATE 26 - STATE UNIVERSITY TIME OF DAY SERVICE (6,000 kW or greater, Annual Averages)											
kWh	10.96% On-Peak-\$	89.04% Off-Peak-\$	100.00% Off-Peak NS	kW	Load Factor	Current			Proposed		Total Bill Differ(%)
	kWh	kWh	kWh			Pre EUERF	EUERF	Total Bill	EUERF	Total Bill	
876,000	96,019	779,981	876,000	6000	20%	\$87,909.62	\$2,975.21	\$90,884.83	\$3,479.20	\$91,388.82	0.6%
1,752,000	192,038	1,559,962	1,752,000	6000	40%	\$112,985.33	\$3,823.88	\$116,809.21	\$4,471.62	\$117,456.95	0.6%
2,628,000	288,057	2,339,943	2,628,000	6000	60%	\$138,061.05	\$4,672.54	\$142,733.58	\$5,464.04	\$143,525.09	0.6%
3,504,000	384,076	3,119,924	3,504,000	6000	80%	\$163,136.76	\$5,521.20	\$168,657.96	\$6,250.00	\$169,386.76	0.4%
						\$0.00		\$0.00			
1,118,944	122,648	996,296	1,118,944	7664	20%	\$112,251.04	\$3,799.02	\$116,050.07	\$4,442.56	\$116,693.60	0.6%
2,479,721	271,804	2,207,917	2,479,721	7664	44%	\$151,203.62	\$5,117.34	\$156,320.96	\$5,984.19	\$157,187.81	0.6%
3,356,832	367,945	2,988,887	3,356,832	7664	60%	\$176,311.15	\$5,967.07	\$182,278.22	\$6,250.00	\$182,561.15	0.2%
4,475,776	490,593	3,985,183	4,475,776	7664	80%	\$208,341.18	\$6,250.00	\$214,591.18	\$6,250.00	\$214,591.18	0.0%
						\$0.00		\$0.00			
2,190,000	240,047	1,949,953	2,190,000	15000	20%	\$219,563.99	\$6,250.00	\$225,813.99	\$6,250.00	\$225,813.99	0.0%
4,380,000	480,095	3,899,905	4,380,000	15000	40%	\$282,253.29	\$6,250.00	\$288,503.29	\$6,250.00	\$288,503.29	0.0%
6,570,000	720,142	5,849,858	6,570,000	15000	60%	\$344,942.55	\$6,250.00	\$351,192.55	\$6,250.00	\$351,192.55	0.0%
8,760,000	960,189	7,799,811	8,760,000	15000	80%	\$407,631.81	\$6,250.00	\$413,881.81	\$6,250.00	\$413,881.81	0.0%

Further information regarding this case may be obtained by contacting EPE or the Commission at the addresses and telephone numbers provided below. The Commission has assigned Case No. 24-00154-UT to this proceeding, and all inquiries or written comments concerning this matter should refer to that case number.

The present procedural schedule established by the Commission for this proceeding is as follows:

1. Any person who desires to intervene to become a party to this case must file a Motion for Leave to Intervene, pursuant to 17.1.2.26(A) NMAC and 17.1.2.26(B) NMAC, on or before _____, 2024.
2. The Commission Staff shall and Interveners may file any direct testimony on or before _____, 2024.
3. Any rebuttal testimony by EPE, Staff or Interveners must be filed on or before _____, 2024.

A public hearing will be held via Zoom beginning at 9:30 A.M. on _____, 2024, or at the Commission's offices, Bokum Building at 142 W. Palace Ave., Santa Fe, New Mexico, for the purpose of hearing and receiving evidence, arguments and any other appropriate matters in order to determine whether EPE's proposed rate, programs and budgets, and incentives, should be approved by the Commission.

Any interested person may examine EPE's Application and the pre-filed testimonies, exhibits, pleadings and other documents filed in the case online at <http://www.prc.nm.gov/case-lookup-e-docket/> under "Case Lookup Edocket", or by making arrangements for an in-person viewing at the Commission offices by calling (505) 690-4191 during normal business hours, or at EPE's offices, 2820 Las Vegas Ct., Las Cruces, New Mexico, 88005, telephone number (575) 523-3506, or at EPE's website <https://www.epelectric.com/company/public-notice>.

The Commission's Utility Division Procedures (Rule 17.1.2 NMAC) apply to this proceeding except as modified by order of the Commission or Hearing Examiner. A copy of the rules may be obtained from the offices of the Commission.

Any interested person may appear at the time of hearing and make a written or oral comment without becoming an intervener, but the comment will not be considered as evidence in this proceeding. Interested persons may also send written comments, which shall reference NMPRC Case No. 21-00114-UT, to the Commission at the address set out above or to P.O. Box 1269, Santa Fe, NM 87504.

Anyone filing pleadings or testimony will serve copies upon all parties of record the Commission Staff, and the Hearing Examiner by first class mail or hand-delivery and by e-mail. Any person whose testimony has been pre-filed will attend the hearing and submit to examination under oath.

Any person with a disability requiring special assistance in order to participate in this proceeding should contact the offices of the Commission at least 24 hours prior to the commencement of the hearing.

I S S U E D at Santa Fe, New Mexico this ____ day of ____ 2024.

NEW MEXICO PUBLIC REGULATION COMMISSION

Hearing Examiner

EL PASO ELECTRIC COMPANY

ADVICE NOTICE NO. 302

PAGE 1 OF 1

**NEW MEXICO PUBLIC REGULATION COMMISSION
OF THE STATE OF NEW MEXICO**

El Paso Electric Company (EPE) hereby gives notice to the public and the Commission of the filing and publishing of the following changes in its Rates, which are attached hereto:

RATES

Rate Number	Title of Rate	Cancelling Rate Number	Date Effective	
14 th Revised Rate No. 17	Efficient Use of Energy Recovery Factor (EUERF)	13 th Revised Rate No. 17	01/01/2025	X

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

EL PASO ELECTRIC COMPANY
REVISED TABLE OF CONTENTS

RATE SCHEDULES

PAGE 1 OF 2

Rate Schedule Number	Title	
14 th Revised Rate 1	Residential Service Rate	
16 th Revised Rate 3	Small General Service Rate	
16 th Revised Rate 4	General Service Rate	
16 th Revised Rate 5	Irrigation Service Rate	
13 th Revised Rate 7	City and County Service Rate	
13 th Revised Rate 8	Water, Sewage, Storm Sewage Pumping or Sewage Disposal Rate	
13 th Revised Rate 9	Large Power Service Rate	
15 th Revised Rate 10	Military Research and Development Power Rate	
14 th Revised Rate 11	Street Lighting Service Rate	
14 th Revised Rate 12	Private Area Lighting Rate	
11 th Revised Rate 15	Miscellaneous Service Charges	
44 th Revised Rate 16	Purchased Power Service	
14 th Revised Rate 17	Efficient Use of Energy Recovery Factor (EUERF)	X
20 th Revised Rate 18	Fuel and Purchased Power Cost Adjustment Clause (FPPCAC)	
12 th Revised Rate 19	Seasonal Agriculture Processing Service Rate	
11 th Revised Rate 21	Supplementary Power Service for Cogeneration and Small Power Production Facilities	
12 th Revised Rate 22	Backup Power Service for Cogeneration and Small Power Production Facilities	

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

EL PASO ELECTRIC COMPANY

REVISED TABLE OF CONTENTS

RATE SCHEDULES

PAGE 2 OF 2

12 th Revised Rate 23	Maintenance Power Service for Cogeneration and Small Power Production Facilities
12 th Revised Rate 24	Curtailable Power Service for Cogeneration and Small Power Production Facilities
10 th Revised Rate 25	Outdoor Recreational Lighting Service Rate
9 th Revised Rate 26	State University Service Rate
7 th Revised Rate 29	Noticed Interruptible Service for Rate Large Power Service
7 th Revised Rate 30	Load Retention Rate
7 th Revised Rate 38	Renewable Portfolio Standard (RPS) Cost Rider
Original Rate 38.1	Renewable Portfolio Standard (RPS) Cost Rider (Credit) / Surcharge
1 st Revised Rate 39	Economic Development Rate
1 st Revised Rate 41	Federal Tax Credit Factor (FTCF)
1 st Revised Rate 42	Experimental Electric Vehicle Charging Rate (EEVC)
1 st Revised Rate 44	Transportation Electrification Plan (TEP) Cost Rider
2 nd Revised Rate 46	Advanced Metering System Rider (AMS)
Original Rate 47	Community Solar Program Rate

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

**EL PASO ELECTRIC COMPANY
FOURTEENTH REVISED RATE NO. 17
CANCELLING THIRTEENTH REVISED RATE NO. 17**

Attachment B

Page 4 of 5

X

X

EFFICIENT USE OF ENERGY RECOVERY FACTOR (EUERF)

Page 1 of 2

APPLICABILITY

This rate schedule is applicable to electric service billed under the rate schedules indicated below.

Pursuant to the New Mexico Public Regulation Commission Rule 17.7.2, the EUERF allows the Company to recover the cost of energy efficiency programs from the customer classes with an opportunity to participate under such programs.

TERRITORY

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

EUERF MONTHLY FACTOR

The monthly charge for the EUERF hereunder shall be comprised of the following rate charges, not to exceed \$75,000 per customer per year.

<u>Rate No.</u>	<u>Rate Schedule Description</u>	<u>Total EUERF per Pre-Tax Charges</u>	
01	Residential Service Rate	3.9577%	X
03	Small General Service Rate	3.9577%	X
04	General Service Rate	3.9577%	X
05	Irrigation Service Rate	3.9577%	X
07	City and County Service Rate	3.9577%	X
08	Water, Sewage, Storm Sewage Pumping or Sewage Disposal Rate	3.9577%	X
09	Large Power Service Rate	3.9577%	X

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

**EL PASO ELECTRIC COMPANY
FOURTEENTH REVISED RATE NO. 17
CANCELLING THIRTEENTH REVISED RATE NO. 17**

Attachment B

Page 5 of 5

X

X

EFFICIENT USE OF ENERGY RECOVERY FACTOR (EUERF)

Page 2 of 2

11	Street Lighting Service Rate	3.9577%	X
19	Seasonal Agriculture Processing Service Rate	3.9577%	X
25	Outdoor Recreational Lighting Service Rate	3.9577%	X
26	State University Service Rate	3.9577%	X
29	Noticed Interruptible Service Rate for Large Power Service	3.9577%	X
30	Load Retention Rate	3.9577%	X

Advice Notice No. 302

Signature/Title /s/James Schichtl

James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC)
COMPANY'S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)
)
EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)

Case No. 24-00154-UT

DIRECT TESTIMONY

OF

VICTOR H. SILVA

ON BEHALF OF

EL PASO ELECTRIC COMPANY

JULY 29, 2024

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

TABLE OF CONTENTS

<u>Subject</u>	<u>Page</u>
I. INTRODUCTION AND QUALIFICATIONS	1
II. PURPOSE OF DIRECT TESTIMONY	3
III. SUPPORT FOR REQUESTED VARIANCE	5
IV. SUMMARY OF APPLICATION	7
V. SUMMARY OF EPE’S ENERGY EFFICIENCY SAVINGS GOALS AND EPE’S PROGRESS TOWARDS THOSE GOALS	10
VI. OVERVIEW OF EPE'S 2023 ACHIEVEMENTS AND 2024 EXISTING ENERGY EFFICIENCY PROGRAMS	14
VII. EPE’S PROPOSED 2025, 2026, AND 2027 ENERGY EFFICIENCY AND LOAD MANAGEMENT PLAN	16
VIII. PREFILING REQUIREMENT FOR STAKEHOLDER INPUT	33
IX. COMPLIANCE REQUIREMENTS.....	36
X. CONCLUSION.....	39

EXHIBITS

Exhibit VHS-1	EPE’s 2024 Existing Program Portfolio Budget
Exhibit VHS-2	EPE’s 2025-2027 Proposed Program Portfolio Budget
Exhibit VHS-3	Public Advisory Meetings – Official Service List
Exhibit VHS-4	Public Advisory Meeting – List of Attendees
Exhibit VHS-5	Energy Efficiency and Load Management Rule Requirements

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

I. INTRODUCTION AND QUALIFICATIONS

Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Victor H. Silva. My business address is 100 N. Stanton, El Paso, Texas 79901.

Q2. HOW ARE YOU EMPLOYED?

A. I am employed by El Paso Electric Company ("EPE" or "Company") as the Manager – Energy Efficiency.

Q3. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND AND EXPERIENCE.

A. In 2008, I graduated from The University of Texas at El Paso with a Bachelor of Business Administration with a major in Marketing. After graduation, I joined ECOS Consulting (then acquired by ECOVA and currently Engie North America Inc.) as a Texas energy efficiency program field coordinator based in El Paso, in the area of lighting technologies for various Southwest electric utilities (including EPE). I subsequently transferred within the same division to work in Arizona as a field coordinator for lighting and variable speed motor technology applications where I trained contractors, on behalf of the Arizona Public Service (APS), on the benefits of energy saving swimming pool pumps. In 2011, I obtained a position with EPE as an Energy Efficiency Program Manager in the Energy Efficiency Department managing programs for residential and commercial customers on various energy efficient technologies and customer outreach. In 2014, I relocated to Albuquerque, New Mexico

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 to accept a position as Strategic Account Manager with Public Service Company of
2 New Mexico (PNM), managing large commercial customers. In 2017, I moved back to
3 El Paso and accepted a position with EPE in the Rate Research section of the
4 Regulatory Affairs group as a Rate Analyst. In 2022, I received a progressive
5 promotion as a Senior Rate Analyst. In June of 2024, I was promoted to Manager of
6 the Energy Efficiency department at EPE.

7 In 2013, I received a certificate as a Certified Energy Auditor (CEA) from the
8 Association of Energy Engineers. In 2014, I obtained a graduate certificate in HVAC
9 technologies from El Paso Community College. In 2015, I received a graduate
10 certificate from New Mexico State University in Public Utility Regulation &
11 Economics.

12 In addition to the above education and professional experience, I have attended
13 professional development seminars covering rate design and energy efficiency
14 technologies.

15

16 **Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES WITH EPE.**

17 **A.** As Manager in the Energy Efficiency Department, my primary responsibilities include
18 the oversight of the energy efficiency personnel as well as managing the development,
19 implementation, and administration of EPE's energy efficiency and load management
20 programs. I also provide testimony in related regulatory filings.

21

22 **Q5. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE UTILITY**
23 **REGULATORY BODIES?**

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 **A.** Yes, I have previously filed testimony before the Public Utility Commission of Texas.

2

3

II. PURPOSE OF DIRECT TESTIMONY

4 **Q6. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

5 **A.** The purpose of my direct testimony is to support EPE’s application for NMPRC
6 approval of its 2025-2027 Energy Efficiency and Load Management Plan ("EE/LM
7 Plan"), utility incentives, and Fourteenth Revised Rate No. 17 - Efficient Use of Energy
8 Recovery Factor ("EUERF") (“Revised Rider”) in accordance with the Efficient Use
9 of Energy Act, (“EUEA”) (“Application”). Additionally, EPE is requesting approval
10 of a variance from Rule 17.7.2.8.E, allowing EPE to carry forward its 2023 plan year
11 underage and refund it through the proposed EUERF rider, as well as approval to
12 include an avoided emissions benefit in the cost effectiveness test. Specifically, my
13 direct testimony:

- 14 1. Introduces EPE’s other witnesses that are presenting direct testimony in this
15 case;
- 16 2. Summarizes EPE’s Application;
- 17 3. Provides support for the requested variance;
- 18 4. Provides support for inclusion of an avoided emissions benefit in the Utility
19 Cost Test (“UCT”);
- 20 5. Summarizes the statutory goals of EPE’s programs and EPE’s progress
21 towards meeting those goals;
- 22 6. Provides an overview of EPE’s 2023 program achievements and summarizes
23 its existing 2024 programs;

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 7. Supports the proposed EE/LM Plan, including, a) Commission
2 reauthorization of four programs previously approved by the Commission
3 which did not meet the UCT in 2023, b) EE/LM plan year budgets and c)
4 utility incentive;

5 8. Addresses pre-filing requirements for stakeholder input; and

6 9. Addresses compliance requirements from the Final Order in Case No. 21-
7 00114-UT.

8
9 **Q7. DOES EPE'S APPLICATION COMPLY WITH NMPRC RULE 17.7.2?**

10 **A.** Yes. However, Rule 17.7.2 (the "Rule") does not incorporate Section 62-17-5(G) of
11 the Efficient Use of Energy Act's ("EUEA's") energy savings targets for electric
12 utilities for the 2021-2025 period. Additionally, the Commission has opened Docket
13 No. 24-00257-UT to address the statutory energy savings targets for electric utilities
14 for the 2026-2030 period. EPE's Application projects substantial compliance with the
15 2020 baseline targets set forth in the statute for 2025 and because the Commission has
16 not yet set energy savings targets for the 2026-2030 period, EPE's 2025-2027 Plan
17 continues to utilize the 2020 statutory baseline.

18
19 **Q8. WHO ARE EPE'S OTHER WITNESSES PROVIDING DIRECT TESTIMONY**
20 **IN THIS CASE?**

21 **A.** EPE witness Derek R. Neumann, Senior Engineer at Frontier Energy ("Frontier"),
22 presents the details of EPE's EE/LM Plan, which is set forth in Exhibit DRN-1. EPE
23 witness Neumann's direct testimony addresses the program cost-effectiveness and

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 validation analysis undertaken to arrive at EPE's EE/LM Plan proposal. EPE witness
2 Neumann also addresses certain recommendations that EPE solicited and received
3 regarding its proposed plan.

4 EPE witness Adrian Hernandez, Principal Rate Analyst – Rate Research,
5 provides the discount rate EPE used to calculate the UCT; reconciles EPE's 2023 plan
6 year tariff rider collections, plan year expenditures, and the utility incentive; addresses
7 carrying charges, including appropriate rates and to what costs carrying charges should
8 apply; and supports EPE's proposed revision to Rate No. 17 – Efficient Use of Energy
9 Recovery Factor ("EUERF") pursuant to 17.7.2.13 NMAC.

10
11 **Q9. ARE YOU SPONSORING ANY EXHIBITS IN SUPPORT OF YOUR DIRECT**
12 **TESTIMONY?**

13 **A.** Yes, I am sponsoring the following exhibits:

- 14 • Exhibit VHS-1 EPE's 2024 Existing Program Portfolio Budget;
- 15 • Exhibit VHS-2 EPE's 2025-2027 Proposed Program Portfolio Budget;
- 16 • Exhibit VHS-3 Public Advisory Meetings – Official Service List;
- 17 • Exhibit VHS-4 Public Advisory Meeting – List of Attendees;
- 18 • Exhibit VHS-5 Energy Efficiency and Load Management Rule Requirements

19
20 **III. SUPPORT FOR REQUESTED VARIANCE**

21 **Q10. PLEASE DESCRIBE WHAT VARIANCE EPE IS REQUESTING.**

22 **A.** Pursuant to Rule 17.7.2.19, EPE requests a variance from Rule 17.7.2.8(E) to authorize
23 EPE to carry forward EPE's 2023 plan year underage in the amount of \$1,917,236 and

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 refund it through the proposed EUERF rate set forth in Advice Notice No. 302. EPE
2 proposes to include this cumulative underage in the proposed EUERF for 2025 as a
3 reconciliation rate element. The underage and budget calculations are addressed by
4 EPE witness Adrian Hernandez in his direct testimony.

5
6 **Q11. WHAT IS THE REASON FOR THE REQUESTED VARIANCE? [17.7.2.19(A)]**

7 **A.** EPE seeks the variance so that it can refund to its customers the overcollection which
8 led to the underage, thereby reducing its EUERF reflected in Advice Notice No. 302.
9 As explained by Mr. Hernandez, this variance request is consistent with the variance
10 EPE sought and was granted in its prior EE/LM Plan case in Docket No. 21-00114-UT,
11 effectively approving the cumulative reconciliation methodology EPE proposed in that
12 proceeding.

13
14 **Q12. IDENTIFY EACH OF THE SECTIONS OF THE RULE FOR WHICH THE**
15 **VARIANCE IS REQUESTED. [17.7.2.19(B)]**

16 **A.** Rule 17.7.2.8(E) requires a utility “to make its best efforts to expend its applicable plan
17 funding as calculated in Subsection (C) of 17.7.2.8 NMAC above . . . **adding any**
18 **applicable prior plan year underage . . .**” (Emphasis added).

19
20 **Q13. IF GRANTED, WHAT EFFECT WILL THE VARIANCE HAVE ON**
21 **COMPLIANCE WITH THE RULE AND EUEA? [17.7.2.19(C)]**

22 **A.** EPE requests the variance to align EPE’s proposed 2025 plan year budget of
23 \$6,604,915 with the 3-5% statutory funding requirements, and to refund to customers

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 the 2023 plan year underage of \$1,917,236.

2
3 **Q14. DESCRIBE HOW GRANTING OF THE REQUESTED VARIANCE WILL**
4 **FURTHER THE PURPOSES OF THE EUEA AND WHY IT IS A**
5 **REASONABLE ALTERNATIVE TO THE RULE. [17.7.2.19(D); 17.7.2.19(E)]**

6 **A.** The requested variance is reasonable because it allows EPE to comply with the funding
7 requirements of the EUEA, which authorizes estimated plan year funding and program
8 costs of at least three percent and no more than five percent of estimated billing
9 revenues, while mitigating the rate impact of the factor. Addressing underages by
10 refunding customers and adjusting the EUERF is consistent with the variance approved
11 in Docket No. 21-00114-UT.

12
13 **IV. SUMMARY OF APPLICATION**

14 **Q15. PLEASE SUMMARIZE EPE'S APPLICATION IN THIS CASE.**

15 **A.** EPE is seeking Commission approval of its proposed 2025-2027 EE/LM Plan,
16 corresponding annual budgets, a reasonable utility incentive, request for a variance, the
17 Revised Rider, and addition of an avoided emissions benefit to the cost effectiveness
18 test. EPE is proposing Commission reauthorization of all its existing energy efficiency
19 and load management programs that were approved in Case No. 21-00114-UT, with
20 modifications to one program.

21 The proposed existing and modified programs are as follows:

- 22 • Smart Students Program,
- 23 • Residential Comprehensive Program,

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

- 1 • Residential Products Program, (modified and with a new name),
- 2 • ENERGY STAR® New Homes Program,
- 3 • Marketplace Program,
- 4 • Residential Load Management Program,
- 5 • EnergySaver Program,
- 6 • Energy\$mart Program,
- 7 • Commercial Comprehensive Program,
- 8 • SCORE Plus Program, and
- 9 • Commercial Load Management Program.

10 EPE's proposed EE/LM Plan's program portfolio is cost effective pursuant to
11 the UCT, as set forth in EPE witness Neumann's direct testimony and Exhibit DRN-1.
12 EPE witness Neumann presents and supports the UCTs of EPE's proposed program
13 portfolio. The proposed portfolio of programs meets the UCT. Additionally, EPE has
14 presented alternative cost-effectiveness test results which includes an avoided
15 emissions benefit. These results were calculated based on direction from the statewide
16 evaluator and in response to stakeholder recommendations. A comparison of both
17 calculations are supported and described in witness Neumann's direct testimony and
18 Exhibit DRN-1.

19 EPE selected its proposed programs and modifications to existing programs
20 utilizing the same third-party implementers currently under contract with EPE, with the
21 exception of ARCA Recycling, Inc. which discontinued its appliance recycling service
22 to EPE during the 2023 plan year.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 In the development of its proposed EE/LM Plan, EPE carefully considered
2 recommendations it received, which it solicited through email communications and
3 discussions at the five public advisory meetings that EPE-hosted. EPE also considered
4 the results of a Market Potential Study.

5 EPE also requests approval to recover the proposed EE/LM Plan annual
6 budgets, based on not less than three percent and not more than five percent of EPE's
7 historical 2023 total eligible retail revenues. For 2025, the proposed program budget
8 is \$6,604,915, which does not include the underage amount of \$1,917,236. The
9 proposed program budget is 4.45 percent of EPE's 2023 eligible retail revenues. For
10 2026 and 2027, EPE proposes a budget of \$6,921,170 and \$7,258,019 for each program
11 year, respectively. The 2026 and 2027 budgets are 4.67 percent and 4.89 percent of
12 historical 2023 eligible retail revenues, respectively. EPE requests approval to modify
13 its proposed budgets for program years 2026 and 2027 based on actual 2024 and 2025
14 eligible retail revenues. EPE additionally requests approval to continue the utility
15 incentive mechanism approved in Case No. 21-00114-UT of a baseline of 6.6 percent
16 of program expenditures for verified savings of at least 16 GWh with an "adder"
17 incentive of 0.075 percent for each 1.0 GWh of additional energy savings up to a
18 maximum of 7.18 percent for years 2025 through 2027. The annual utility incentive
19 will be subject to a true-up based on actual expenses and energy savings achieved each
20 year. Finally, EPE proposes a revised EUERF of 3.9577 percent to recover the three
21 to five percent funding for the proposed EE/LM Plan and the utility incentive as
22 calculated in Exhibit AH-5 of EPE witness Hernandez.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

**V. SUMMARY OF EPE'S ENERGY EFFICIENCY SAVINGS GOALS
AND EPE'S PROGRESS TOWARDS THOSE GOALS**

**Q16. WHAT ARE THE ENERGY EFFICIENCY SAVINGS GOALS THAT EPE
MUST OBTAIN?**

A. The currently effective EUEA requires investor-owned electric utilities to achieve no less than five percent reduction of total 2020 retail kilowatt-hour sales over the period of 2021 to 2025. The 2025 target may be reduced by the Commission if a utility cannot achieve the target within the three percent to five percent funding level prescribed by the EUEA. EPE's total retail sales to applicable customer classes was 1,577,457,302 in 2020. Accordingly, EPE's EUEA total energy savings for the 2021-2025 period is 78,872,865 kWh, or an average of 15,774,573 kWh per year as shown in Table 2 and Table 3 below.

**Q17. WILL THE PROJECTED ANNUAL SAVINGS UNDER EPE'S EE/LM PLAN,
POSITION EPE TO MEET THE CURRENTLY EFFECTIVE 2025 EUEA
TARGET?**

A. EPE's projected savings demonstrate substantial compliance with the 2025 EUEA target. Based on verified savings for 2021, 2022, 2023, and projected savings for 2024, 2025, as shown in Table 2 Savings Goals, EPE projects it will achieve 97.5 percent of the EUEA target, as of this filing date of its Application in this case.

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**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

Table 2 - Savings Goals

Year	Portfolio EUL	Annual Savings	Expired Annual Portfolio Savings	Cumulative Savings	EUEA Goal	Percent of Goal
2021	17	12,520,086		12,520,086		15.87%
2022	12	7,743,502		20,263,588		25.69%
2023	12	17,667,997		37,931,585		48.09%
2024		22,075,287		60,006,872		76.08%
2025		16,903,920		76,910,792	78,872,865	97.51%

- 2024 approved estimated savings as filed in 21-00114-UT.
- 2025 projected estimated savings in this filing.

Q18. IS EPE PROPOSING AN ALTERNATIVE 2025 ENERGY SAVINGS GOAL IN THIS APPLICATION PURSUANT TO 62-17-5(H)?

A. No, as of the date of this filing, EPE has not determined that it will not meet its 2021-2025 goal.

Q19. WHAT PROGRESS HAS EPE MADE TOWARD ACHIEVING ITS EUEA GOALS ON A CUMULATIVE BASIS?

A. As of 2023, EPE has achieved a verified, cumulative energy savings of 196,278,836 kWh, which exceeds the 2020 Goal of 105,304,953. Please see Table 3 from “2024 Annual Report for Energy Efficiency Programs - Program Year 2023” for the annual and cumulative energy savings for each year.

/

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**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1

Table 3

Table 3 - 2023 Cumulative Energy Savings

Year	Portfolio EUL	Annual kWh Savings	Annual Expired	Cumulative kWh Savings	EUEA Goal
2008	7	855,912		855,912	
2009	11	4,667,928		5,523,840	
2010	13	5,169,908		10,693,748	
2011	13	14,728,590		25,422,338	
2012	13	13,537,655		38,959,993	
2013	11	12,832,995		51,792,988	
2014	13	20,692,228		72,485,216	65,815,596
2015	13	15,729,342		88,214,558	
2008 Expired			(855,912)	87,358,646	
2016	13	18,213,422		105,572,068	
2017	14	12,729,242		118,301,310	
2018	14	17,216,718		135,518,028	
2019	12	16,549,072		152,067,100	
2020	16	16,117,987		168,185,087	105,304,953
2009 Expired			(4,667,928)	163,517,159	
2021	17	12,520,086		176,037,245	
2022	12	7,743,502		183,780,747	
2010 Expired			(5,169,908)	178,610,839	
2023	12	17,667,997		196,278,836	
2024					
2025					78,872,865

2

3 * The 2025 statutory goal requires that EPE achieve savings of not less than 78,872,865 kWh or about
4 15,774,573 kWh of annual savings in 2021 through 2025.

5

6 **Q20. WHAT CAUSED EPE’S ENERGY SAVINGS TO DECREASE IN 2022 BELOW**
7 **HISTORIC SAVINGS LEVELS?**

8 **A.** A number of factors contributed to EPE’s cumulative underage as of the end of Plan
9 Year (“PY”) 2022. First and foremost, as explained in EPE’s Verified Motion to Adjust
10 2022-2024 EE/LM Plan Expenditures filed and still pending in EPE Docket No. 21-
11 00114-UT, EPE was not able to implement its 2022-2024 EE/LM Plan until after it was

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 approved by Commission Final Order, which did not occur until November 30, 2022,
2 after eleven months of PY 2022 had elapsed. This caused an eleven-month delay in
3 EPE's ability to fund and implement programs and measures. As a result, EPE could
4 not launch (or fund) two new program proposals (Marketplace and Energy\$mart) and
5 could not launch the modified Educational Program (Smart Students) formally known
6 as the Living Wise Program, which included a new FutureWise educational kit in
7 addition to the established Living Wise educational kit. Additionally, and for the same
8 reasons, EPE did not fund three new measure proposals (Refrigerator, Freezer, and
9 Window Air Conditioner Recycling) in PY 2022. The inability to implement these
10 projects and measures contributed to \$662,792 of the underage.

11 Second, global supply chain issues resulted in construction delays and delayed
12 closure of planned SCORE Plus energy efficiency projects for 2023, which contributed
13 approximately \$1.04 million to EPE's underage.

14 Third, EPE's approved 12th Revised Rate No. 17-EUERF for PY 2022 was
15 established based on EPE's 2020 revenue collections. Since that time, overall
16 collections increased due to general load growth. As noted above, the PY 2022 Rate
17 No. 17-EUERF is applied as a percentage of base and fuel on the customer bill. Thus,
18 as overall revenues increased, so did EPE's EE/LM funding collections. For the reasons
19 explained above, even using its best efforts, EPE was unable to expend its EE/LM
20 program funding underage in 2022 in a cost-effective manner.

21
22 **Q21. WHAT ENERGY SAVINGS TARGET IS EPE USING FOR THE 2026-2030**
23 **PERIOD?**

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 **A.** Because the Commission has not established its new targets for the 2026-2030 period,
2 EPE is continuing to use the 2020 baseline set for the 2021-2025 period.

3
4 **VI. OVERVIEW OF EPE'S 2023 ACHIEVEMENTS AND 2024 EXISTING**
5 **ENERGY EFFICIENCY PROGRAMS**

6 **Q22. HAS EPE FILED ITS 2024 ANNUAL REPORT FOR ITS 2023 ENERGY**
7 **EFFICIENCY PROGRAMS WITH THE COMMISSION?**

8 **A.** Yes. EPE has filed its 2024 Annual Report for Energy Efficiency Programs, Program
9 Year 2023 ("2024 Annual Report"). In accordance with 17.7.2.8.A NMAC, EPE filed
10 its 2024 Annual Report and the statewide evaluator's measurement and verification
11 report, *Evaluation of the 2023 El Paso Electric Energy Efficiency Programs, July 29,*
12 *2024 ("M&V Report")*, as an Appendix to the Annual Report in Case No. 21-00114-
13 UT.

14
15 **Q23. WHAT WERE THE ENERGY SAVINGS EPE ACHIEVED FOR THE 2023**
16 **PROGRAM YEAR?**

17 **A.** EPE achieved a total of 17,667,997 kWh of energy reduction through its 2023 EE/LM
18 programs. A complete accounting of EPE's program year 2023 EE/LM programs is
19 provided in EPE's 2024 Annual Report. EPE's energy reduction achievements were
20 verified by the statewide M&V evaluator, EcoMetric Consulting LLC ("EcoMetric").

21
22 **Q24. PLEASE SUMMARIZE EPE'S 2024 EXISTING EE/LM PROGRAMS.**

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 **A.** EPE's 2024 existing EE/LM programs were approved by the Commission in Case
2 No. 21-00114-UT in accordance with Rule 17.7.2.8(A). These programs are available
3 to customers in participating rate classes, as discussed further in EPE witness
4 Hernandez's direct testimony.

5 A detailed description of these programs can be found in EPE's 2024 Annual
6 Report. Please see Exhibit VHS-1 for the 2024 program portfolio and the budget. For
7 New Mexico residential customers, EPE currently offers the following programs:

- 8 • Smart Students Program,
- 9 • Residential Comprehensive Program,
- 10 • Residential Lighting Program,
- 11 • ENERGY STAR® New Homes Program,
- 12 • Marketplace Program,
- 13 • Residential Load Management Program,
- 14 • EnergySaver Program, and
- 15 • Energy\$mart Program.

16 For New Mexico commercial and industrial customers, EPE currently offers the
17 following programs:

- 18 • Commercial Comprehensive Program,
- 19 • SCORE Plus Program, and
- 20 • Commercial Load Management Program.

21 In addition, large commercial customers who choose not to participate in any of
22 EPE's commercial EE/LM programs have the option of pursuing their own energy

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 efficiency efforts through the Large Customer Self-Direct Program under 17.7.2.10-11
2 NMAC. To date, no EPE customer has sought to pursue this option.
3

**VII. EPE’S PROPOSED 2025, 2026, AND 2027 ENERGY
EFFICIENCY AND LOAD MANAGEMENT PLAN**

EE/LM Plan Overview

Q25. WHAT PERIOD OF TIME DOES THE PROPOSED EE/LM PLAN COVER?

8 **A.** The proposed EE/LM Plan contains a proposed portfolio of programs and budgets for
9 calendar years 2025 through 2027. Once approved, the portfolio of programs will
10 continue in effect until modified by the Commission. In accordance with the Rule,
11 EPE will file its next new EE/LM Plan filing in 2027.
12

**Q26. WERE THERE ANY INDEPENDENT STUDIES TAKEN INTO
CONSIDERATION THAT INFLUENCED EPE’S DEVELOPMENT OF THE
2025-2027 EE/LM PLAN?**

16 **A-** Yes, EPE consulted and contracted with Resource Innovations, to develop a utility
17 Market Potential Study “MPS” or “El Paso Electric Energy Efficiency and Load
18 Management Market Potential Report”, to determine the potential energy and demand
19 savings that could be achieved by energy efficiency (EE) and load management (LM)
20 programs in the EPE New Mexico service territory. The MPS highlights opportunities
21 and potential in commercial and residential HVAC, including heat pumps, and the
22 importance of considering alternatives to residential LED lighting measures as
23 residential lighting savings decrease.

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

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2 **Q27. ARE THERE ANY CHANGES COMPARED TO THE EXISTING**
3 **PORTFOLIO IN THE PROPOSED 2025-2027 EE/LM PLAN?**

4 **A.** Yes. When considering one of the potentials in HVAC from the MPS, EPE proposes
5 to add two new measures (CoolSaver & Strategic Energy Management "SEM") to
6 existing programs and proposes to modify one existing program. These are noted in
7 more detail later in my testimony.

8

9 **Q28. WHY IS EPE PROPOSING NEW MEASURES AND ONE PROGRAM**
10 **MODIFICATION?**

11 **A.** EPE is proposing to add two new measures to SCORE Plus and a modification to one
12 existing program to provide additional measures and energy savings opportunities in
13 EPE's program portfolio for our customers. The CoolSaver is a tune-up measure that
14 increases the efficiency of an air conditioning cooling equipment system and a Strategic
15 Energy Management (SEM) measure, which is a custom measure that identifies
16 opportunities to reduce energy consumption for commercial customers. The proposed
17 program modification to the Residential Lighting Program, revising it and renaming it
18 to the "Residential Products Program", will provide customers the opportunity for
19 additional energy efficiency measures at retail stores. Some of these changes have been
20 requested by our customers and others have been successful in EPE's Texas service
21 territory.

22

23 **Q29. WHAT MODIFICATION IS BEING MADE TO THE EXISTING**

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

RESIDENTIAL LIGHTING PROGRAM?

A. EPE is proposing to modify the existing Residential Lighting Program to rename it to the “Residential Products Program” and include additional retail products such as Door Seals and Sweeps, Insulating Foam Sealant Spray, ENERGY STAR® Bath Vent and Ceiling Fans, Window film, Advanced Power Strips and others. EPE is able to offer this environmentally important measure in New Mexico as part of a cost-effective program. A primary driver of modifying the Residential Lighting Program is changes in the EISA standards which impact the savings that can be claimed by lighting, as described in the testimony of EPE witness Neumann.

Q30. WHAT TYPES OF PROGRAMS IS EPE PROPOSING IN THE EE/LM PLAN?

A. EPE is proposing Commission reauthorization of seven residential programs and three commercial programs in the EE/LM Plan that were approved by the Commission Case No. 21-00114-UT Final Order, as well as revision to the one residential program described above. The residential programs consist of one educational program, providing age-appropriate educational kits for fifth graders and for high school students, two low-income weatherization programs, one comprehensive rebate program, one retail residential products program, one residential new homes program, an online marketplace, and one residential load management program. The three commercial programs consist of a comprehensive commercial rebate program, a comprehensive program for large customers that allows special projects, and a commercial load management program. These programs are shown in Exhibit VHS-2, and in Exhibit DRN-1 of EPE witness Neumann’s direct testimony.

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

1

2 **Q31. DOES EPE'S PROPOSED PORTFOLIO OF PROGRAMS MEET THE**
3 **UTILITY COST TEST?**

4 **A.** Yes, EPE's proposed portfolio of programs meets the UCT. Please refer to the direct
5 testimony of EPE witness Neumann and Exhibit DRN-1 for more details.

6

7 **Q32. DOES EPE'S PROPOSED PORTFOLIO OF PROGRAMS MEET THE**
8 **ALTERNATIVE UTILITY COST TEST RESULTS, WHICH INCLUDES AN**
9 **AVOIDED UTILITY CARBON EMISSIONS BENEFIT?**

10 **A.** Yes, as presented and supported by EPE witness Neumann.

11

12 **Q33. WHY IS EPE PROPOSING COMMISSION APPROVAL TO INCLUDE AN**
13 **AVOIDED EMISSIONS BENEFIT IN EPE'S UTILITY COST TEST?**

14 **A.** The integration of an avoided emissions benefit into the cost effectiveness test captures
15 benefits not typically quantified by the UCT. In November 2023, the Environmental
16 Protection Agency (EPA) published supplementary material for Docket No. EPA-HQ-
17 OAR-2021-0317 titled "Supplementary Material for the Regulatory Impact Analysis
18 for the Final Rulemaking, Standards of Performance for New, Reconstructed, and
19 Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas
20 Sector Climate Review". This document provides updated values in dollars per ton for
21 the social cost of carbon. Calculating these benefits is straightforward and relies on
22 established values for the social cost of carbon published by the EPA. (By multiplying
23 the social cost of carbon (\$/ton) by utility-specific emissions rates (tons of CO₂e per

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 MWh), a utility-specific \$/MWh avoided carbon emissions benefit can be derived. This
2 metric should be included in the UCT to fully capture the environmental and economic
3 benefits of energy efficiency measures that result in reduced energy consumption. This
4 approach ensures that the true value of energy efficiency programs is recognized,
5 promoting greater investment and implementation of such measures.

6 Additionally, the public advisory meeting stakeholders requested inclusion of
7 an avoided carbon emissions benefit to improve the cost effectiveness of measures with
8 quantifiable energy and carbon emissions savings. Comments included a
9 recommendation from the Southwest Energy Efficiency Project (“SWEEP”) that EPE
10 should consider including the value of an avoided greenhouse gas emissions benefit in
11 its cost effectiveness analysis and comments from Phil Simpson on the importance of
12 improving the cost effectiveness of heat pump measures to allow utilities to offer
13 incentives in line with heat pump energy and emissions savings benefits.

2025-2027 EE/LM Plan Budgets

16 **Q34. HOW DID EPE CALCULATE THE FUNDING LEVEL FOR THE PROPOSED**
17 **2025-2027 EE/LM PLAN YEAR BUDGETS?**

18 **A.** EPE witness Hernandez presents the three to five percent funding level for the proposed
19 EE/LM Plan budgets based on historical 2023 revenues for all customer classes that
20 are subject to the EUERF for program years 2025 through 2027. Annual budgets were
21 then set at not less than three percent and not more than five percent of the 2023
22 revenues for all three years as required by the EUEA and Rule. This resulted in a base
23 annual budget range of \$6,604,915 to \$7,258,019. The projected annual budgets are as

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 follows: \$6,604,915 for 2025, \$6,921,170 for 2026, and \$7,258,019 for 2027. Please
2 refer to EPE witness Hernandez's Exhibit AH-5.
3

4 **Q35. HOW DOES EPE PROPOSE TO ADJUST ITS 2026 AND 2027 EE/LM PLAN'S**
5 **BUDGETS?**

6 **A.** EPE requests approval to modify its proposed budgets for plan years 2026 and 2027
7 based on actual 2025 and 2026 revenues. Within each program year of the approved
8 EE/LM Plan, EPE proposes to shift funding among Programs and to adjust program
9 year expenditures within the ten percent authorized by the Rule, thereby modifying
10 approved EE/LM budgets to align program year expenditures with required program
11 year funding requirements. Consistent with the EUEA and the Rule, EPE will reconcile
12 authorized EE/LM Plan collections and expenditures, including utility incentive
13 amounts, on an annual basis. EPE will report this annual reconciliation, as well as
14 program year and expected next program year budget adjustments, in its Annual Report
15 filed with the Commission.
16

17 **Q36. HOW DID EPE BUDGET FOR EACH PROGRAM?**

18 **A.** Once EPE established its overall portfolio budget, based on the amended EUERF
19 funding requirement, EPE then refined the budget to the program level. The proposed
20 budgets were developed based on past three-year experience, anticipated participation
21 levels by measure, and the associated measure incentive levels that were necessary to
22 encourage participation. Each program was then reviewed pursuant to the cost
23 effectiveness test as addressed in the direct testimony of EPE witness Neumann.

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

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2 **Q37. WHAT EXPENSES ARE INCLUDED IN THE 2025-2027 EE/LM PLAN**
3 **BUDGETS AND HOW ARE THESE EXPENSES ALLOCATED TO**
4 **INDIVIDUAL PROGRAM BUDGETS?**

5 **A.** The EE/LM Plan budgets include customer incentives, internal administration costs,
6 marketing, research and development, and M&V costs. These shared expenses were
7 allocated to the individual program budgets, in proportion to their costs. Program
8 budgets are shown in Exhibit VHS-2.

9

10 **Q38. HOW ARE THE INTERNAL ADMINISTRATION COSTS RECOVERED?**

11 **A.** The internal administration costs are recovered through base rates. These costs are not
12 recovered in the EUERF, as shown in EPE witness Hernandez's Exhibit AH-5.

13

14 **Q39. DOES EPE'S EE/LM PLAN MEET THE REQUIREMENT UNDER THE EUEA**
15 **THAT AT LEAST FIVE PERCENT OF THE TOTAL EXPENDITURES MUST**
16 **BE DIRECTED TOWARDS LOW INCOME CUSTOMERS?**

17 **A.** Yes. The EnergySaver Program and the EnergySmart Program, which are EPE's low-
18 income residential programs, have a proposed combined budget that is approximately
19 17.4 percent for 2025, 16.6 percent for 2026, and 15.8 percent for 2027 of the overall
20 annual budget for that year.

21

22 *2025-2027 EE/LM Plan Utility Incentive*

23 **Q40. IS EPE REQUESTING RECOVERY OF A UTILITY INCENTIVE FOR ITS**

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

EE/LM PLAN?

A. Yes. EPE is proposing the continuation of the incentive mechanism approved in Case No. 21-00114-UT for its EE/LM Plan utility incentive. In EPE’s 2022-24 EE/LM Plan, EPE agreed to adopt Staff’s recommendation to modify its proposed sliding scale incentive mechanism to begin the baseline incentive at 16 gigawatt-hours (“GWh”). Specifically, 6.6 percent for verified savings of at least 12 GWh, with an “add” incentive of 0.075 percent for each 1.0 GWh of additional energy savings up to a maximum of 7.18 percent. Consistent with that approved approach, EPE requests a baseline incentive of 6.6 percent of plan year program costs for verified annual savings of at least 16 GWh, with an adder incentive of 0.075 percent for each 1.0 GWh of additional energy savings up to a maximum of 7.18 percent as addressed in EPE witness Hernandez’s direct testimony.

Q41. IS THE REQUESTED EE/LM PLAN UTILITY INCENTIVE CONSISTENT WITH THE RULE?

A. Yes. Section 8(L) of the Rule requires a proposed utility incentive to be based on a utility’s costs and on satisfactory performance of measures and programs, and to not exceed the product of its WACC and approved programs costs. The amended EUEA specifies that the Commission shall not adjust for taxes when selecting a discount rate. EPE’s incentive proposal is based on EPE’s EE/LM Plan program costs and is performance-based, subject to true-up based on verified savings of program performance, as shown in EPE witness Hernandez’s direct testimony. This proposal will not result in a utility incentive which exceeds the amount of EPE’s WACC of 7.18

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 percent approved by the Commission in EPE’s last general rate case, Case No. 20-
2 00104-UT.

Description of Proposed EE/LM Plan Programs

5 **Q42. PLEASE PROVIDE A DESCRIPTION OF EPE’S 2025-2027 PROPOSED**
6 **RESIDENTIAL PROGRAMS.**

7 **A.** EPE is proposing to continue seven existing residential EE Programs and to modify the
8 Residential Lighting Program. Following is a description of each program:

9 **Proposed residential programs:**

- 10 1. Residential Comprehensive Program – This program is an existing program,
11 however, EPE is proposing to modify it by removing the appliance recycling
12 measure. Therefore, this program will offer rebates for the installation of various
13 deemed energy saving measures such as ceiling insulation, attic encapsulation, duct
14 sealing, air infiltration reduction, solar screen installation, ENERGY STAR® cool
15 roofs, ENERGY STAR® connected smart thermostats, ENERGY STAR® windows,
16 and energy efficient pool pump motors. This program also offers rebates for HVAC
17 measures such as eligible high efficiency evaporative coolers, central refrigerated
18 air conditioners, mini-split air conditioning (“a/c”) systems, and heat pumps. In
19 addition, EPE provides rebates for insulation for homes with evaporative cooling
20 that have electric resistance heating. EPE additionally proposes to add rebates for
21 TRM measures such as solar attic fans, a/c window units, and heat pump water
22 heaters. The rebates are paid directly to the customer or, upon customer
23 approval, can be paid to the contractors that perform the installation.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 2. Residential Products Program – This modified program (previously Residential
2 Lighting Program) provides incentives in the form of markdowns at retail locations.
3 Additional retail products (ENERGY STAR® certified products) will be added, in
4 addition to lighting, to provide an instant discount at the register of participating
5 retailers. Retail locations participate in this program and provide the markdown
6 incentive at the point of purchase. EPE proposes to modify the previous residential
7 lighting program and rename it the Residential Product Program in large part due to
8 reduced savings stemming from updated EISA lighting standards. EPE witness
9 Neumann provides an update on those lighting standards.

10 3. ENERGY STAR® New Homes Program ("New Homes Program") – This is an
11 existing program which provides incentives for homebuilders to construct more
12 energy efficient homes that exceed the current building code. EPE proposes to
13 provide a higher incentive to homebuilders that construct all electric homes and
14 manufactured homes. There are three incentive paths in this program that
15 homebuilders can choose from, depending upon which one fits their needs: the
16 Prescriptive Path, the Performance Path or All Electric Performance Path. The
17 measure-specific Prescriptive Path provides incentives based on above-code
18 installation of a combination of measures including ENERGY STAR® and
19 refrigerators, heat pump water heaters, ENERGY STAR smart thermostats, high-
20 efficiency cooling equipment, radiant barriers, and insulation. The Performance
21 Path provides tiered incentive levels for new homes that exceed the 2021
22 International Energy Conservation Code. The minimum tier for homebuilders to
23 qualify for the Performance Path is ten percent above the standard. The incentives

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 for the New Homes Program are paid directly to the homebuilder or, upon their
2 approval, to one of their subcontractors. The All-Electric Performance Path
3 provides incentives for ENERGY STAR® thermostats and pool pumps.
4 Additionally, an incentive for Manufactured Homes is being proposed and will
5 follow new construction program standards. Using a midstream model to offer
6 incentives to manufactured home retailers and community owners who sell energy
7 efficient manufactured homes.

8 4. Marketplace Program – This existing program provides eligible customers instant
9 rebates through an online marketplace for deemed energy efficiency products. The
10 EPE Marketplace will offer customers a variety of energy efficient products such
11 as smart thermostats, lighting, advanced power strips, room window air
12 conditioners, and bundled energy efficiency kits. Additionally, the marketplace
13 provides a path for customers to enroll their newly purchased smart thermostats
14 into the Residential Load Management Program. As more load management
15 capable devices become available, they may be offered for sale through the online
16 Marketplace. The Marketplace will offer customers the ability to enroll these
17 additional load management capable devices into the Residential Load
18 Management Program.

19 5. Residential Load Management Program – This is an existing program which
20 provides incentives for residential customers and targets reduction in demand. For
21 example, EPE has the capability of remotely adjusting participating customers'
22 internet-enabled smart thermostats during load management events to relieve peak
23 load. Customers receive a \$25 incentive for the enrollment of a new internet

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 enabled smart thermostat or for registering an existing qualifying unit. Customers
2 may also receive an additional \$50 rebate for the purchase of a new internet enabled
3 smart thermostat through EPE's online Marketplace.

- 4 6. EnergySaver Program – This is an existing low-income program that currently
5 offers eligible residential customers, depending on their cooling and heating type,
6 a variety of deemed energy efficiency measures such as an evaporative coolers,
7 ceiling insulation, lighting upgrades, low-flow showerheads, faucet aerators,
8 ENERGY STAR® connected smart thermostats, duct sealing, air infiltration
9 reduction, domestic hot water tank and pipe insulation, all at no cost. EPE provides
10 ENERGY STAR® window a/c units as an additional measure on a limited basis.
11 Qualification for the Program is based on an annual household income at or below
12 200 percent of the federal poverty guidelines. In the EE/LM Plan, EPE will focus
13 program promotions to those customers experiencing ability-to-pay problems. This
14 program has been extremely successful due to the extensive collaboration with
15 other community organizations that provide services to low-income customers.

- 16 7. EnergySmart Program – This program is an existing program that provides a
17 weatherization program with an established network of trained service providers
18 and a staff with many years of experience. MFA will subcontract with Southwestern
19 Regional Housing and Community Development Corporation ("SRHCDC") to
20 implement the single-family ("SF") and multifamily ("MF") aspects of this
21 program. SRHCDC has been in operation since 2001 and has partnered with MFA
22 utilizing the HOME Investment Partnerships Program ("HOME") funds to serve
23 low-income families since that time. For SF homes, this program provides home

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DIRECT TESTIMONY OF
VICTOR H. SILVA**

energy audits utilizing the National Energy Assessment Tool (“NEAT”) modeling to determine costs and savings estimates. Multifamily audit reports use Targets Retrofit Energy Assessment Tool (“TREAT”) modeling to determine costs and savings estimates. This program also provides a holistic approach to building science by performing audits on the mechanical measures, the building shell measures and the electric baseload measures. The implementer, MFA, leverages other funding sources to maximize energy efficiency benefits to customers which would otherwise not be cost effective for EPE to carry out alone.

8. The Smart Students Program – This program consists of LivingWise[®] educational kits and the newer FutureWise educational kits. The LivingWise[®] kit is an effective tool that teaches fifth grade students to use energy more efficiently in their homes. The FutureWise kit as an effective tool that helps high school students learn how to read utility bills, how to save money on energy usage and more. The FutureWise kit also provides the students with smart devices which will spark/entice their interest in energy-saving technology. The LivingWise[®] kits, as well as the FutureWise kits, educate students and parents alike.

Q43. WHY IS EPE PROPOSING TO DISCONTINUE THE APPLIANCE RECYCLING MEASURE?

- A.** EPE is proposing to discontinue the Appliance Recycling Measure as the contractor, ARCA Recycling, went out of business in 2023.

Q44. PLEASE PROVIDE A DESCRIPTION OF EPE’S 2025-2027 PROPOSED

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

COMMERCIAL PROGRAMS.

A. EPE is proposing to continue its three existing commercial EE Programs in addition to continuing to offer a Building Operating Certification training incentive to all commercial programs. Following is a description of each program:

Proposed commercial programs:

1. Commercial Comprehensive Program – This is an existing program which offers incentives for lighting retrofits and new construction projects to commercial customers with an average demand of equal to or less than 100 kW, as well as technical support and outreach services as necessary. EPE offers a Building Operating Certification training to participants. This program also includes all of EPE's commercial direct rebates, for retrofit and new construction projects, such as commercial HVAC, building envelope, refrigeration, motor controls, and ENERGY STAR® certified equipment measures as approved in the TRM or State Evaluator. EPE proposes to add a behavior M&V measure option for Building Operator Certification training participants. EPE also extends program rebates to commercial customers with an average demand greater than 100 kW. Incentives and rebates are paid directly to the customer or, upon customer approval, may be paid to the contractors that perform the installation.

2. SCORE Plus Program – This is an existing program which offers incentives for commercial customers with an average demand of greater than 100 kW, as well as all schools, city, county, and government facilities. EPE offers a Building Operating Certification training to participants. This program also provides customers with technical support, facility energy benchmarking and Energy Master Planning

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

Workshops are available to selected customers. The SCORE Plus Program provides incentives for a wide range of energy efficiency measures such as lighting, HVAC, equipment controls, behavioral M&V, and custom projects. New construction and retrofit projects are accepted in this program as well. Incentives are paid directly to the customer or, upon customer approval, can be paid to the contractors that perform the installation. For the 2025-2027 EE / LM filing, EPE proposes to add two new measures, CoolSaver, which is a a/c tune-up measure, and Strategic Energy Management (SEM), which is custom measure that identifies energy efficiency opportunities for commercial customers under the SCORE Plus program requirements.

3. Commercial Load Management Program – This is an existing program which allows participating customers to provide, when requested by EPE, voluntary curtailment of electric consumption during peak demand periods in return for incentive payments. Incentives are based on verified demand savings that customers are able to achieve in response to notifications of voluntary curtailment events by EPE. Demand savings and incentive payment amounts are based on the actual, verified load curtailments. In addition, EPE offers a Building Operating Certification training to participants.

Q45. PURSUANT TO RULE 17.7.2.8(H)(16), PROVIDE JUSTIFICATION FOR EPE’S REQUEST FOR THE COMMISSION TO REAUTHORIZE THREE OF ITS EXISTING RESIDENTIAL PROGRAMS AND ONE EXISTING COMMERCIAL PROGRAM WHICH DID NOT MEET THE UCT IN THE 2023

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

PROGRAM YEAR.

A. While the portfolio of programs must achieve a total Utility Cost Test ratio of at least 1.0, this doesn't apply to each program in isolation. When considering the aggregate benefits across multiple programs, the overall impact may still be positive. Some programs may have non-monetary benefits (e.g., environmental impact, grid stability, community involvement) that aren't fully captured by the UCT.

The Smart Students Program had a 2023 PY UCT of 0.53, with an Alternative UCT Ratio of 1.24. Due to an 11-month regulatory delay in program approval, 2023 was the first year for this new program that included high school students. The FutureWise kit measures, implemented through the program, are more advanced, higher cost measures that are more appropriate for high school students. EPE is reviewing the measure mix and considering other measures that may increase energy savings.

The ENERGY STAR New Homes Program had a UCT of 0.96, with an Alternative UCT Ratio of 1.44. This UCT is marginally below one, and EPE's plan projects that with proposed program adjustments outlined in the program description, its UCT ratio will increase..

The NM Residential Marketplace Program achieved a UCT score of 0.06 in its first year. The TX Marketplace also had a UCT of less than 1.0 in its first year. However, the TX Marketplace has since evolved, now achieving a UCT greater than 3.0. This improvement trajectory in a similarly implemented program demonstrates that the NM Marketplace has the potential for significant progress and cost-effectiveness in subsequent years.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 The first year of the NM Marketplace was also notably impacted by supply
2 chain issues, limiting the availability of certain products. These limitations likely
3 hindered customer participation and program performance. As supply chains have
4 stabilized, the availability of energy-efficient products have increased, likely
5 improving the program's future cost-effectiveness.

6 Despite the initial performance, EPE witness Neumann projects that the NM
7 Marketplace program can achieve a significantly better cost effectiveness in subsequent
8 years as participation increases. When considering the cost effectiveness test results
9 that includes avoided utility carbon emissions benefits, the UCT is projected to be over
10 1.6 in subsequent years. This indicates that the program has the potential for cost-
11 effectiveness when broader environmental benefits are accounted for. EPE plans to
12 consider adjusting incentive levels for Marketplace products, but the focus will be on
13 increasing utility-driven marketing efforts to supplement implementer marketing.
14 These marketing adjustments are designed to boost customer awareness and
15 participation, which are critical for the program's success based on cost effectiveness
16 analysis.

17 The NM Residential Marketplace Program is a critical component of EPE's
18 overall residential energy efficiency portfolio. The Marketplace provides an essential
19 platform for customers to purchase smart thermostats, which are key to enrolling and
20 participating in the cost-effective Residential Load Management Program. The online
21 Marketplace also provides an opportunity to offer additional load management capable
22 devices as they become available on the market. This integration not only supports

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 energy efficiency but also enhances load management capabilities, contributing to
2 overall system reliability and efficiency.

3 The Commercial Load Management Program had a UCT of 0.62, with an
4 Alternative UCT Ratio of 0.62, as load management programs primarily produce
5 capacity benefits rather than energy benefits. One of the participants, NMSU, did not
6 participate in one of the 2023 events due to automated control system failure which
7 reduced the overall program savings. Even though this specific program UCT fell
8 below the 1.0 threshold, it is projected by EPE witness Neumann, to attain a UCT of
9 over 1.4 in subsequent years and contribute to system-wide energy savings and grid
10 reliability. To encourage more participation within Commercial Load Management,
11 EPE has worked with the statewide evaluator to allow more flexibility on mid-season
12 enrollment and event participation.

13
14 **VIII. PREFILING REQUIREMENT FOR STAKEHOLDER INPUT**

15 **Q46. PLEASE DESCRIBE EPE'S PROCESS FOR SOLICITING**
16 **RECOMMENDATIONS FOR EPE'S EE/LM PLAN.**

17 **A.** EPE issued a request for recommendations on the design and implementation of the
18 programs via email to stakeholder groups, including the Commission Staff, the
19 New Mexico Department of Justice's office, and the New Mexico Energy, Minerals
20 and Natural Resources Department, and other interested persons before seeking
21 NMPRC approval. EPE held a series of Public Virtual Advisory Meetings on June 30,
22 July 26, August 30, September 7, and December 13, 2023. EPE invited, via e-mail,
23 parties whose e-mail addresses are listed on the official service list from EPE's Case

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 No. 21-00114-UT. Please see Exhibit VHS-3 for the Official Service List and Exhibit
2 VHS-4 for the list of the attendees. SWEEP, Allen Downs, Don Kurtz, and Philip
3 Simpson provided program recommendations. EPE met with representatives during the
4 five public advisory meetings to discuss each of the recommendations. EPE then further
5 evaluated the recommendations.

6
7 **Q47. AFTER MEETING AND DISCUSSING RECOMMENDATIONS PROPOSED**
8 **BY THE PUBLIC ADVISORY GROUP, WHICH RECOMMENDATIONS**
9 **DOES EPE PROPOSE?**

10 **A.** EPE's proposed plan incorporates and has considered the following recommendations.

11 EPE will continue to work towards:

- 12 ○ Spending its full annual budget and meeting the savings requirements in the
13 Efficient Use of Energy Act ("EUEA");
- 14 ○ Maintaining energy savings goals of 15.8 GWh per year, at a minimum;
- 15 ○ Proposing and seeking approval of avoided carbon emissions benefits in the
16 cost effectiveness test, improving cost effectiveness and increasing incentive
17 potential for energy saving measures;
- 18 ○ Increasing the incentives in the residential and commercial cooling program
19 budgets to encourage heat pump and heat pump water heater adoption;
- 20 ○ Aligning EnergySmart program with federal programs to maximize customer
21 access to energy efficiency funding;
- 22 ○ Meeting with stakeholders after the state submits their Home Energy Rebate
23 Application to DOE to discuss any needed changes to the design of EPE

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 programs to align with federal funding and possibly coordinating with the
2 state on these programs;

3 ○ Growing all-electric new construction opportunities. EPE is proposing in this
4 filing to include an all-electric measure within the ENERGY STAR New
5 Homes Program;

6 ○ Expanding offerings to help reach additional low-income and underserved
7 customers. EPE is coordinating with MFA to sequence the use of federal funds
8 with EPE funding to maximize low-income opportunities within the
9 EnergySmart program;

10 ○ Understanding available demand response programs and technologies that
11 leverage Advanced Metering Infrastructure (AMI). EPE is working with
12 current implementers to understand the capabilities of developing demand
13 response and behavioral program technologies;

14 ○ Analyzing the incentive levels for enrolling and participating in the Residential
15 Load Management Program to evaluate the possibility of increasing the
16 program incentive;

17 ○ Collaborating with stakeholders beyond utilities. EPE is working with
18 EMNRD, the NM State Energy Office, GridWorks, The City of Las Cruces
19 (Plugged in for Good), and the Public Advisory Group to identify and take
20 advantage of synergies between government and utility programs and on
21 opportunities to cross-market programs; and

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

- 1 ○ Encouraging more participation within Commercial Load Management. EPE
2 has worked with EcoMetric, the statewide evaluator, to allow more flexibility
3 on mid-season enrollment and event participation.

4
5 **Q48. WHAT COLLABORATION EFFORTS HAS EPE INITIATED?**

- 6 **A.** EPE has participated in the New Mexico Building Decarbonization Roadmap Meetings
7 led by Gridworks and the Energy Minerals and Natural Resources Department
8 (“EMNRD”) in addition to separate strategy meetings with EMNRD. The
9 collaboration has been focused on aligning IRA funded programs with utility programs
10 to maximize the ability for customers to take advantage of multiple energy efficiency
11 project funding sources. Additionally, EPE is working with EMNRD on inclusion of
12 links to EPE programs on a “one stop shop” website that EMNRD is working on that
13 will provide New Mexico residents with information about available EE programs.

14
15 **IX. COMPLIANCE REQUIREMENTS**

16 **Q49. HAS EPE MET THE FILING REQUIREMENTS OF THE RULE?**

- 17 **A.** Yes. See Exhibit VHS-5 for the complete listing of all the filing requirements of the
18 Rule.

19
20 **Q50. WHAT WERE THE COMPLIANCE ITEMS REFERENCED IN THE FINAL**
21 **ORDER IN CASE NO. 21-00114-UT?**

- 22 **A.** In Case No. 21-00114-UT, the Final Order, dated November 30, 2022, contained the
23 following compliance item for EPE in the Ordering Paragraphs:

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

¶ D. EPE and CLC are each ordered to file in this docket, on or before December 20, 2022, a description of the recent federal regulatory changes concerning non-LED lighting referenced in CLC's Exceptions and a brief analysis of the potential impact(s) of such changes on EPE's energy efficiency programs. The responses to this bench request will not be considered part of the adjudicatory record of this docket, as the Commission does not intend to reopen the record.

Q51. WHAT ARE THE COMPLIANCE REQUIREMENTS REFERENCED IN THE RECOMMENDED DECISION AND INCORPORATED INTO THE FINAL ORDER?

A. The Decretal Paragraphs contain one compliance item for EPE:

¶ C The agreements reached by the parties as to the following are acknowledged and incorporated into this Order.

1. EPE's sliding scale incentive proposal, as modified to accept Staff's beginning baseline incentive at 16 GWh, based on EPE's program costs and satisfactory program performance.
2. Regarding the reconciliation of the historical overage, it should be collected over two years, reducing the reconciliation element included in EUERF factor by half to 0.28585 percent (or 0.5717 percent x 50 percent).

¶ D EPE's first annual report concerning its 2022-2024 EE Program shall be filed on or before July 1, 2023.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1

2 **Q52. HAS EPE MET THE ABOVE LISTED FINAL ORDER COMPLIANCE**
3 **ITEMS?**

4 **A.** Yes. In the recommended decision and Final Order in Case No. 21-00114-UT, EPE
5 addressed paragraph C section 1 and 2 as further described in the testimony of EPE
6 witness Hernandez. EPE also complied with paragraph D of the compliance by filing
7 the Annual Report on June 1, 2023.

8

9 **Q53. HAS EPE MET THE M&V REQUIREMENTS OF THE EUEA AND THE**
10 **RULE?**

11 **A.** Yes. The Commission-approved M&V evaluator, EcoMetric, performed its
12 independent M&V evaluation of EPE's 2023 EE/LM Programs.

13

14 **Q54. IS EPE SEEKING COMMISSON APPROVAL OF ITS MOTION PENDING IN**
15 **CASE NO. 21-00114-UT WHICH YOU DESCRIBED EARLIER IN YOUR**
16 **TESTIMONY? AND IF NOT, WHY NOT?**

17 **A.** No. EPE's Application in this docket does not seek approval of that motion because
18 that motion is largely moot. EPE's prior and most recent adjustment to its Revised
19 Rate No. 17-EUERF filed in Advice Notice No. 287 went into effect by operation of
20 Rule 210 effective July 1, 2023. The pending motion provided the evidentiary basis
21 for that advice notice, and EPE filed the motion at the request of Staff who did not
22 oppose the rate adjustment in Advice Notice No. 287. As explained in the declaration
23 of EPE witness Hernandez that supported that motion, EPE's Advice Notice No. 287

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
VICTOR H. SILVA**

1 reduced EPE's Rate No. 17-EUERF rider from 4.3583 percent to 3.3844 percent. EPE's
2 proposed adjustment was consistent with Section 17.7.2.8(E) of the Rule, as well as
3 with the reconciliation methodology approved in for the 2020 cumulative overage in
4 Case No. 21-00114-UT. The adjusted rate also levelized EPE's 2022-2024 EE/LM
5 Plan expenditures with Rate No. 17-EUERF collections during the three-year period of
6 EPE's 2022-2024 Plan.

7

8 **X. CONCLUSION**

9 **Q55. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

10 **A.** Yes, it does.

2024						
Programs	Customer Incentives	Administrative Expenses	Marketing	R&D	M&V Costs	Program Cost
Education	\$ 114,700	\$ 20,180	\$ -	\$ -	\$ -	\$ 134,880
Smart Students	\$ 114,700	\$ 20,180	\$ -	\$ -	\$ -	\$ 134,880
Residential	\$ 1,471,634	\$ 949,974	\$ 64,654	\$ 26,971	\$ 54,243	\$ 2,567,475
Residential Comprehensive	\$ 687,593	\$ 325,598	\$ 36,482	\$ 23,618	\$ 20,279	\$ 1,093,570
Residential Lighting	\$ 255,533	\$ 153,425	\$ 803	\$ -	\$ 4,741	\$ 414,502
ENERGY STAR® New Homes	\$ 228,924	\$ 157,494	\$ 305	\$ 3,352	\$ 14,223	\$ 404,298
Marketplace	\$ 109,734	\$ 117,367	\$ 13,767	\$ -	\$ -	\$ 240,869
Residential Load Management	\$ 189,850	\$ 196,090	\$ 13,296	\$ -	\$ 15,000	\$ 414,236
Low Income	\$ 1,077,538	\$ 190,384	\$ 27,895	\$ 15,582	\$ 26,957	\$ 1,338,356
EnergySaver	\$ 688,113	\$ 134,337	\$ 23,740	\$ 13,101	\$ 26,957	\$ 886,248
Energy\$mart	\$ 389,425	\$ 56,047	\$ 4,155	\$ 2,481	\$ -	\$ 452,108
Commercial	\$ 1,387,568	\$ 942,720	\$ 7,452	\$ 57,447	\$ 74,162	\$ 2,469,348
Commercial Comprehensive	\$ 327,053	\$ 127,845	\$ 5,208	\$ 15,017	\$ 26,331	\$ 501,453
SCORE Plus	\$ 879,015	\$ 649,023	\$ 1,967	\$ 41,968	\$ 27,831	\$ 1,599,804
Commercial Load Management	\$ 181,500	\$ 165,852	\$ 277	\$ 462	\$ 20,000	\$ 368,091
Totals	\$ 4,051,440	\$ 2,103,258	\$ 100,000	\$ 100,000	\$ 155,362	\$ 6,510,060

Amounts may not add or tie due to rounding.

2025						
Programs	Customer Incentives	Administrative Expenses	Marketing	R&D	M&V Costs	Program Cost
Education	\$ 114,709	\$ 20,171	\$ -	\$ -	\$ -	\$ 134,880
Smart Students	\$ 114,709	\$ 20,171	\$ -	\$ -	\$ -	\$ 134,880
Residential	\$ 1,406,845	\$ 997,191	\$ 64,654	\$ 26,971	\$ 54,243	\$ 2,549,902
Residential Comprehensive	\$ 572,965	\$ 271,361	\$ 36,482	\$ 23,618	\$ 20,279	\$ 924,705
Residential Products	\$ 255,534	\$ 153,424	\$ 803	\$ -	\$ 4,741	\$ 414,502
ENERGY STAR® New Homes	\$ 269,762	\$ 250,000	\$ 305	\$ 3,352	\$ 14,223	\$ 537,642
Marketplace	\$ 99,759	\$ 106,697	\$ 13,767	\$ -	\$ -	\$ 220,223
Residential Load Management	\$ 208,825	\$ 215,709	\$ 13,296	\$ -	\$ 15,000	\$ 452,830
Low Income	\$ 918,736	\$ 159,390	\$ 27,895	\$ 15,582	\$ 26,957	\$ 1,148,560
EnergySaver	\$ 529,315	\$ 103,339	\$ 23,740	\$ 13,101	\$ 26,957	\$ 696,452
EnergySmart	\$ 389,421	\$ 56,051	\$ 4,155	\$ 2,481	\$ -	\$ 452,108
Commercial	\$ 1,456,265	\$ 1,176,247	\$ 7,452	\$ 57,447	\$ 74,162	\$ 2,771,573
Commercial Comprehensive	\$ 297,390	\$ 116,153	\$ 5,208	\$ 15,017	\$ 26,331	\$ 460,099
SCORE Plus	\$ 1,001,049	\$ 915,875	\$ 1,967	\$ 41,968	\$ 27,831	\$ 1,988,690
Commercial Load Management	\$ 157,826	\$ 144,219	\$ 277	\$ 462	\$ 20,000	\$ 322,784
Totals	\$ 3,896,555	\$ 2,352,999	\$ 100,000	\$ 100,000	\$ 155,362	\$ 6,604,915

2026						
Programs	Customer Incentives	Administrative Expenses	Marketing	R&D	M&V Costs	Program Cost
Education	\$ 114,709	\$ 20,171	\$ -	\$ -	\$ -	\$ 134,880
Smart Students	\$ 114,709	\$ 20,171	\$ -	\$ -	\$ -	\$ 134,880
Residential	\$ 1,434,677	\$ 1,018,744	\$ 64,654	\$ 26,971	\$ 54,243	\$ 2,599,288
Residential Comprehensive	\$ 572,965	\$ 271,361	\$ 36,482	\$ 23,618	\$ 20,279	\$ 924,705
Residential Products	\$ 255,534	\$ 153,424	\$ 803	\$ -	\$ 4,741	\$ 414,502
ENERGY STAR® New Homes	\$ 276,694	\$ 250,000	\$ 305	\$ 3,352	\$ 14,223	\$ 544,574
Marketplace	\$ 99,759	\$ 106,697	\$ 13,767	\$ -	\$ -	\$ 220,223
Residential Load Management	\$ 229,725	\$ 237,262	\$ 13,296	\$ -	\$ 15,000	\$ 495,284
Low Income	\$ 918,736	\$ 159,390	\$ 27,895	\$ 15,582	\$ 26,957	\$ 1,148,560
EnergySaver	\$ 529,315	\$ 103,339	\$ 23,740	\$ 13,101	\$ 26,957	\$ 696,452
Energy\$mart	\$ 389,421	\$ 56,051	\$ 4,155	\$ 2,481	\$ -	\$ 452,108
Commercial	\$ 1,456,265	\$ 1,443,116	\$ 7,452	\$ 57,447	\$ 74,162	\$ 3,038,442
Commercial Comprehensive	\$ 297,390	\$ 116,153	\$ 5,208	\$ 15,017	\$ 26,331	\$ 460,099
SCORE Plus	\$ 1,001,049	\$ 1,182,744	\$ 1,967	\$ 41,968	\$ 27,831	\$ 2,255,559
Commercial Load Management	\$ 157,826	\$ 144,219	\$ 277	\$ 462	\$ 20,000	\$ 322,784
Totals	\$ 3,924,387	\$ 2,641,421	\$ 100,000	\$ 100,000	\$ 155,362	\$ 6,921,170

2027						
Programs	Customer Incentives	Administrative Expenses	Marketing	R&D	M&V Costs	Program Cost
Education	\$ 114,709	\$ 20,171	\$ -	\$ -	\$ -	\$ 134,880
Smart Students	\$ 114,709	\$ 20,171	\$ -	\$ -	\$ -	\$ 134,880
Residential	\$ 1,465,184	\$ 1,042,468	\$ 64,654	\$ 26,971	\$ 54,243	\$ 2,653,519
Residential Comprehensive	\$ 572,965	\$ 271,361	\$ 36,482	\$ 23,618	\$ 20,279	\$ 924,705
Residential Products	\$ 255,534	\$ 153,424	\$ 803	\$ -	\$ 4,741	\$ 414,502
ENERGY STAR® New Homes	\$ 284,226	\$ 250,000	\$ 305	\$ 3,352	\$ 14,223	\$ 552,106
Marketplace	\$ 99,759	\$ 106,697	\$ 13,767	\$ -	\$ -	\$ 220,223
Residential Load Management	\$ 252,700	\$ 260,986	\$ 13,296	\$ -	\$ 15,000	\$ 541,982
Low Income	\$ 918,736	\$ 159,390	\$ 27,895	\$ 15,582	\$ 26,957	\$ 1,148,560
EnergySaver	\$ 529,315	\$ 103,339	\$ 23,740	\$ 13,101	\$ 26,957	\$ 696,452
Energy\$mart	\$ 389,421	\$ 56,051	\$ 4,155	\$ 2,481	\$ -	\$ 452,108
Commercial	\$ 1,456,265	\$ 1,725,735	\$ 7,452	\$ 57,447	\$ 74,162	\$ 3,321,061
Commercial Comprehensive	\$ 297,390	\$ 116,153	\$ 5,208	\$ 15,017	\$ 26,331	\$ 460,099
SCORE Plus	\$ 1,001,049	\$ 1,465,362	\$ 1,967	\$ 41,968	\$ 27,831	\$ 2,538,178
Commercial Load Management	\$ 157,826	\$ 144,219	\$ 277	\$ 462	\$ 20,000	\$ 322,784
Totals	\$ 3,954,894	\$ 2,947,764	\$ 100,000	\$ 100,000	\$ 155,362	\$ 7,258,019

2025-2027 EE/LM PUBLIC ADVISORY SERVICE LIST

Exhibit VHS-3

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17.7.2.8 PUBLIC UTILITY FILING REQUIREMENTS FOR APPLICATIONS AND ANNUAL REPORTS:			Witness/Reference
A. Timing. Beginning in the year specified below, each public utility shall file an application every three years:			Silva
2021	2022	2023	
El Paso Electric Company (and its successors)	Southwest Public Service Company (and its successors)	Public Service Company of New Mexico (and its successors)	
Zia Natural Gas Company (and its successors)	New Mexico Gas Company (and its successors)	Raton Natural Gas Company (and its successors)	
		Any other public utility	
Each of the three years covered by an application shall, for the purposes of 17.7.2.7 NMAC, be treated as a plan year. Each public utility may, but is not required to, file an application prior to the year specified in this subsection. If a utility does not elect to file an application prior to the year specified in this subsection, the measures, programs and incentive approved in the utility's last energy efficiency case shall continue in effect until modified or terminated. If a utility does elect to file an application prior to the year specified in this subsection, the measures, programs and incentive approved in that case shall continue in effect as provided by the commission. All utilities shall file their annual reports each year and in the same docket as the application that covered the period of the annual report. Public Service Company of New Mexico (and its successors) shall file its application and its annual reports on April 15 of the applicable year. Southwestern Public Service Company (and its successors) shall file its application and its annual reports on May 15 of the applicable year. El Paso Electric Company (and its successors) shall file its application and its annual reports on June 1 of the applicable year. A natural gas company shall file its annual report on or before July 1 of each year, and shall file its application on or before August 31 of the applicable year in which it is required to file an application. If a specified filing date falls on a weekend or legal holiday, the public utility shall file on the next business day.			
B. Compliance with pre-filing requirements. Applications shall describe how the public utility has met the pre-filing requirements of Subsection E of Section 62-17-5 NMSA 1978, including descriptions of the process used to solicit non-binding recommendations, and any competitive bids required by the commission for good cause. The public utility shall identify by name, association, and contact information, each interested party that participated in the process, including commission staff, the attorney general, and the energy, minerals and natural resources department. The public utility shall summarize each participant's non-binding recommendation on the design, implementation, and use of third-party energy service contractors through competitive bidding for programs and measures.			Silva
C. The public utility shall identify within its application, its estimated plan year funding for energy efficiency and load management program costs for each year during the plan period.			Silva
(1) Estimated plan year funding for electric public utilities energy efficiency and load management program costs shall be expressed in dollars and shall be no less than three percent and no more than five percent of billing revenues from all of its customers' bills that the public utility estimates to be billed during the plan year to customer classes with the opportunity to participate, excluding:			Variance - Silva
(a) gross receipts taxes and franchise and right-of-way access fees;			Silva
(b) revenues that the public utility estimates to bill during the plan year to any single customer that exceed \$75,000.00;			Silva
(c) any customer's plan year self-directed program credits approved by the public utility or by a commission approved self-direct administrator; and			Silva
(d) any customer's plan year self-directed program exemptions approved by the public utility or by a commission-approved self-direct administrator.			Silva
(2) Estimated plan year funding for gas public utilities' energy efficiency and load management program costs shall be expressed in dollars and shall not exceed five percent of customers' bills that the public utility estimates to be billed during the plan year, excluding:			N/A
(a) gross receipts taxes and franchise and right-of-way access fees;			N/A
(b) revenues that the public utility estimates to bill during the plan year to any single customer that exceed seventy five thousand (\$75,000);			N/A
(c) any customer's plan year self-directed program credits approved by the public utility or by a commission-approved self-direct administrator; and			N/A
(d) any customer's plan year self-directed program exemptions approved by the public utility or by a commission-approved self-direct administrator			N/A
D. The public utility's application shall calculate and provide the difference between its actual prior plan year expenditures for measures and programs and the same plan year's applicable funding required by statute. At the end of each plan year, the public utility shall calculate the following applicable values:			Silva/Hernandez
(1) any plan year overage; or			Silva/Hernandez
(2) any plan year underage.			Silva/Hernandez
E. In each plan year, a public utility shall make its best efforts to expend its applicable plan funding as calculated in Subsection C of 17.7.2.8 NMAC above subtracting any applicable prior plan year overage or adding any applicable prior plan year underage; provided, however, that a public utility may periodically adjust its plan year expenditures by an amount not greater than ten percent of the approved funding level if the adjustment will result in aligning plan year expenditures more closely with projected plan year collections. By motion in the docket of its most recent energy efficiency case a utility may seek approval to adjust its plan year expenditures by more than ten percent of the approved funding level.			Variance - Silva
F. The application shall include an executive summary to facilitate commission review.			Application
G. The utility shall utilize well known, commercially available or standard engineering, economic and financial calculations, ratings, and simulations, or other reasonable methods, to determine monetary costs and avoided monetary costs of measures and programs.			Neumann
H. For each proposed measure or program, including previously approved measures and programs submitted for reauthorization, the application shall provide:			Silva
(1) the public utility's statement that the measure or program is estimated to be cost-effective and meets the utility cost test;			Silva
(2) a detailed description of the proposed measure or program;			Silva
(3) the expected useful life of the measure or program;			Neumann
(4) any participation requirements and restrictions of the measure or program;			Silva/Neumann
(5) the time period during which the measure or program will be offered;			Silva
(6) a description of any competitive bid process for utility measures or programs;			Silva
(7) the estimated number of measure or program participants, supported by written testimony and exhibits;			Silva
(8) the estimated economic benefit to the participants attributable to the measure or program, supported by written testimony and exhibits;			Neumann
(9) the estimated annual energy savings and the estimated energy savings over the useful life for the measure or program (expressed in kilowatt hours and dollars for electric utilities or in therms and dollars for gas utilities), supported by written testimony and exhibits;			Silva
(10) the estimated annual demand savings and the estimated demand savings over the useful life for the measure or program (expressed in kilowatts and dollars), supported by written testimony and exhibits;			Silva
(11) the proposed program costs to be incurred by the utility to support more than one measure or program, along with the associated allocation of this cost to each measure or program, and the method used to determine each allocation, supported by written testimony and exhibits;			Silva

(12)	a detailed separate measure or program budget that identifies the estimated monetary program costs to be incurred by the public utility in acquiring, developing, and operating each measure and program on a life cycle basis, for each year of the expected useful life of the measure or program;	Silva
(13)	the estimated monetary program costs to be incurred by the public utility in acquiring, developing, and operating each measure or program on a life cycle basis, supported by written testimony and workpapers that:	Silva
(a)	demonstrate and justify how the estimated monetary program costs will be equal to or greater than the actual monetary program costs; and	Silva
(b)	explain the public utility's rationale and methodology used to determine the estimated monetary program costs.	Silva
(14)	the estimated avoided monetary cost associated with developing, acquiring and operating associated supply side resources, supported by written testimony and exhibits that:	Silva
(a)	demonstrate and justify how the estimated avoided monetary cost will be equal to or greater than the actual avoided monetary cost; and	Silva
(b)	explain the public utility's rationale and methodology used to estimate the avoided monetary cost associated with acquiring, developing, and operating the associated supply side resource.	Silva
(15)	supporting documentation, underlying data, calculations, estimates and other items shall be presented in a manner that facilitates the preparation of a measurement and verification report by an independent program evaluator, along with compilation and preparation of the public utility's reporting requirements, and that facilitates a simple comparison of measure or program estimated results to actual results, including the public utility's cost of capital and discount rate; and	Silva
(16)	if the utility cost test is not met, justify why the utility is proposing to implement the program within its portfolio of proposed programs.	Silva
I.	The public utility shall demonstrate, and has the burden to demonstrate, that it has evaluated and determined that the proposed measure or program is cost-effective and will reduce energy usage or energy demand or both, if approved by the commission and implemented by the utility.	Silva
J.	The public utility shall demonstrate that its portfolio of proposed measures and programs are cost-effective, meets the utility cost test as defined by Subsection C of Section 62-17-4 NMSA 1978 and are designed to provide every affected customer class with the opportunity to participate and benefit economically.	Silva
K.	The public utility shall demonstrate that no less than five percent of the funding for measure and program costs shall be specifically directed to measures or programs for low-income customers.	Silva
L.	Any application that includes a proposed annual incentive award shall:	Hernandez
(1)	be based on the utility's costs;	Hernandez
(2)	be based on satisfactory performance of measures and programs;	Hernandez
(3)	be supported by written testimony and exhibits; and	Hernandez
(4)	shall not exceed the product (expressed in dollars) of:	Hernandez
(a)	its weighted cost of capital (expressed as a percent), and	Hernandez
(b)	its approved annual program costs.	Hernandez
M.	For each approved large customer self-directed program, the utility's application shall describe, in an annual report, the process that enabled the utility to determine that a large customer self-directed program met the cost-effective definition set forth in Subsection B of Section 62-17-9 NMSA 1978 and merited the credit or exemption.	Silva
N.	The commission shall act expeditiously on the public utility's request for approval of its energy efficiency and load management measures and programs.	Silva
[17.7.2.8 NMAC - Rp. 17.7.2.8 NMAC, 9/26/2017]		
17.7.2.9 RESIDENTIAL PROGRAMS:		
A.	The programs should enable residential customers or households to conserve energy, reduce demand, or reduce residential energy bills.	Silva
B.	Provided that the public utility's total portfolio of programs remains cost-effective, no less than five percent of the amount received by the public utility for program costs shall be specifically directed to energy efficiency programs for low-income customers.	Silva
(1)	A public utility may coordinate with existing community resources, including affordable housing programs, and low-income weatherization programs managed by federal, state, county, or local governments. This section does not preclude the public utility from designing and proposing other low-income programs.	Silva
(2)	Whenever possible, providers of low-income energy efficiency measures or programs should have demonstrated experience and effectiveness in the design, administration and provision of low-income measures and programs, along with experience in identifying and conducting outreach to low-income households. In the absence of qualified independent agencies, a public utility that does not provide measures or programs directly, may solicit qualified competitive bids for these services.	Silva
(3)	In developing the utility cost test for energy efficiency and load management measures and programs directed to low-income customers, unless otherwise quantified in a commission proceeding, the public utility shall assume that twenty percent of the calculated energy savings is the reasonable value of reductions in working capital, reduced collection costs, lower bad-debt expense, improved customer service, effectiveness, and other appropriate factors qualifying as utility system economic benefits.	Silva
[17.7.2.9 NMAC - Rp. 17.7.2.9 NMAC, 9/26/2017; A, 10/26/2021]		
17.7.2.10 SELF-DIRECTED PROGRAM CREDITS FOR LARGE CUSTOMERS: The following criteria apply to large customer utility credits for self-directed programs.		
A.	The expenditures made by the large customer at its facilities shall be cost-effective according to the utility cost test.	N/A
B.	Projects that have received rebates, financial or other program support from a utility are not eligible for a credit.	N/A
C.	Eligible expenditures must have a simple payback period of more than one year but less than seven years.	N/A
D.	Large customers shall seek and receive approval for credits from the utility or a commission-approved self-direct administrator.	N/A
E.	Large customers applying for an investor-owned electric utility bill credit must meet the electricity consumption size criteria set forth in Subsection G of Section 62-17-4 NMSA 1978 and the utility cost test.	N/A
F.	Large customers applying for gas utility bill credit must meet the gas consumption criteria as set forth in Subsection G of Section 62-17-4 NMSA 1978 and the utility cost test.	N/A
G.	Large customers seeking a credit shall provide, to the public utility or the commission-approved self-direct program administrator, access to all relevant engineering studies and documentation needed to verify energy savings of the project, and allow access to its site for reasonable inspections, at reasonable times. All records relevant to a self-direct program shall be maintained by the large customer for the duration of that program, which shall be evaluated in accordance with 17.7.2.15 NMAC, subject to appropriate protections for confidentiality.	N/A
H.	The utility shall designate a qualified representative to review, approve, or disapprove large customer requests for credits.	N/A
I.	The commission may appoint a "commission-approved" self-direct program administrator to review, approve, or disapprove large customer requests for credits.	N/A

J.	Approvals or disapprovals by the utility representative or administrator shall be subject to commission review. Within 30 business days of the action, the utility representative or administrator shall file and serve notice of each self-direct program review, approval, or disapproval with the commission, and on all interested parties. Notice of an appeal of a utility or administrator approval or disapproval of a large customer credit request shall be filed with the commission within 30 calendar days of the approval or disapproval action by Staff, the large customer or any interested party.	N/A
K.	Once approved, the credit may be used to offset up to seventy percent of the tariff rider authorized by the Efficient Use of Energy Act, until said credit is exhausted.	N/A
L.	Any credit not fully utilized in the year it is received shall carry over to subsequent years.	N/A
M.	Implementation of credits shall be designed to minimize utility administrative costs.	N/A
N.	Self-direct program participants, or large customers seeking exemption, shall submit qualified in-house or contracted engineering studies,	N/A
O.	Large customers must respond to reasonable utility or administrator information requests and allow the utility or an administrator to perform necessary site visits.	N/A
P.	The utility or administrator shall act in a timely manner on requests for self-direct program approval.	N/A
Q.	For investor-owned electric utilities, the equivalent amount of energy savings associated with a large customer's self-directed program will be accounted for in calculating its compliance with minimum required energy savings.	N/A
R.	Large customer expenditures incurred to produce electric energy savings or electric demand savings are only eligible for an electric utility bill credit. Large customer expenditures incurred to produce natural gas energy savings or natural gas demand savings are only eligible for a gas utility bill credit. Large customer expenditures incurred to produce both electric and natural gas energy savings, both electric and natural gas demand savings, or any combination of energy savings and demand savings for both electric and natural gas are eligible for both an electricity bill credit and a gas utility bill credit, provided that the same energy efficiency expenditures or load management expenditures cannot be accounted for twice.	N/A
S.	Upon written request by the large customer, the information provided by that customer to the utility or program administrator, program evaluator, or others, shall remain confidential, except as otherwise ordered by the commission.	N/A
[17.7.2.10 NMAC - Rp. 17.7.2.10 NMAC, 9/26/2017]		
17.7.2.11 SELF-DIRECTED PROGRAM EXEMPTIONS FOR LARGE CUSTOMERS: The following criteria apply to utility exemptions to large customers for self-directed programs.		N/A
A.	To receive approval for an exemption to paying seventy percent of the tariff rider, a large customer must demonstrate to the reasonable satisfaction of the utility or self-direct program administrator that it has exhausted all cost-effective energy efficiency measures at its facility.	N/A
B.	Projects that have received rebates, financial or other program support from a utility are not eligible for an exemption.	N/A
C.	Eligible expenditures must have a simple payback period of more than one year but less than seven years.	N/A
D.	Large customers shall seek and receive approval for exemptions from the utility or a commission-approved self-direct administrator.	N/A
E.	Large customers applying for an investor-owned electric utility bill exemption must meet the electricity consumption size criterion set forth in Subsection G of Section 62-17-4 NMSA 1978.	N/A
F.	Large customers applying for a gas utility bill exemption must meet the gas consumption criterion set forth in Subsection G of Section 62-17-4 NMSA 1978	N/A
G.	The utility shall designate a qualified representative to review and approve, or disapprove, large customer requests for exemptions.	N/A
H.	The commission may appoint a "commission-approved" self-direct program administrator to review and approve, or disapprove, large customer requests for exemptions.	N/A
I.	Approvals or disapprovals by the utility representative or administrator shall be subject to commission review. Within 30 business days of the action, the utility representative or administrator shall file and serve notice of each self-direct program approval or disapproval with the commission, and on all interested parties. Notice of an appeal of a utility or administrator approval or disapproval of a large customer exemption request shall be filed with the commission within 30 calendar days of the approval or disapproval action by staff, the large customer or any interested party.	N/A
J.	Self-direct program participants, or large customers seeking an exemption shall provide, to the public utility or the commission approved self-direct program administrator, access to all relevant engineering studies and documentation needed to verify energy saving of the project, and allow access to its site for reasonable inspections, at reasonable times. All records relevant to a self-direct program shall be maintained by the large customer for the duration of that program, which shall be evaluated in accordance with 17.7.2.15 NMAC, subject to appropriate protections for confidentiality.	N/A
K.	Self-direct program participants, or large customers seeking exemption, shall submit qualified in-house or contracted engineering studies, and such other information as may be reasonably required by the utility or program administrator, to demonstrate qualification for self-direct program exemptions.	N/A
L.	Large customers must respond to reasonable utility or administrator information requests and allow the utility or an administrator to perform necessary site visits.	N/A
M.	The utility or administrator shall act in a timely manner on requests for self-direct program approval.	N/A
N.	For investor-owned electric utilities, the equivalent amount of energy savings associated with a large customer's self-directed program will be accounted for in calculating its compliance with minimum required energy savings.	N/A
O.	Large customer expenditures incurred to produce electric energy savings or electric demand savings are only eligible for an electric utility bill credit. Large customer expenditures incurred to produce natural gas energy savings or natural gas demand savings are only eligible for a gas utility bill credit. Large customer expenditures incurred to produce both electric and natural gas energy savings, both electric and natural gas demand savings or any combination of energy savings and demand savings for both electric and natural gas are eligible for both an electricity bill credit and a gas utility bill credit, provided that the same energy efficiency expenditures or load management expenditures cannot be accounted for twice.	N/A
P.	Upon written request by the large customer, the information provided by large customers to the utility or program administrator, program evaluator or others shall remain confidential, except as otherwise ordered by the commission.	N/A
[17.7.2.11 NMAC - Rp. 17.7.2.11 NMAC, 9/26/2017]		
17.7.2.12 MODIFICATION OR TERMINATION OF PROGRAMS:		
A.	Within each plan year, the utility, commission staff, attorney general, energy, minerals and natural resources department, or any other interested party, may petition the commission to modify or terminate a measure or program, or to approve a new program, for good cause by filing a motion in the same docket in which the public utility filed its most recent application. Program modification or termination shall not nullify any preexisting obligations of the utility, alternative energy efficiency provider, or contractor, for performance or failure to perform. Termination of a program or programs shall be accomplished in a manner that allows the utility to fully recover its prudent and reasonable program costs.	Silva
B.	Within each plan year, a utility may add or subtract measures within a program, modify customer incentive levels, or make other adjustments to an approved program if necessary for the overall success of the program and so long as the portfolio of programs remains cost effective under the utility cost test.	Silva
[17.7.2.12 NMAC - Rp. 17.7.2.12 NMAC, 1/1/2015, A, 9/26/2017, 9/26/2017; A, 10/26/2021]		
17.7.2.13 FILING REQUIREMENTS FOR COST RECOVERY :		

	A. Electric utility recovery of program costs shall only be from customer classes with an opportunity to participate in approved measures and programs, and shall be three percent to five percent of customers' bills or seventy-five thousand dollars (\$75,000) per customer per plan year, whichever is less. For gas utilities, recovery of program costs shall be no more than five percent of total annual revenues adjusted to maximize the impact on any single customer to \$75,000.00 per plan year.	Hernandez
	B. The public utility, at its option, may recover its prudent and reasonable program costs and approved incentives, either through an approved tariff rider, in base rates or by combining recovery through a tariff rider and base rates	Hernandez
	C. If a public utility seeks recovery of costs through a tariff rider, a utility shall present the proposed ratemaking treatment to the commission for approval. The proposal shall reconcile recovery of any costs currently being recovered through a tariff rider or in base rates, or by a combination of the two, as well as any new costs proposed to be recovered through a tariff rider or in base rates, or by a combination of the two.	Hernandez
	(1) The tariff rider shall be applied on a monthly basis, unless otherwise allowed by the commission.	Hernandez
	(2) Unless otherwise ordered by the commission, a tariff rider approved by the commission shall require language on customer bills explaining program benefits.	Hernandez
	(3) A public utility seeking approval of a tariff rider shall file an advice notice containing the information required by 17.1.2.210.11 NMAC and served upon the individuals and entities set forth in that rule. The proposed tariff rider shall go into effect 30 days after filing, unless suspended by the commission for a period not to exceed 180 days. If the commission has not acted to approve or disapprove the tariff rider by the end of an ordered suspension period, or within 30 days of filing, it shall be deemed approved as a matter of law.	Hernandez
	D. If base rate recovery of costs is sought, a utility shall present the proposed ratemaking treatment to the commission for approval. The proposal shall reconcile recovery of any costs currently being recovered through a tariff rider or in base rates, or by a combination of the two, as well as any new costs proposed to be recovered through a tariff rider or in base rates, or by a combination of the two.	Hernandez
	E. Program costs and incentives may be deferred for future recovery through creation of a regulatory asset. Prior commission approval is required for the public utility to create a regulatory asset and to establish any associated carrying charge.	Hernandez
	[17.7.2.13 NMAC - Rp. 17.7.2.13 NMAC, 9/26/2017; A, 10/26/2021]	
	17.7.2.14 ANNUAL REPORT:	
	A. Annual reports shall provide information relating to the public utility's actions to comply with the Efficient Use of Energy Act.	Silva
	B. Each public utility shall post its annual report on a publicly accessible website.	Silva
	C. Annual reports shall include the following for each measure and program:	Silva
T 1,	(1) documentation of program expenditures and estimates of the program expenditures expected in the next year, including documentation of any adjustments to expenditures in the plan year and expected adjustments to the next plan year;	Silva
T 1,	(2) estimated and actual customer participation levels;	Silva
T 1,	(3) estimated and actual energy savings;	Silva
T 1,	(4) estimated and actual demand savings;	Silva
T 1,	(5) estimated and actual monetary costs of the public utility;	Silva
T 8	(6) estimated and actual avoided monetary costs of the public utility;	Silva
T 9	(7) an evaluation of its cost-effectiveness; and	Silva
P 12	(8) an evaluation of the cost-effectiveness and pay-back periods of self-directed programs.	Silva
	D. Annual reports also shall include the following:	Silva
Att	(1) the most recent measurement and verification report of the independent program evaluator, which includes documentation, at both the portfolio and individual program levels of expenditures, savings, and cost-effectiveness of all energy efficiency measures and programs and load management measures and programs, expenditures, savings, and cost-effectiveness of all self-direct programs, and all assumptions used by the evaluator;	Silva
P 12	(2) a listing of each measure or program expenditure not covered by the independent measurement and verification report and related justification as to why the evaluation was not performed;	Silva
T 4,	(3) a comparison of estimated energy savings, demand savings, monetary costs and avoided monetary costs to actual energy savings, demand savings, actual monetary costs, and avoided monetary costs for each of the utility's approved measures or programs by	Silva
T 1,	(4) a listing of the number of program participants served for each of the utility's approved measures or programs by year;	Silva
T 10	(5) a listing of the calculated economic benefits for each of the utility's approved measures or programs by year;	Silva
P 12	(6) information on the number of customers applying for and participating in self-direct programs, the number of customers applying for and receiving exemptions, measurement and verification of self-direct program targets, payback periods and achievements, customer expenditures on qualifying projects, oversight expenses incurred by the utility representative or administrator; and	Silva
	(7) any other information required by the commission.	Silva
	[17.7.2.14 NMAC - Rp. 17.7.2.14 NMAC, 9/26/2017]	
	17.7.2.15 MEASUREMENT AND VERIFICATION:	
	A. Every energy efficiency and load management program shall be independently evaluated at least every three years. Every year, a public utility shall submit to the commission a comprehensive measurement, verification and program evaluation report prepared by an independent program	Silva
	(1) The independent program evaluator shall, at a minimum determine and verify energy and demand savings;	Silva
	(a) determine and verify energy and demand savings;	Silva
	(b) determine program cost effectiveness by applying the monetary values contained in the utility's approved plan	Silva
	(c) assess the public utility's performance in implementing energy efficiency and load management programs;	Silva
	(d) assess whether the utility has failed to meet its requirements under the Efficient Use of Energy Act or has not	Silva
	(e) provide recommended improvements on program performance for commission directed modification;	Silva
	(f) confirm that commission approved measures and programs were installed or implemented, meet reasonable quality standards, and are operating fully and correctly;	Silva
	(g) utilize applicable international performance measurement and verification protocols, describe any deviation from those protocols, and explain the reason for that deviation; and	Silva
	(h) fulfill any other measurement and verification statutory requirements not specifically delineated herein.	Silva
	(2) The public utility shall cooperate with the independent program evaluator and commission staff in making information and	Silva
	B. The commission, through its staff, will select and direct an independent program evaluator to prepare and submit a comprehensive measurement, verification and program evaluation report to the commission. Staff, to fulfill its obligation under Subsection B of this Section, may consult with public utilities and other interested parties.	Silva
	C. Staff shall:	Silva
	(1) undertake a competitive bid process and abide by state purchasing rules and commission policies in selecting a sole independent program evaluator to evaluate public utility compliance with the Efficient Use of Energy Act;	Silva
	(2) develop a request for proposals ("RFP"), including the scope, terms of work, and evaluation process to score the RFP	Silva
	(3) receive, review, score and rank the RFP responses;	Silva
	(4) subsequently rank and recommend competitive qualified bidders to the commission;	Silva

(5)	negotiate a contract with the competitive bidder awarded the contract; and	Silva
(6)	administer the contract, including: confirming that contract deliverables are met, reviewing invoices and related contract performance, and approving utility invoices after staff's review and approval.	Silva
D.	Funding for services of the independent program evaluator's completion of a comprehensive measurement and verification report will be paid initially by the public utility and treated as a regulatory asset; to be recovered through rates established in the public utility's next general rate	Silva
E.	Self-direct measures, programs, expenditures, credits and exemptions shall be evaluated and reported in the utility's annual report by the independent program evaluator using the same measurement and verification standards applied to utility measures and programs by the utility or commission-approved self-direct program administrator.	Silva
F.	Upon written request by the large customer, the information provided by large customers to the utility or program administrator, program evaluator, or others, shall remain confidential except as otherwise ordered by the commission.	Silva
G.	The commission may require other information.	Silva
[17.7.2.15 NMAC - Rp. 17.7.2.15 NMAC, 9/26/2017]		
17.7.2.16 RURAL ELECTRIC COOPERATIVES:		
A.	Distribution cooperative utilities shall, within 24 months after the effective date of this rule, and every 24 months thereafter, examine potential customer assistance in reducing energy consumption or peak electricity demand in a cost-effective manner. Based on these studies, distribution cooperative utilities shall establish and implement energy efficiency and load management targets and programs that are economically feasible and practical for their members and customers. Approval for such programs shall reside with the governing body of each distribution cooperative utility rather than the commission.	N/A
B.	Each distribution cooperative utility shall simultaneously file with the commission its annual report by May 1st, along with a report describing the cooperative's examination of efficiency potential set forth in Subsection A of Section 17.7.2.18 NMSA 1978. The distribution cooperative utility's report will also address all of its programs or measures that promote energy efficiency, conservation or load management. The report shall set forth the costs of each of the programs or measures for the previous calendar year and the resulting effect on electricity consumption. In offering or implementing energy efficiency, conservation or load management programs, a distribution cooperative utility shall attempt to minimize any cross-subsidies between customer classes.	N/A
C.	Each distribution cooperative utility shall include in the report required by Subsection B of Section 17.7.2.18 NMSA 1978, a description of all planned programs or measures to promote energy efficiency, conservation or load management and the anticipated implementation date.	N/A
D.	Costs resulting from programs or measures to promote energy efficiency, conservation or load management may be recovered by the distribution cooperative utility through its general rates. In requesting approval to recover such costs in general rates, the distribution cooperative utility may elect to use the procedure set forth in Subsection G of Section 62-8-7 NMSA 1978.	N/A
E.	The commission may develop necessary compliance forms.	N/A
[17.7.2.16 NMAC - Rp. 17.7.2.16 NMAC, 9/26/2017]		
17.7.2.17 [RESERVED]		
[17.7.2.17 NMAC - Rp. 17.7.2.17 NMAC, 9/26/2017; Repeal, 10/26/2021]		
17.7.2.18	AUDIT: The commission may order a public utility to submit to an audit that examines whether the public utility's energy efficiency and load management program costs are prudent, reasonable and being properly assigned to programs in accordance with this rule, commission orders, and other applicable requirements and standards. The cost of such audit shall be considered recoverable program costs, unless it results in a commission order containing findings of the public utility's malfeasance, in which case, audit costs shall not be recoverable from the public utility's customers.	N/A
[17.7.2.18 NMAC - Rp. 17.7.2.18 NMAC, 9/26/2017]		
17.7.2.19 VARIANCES: Written applications for a variance from any of the provisions of this guideline shall:		
A.	state the reason(s) for the variance request;	Silva
B.	identify each of the sections of this guideline for which a variance is requested;	Silva
C.	describe the effect the variance will have, if granted, on compliance with this guideline;	Silva
D.	describe how granting the variance will not compromise, or will further, the purposes of this guideline; and	Silva
E.	indicate why the proposed variance is a reasonable alternative to the requirements of this guideline.	Silva
[17.7.2.19 NMAC - N, 9/26/2017]		

HISTORY OF 17.7.2 NMAC:

Pre NMAC History: none.

History of Repealed Material:

17.7.2 NMAC, Energy Efficiency (filed 2/2/2007), repealed 5/3/2010.

17.7.2 NMAC, Energy Efficiency (filed 4/16/2010), repealed 1/1/2015.

17.7.2 NMAC, Energy Efficiency, filed (04/16/2010) - Repealed effective 9/26/2017.

NMAC History:

17.7.2 NMAC, Energy Efficiency (filed 2/2/2007) was replaced by 17.7.2 NMAC, Energy Efficiency, effective 5/3/2010.

17.7.2 NMAC, Energy Efficiency, (filed 04/16/2010) was replaced by 17.7.2 NMAC, Energy Efficiency, effective 9/26/2017.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC)
COMPANY'S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)
)
EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)

Case No. 24-00154-UT

DECLARATION OF VICTOR H. SILVA IN SUPPORT OF
THE FOREGOING DIRECT TESTIMONY IN EL PASO
ELECTRIC'S APPLICATION FOR APPROVAL OF ITS 2025-2027
ENERGY EFFICIENCY AND LOAD MANAGEMENT PLAN, UTILITY
INCENTIVE AND REVISED RATE NO. 17-EFFICIENT USE OF
ENERGY RECOVERY FACTOR

I ***Victor H. Silva***, pursuant to Rule 1-011 NMRA, state as follows:

1. I affirm in writing under penalty of perjury under the laws of the State of New Mexico that the following statements are true and correct.

2. I am over 18 years of age and have personal knowledge of the facts stated herein. I am employed by El Paso Electric Company ("EPE" or "the Company") as the *Manager-Energy Efficiency*.

3. The foregoing Direct Testimony of Victor H. Silva, together with all exhibits sponsored therein and attached thereto, is true and accurate based on my knowledge and belief.

4. I submit this Declaration, based upon my personal knowledge and upon information and belief, in support of EPE's *Application for Approval of Its 2025-2027 Energy Efficiency and Load Management Plan, Utility Incentive and Revised Rate No. 17-Efficient Use of Energy Recovery Factor*.

FURTHER, DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 29, 2024.

/s/ Victor H. Silva

VICTOR H. SILVA

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC)
COMPANY'S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)

Case No. 24-00154-UT

EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)

DIRECT TESTIMONY

OF

DEREK R. NEUMANN

ON BEHALF OF

EL PASO ELECTRIC COMPANY

JULY 29, 2024

TABLE OF CONTENTS

<u>Subject</u>	<u>Page</u>
I. INTRODUCTION AND QUALIFICATIONS.....	1
II. PURPOSE OF DIRECT TESTIMONY	2
III. PROGRAM ANALYSIS AND VALIDATION	3
IV. COST-EFFECTIVENESS CALCULATIONS	9
V. CONCLUSION.....	19

EXHIBITS

Exhibit DRN-1 EPE's 2025-2027 Energy Efficiency and Load Management Plan

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

I. INTRODUCTION AND QUALIFICATIONS

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

A. My name is Derek R. Neumann. I am a Senior Engineer at Frontier Energy ("Frontier"),
1515 S. Capital of Texas Highway, Suite 110, Austin, Texas 78746.

Q2. WHAT IS FRONTIER'S ROLE IN THIS PROCEEDING?

A. Frontier has been retained by El Paso Electric Company ("EPE" or "Company") to
analyze and validate the cost-effectiveness of EPE's proposed energy efficiency and
load management programs for residential, commercial, and industrial customers in
EPE's New Mexico service territory.

**Q3. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL
EXPERIENCE.**

A. I earned a Bachelor of Science degree in Mechanical Engineering and certification in
Business Foundations from The University of Texas at Austin in December 2008. I
earned an Association of Energy Engineering Certified Energy Manager ("CEM")
certification in 2012. I am currently a member of the Association of Energy Engineers
and the Association of Energy Services Professionals.

In 2009, I was hired by Frontier as an energy analyst. I was promoted to my
current role of senior engineer in 2018. In this capacity, I provide program design,
engineering, regulatory, and evaluation support to Frontier's client base and assist in
administering the Texas investor-owned utilities' energy efficiency organization, the
Electric Utility Marketing Managers of Texas ("EUMMOT").

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1

2 **Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES WITH**
3 **FRONTIER.**

4 **A.** As a Senior Engineer, my primary responsibilities include coordinating program design
5 and implementation activities, conducting cost-effectiveness analyses, and providing
6 qualitative research and quantitative analysis to analyze utility energy efficiency and
7 load management programs. I have extensive experience in developing deemed savings
8 methodologies for state technical reference manuals ("TRM") and other regulatory
9 filings, including serving as the engineering lead for the Texas TRM on behalf of
10 EUMMOT. In this role, I serve as the primary point of reference and intermediary
11 between the Texas electric investor-owned utilities and the statewide evaluator. I
12 currently support or have supported deemed savings development in Arkansas, Illinois,
13 Louisiana, New Mexico, and Oklahoma.

14

15 **II. PURPOSE OF DIRECT TESTIMONY**

16 **Q5. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

17 **A.** The purpose of my direct testimony is to present and support EPE's 2025-2027 Energy
18 Efficiency and Load Management Plan ("EE/LM Plan") attached as Exhibit DRN-1. In
19 doing so, I describe the program screening and cost-effectiveness analysis EPE used to
20 develop its EE/LM Plan.

21

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1 **Q6. ARE YOU SPONSORING ANY EXHIBITS?**

2 **A.** Yes, I am sponsoring Exhibit DRN-1: EPE's EE/LM Plan. This exhibit contains the
3 details of the energy efficiency and load management ("EE/LM") portfolio and
4 programs' benefit-cost analyses, including the technical assumptions, program costs
5 and energy and demand savings used to estimate cost-effectiveness. More specifically,
6 Exhibit DRN-1 contains information pertaining to program descriptions, eligible
7 measures, estimated useful lives, requirements and restrictions, estimated participants,
8 supporting documentation, underlying data, calculations, and estimates used to
9 calculate cost-effectiveness.

10

11 **Q7. WAS THE ATTACHED EXHIBIT PREPARED UNDER YOUR DIRECT**
12 **SUPERVISION AND CONTROL?**

13 **A.** Yes.

14

15 **III. PROGRAM ANALYSIS AND VALIDATION**

16 **Q8. HOW DID FRONTIER PARTICIPATE IN THE ANALYSIS AND**
17 **VALIDATION OF EPE'S PROPOSED ENERGY EFFICIENCY AND LOAD**
18 **MANAGEMENT PROGRAMS?**

19 **A.** Frontier worked collaboratively with EPE to analyze potential modifications of its
20 selected EE/LM programs, consider new programs and measures, and conduct the
21 program and portfolio-level cost-effectiveness analyses supporting EPE's proposed
22 EE/LM Plan.

23

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

**Q9. PLEASE PROVIDE A SUMMARY OF RECENT REGULATORY CHANGES
PERTAINING TO GENERAL SERVICE LIGHTING AND A BRIEF
ANALYSIS OF THE POTENTIAL IMPACT(S) OF SUCH CHANGES ON
EPE'S ENERGY EFFICIENCY PROGRAMS.**

A. The Energy Independence and Security Act ("EISA") was passed in 2007. Among other things, it directed the U.S. Department of Energy ("DOE") to initiate rulemaking procedures to determine whether efficiency standards in effect for general service lamps ("GSL") should be amended to be more stringent, to consider a minimum standard of 45 lumens per watt for GSLs, and to determine whether existing exemptions for certain incandescent or halogen lamps should be maintained or discontinued.

Largely because of different interpretations by the Obama, Trump, and Biden administrations, residential lighting standards were in flux over the past several years, leading to unpredictability and uncertainty affecting the energy efficiency portfolio planning process in New Mexico and across the country. In May 2022, the DOE finalized two rules pertaining to GSLs that will ultimately phase out incandescent lamps in favor of more efficient lighting measures, including light emitting diodes ("LED"). Specifically, the DOE adopted more stringent definitions of GSLs and a 45 lumens per watt minimum efficiency standard. Due to a phased enforcement schedule, non-compliant products were still available through July 2023.

The Commission's Energy Efficiency Rule (17.7.2 NMAC) guides the process by which new baseline standards will be incorporated into New Mexico energy efficiency programs. Specifically, 17.7.2.15 NMAC requires a utility's energy efficiency portfolio to undergo measurement and verification analyses conducted by an

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1 independent program evaluator selected by the Commission. The New Mexico
2 independent evaluator maintains the NM TRM, which applies an alternate baseline
3 primarily for direct install applications where a project can document the removal of
4 incandescent or halogen lamps. In these cases, the legacy EISA first-tier baseline is
5 applied over the expected remaining useful life of the removed lamp.

6 Broadly speaking, the latest baseline changes significantly reduce the amount
7 of energy savings and demand reduction EPE can claim going forward for impacted
8 lamp types. This will subsequently lower lighting measure cost-effectiveness under
9 current incentive rates. However, the lighting measure remains highly visible, tangible,
10 and requested among EPE's customer base. After reviewing and incorporating the
11 latest evaluator guidance from the NM TRM, EPE and Frontier expect that the overall
12 portfolio will remain cost effective and that most, if not all, programs will maintain
13 cost-effectiveness as the program designs appropriately adapt to change standards—
14 namely by emphasizing other efficiency measures not impacted by the EISA standards.
15 The EISA standards change is a primary driver behind expanding the Residential
16 Lighting Program to include additional energy efficiency measures under the new
17 Residential Products Program.

18
19 **Q10. PLEASE DESCRIBE THE GENERAL PROCESS USED TO ANALYZE AND**
20 **VALIDATE EPE'S PROPOSED PROGRAMS' COST-EFFECTIVENESS.**

21 **A.** Frontier conducted the quantitative analyses used to estimate the costs and benefits of
22 EPE's potential EE/LM program portfolio. Previous program year participation levels
23 and savings data, implementer-provided estimates, and New Mexico and other

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1 statewide TRM deemed savings methodologies formed the basis for the initial
2 projections.¹ Frontier analyzed how program designs and measure mixes impacted
3 likely participation, estimated savings, and overall cost-effectiveness. In collaboration
4 with EPE, Frontier used the results of this analysis to propose the necessary program
5 design inputs, budgets and participation levels required to demonstrate a portfolio of
6 cost-effective energy efficiency and load management programs accessible to every
7 affected customer class, which were included in EPE's EE/LM Plan.

8 Exhibit DRN-1 provides additional details regarding the proposed programs
9 and associated measures, including the expected useful life, participation requirements
10 and restrictions, and the time period during which the programs will be offered. In
11 addition, Exhibit DRN-1 also details the estimated number of program participants,
12 estimated economic benefit to the participants, and projected energy and demand
13 savings and budgets.

14
15 **Q11. WHAT COST-EFFECTIVENESS STANDARD WAS USED TO ANALYZE**
16 **THE PROPOSED PROGRAMS?**

17 **A.** EPE used the Utility Cost Test ("UCT") to analyze the measure mix for each program,
18 as directed by Rule 17.7.2 NMAC (the "Rule").²

¹ Estimated savings were projected based on past program participant-level data, including, but not limited to, measure mix and housing characteristics. Implementer-provided costs and savings were used to inform estimated program performance. Technical assumptions provided in the New Mexico Technical Resource Manual ("NM TRM") were used to calculate savings. Other state TRMs, primarily the Texas Technical Reference Manual version 11.0 ("TX TRM") and Illinois Statewide Technical Reference Manual for Energy Efficiency version 12.0 ("IL TRM"), were used for measures not included in the NM TRM. Please see Exhibit DRN-1 for details regarding technical assumptions and savings calculations.

² 17.7.2.8(J) NMAC.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

**Q12. WERE ANY OTHER COST-EFFECTIVENESS TESTS USED TO ANALYZE
POTENTIAL PROGRAMS? IF SO, EXPLAIN.**

A. Yes. At EPE's request, the statewide evaluator presented EPE with alternative cost-effectiveness results that included an avoided utility carbon emissions benefit. These results included the following inputs for calculating this benefit: 1) an emissions rate equal to 0.249 short tons (498 pounds) of CO₂ per MWh, and 2) the social cost of carbon equal to \$117.93 per short ton of CO₂ (2,000 pounds). The emissions rate is sourced from EPE's 2022 Corporate Sustainability Report³, and the social cost of carbon is sourced from the EPA's 2023 Report on the Social Cost of Greenhouse Gases.^{4,5} Multiplying the emissions rate by the social cost of carbon produces an avoided emissions benefit of \$29.37 per MWh or \$0.02937 per kWh (in 2020 dollars). These values are 'system-level', meaning the impacts from energy efficiency programs are scaled up for line losses before calculating the monetary value of avoided emissions.

EPE directed Frontier to calculate the UCT assuming these additional benefits based on direction from its statewide evaluator and in response to stakeholder recommendations.

³ EPE 2022 Corporate Sustainability Report, p. 25.

<https://www.epelectric.com/files/html/Sustainability%20Report/2022%20Corporate%20Sustainability%20Report.pdf>.

⁴ EPA 2023 Report on the Social Cost of Greenhouse Gases, November 2023, Table ES.1, p. 4.

https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf.

⁵ The \$130 value is halfway between the 2020 and 2030 social cost values (in 2020 dollars) at a 2.5% discount rate. For this analysis, the social cost was converted from dollars per metric ton to dollars per short ton using a conversion factor of 0.9071847.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

Q13. WHAT MEASURES MAY BE IMPACTED BY INCORPORATING AVOIDED UTILITY CARBON EMISSIONS BENEFITS INTO THE ALTERNATE COST-EFFECTIVENESS TEST?

A. Any measure producing energy savings would improve program benefits at the rates described in the previous response. This includes measures like heat pumps and heat pump water heaters. In their October 20, 2023, non-binding recommendations, the Southwest Energy Efficiency Project (“SWEEP”) recommended higher incentives for these measures targeting levels offsetting 100 percent of incremental measure cost. Should the Commission opt to allow avoided utility carbon emissions benefits to be counted toward program cost-effectiveness, EPE plans to analyze the potential of increasing incentive rates for beneficial electrification measures like these. Programs primarily driven by demand savings are less affected, such as Residential and Commercial Load Management.

Q14. PLEASE DESCRIBE ANY DEFINING CHARACTERISTICS OF EPE'S SERVICE TERRITORY THAT IMPACT SAVINGS POTENTIAL.

A. EPE's residential sector has a particularly high saturation of evaporative cooling for residences. EPE's 2024 Residential Appliance Saturation Survey indicates that 33.2 percent of EPE's residential customers have evaporative cooling systems. The most common household heating source across EPE service territory is a natural gas furnace, with a saturation rate of 73.4 percent. Commercial customer facilities also exhibit a relatively higher saturation of evaporative cooling systems and gas space and water heating.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1 This creates a risk with regard to EPE's program selection because market
2 projections may be overly weighted with savings potential from commercial
3 refrigerated air systems. EPE's residential customer electricity consumption is much
4 lower than in many other parts of the country with similar ambient summer and winter
5 temperatures, which results in a corresponding lowering of the savings potential
6 associated with those customers.

7 The lower electricity consumption is primarily an outcome of the high
8 evaporative cooling saturation. This characteristic establishes a lower energy savings
9 potential on a per customer basis, creating ongoing challenges for EPE in achieving
10 energy savings. Frontier was mindful of EPE's service territory characteristics in the
11 development of the EE/LM Plan.

12
13 **Q15. IS EPE'S PROPOSED EE/LM PLAN COST EFFECTIVE?**

14 **A.** Yes. The overall energy efficiency portfolio was found to be cost-effective for each
15 year based on the standard UCT calculation. Please see section IV of my direct
16 testimony and Exhibit DRN-1 for more details.

17
18 **IV. COST-EFFECTIVENESS CALCULATIONS**

19 **Q16. DESCRIBE THE UCT STANDARD EPE USED TO DETERMINE THE COST-**
20 **EFFECTIVENESS OF EPE'S PROPOSED PROGRAMS AND OVERALL**
21 **PORTFOLIO.**

22 **A.** The Efficient Use of Energy Act ("EUEA"), defines the UCT as "a standard that is met
23 if the monetary costs that are borne by the public utility and that are incurred to develop,

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

acquire and operate energy efficiency or load management resources on a life-cycle basis are less than the avoided monetary costs associated with developing, acquiring and operating the associated supply-side resources."⁶

As such, the UCT restricts the benefit-cost test perspective to a comparison of avoided supply-side costs to utility program costs. The present value of avoided capacity and energy costs across the life of the measures are treated as benefits and included in the numerator of the benefit-cost ratio. EPE's avoided capacity and energy costs used to calculate the program benefits are detailed in Exhibit DRN-1, Appendix C. The present value of program costs and incentives as detailed in Exhibit DRN-1 are included in the denominator of the benefit-cost ratio. A benefit-cost ratio greater than 1.0 indicates the program is cost effective.

The UCT is expressed using the following inputs:

Benefits	Costs
• Energy-related costs avoided by the utility • Capacity-related costs avoided by the utility • Environmental benefit due to avoided utility carbon emissions	• Administrative ("admin") costs⁷ • Participant Incentives

Q17. WHAT DISCOUNT RATES WERE USED TO CALCULATE THE UCT?

A. EPE used a discount rate of 7.18 percent⁸ to calculate the present value of costs and benefits for the UCT calculation, as shown in EPE witness Adrian Hernandez's Exhibit AH-2. All other factors held constant, the higher the discount rate, the lower the UCT

⁶ NMSA 1978, Section 62-17-4(K).

⁷ For cost-effectiveness testing, "administrative costs" include program administration, marketing, research and development, and evaluation measurement & verification ("EM&V") expenses. Please see EPE witness Silva's Exhibit VHS-2 for a breakdown of administrative costs per program.

⁸ Approved in Case No. 20-00104-UT.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

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3 **Q18. WHAT OTHER FACTORS WERE USED TO CALCULATE THE UCT?**

4 **A.** Because cost-effectiveness is calculated by first converting estimated gross savings at
5 the meter to estimated net savings at the source, two additional factors were applied to
6 estimated program impacts in the cost-effectiveness calculation: (1) EPE's energy and
7 capacity line loss factors of 6.90% percent and 7.54%, respectively,⁹ were used to
8 convert program savings calculated at the meter to savings at the source; and (2)
9 program-level net-to-gross ("NTG") ratios¹⁰ obtained from EPE's 2023 measurement
10 and verification evaluation report as prepared by the statewide evaluator, EcoMetric
11 Consulting LLC ("EcoMetric"),¹¹ were used to adjust participant savings to reflect the
12 impact of customers who are not influenced by an energy efficiency incentive program,
13 but who accept a utility rebate. This factor converts gross program savings to net
14 program savings. Please see Exhibit DRN-1 for the NTG factors used for each program.

15
16 **Q19. DID EPE PROVIDE THE COSTS ASSOCIATED WITH THE ACQUISITION,**
17 **DEVELOPMENT, AND OPERATION OF EACH PROGRAM?**

18 **A.** Yes. Costs associated with the acquisition, development, and operation for each
19 program in EPE's EE/LM Plan are included in the analyses shown in Exhibit DRN-1.

⁹ EPE's 2019 system line loss study used in EPE's most recent New Mexico rate case, CN 20-00104-UT, Schedule M-3.

¹⁰ The NTG factor deducts energy savings that would have been achieved in the absence of the energy efficiency program (e.g., free-riders) from the cost-effectiveness calculation. Thus, the lower the NTG factor, the higher the free-ridership and the lower the UCT ratio, all other factors held constant.

¹¹ PY 2023 Evaluation of El Paso Electric Energy Efficiency Programs Final Report, May 24, 2024, EcoMetric Consulting LLC.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

Program-level costs used to calculate cost-effectiveness are also provided in Exhibit DRN-1 and summarized in the tables below. As described in EPE witness Victor H. Silva's direct testimony, EPE established the total program funding based on the Rule requirements outlined in the EUEA. From that total, EPE and Frontier developed projected budgets to implement cost-effective programs.

Q20. DID EPE ASSEMBLE A COST-EFFECTIVE PORTFOLIO OF ENERGY EFFICIENCY PROGRAMS?

A. Yes. Table 1, Table 2 and Table 3 on the following pages list the 2025, 2026, and 2027 projected program participants,¹² energy and demand savings,¹³ and estimated program costs used to calculate the UCT for each program in EPE's proposed EE/LM Plan. Based on this analysis, the overall portfolio is cost effective, in accordance with the Rule. Please see Exhibit DRN-1 for the program-level technical assumptions used to produce these results.

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¹² For some programs, the number of program participants may represent the projected number of homes or businesses participating in a program. For others, the number of participants may represent the number of installed measures or number of completed projects (which consist of various measure mixes and quantities). Please see Exhibit DRN-1 for details.

¹³ Savings (kW and kWh) represent annual savings resulting from installed measures each program year.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

Table 1*

2025	Participants	Annual kW	Annual kWh	Annual Incentive Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
Smart Students	4,453	55	491,200	\$114,709	\$20,171	\$134,880
Residential Comprehensive	1,551	935	1,687,161	\$572,965	\$351,740	\$924,705
Residential Products	134,956	213	1,272,250	\$255,534	\$158,968	\$414,502
Energy Star® New Homes	817	140	628,550	\$269,762	\$267,880	\$537,642
Marketplace	2,819	25	845,112	\$99,759	\$120,464	\$220,223
Residential Load Management	7,803	7,533	173,120	\$208,825	\$244,005	\$452,830
EnergySaver	326	563	1,033,656	\$529,315	\$167,137	\$696,452
Energy\$mart	45	319	956,552	\$389,421	\$62,687	\$452,108
Commercial Comprehensive	132	410	2,398,000	\$297,390	\$162,708	\$460,099
SCORE Plus	112	1,198	7,402,907	\$1,001,049	\$987,641	\$1,988,690
Commercial Load Management	23	4,248	15,413	\$157,826	\$164,958	\$322,784
Total Portfolio Budget	153,037	15,638	16,903,920	\$3,896,555	\$2,708,361	\$6,604,915

*Due to rounding, totals may not match the sum of individual programs as summarized in this table.

Table 2*

2026	Participants	Annual kW	Annual kWh	Annual Incentive Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
Smart Students	4,453	55	491,200	\$114,709	\$20,171	\$134,880
Residential Comprehensive	1,551	935	1,687,161	\$572,965	\$351,740	\$924,705
Residential Products	134,956	213	1,272,250	\$255,534	\$158,968	\$414,502
Energy Star® New Homes	846	139	621,157	\$276,694	\$267,880	\$544,574
Marketplace	2,819	25	845,112	\$99,759	\$120,464	\$220,223
Residential Load Management	8,639	8,341	173,120	\$229,725	\$265,559	\$495,284
EnergySaver	326	563	1,033,656	\$529,315	\$167,137	\$696,452
Energy\$mart	45	319	956,552	\$389,421	\$62,687	\$452,108
Commercial Comprehensive	132	410	2,398,000	\$297,390	\$162,708	\$460,099
SCORE Plus	112	1,198	7,402,907	\$1,001,049	\$1,254,510	\$2,255,559
Commercial Load Management	23	4,248	15,413	\$157,826	\$164,958	\$322,784
Total Portfolio Budget	153,902	16,445	16,896,527	\$3,924,387	\$2,996,783	\$6,921,170

*Due to rounding, totals may not match the sum of individual programs as summarized in this table.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

Table 3*

2027	Participants	Annual kW	Annual kWh	Annual Incentive Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
Smart Students	4,453	55	491,200	\$114,709	\$20,171	\$134,880
Residential Comprehensive	1,551	935	1,687,161	\$572,965	\$351,740	\$924,705
Residential Products	134,956	213	1,272,250	\$255,534	\$158,968	\$414,502
Energy Star® New Homes	874	137	613,884	\$284,226	\$267,880	\$552,106
Marketplace	2,819	25	845,112	\$99,759	\$120,464	\$220,223
Residential Load Management	9,558	9,230	173,120	\$252,700	\$289,282	\$541,982
EnergySaver	326	563	1,033,656	\$529,315	\$167,137	\$696,452
EnergySmart	45	319	956,552	\$389,421	\$62,687	\$452,108
Commercial Comprehensive	132	410	2,398,000	\$297,390	\$162,708	\$460,099
SCORE Plus	112	1,198	7,402,907	\$1,001,049	\$1,537,129	\$2,538,178
Commercial Load Management	23	4,248	15,413	\$157,826	\$164,958	\$322,784
Total Portfolio Budget	154,849	17,332	16,889,254	\$3,954,894	\$3,303,125	\$7,258,019

*Due to rounding, totals may not match the sum of individual programs as summarized in this table.

Table 4 provides a snapshot of the EE/LM Plan's UCT results per year using both the standard UCT and the alternative UCT with additional utility carbon emissions benefits. A benefit-cost ratio greater than 1.0 demonstrates that the program and overall portfolio is cost effective under the EUEA's standards.¹⁴

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¹⁴ NMSA 1978, Sections 62-17-4(C) and (K)

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1 **Table 4**

Program	UCT					
	2025		2026		2027	
	Standard	With Emissions	Standard	With Emissions	Standard	With Emissions
Smart Students	0.75	1.33	0.75	1.33	0.75	1.33
Residential Comprehensive	1.64	2.16	1.66	2.17	1.67	2.19
Residential Products	1.81	2.95	1.83	2.96	1.84	2.98
Energy Star® New Homes	0.65	1.00	0.63	0.98	0.61	0.95
Marketplace	0.80	1.65	0.80	1.65	0.79	1.64
Residential Load Management	1.93	2.02	1.98	2.06	2.03	2.10
EnergySaver	1.39	1.75	1.40	1.76	1.42	1.77
Energy\$mart	1.49	1.97	1.50	1.99	1.51	2.00
Commercial Comprehensive	2.14	3.53	2.15	3.54	2.15	3.55
SCORE Plus	1.10	1.90	0.98	1.68	0.87	1.49
Commercial Load Management	1.47	1.47	1.50	1.50	1.52	1.53
Portfolio	1.36	2.06	1.32	1.99	1.28	1.92

2

3 **Q21. WHAT ARE THE PROJECTED LIFETIME SAVINGS FOR EACH YEAR OF**

4 **EPE'S PROPOSED EE/LM PLAN?**

5 **A.** The projected lifetime energy and demand savings for each year of EPE's proposed

6 portfolio are shown in Table 5* (2025), Table 6* (2026), and Table 7* (2027). Lifetime

7 savings per program are provided in Exhibit DRN-1.

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**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

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Table 5*

Year	Annual Participants	kW	kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	153,037	15,638	16,903,920	\$3,896,555	\$2,708,361	\$6,604,915
2026	-	3,699	15,763,330	-	-	-
2027	-	3,694	15,685,367	-	-	-
2028	-	3,456	15,401,152	-	-	-
2029	-	3,456	15,399,557	-	-	-
2030	-	3,456	15,390,891	-	-	-
2031	-	3,456	15,390,891	-	-	-
2032	-	3,431	15,210,526	-	-	-
2033	-	3,431	15,198,711	-	-	-
2034	-	3,418	15,116,521	-	-	-
2035	-	2,800	10,129,461	-	-	-
2036	-	2,744	9,667,712	-	-	-
2037	-	2,675	9,133,541	-	-	-
2038	-	2,655	8,920,815	-	-	-
2039	-	2,322	6,909,221	-	-	-
2040	-	810	3,641,520	-	-	-
2041	-	703	2,406,711	-	-	-
2042	-	703	2,406,711	-	-	-
2043	-	526	2,135,909	-	-	-
2044	-	525	2,134,045	-	-	-
2045	-	346	2,028,651	-	-	-
2046	-	346	2,028,651	-	-	-
2047	-	346	2,028,651	-	-	-
2048	-	289	1,773,510	-	-	-
2049	-	289	1,773,510	-	-	-
2050	-	232	1,345,198	-	-	-
2051	-	232	1,345,198	-	-	-
2052	-	232	1,345,198	-	-	-
2053	-	232	1,345,198	-	-	-
2054	-	232	1,345,198	-	-	-
2055	-	29	165,867	-	-	-
2056	-	-	-	-	-	-
2057	-	-	-	-	-	-
Lifetime kWh			229,471,343			

2 * Due to rounding, lifetime kWh may not match the sum of individual years as summarized in this table.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

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Table 6*

Year	Annual Participants	kW	kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	153,092	16,445	16,896,527	\$3,924,387	\$2,996,783	\$6,921,170
2027	-	3,697	15,755,937	-	-	-
2028	-	3,692	15,677,973	-	-	-
2029	-	3,455	15,393,758	-	-	-
2030	-	3,454	15,392,164	-	-	-
2031	-	3,454	15,383,497	-	-	-
2032	-	3,454	15,383,497	-	-	-
2033	-	3,429	15,203,133	-	-	-
2034	-	3,429	15,191,318	-	-	-
2035	-	3,416	15,109,128	-	-	-
2036	-	2,799	10,120,145	-	-	-
2037	-	2,743	9,658,396	-	-	-
2038	-	2,674	9,124,225	-	-	-
2039	-	2,652	8,903,678	-	-	-
2040	-	2,320	6,892,085	-	-	-
2041	-	806	3,621,139	-	-	-
2042	-	700	2,386,330	-	-	-
2043	-	700	2,386,330	-	-	-
2044	-	520	2,110,564	-	-	-
2045	-	520	2,108,700	-	-	-
2046	-	340	2,003,306	-	-	-
2047	-	340	2,003,306	-	-	-
2048	-	340	2,003,306	-	-	-
2049	-	289	1,773,510	-	-	-
2050	-	289	1,773,510	-	-	-
2051	-	232	1,345,198	-	-	-
2052	-	232	1,345,198	-	-	-
2053	-	232	1,345,198	-	-	-
2054	-	232	1,345,198	-	-	-
2055	-	232	1,345,198	-	-	-
2056	-	29	165,867	-	-	-
2057	-	-	-	-	-	-
Lifetime kWh			229,147,317			

2

* Due to rounding, lifetime kWh may not match the sum of individual years as summarized in this table.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

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Table 7*

Year	Annual Participants	kW	kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	154,849	17,332	16,889,254	\$3,954,894	\$3,303,125	\$7,258,019
2028	-	3,696	15,748,664	-	-	-
2029	-	3,691	15,670,701	-	-	-
2030	-	3,453	15,386,486	-	-	-
2031	-	3,453	15,384,891	-	-	-
2032	-	3,453	15,376,225	-	-	-
2033	-	3,453	15,376,225	-	-	-
2034	-	3,427	15,195,860	-	-	-
2035	-	3,427	15,184,045	-	-	-
2036	-	3,414	15,101,855	-	-	-
2037	-	2,797	10,111,242	-	-	-
2038	-	2,741	9,649,493	-	-	-
2039	-	2,672	9,115,322	-	-	-
2040	-	2,649	8,886,955	-	-	-
2041	-	2,317	6,875,362	-	-	-
2042	-	803	3,601,171	-	-	-
2043	-	697	2,366,362	-	-	-
2044	-	697	2,366,362	-	-	-
2045	-	514	2,085,632	-	-	-
2046	-	514	2,083,769	-	-	-
2047	-	334	1,978,375	-	-	-
2048	-	334	1,978,375	-	-	-
2049	-	334	1,978,375	-	-	-
2050	-	289	1,773,510	-	-	-
2051	-	289	1,773,510	-	-	-
2052	-	232	1,345,198	-	-	-
2053	-	232	1,345,198	-	-	-
2054	-	232	1,345,198	-	-	-
2055	-	232	1,345,198	-	-	-
2056	-	232	1,345,198	-	-	-
2057	-	29	165,867	-	-	-
Lifetime kWh			228,829,877			

2

* Due to rounding, lifetime kWh may not match the sum of individual years as summarized in this table.

3

1 **Q22. HOW WERE FUTURE COSTS AND BENEFITS ACCOUNTED FOR IN YOUR**
2 **ANALYSIS?**

3 **A.** Each of the energy efficiency measures assessed in this analysis has an estimated useful
4 life of equal to or greater than one year. Portfolio impacts are evaluated through the
5 entire period that benefits occur, which is through 2057.

6

7 **Q23. DID EPE DEMONSTRATE AND JUSTIFY HOW THE ESTIMATED**
8 **MONETARY PROGRAM COSTS WILL BE EQUAL TO OR GREATER**
9 **THAN THE ACTUAL MONETARY PROGRAM COSTS?**

10 **A.** Yes. EPE formulated its program requirement estimates on a historically proven design
11 based on EPE's and Frontier's extensive experience administering and implementing
12 energy efficiency programs. Furthermore, EPE designed the EE/LM Plan to allow
13 flexibility in spending EPE's budget to achieve its goals. While every estimate has
14 inherent uncertainty, EPE's approach helps ensure that estimated monetary program
15 costs will be equal to or greater than actual monetary program costs. It also helps ensure
16 that actual monetary program benefits exceed actual monetary program costs.

17

18 V. CONCLUSION

19 **Q24. HAS EPE MET THE COST-EFFECTIVENESS REQUIREMENTS OF THE EE**
20 **RULE?**

21 **A.** Yes, EPE has met the cost-effectiveness requirements of the Rule. Please see
22 Exhibit DRN-1 for a full description of supporting documentation and underlying
23 assumptions used to calculate cost-effectiveness for each program.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
DEREK R. NEUMANN**

1

2 **Q25. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

3 **A.** Yes.

EL PASO ELECTRIC'S 2025-2027 ENERGY EFFICIENCY AND LOAD MANAGEMENT PLAN



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JULY 29, 2024

Table of Contents

EXECUTIVE SUMMARY	5
ENERGY EFFICIENCY PLAN OVERVIEW	5
PROPOSED BUDGET	7
PROGRAM SCREENING & COST-EFFECTIVENESS ANALYSIS	9
PROGRESS TOWARDS GOAL	13
EE/LM PLAN DEVELOPMENT.....	13
BACKGROUND OF EXISTING PROGRAMS.....	13
REGULATORY REQUIREMENTS.....	13
PROGRAM ANALYSIS & VALIDATION	13
MEASUREMENT AND VERIFICATION	16
CUSTOMER SELF-DIRECTED ALTERNATIVES.....	17
EPE 2025-2027 RESIDENTIAL PROGRAM PORTFOLIO	17
SMART STUDENTS PROGRAM.....	18
RESIDENTIAL COMPREHENSIVE PROGRAM.....	26
RESIDENTIAL PRODUCTS PROGRAM	33
ENERGY STAR® NEW HOMES PROGRAM.....	39
MARKETPLACE PROGRAM.....	47
RESIDENTIAL LOAD MANAGEMENT PROGRAM	54
ENERGYSAVER PROGRAM.....	58
ENERGY\$MART PROGRAM	66
COMMERCIAL COMPREHENSIVE PROGRAM	74
SCORE PLUS PROGRAM	81
COMMERCIAL LOAD MANAGEMENT PROGRAM	88
APPENDIX A: COST-EFFECTIVENESS INPUTS.....	92
RESIDENTIAL PROGRAMS INPUTS	92
COMMERCIAL PROGRAMS INPUTS	94
APPENDIX B: DISCOUNT RATES.....	95
UTILITY DISCOUNT RATE.....	95
APPENDIX C: AVOIDED COSTS.....	96
UTILITY AVOIDED COSTS.....	96

List of Tables

Table 1: 2025 Proposed Program and Total Portfolio Budgets	7
Table 2: 2026 Proposed Program and Total Portfolio Budgets	8
Table 3: 2027 Proposed Program and Total Portfolio Budgets	8
Table 4. Portfolio Cost-Effectiveness Results	9
Table 5. Program Cost-Effectiveness Results	9
Table 6. 2025 Projected Impacts	10
Table 7. 2026 Projected Impacts	11
Table 8. 2027 Projected Impacts	12
Table 9. Smart Students Program Forecasting Assumptions	20
Table 10. Smart Students Program Forecasting Assumptions Continued	20
Table 11. Smart Students Program Forecasting Assumptions Continued	21
Table 12. Smart Students Program Forecasting Assumptions Continued	21
Table 13. 2025 Smart Students Program Projections.....	22
Table 14. 2026 Smart Students Program Projections.....	23
Table 15. 2027 Smart Students Program Projections.....	24
Table 16. Smart Students Program Cost-Effectiveness Analysis	25
Table 17. Residential Comprehensive Program Forecasting Assumptions	28
Table 18. Residential Comprehensive Program Forecasting Assumptions Continued.....	28
Table 19. Residential Comprehensive Program Forecasting Assumptions Continued.....	29
Table 20. 2025 Residential Comprehensive Program Projections.....	30
Table 21. 2026 Residential Comprehensive Program Projections.....	31
Table 22. 2027 Residential Comprehensive Program Projections.....	32
Table 23. Residential Comprehensive Program Cost-Effectiveness Analysis.....	32
Table 24. Residential Products Program Forecasting Assumptions	34
Table 25. Residential Products Program Forecasting Assumptions	34
Table 26. 2025 Residential Products Program Projections.....	35
Table 27. 2026 Residential Products Program Projections.....	36
Table 28. 2027 Residential Products Program Projections.....	37
Table 29. Residential Products Program Cost-Effectiveness Analysis.....	38
Table 30. ENERGY STAR New Homes Program Forecasting Assumptions	41
Table 31. ENERGY STAR New Homes Program Forecasting Assumptions Continued.....	42
Table 32. ENERGY STAR New Homes Program Forecasting Assumptions Continued.....	42
Table 33. ENERGY STAR New Homes Program Forecasting Assumptions Continued.....	43
Table 34. 2025 ENERGY STAR New Homes Program Projections.....	44
Table 35. 2026 ENERGY STAR New Homes Program Projections.....	45
Table 36. 2027 ENERGY STAR New Homes Program Projections.....	46
Table 37. ENERGY STAR New Homes Program Cost-Effectiveness Analysis	46
Table 38. Marketplace Program Forecasting Assumptions	48
Table 39. Marketplace Program Forecasting Assumptions Continued.....	48
Table 40. Marketplace Program Forecasting Assumptions Continued.....	49
Table 41. 2025 Marketplace Program Projections.....	50
Table 42. 2026 Marketplace Program Projections.....	51
Table 43. 2027 Marketplace Program Projections.....	52
Table 44. Marketplace Program Cost-Effectiveness Analysis.....	53
Table 45. Residential Load Management (“LM”) Program Forecasting Assumptions	55
Table 46. 2025 Residential Load Management Program Projections.....	56
Table 47. 2026 Residential Load Management Program Projections.....	56
Table 48. 2027 Residential Load Management Program Projections.....	57
Table 49. Residential Load Management Program Cost-Effectiveness Analysis.....	57
Table 50. EnergySaver Program Forecasting Assumptions.....	60

Table 51. EnergySaver Program Forecasting Assumptions Continued	60
Table 52. EnergySaver Program Forecasting Assumptions Continued	61
Table 53. 2025 EnergySaver Program Projections	62
Table 54. 2026 EnergySaver Program Projections	63
Table 55. 2027 EnergySaver Program Projections	64
Table 56. EnergySaver Program Cost-Effectiveness Analysis	65
Table 57. EnergySmart Program Forecasting Assumptions	67
Table 58. EnergySmart Program Forecasting Assumptions Continued	67
Table 59. EnergySmart Program Forecasting Assumptions Continued	68
Table 60. 2025 EnergySmart Program Projections	69
Table 61. 2026 EnergySmart Program Projections	70
Table 62. 2027 EnergySmart Program Projections	71
Table 63. EnergySmart Program Cost-Effectiveness Analysis	72
Table 64. Commercial Comprehensive Program Forecasting Assumptions	75
Table 65. Commercial Comprehensive Program Forecasting Assumptions Continued	76
Table 66. Commercial Comprehensive Program Forecasting Assumptions Continued	77
Table 67. 2025 Commercial Comprehensive Program Annual Impact Projections	78
Table 68. 2026 Commercial Comprehensive Program Annual Impact Projections	79
Table 69. 2027 Commercial Comprehensive Program Annual Impact Projections	80
Table 70. Commercial Comprehensive Program Cost-Effectiveness Analysis	80
Table 71. SCORE Plus Program Forecasting Assumptions	83
Table 72. SCORE Plus Program Forecasting Assumptions Continued	83
Table 73. SCORE Plus Program Forecasting Assumptions Continued	84
Table 74. 2025 SCORE Plus Program Projections	85
Table 75. 2026 SCORE Plus Program Projections	86
Table 76. 2027 SCORE Plus Program Projections	87
Table 77. SCORE Plus Program Cost-Effectiveness Analysis	87
Table 78. Commercial Load Management Program Forecasting Assumptions	90
Table 79. 2025 Commercial Load Management Program Projections	90
Table 80. 2026 Commercial Load Management Program Projections	90
Table 81. 2027 Commercial Load Management Program Projections	90
Table 82. Commercial Load Management Program Cost-Effectiveness Analysis	91
Table 83. Residential Measure Lives and Savings Sources	92
Table 84. Residential Net-to-Gross Ratios ("NTGR") and Free Ridership	93
Table 85. Commercial Measure Lives and Savings Sources	94
Table 86. Commercial NTGR and Free Ridership	94
Table 87: Avoided Costs	97

Executive Summary

Pursuant to the New Mexico Efficient Use of Energy Act (NMSA 1978, Section 62-17-1 et seq.) (“EUEA”) and the New Mexico Public Regulation Commission (“Commission” or “NMPRC”) Energy Efficiency Rule (“EE Rule” or “Rule”),¹ El Paso Electric Company (“EPE,” or “Company”) submits its proposed 2025-2027 Energy Efficiency and Load Management Plan (“EE/LM Plan”). The EUEA and Rule require public utilities to offer customers cost-effective energy efficiency (“EE”) and load management (“LM”) programs (“Programs”). The EUEA and Rule further authorize cost recovery for qualified expenditures relating to the study, development and implementation of these Programs.

EPE’s EE/LM Plan proposes modifications to EPE’s existing portfolio of programs that have been designed to increase participation and to expedite EPE’s achievement of EUEA goals. These proposed adjustments will be implemented upon Commission review and approval.

EPE offers retail electric service in both Texas and New Mexico to approximately 453,794 customers, with approximately 106,177 (23.4 percent) customers located in New Mexico. EPE’s New Mexico service territory encompasses the City of Las Cruces, and nearby municipalities located in the New Mexico counties of Doña Ana, Luna, Otero and Sierra.

Energy Efficiency Plan Overview

2023 Programs

EPE’s existing EE Programs were approved by the Commission in NMPRC Case No. 21-00114-UT. This EE/LM Program portfolio is available to customers in EPE’s New Mexico residential, commercial, and industrial customer classes and includes the following programs:

- Smart Students
- Residential Comprehensive
- Residential Lighting
- ENERGY STAR® New Homes
- Marketplace
- Residential Load Management
- EnergySaver
- Energy\$mart
- Commercial Comprehensive
- SCORE Plus
- Commercial Load Management

¹ New Mexico Administrative Code (“NMAC”) Title 17 Chapter 7 Part 2.

Proposed EE/LM Plan Overview

EPE contracted with Frontier Energy (“Frontier”) to assist in the analysis and validation of EPE’s proposed program offerings selected for 2025, 2026, and 2027.

Frontier worked collaboratively with EPE to analyze potential new programs, existing program modifications, consider new measures, and conduct the program- and portfolio-level cost-effectiveness analyses supporting EPE’s proposed EE/LM Plan.

Proposed Changes

EPE is proposing to continue all its existing energy efficiency and load management programs that were approved in Case No. 21-00114-UT, with the incorporation of several new measures or participation paths for various programs.

Specifically, the proposed Residential Lighting Program, re-named the Residential Products Program, will be expanded to include measures like LED nightlights, advanced power strips, air purifiers, bath ventilation fans, ceiling fans, water coolers, and several weatherization measures. These measures are distributed through retail channels.

Other programs introducing new measures include, but are not limited to, ENERGY STAR New Homes, Marketplace, Residential Load Management, and SCORE Plus Programs. For residential programs, ENERGY STAR New Homes added a manufactured homes pilot, and Marketplace added several of the same weatherization measures incorporated into Residential Products. Additionally, Residential Load Management plans to extend demand response capabilities to other equipment types, such as room air conditioners and domestic hot water. For commercial programs, SCORE Plus is adding HVAC tune-ups and a Strategic Energy Management (“SEM”) behavioral path.

Additional program descriptions of the proposed EE/LM Plan are provided in witness Silva’s testimony. Program design considerations and assumptions used for the purpose of cost-effectiveness analysis are provided in the following sections. This includes a detailed list of proposed measures included per program for the purpose of cost-effectiveness analysis. This measure mix per program was selected for analysis based on past program performance, program implementer goals and projections, stakeholder input, and EPE-provided targets.

With these updates, the proposed EE/LM Plan consists of the following programs:

- Smart Students
- Residential Comprehensive
- Residential Products
- ENERGY STAR New Homes
- Marketplace
- Residential Load Management
- EnergySaver
- Energy\$mart
- Commercial Comprehensive
- SCORE Plus
- Commercial Load Management

Proposed Budget

EPE established the portfolio budget based on the three to five percent funding methodology outlined in the EUEA. The proposed program budgets shown in the below tables were developed based on past experience, anticipated participation levels by measure, and the associated measure incentive levels that were deemed necessary to encourage participation.²

Table 1: 2025 Proposed Program and Total Portfolio Budgets

EPE Plan	Annual Incentive Costs (\$)	Annual Administrative Costs (\$)	Total Annual Costs (\$)
Smart Students	\$114,709	\$20,171	\$134,880
Residential Comprehensive	\$572,965	\$351,740	\$924,705
Residential Products	\$255,534	\$158,968	\$414,502
ENERGY STAR New Homes	\$269,762	\$267,880	\$537,642
Marketplace	\$99,759	\$120,464	\$220,223
Residential Load Management	\$208,825	\$244,005	\$452,830
EnergySaver	\$529,315	\$167,137	\$696,452
EnergySmart	\$389,421	\$62,687	\$452,108
Commercial Comprehensive	\$297,390	\$162,708	\$460,099
SCORE Plus	\$1,001,049	\$987,641	\$1,988,690
Commercial Load Management	\$157,826	\$164,958	\$322,784
Total Portfolio	\$3,896,555	\$2,708,361	\$6,604,915

² Due to rounding, totals may not match the sum of individual programs as summarized in these tables, or others throughout this document.

Table 2: 2026 Proposed Program and Total Portfolio Budgets

EPE Plan	Annual Incentive Costs (\$)	Annual Administrative Costs (\$)	Total Annual Costs (\$)
Smart Students	\$114,709	\$20,171	\$134,880
Residential Comprehensive	\$572,965	\$351,740	\$924,705
Residential Products	\$255,534	\$158,968	\$414,502
ENERGY STAR New Homes	\$276,694	\$267,880	\$544,574
Marketplace	\$99,759	\$120,464	\$220,223
Residential Load Management	\$229,725	\$265,559	\$495,284
EnergySaver	\$529,315	\$167,137	\$696,452
EnergySmart	\$389,421	\$62,687	\$452,108
Commercial Comprehensive	\$297,390	\$162,708	\$460,099
SCORE Plus	\$1,001,049	\$1,254,510	\$2,255,559
Commercial Load Management	\$157,826	\$164,958	\$322,784
Total Portfolio	\$3,924,387	\$2,996,783	\$6,921,170

Table 3: 2027 Proposed Program and Total Portfolio Budgets

EPE Plan	Annual Incentive Costs (\$)	Annual Administrative Costs (\$)	Total Annual Costs (\$)
Smart Students	\$114,709	\$20,171	\$134,880
Residential Comprehensive	\$572,965	\$351,740	\$924,705
Residential Products	\$255,534	\$158,968	\$414,502
ENERGY STAR New Homes	\$284,226	\$267,880	\$552,106
Marketplace	\$99,759	\$120,464	\$220,223
Residential Load Management	\$252,700	\$289,282	\$541,982
EnergySaver	\$529,315	\$167,137	\$696,452
EnergySmart	\$389,421	\$62,687	\$452,108
Commercial Comprehensive	\$297,390	\$162,708	\$460,099
SCORE Plus	\$1,001,049	\$1,537,129	\$2,538,178
Commercial Load Management	\$157,826	\$164,958	\$322,784
Total Portfolio	\$3,954,894	\$3,303,125	\$7,258,019

Program Screening & Cost-effectiveness Analysis

Overview

Frontier conducted the quantitative analyses used to estimate the costs and benefits of EPE's potential EE/LM Plan.

EPE used a discount rate of 7.18 percent³ to calculate the present value of costs and benefits for the Utility Cost Test ("UCT") calculation, as shown in EPE witness Adrian Hernandez's Exhibit AH-2. All other factors held constant, the higher the discount rate, the lower the UCT value.

The below tables provide the cost-effectiveness of EPE's EE/LM Plan and program-level results. Because the benefit-cost ratio is equal to or greater than 1.00, the portfolio is cost-effective based on the UCT.

Table 4. Portfolio Cost-Effectiveness Results

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.36	2.06	1.32	1.99	1.28	1.92
Total Benefits (\$000s)	8,969	13,621	9,140	13,788	9,288	13,932
Total Costs (\$000s)	6,605	6,605	6,921	6,921	7,258	7,258

Table 5. Program Cost-Effectiveness Results

Program	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Smart Students	0.75	1.33	0.75	1.33	0.75	1.33
Residential Comprehensive	1.64	2.16	1.66	2.17	1.67	2.19
Residential Products	1.81	2.95	1.83	2.96	1.84	2.98
ENERGY STAR New Homes	0.65	1.00	0.63	0.98	0.61	0.95
Marketplace	0.80	1.65	0.80	1.65	0.79	1.64
Residential Load Management	1.93	2.02	1.98	2.06	2.03	2.10
EnergySaver	1.39	1.75	1.40	1.76	1.42	1.77
EnergySmart	1.49	1.97	1.50	1.99	1.51	2.00
Commercial Comprehensive	2.14	3.53	2.15	3.54	2.15	3.55
SCORE Plus	1.10	1.90	0.98	1.68	0.87	1.49
Commercial Load Management	1.47	1.47	1.50	1.50	1.52	1.53
Total Portfolio	1.36	2.06	1.32	1.99	1.28	1.92

The projected annual kilowatt ("kW") and kilowatt-hour ("kWh") savings and costs for EPE's EE/LM Plan are summarized in the following tables. In addition, total projected lifetime energy savings for the

³ Approved in Case No. 20-00104-UT

overall portfolio is presented in the last row of each table. Projected savings per measure are detailed in the individual program sections of this EE/LM Plan.

Table 6. 2025 Projected Impacts⁴

Year	Annual Participants ⁵	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	153,037	15,638	16,903,920	\$3,896,555	\$2,708,361	\$6,604,915
2026	-	3,699	15,763,330	-	-	-
2027	-	3,694	15,685,367	-	-	-
2028	-	3,456	15,401,152	-	-	-
2029	-	3,456	15,399,557	-	-	-
2030	-	3,456	15,390,891	-	-	-
2031	-	3,456	15,390,891	-	-	-
2032	-	3,431	15,210,526	-	-	-
2033	-	3,431	15,198,711	-	-	-
2034	-	3,418	15,116,521	-	-	-
2035	-	2,800	10,129,461	-	-	-
2036	-	2,744	9,667,712	-	-	-
2037	-	2,675	9,133,541	-	-	-
2038	-	2,655	8,920,815	-	-	-
2039	-	2,322	6,909,221	-	-	-
2040	-	810	3,641,520	-	-	-
2041	-	703	2,406,711	-	-	-
2042	-	703	2,406,711	-	-	-
2043	-	526	2,135,909	-	-	-
2044	-	525	2,134,045	-	-	-
2045	-	346	2,028,651	-	-	-
2046	-	346	2,028,651	-	-	-
2047	-	346	2,028,651	-	-	-
2048	-	289	1,773,510	-	-	-
2049	-	289	1,773,510	-	-	-
2050	-	232	1,345,198	-	-	-
2051	-	232	1,345,198	-	-	-
2052	-	232	1,345,198	-	-	-
2053	-	232	1,345,198	-	-	-
2054	-	232	1,345,198	-	-	-
2055	-	29	165,867	-	-	-
2056	-	-	-	-	-	-
2057	-	-	-	-	-	-
Lifetime kWh			229,471,343			

⁴ Due to rounding, totals may not match the sum of individual parts as summarized in this table.

⁵ For some programs, the number of program participants may represent the projected number of homes or businesses participating in a program. For others, the number of participants may represent the number of installed measures or number of completed projects, which consists of various measure mixes and quantities. Please see the program descriptions for details

Table 7. 2026 Projected Impacts⁶

Year	Annual Participants⁷	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	153,902	16,445	16,896,527	\$3,924,387	\$2,996,783	\$6,921,170
2027	-	3,697	15,755,937	-	-	-
2028	-	3,692	15,677,973	-	-	-
2029	-	3,455	15,393,758	-	-	-
2030	-	3,454	15,392,164	-	-	-
2031	-	3,454	15,383,497	-	-	-
2032	-	3,454	15,383,497	-	-	-
2033	-	3,429	15,203,133	-	-	-
2034	-	3,429	15,191,318	-	-	-
2035	-	3,416	15,109,128	-	-	-
2036	-	2,799	10,120,145	-	-	-
2037	-	2,743	9,658,396	-	-	-
2038	-	2,674	9,124,225	-	-	-
2039	-	2,652	8,903,678	-	-	-
2040	-	2,320	6,892,085	-	-	-
2041	-	806	3,621,139	-	-	-
2042	-	700	2,386,330	-	-	-
2043	-	700	2,386,330	-	-	-
2044	-	520	2,110,564	-	-	-
2045	-	520	2,108,700	-	-	-
2046	-	340	2,003,306	-	-	-
2047	-	340	2,003,306	-	-	-
2048	-	340	2,003,306	-	-	-
2049	-	289	1,773,510	-	-	-
2050	-	289	1,773,510	-	-	-
2051	-	232	1,345,198	-	-	-
2052	-	232	1,345,198	-	-	-
2053	-	232	1,345,198	-	-	-
2054	-	232	1,345,198	-	-	-
2055	-	232	1,345,198	-	-	-
2056	-	29	165,867	-	-	-
2057	-	-	-	-	-	-
		Lifetime kW	229,147,317			

⁶ Due to rounding, totals may not match the sum of individual parts as summarized in this table.

⁷ For some programs, the number of program participants may represent the projected number of homes or businesses participating in a program. For others, the number of participants may represent the number of installed measures or number of completed projects, which consists of various measure mixes and quantities. Please see the program descriptions for details

Table 8. 2027 Projected Impacts⁸

Year	Annual Participants⁹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	154,849	17,332	16,889,254	\$3,954,894	\$3,303,125	\$7,258,019
2028	-	3,696	15,748,664	-	-	-
2029	-	3,691	15,670,701	-	-	-
2030	-	3,453	15,386,486	-	-	-
2031	-	3,453	15,384,891	-	-	-
2032	-	3,453	15,376,225	-	-	-
2033	-	3,453	15,376,225	-	-	-
2034	-	3,427	15,195,860	-	-	-
2035	-	3,427	15,184,045	-	-	-
2036	-	3,414	15,101,855	-	-	-
2037	-	2,797	10,111,242	-	-	-
2038	-	2,741	9,649,493	-	-	-
2039	-	2,672	9,115,322	-	-	-
2040	-	2,649	8,886,955	-	-	-
2041	-	2,317	6,875,362	-	-	-
2042	-	803	3,601,171	-	-	-
2043	-	697	2,366,362	-	-	-
2044	-	697	2,366,362	-	-	-
2045	-	514	2,085,632	-	-	-
2046	-	514	2,083,769	-	-	-
2047	-	334	1,978,375	-	-	-
2048	-	334	1,978,375	-	-	-
2049	-	334	1,978,375	-	-	-
2050	-	289	1,773,510	-	-	-
2051	-	289	1,773,510	-	-	-
2052	-	232	1,345,198	-	-	-
2053	-	232	1,345,198	-	-	-
2054	-	232	1,345,198	-	-	-
2055	-	232	1,345,198	-	-	-
2056	-	232	1,345,198	-	-	-
2057	-	29	165,867	-	-	-
Lifetime kWh			228,829,877			

⁸ Due to rounding, totals may not match the sum of individual parts as summarized in this table.

⁹ For some programs, the number of program participants may represent the projected number of homes or businesses participating in a program. For others, the number of participants may represent the number of installed measures or number of completed projects, which consists of various measure mixes and quantities. Please see the program descriptions for details

Progress towards Goal

The 2019 amendment to the EUEA modified the EUEA reporting baseline requiring that EPE achieve energy savings of not less than 5 percent of 2020 retail sales from its EE and LM programs implemented in years 2021 through 2025. Based on actual 2020 retail sales, EPE programs will have to achieve 78,872,865 kWh, or approximately 15,774,573 kWh of annual energy savings in 2021 through 2025.

EE/LM Plan Development

Background of Existing Programs

EPE began its New Mexico EE Programs with the LivingWise® Program and CFL Program in 2008, followed with more extensive program offerings in subsequent years. These offerings included residential customer rebate measures for high efficiency cooling and weatherization and a continuation of a markdown program for CFLs and a CFL giveaway measure. The commercial customer class was provided with longstanding offers for incentives on a variety of efficiency projects since 2009. The initial commercial measures eligible for incentives included lighting and HVAC technologies, motors, variable speed drives (“VSD”) and thermal energy storage. EPE also offered a low-income program for qualifying residential customers.

In NMPRC Case 11-00047-UT, EPE filed and received approval for program changes to its 2010 Programs for 2011 through 2013. EPE’s 2014-2016 EE Programs were approved by the Commission in NMPRC Case No. 13-00176-UT, the 2017/2018 offerings were approved in NMPRC Case No. 16-00185-UT, the 2019-2021 EE/LM Plan was approved in NMPRC Case No. 18-00116-UT, and the 2022-2024 EE/LM Plan was approved in NMPRC Case No. 21-00114-UT.

In addition to formal rebate and incentive programs currently offered in New Mexico and Texas, EPE’s websites (www.EPESaver.com for NM) and (www.EPESavings.com for TX) contain energy conservation and energy efficiency information for its customers. At these websites, customers and the general public are also provided with links to additional websites for energy efficiency tips and information. In addition, EPE offers a variety of rates to residential, commercial and industrial customers in its New Mexico and Texas jurisdictions that are designed to promote load management and energy efficiency.

Regulatory Requirements

17.7.2.8.J NMAC requires that the utility’s portfolio of EE Programs be cost-effective. Section 62-17-4(C) of the EUEA states that the UCT shall be used to determine cost-effectiveness. All Programs proposed by EPE in the EE/LM Plan are cost-effective, achieving a positive UCT of 1.00 or greater.

Program Analysis & Validation

EPE employed Frontier to analyze potential program modifications of its selected EE/LM programs, consider new measures, and conduct the program- and portfolio-level cost-effectiveness analyses supporting EPE’s proposed EE/LM Plan.

Frontier has significant experience in program analysis, development, and validation. As a nationally recognized consulting firm, it provides energy efficiency and demand response program design, evaluation, implementation, and measurement and verification (“M&V”) services to clients across the country. Frontier has provided significant contributions to program design, implementation, and evaluation activities in Arkansas, California, Colorado, New Mexico, New York, Oklahoma, and Texas.

Cost-effectiveness Analysis

The basic structure of any cost-effectiveness test involves a calculation of the total benefits and the total costs in dollar terms from a certain vantage point to determine whether the overall benefits exceed the costs. A test passes if the benefit-cost ratio is greater than one and fails if less than one. For the purposes of Frontier’s analysis, results are reported as the ratio of benefits to costs, calculated as follows.¹⁰

$$\text{Benefit-Cost Ratio}_i = \frac{NPV \sum \text{benefits}_i \text{ (dollars)}}{NPV \sum \text{costs}_i \text{ (dollars)}}$$

EPE used the UCT to analyze, screen, and validate the measure mix for each program design, as directed by the EUEA. The EUEA defines the UCT as “a standard that is met if the monetary costs that are borne by the public utility and that are incurred to develop, acquire and operate energy efficiency or load management resources on a life-cycle basis are less than the avoided monetary costs associated with developing, acquiring and operating the associated supply-side resources.”

As such, the UCT restricts the benefit-cost test perspective to a comparison of avoided supply-side costs to utility program costs. The present value of avoided capacity and energy costs across the life of the measures are treated as benefits and included in the numerator of the benefit-cost ratio. The present value of program costs and incentives as detailed herein are included in the denominator of the benefit-cost ratio. A benefit-cost ratio greater than or equal to 1.00 indicates the program is cost-effective and demonstrates that the utility will benefit from implementation of the EE/LM Plan. In turn, this will translate into benefits to customers in the form of lower electricity rates in the long run. The UCT is expressed using the following inputs:

Benefits:

- Energy-related costs avoided by the utility
- Capacity-related costs avoided by the utility

Costs:

- Administrative costs¹¹
- Participant incentives

At EPE’s request, the statewide evaluator presented EPE with alternative cost-effectiveness results that included an avoided utility carbon emissions benefit. These results included the following inputs for calculating this benefit:

¹⁰ “Understanding Cost-Effectiveness of Energy Efficiency Programs: Best Practices, Technical Methods, and Emerging Issues for Policy-Makers,” U.S. Environmental Protection Agency (EPA). November 2008. Table 2-1.
https://19january2017snapshot.epa.gov/sites/production/files/2015-08/documents/understanding_cost-effectiveness_of_energy_efficiency_programs_best_practices_technical_methods_and_emerging_issues_for_policy-makers.pdf.

¹¹ For the purpose of cost-effectiveness testing, “administrative costs” include program administration, marketing, research & development, and M&V expenses. Please see EPE witness Silva’s Exhibit VHS-2 for a breakdown of administrative costs per program.

- 1) An emissions rate equal to 0.249 short tons (498 pounds) of CO₂ per MWh
- 2) The social cost of carbon equal to \$117.93 per short ton of CO₂ (2,000 pounds).

The emissions rate is sourced from EPE's 2022 Corporate Sustainability Report¹², and the social cost of carbon is sourced from the EPA's 2023 Report on the Social Cost of Greenhouse Gases.^{13,14} Multiplying the emissions rate by the social cost of carbon produces an avoided emissions benefit of \$29.37 per MWh or \$0.02937 per kWh (in 2020 dollars). These values are 'system-level', meaning the impacts from energy efficiency programs are scaled up for line losses before calculating the monetary value of avoided emissions.

EPE directed Frontier to calculate the UCT assuming these additional benefits based on direction from its statewide evaluator and in response to stakeholder recommendations.

Assumptions and Methodologies

EPE employed standard methods and resources to analyze this plan. Technical assumptions sourced from the 2023 NM TRM were used to calculate projected savings, where available. Additionally, the Texas Technical Reference Manual version 11.0 ("TX TRM") and the Illinois Statewide Technical Reference Manual for Energy Efficiency version 12.0 ("IL TRM") were used for measures not included in the NM TRM. EPE and implementer-provided costs and savings were used to inform estimated program performance in some cases. EPE also worked directly with the statewide Evaluation, Measurement, and Verification ("EM&V") contractor, EcoMetric Consulting LLC, to inform other key assumptions necessary for the cost-effectiveness analysis.

To calculate cost-effectiveness for EPE's selected programs, Frontier projected typical participant incentives and savings based on previous results, program administrator experience, and program implementer planning documents including, but not limited to, projected measure mix and housing characteristics. The incentive and annual savings per average participant used in the cost-effectiveness calculations are provided in the forecasting assumptions per measure for each program. The measures included in the forecasting assumptions for each program represent the eligible measures most likely to be installed in the program, or the measures EPE and its program implementer, if applicable, are targeting for increased installation. EPE may choose to increase or decrease the list of eligible measures per program based on new information, cost-effectiveness potential, or other reasons as deemed appropriate by the utility in coordination with the statewide evaluator. EPE has designed the programs to be flexible and may adjust them to provide additional customer benefits if opportunities are identified during the three-year program cycle. As a result, actual program offerings may include energy efficiency measures approved by the statewide evaluator not currently captured in the cost-effectiveness analysis.

Each program was analyzed following the steps below:

1. Collect program inputs, including:
 - a. Measure specifications or typical savings;

¹² EPE 2022 Corporate Sustainability Report, p. 25.

<https://www.epelectric.com/files/html/Sustainability%20Report/2022%20Corporate%20Sustainability%20Report.pdf>.

¹³ EPA 2023 Report on the Social Cost of Greenhouse Gases, November 2023, Table ES.1, p. 4.

https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf.

¹⁴ The \$130 value is halfway between the 2020 and 2030 social cost values (in 2020 dollars) at a 2.5% discount rate. For this analysis, the social cost was converted from dollars per metric ton to dollars per short ton using a conversion factor of 0.9071847.

- b. Estimated useful lives (“EUL”); and
- c. Net-to-gross factors from most recent EM&V program evaluation report.
2. Estimate projected participation and incentive costs.
3. Calculate UCT results using the standard test and incorporating additional benefits for offsetting utility carbon emissions.
4. Review program savings, cost, and cost-effectiveness results and revise inputs where appropriate.

The sources for these inputs and estimates include the following:

- 2023 NM TRM;
- TX TRM 11.0;
- IL TRM 12.0;
- ENERGY STAR resources;
- Utility or implementer provided projections;
- EPE and program administrator experience; and
- EM&V reports and resources.

Utility Economic and Technical Assumptions

EPE used a discount rate of 7.18 percent to calculate the present value of costs and benefits for the UCT calculation. All other factors held constant, the higher the discount rate, the lower the UCT value.

Supply and production avoided cost values were supplied by EPE (see Appendix C: Avoided Costs). All energy and demand impact estimates have been adjusted for EPE’s energy and capacity line loss factors of 6.90 and 7.54 percent, respectively.¹⁵

Measurement and Verification

Unless otherwise specified within the program-specific details of this Plan, the M&V described in this section is applicable to all Programs within EPE’s EE/LM Plan.

EPE will utilize deemed savings values for most projects when available. If formal M&V is required for a custom project by the statewide evaluator, EPE will work with the customer to develop a formal M&V process and plan in accordance with the International Performance Measurement and Verification Protocol (“IPMVP”). For measures utilizing deemed or stipulated savings, participants, contractors, or EPE Program implementers will record pre- and post-installation equipment and building characteristics on EPE-provided measure calculators or software. For example, on commercial lighting projects, contractors or implementers will need to complete the appropriate Lighting Survey Form to indicate pre- and post-installation lighting fixtures, identify the correct building type, and provide other relevant project details.

¹⁵ EPE’s 2019 system line loss study used in EPE’s most recent New Mexico rate case, CN 20-00104-UT, Schedule M-3.

EPE will coordinate with implementers and the statewide evaluator identify a sampling of projects for inspection, ensuring that an adequate number of installations are pre- and post-inspected to ensure that the Programs are producing the expected savings.

The statewide evaluator will also conduct additional inspections to increase confidence in the results of the EE/LM Plan. EPE will rely on the statewide evaluator to provide EM&V review and feedback. The statewide evaluator will be responsible for developing EM&V activities to be performed, as well as a method to evaluate expenditures, free-ridership, and energy savings for the Programs. Additionally, they will review all technical assumptions used by EPE to confirm that the expected savings were achieved at the end of each program year. Going forward, EPE will adjust future plans based on evaluation findings.

EPE retains the right to modify rebate levels and remove or add measures, as deemed necessary, based on economic conditions and program performance while maintaining cost-effectiveness.

Customer Self-Directed Alternatives

In accordance with NMAC 17.7.2.10, the EUEA and the Rule allow for large commercial customers to develop self-directed alternatives. Large customer self-sponsors are required to develop their M&V plans in accordance with the EUEA and the Rule and follow EPE's procedures for filing and approval of self-directed projects. Based on the criteria in the Rule, EPE or the Commission-approved self-direct program administrator will verify that a reasonable M&V plan has been developed and that this plan is followed to quantify the energy savings for each project. Credits will be applied against the large customer's Efficient Use of Energy Recovery Factor charged by EPE in accordance with the EUEA and the Rule.

EPE 2025-2027 Residential Program Portfolio

EPE's Residential Energy Efficiency Program portfolio includes the following programs:

1. Smart Students
2. Residential Comprehensive;
3. Residential Products;
4. ENERGY STAR New Homes;
5. Marketplace
6. Residential Load Management;
7. EnergySaver; and
8. Energy\$mart

Smart Students Program

Program Overview and Goals

The Smart Students Program delivers residential energy efficiency education and measures to fifth grade and high-school students via its LivingWise® and FutureWise kits. The program produces energy savings through the installation of high efficiency measures and supplemental materials to educate students and their families on valuable ways to save energy, water, and money. The program's ultimate objective is to instill life-long energy saving behaviors.

The LivingWise educational kit serves as an effective community outreach tool to improve customer awareness of energy efficiency measures and programs. EPE identifies and enrolls teachers of fifth grade students, providing them with a LivingWise kit that contains energy saving devices and energy efficiency educational materials. The kits will continue to include three light emitting diode ("LED") light bulbs, two 1.5 gallons per minute ("gpm") low-flow showerheads, one 1.5 gpm kitchen faucet aerator, two 0.5 gpm bathroom faucet aerators, a digital thermometer, a flow rate test bag, a natural resource fact chart, and instructions on how to install each measure. It also provides instructions to adjust smart thermostat and water heater settings to achieve behavior-related energy and demand savings. All materials provided meet state and national educational standards, which allow the program to easily fit into the teacher's existing requirements. The students take the LivingWise kit home, and with the help of their parents, install the devices in their home and complete a home energy audit report. All responses, including the home audits, teacher responses, student input and parent responses, are tabulated. This kit is designed to generate immediate and long-term energy savings for participants.

The FutureWise kit – The FutureWise educational kit serves as an effective community outreach tool for high school students which will bring an awareness of how they can save energy. This educational program will take the students into the 'future' real world by providing real life scenarios of some of the complex situations that await them, for example: how to read utility bills and how to navigate thru career opportunities in the green job sector. EPE identifies and enrolls high school teachers, providing them with a FutureWise kit that contains energy saving devices and energy efficiency educational materials. The kits will include advanced power strips, one smart LED, two standard LEDs, and educational material.

Both the LivingWise and FutureWise kits provide instructions to adjust smart thermostat and water heater settings to achieve behavior-related energy and demand savings.

Implementation and Administration Plan

Assignment of Responsibilities

AM Conservation Group ("AMC"), formerly Resource Action Programs ("RAP"), is EPE's implementer for this program. AMC will produce custom Program materials with EPE's approval. EPE will review and approve a list of schools to be targeted by AMC. AM Conservation will identify and enroll 5th grade and high school teachers, providing them the LivingWise and FutureWise kits for both participating students and teacher, along with education materials.

AMC staff will contact the participating/enrolled teachers at various times throughout the program to provide support for the teachers and to request the return of the audit forms and evaluations. AMC will provide EPE with a Program Summary Report in time for inclusion in EPE's Annual Report to the NMPRC.

Target Market Segment and Marketing Plan

The program targets fifth grade and high school students living in EPE’s service territory. Specifically, AMC will conduct the research and marketing efforts necessary to identify eligible schools and sign 5th grade classes up to receive the LivingWise kit and high school classes to receive the FutureWise kit. Participating teachers will deliver the kits as part of a classroom lesson. Take home activities and measure installation in each student’s home will engage the student’s families.

The program will also provide information and incentives tied to enrollment and participation in other EPE Programs.

Participation Requirements

The schools that are approached for participation in this program will be located in EPE’s New Mexico service territory.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The below table details the estimated useful life (“EUL” or “measure life”), incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership.¹⁶ Sources for each of these assumptions are found in Appendix A.

¹⁶ Incentive dollars and savings may be rounded to the year, dollar, kW, kWh, or measure quantity as appropriate for each measure. This applies to the Smart Students Program and all other Programs within the EE/LM Plan.

Table 9. Smart Students Program Forecasting Assumptions

Measure Type	LivingWise Kit				
	Thermostat Setback	DHW Setback	Faucet Aerator #1 (Kitchen)	Faucet Aerator #2 (Bathroom)	Faucet Aerator #3 (Bathroom)
Measure Life (years)	1	2	10	10	10
Incentive per avg participant (\$) 2025	Kit cost = \$17.86				
Incentive per avg participant (\$) 2026	Kit cost = \$17.86				
Incentive per avg participant (\$) 2027	Kit cost = \$17.86				
Annual kWh	30.0	16.3	2.6	3.4	2.1
Annual kW	0.01	0.001	-	-	-
Measure Quantity 2025	3,100	3,100	3,100	3,100	3,100
Measure Quantity 2026	3,100	3,100	3,100	3,100	3,100
Measure Quantity 2027	3,100	3,100	3,100	3,100	3,100
Units of Measurement	Customer	Customer	Product	Product	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%	0.00%

Table 10. Smart Students Program Forecasting Assumptions Continued

Measure Type	LivingWise Kit				
	Low-Flow Showerhead #1	Low-Flow Showerhead #2	LED #1	LED #2	LED #3
Measure Life (years)	10	10	30.6	30.6	30.6
Incentive per avg participant (\$) 2025	Kit cost = \$17.86				
Incentive per avg participant (\$) 2026	Kit cost = \$17.86				
Incentive per avg participant (\$) 2027	Kit cost = \$17.86				
Annual kWh	21.7	11.4	5.3	4.3	3.5
Annual kW	-	-	0.001	0.001	0.001
Measure Quantity 2025	3,100	3,100	3,100	3,100	3,100
Measure Quantity 2026	3,100	3,100	3,100	3,100	3,100
Measure Quantity 2027	3,100	3,100	3,100	3,100	3,100
Units of Measurement	Product	Product	Product	Product	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%	0.00%

Table 11. Smart Students Program Forecasting Assumptions Continued

Measure Type	FutureWise Kit			
	Thermostat Setback	DHW Setback	Advanced Power Strip	Wi-Fi LED
Measure Life (years)	1	2	7	30.6
Incentive per avg participant (\$) 2025	Kit cost = \$43.86			
Incentive per avg participant (\$) 2026	Kit cost = \$43.86			
Incentive per avg participant (\$) 2027	Kit cost = \$43.86			
Annual kWh	30.0	16.3	38.2	5.6
Annual kW	0.01	0.001	0.004	0.001
Measure Quantity 2025	1,353	1,353	1,353	1,353
Measure Quantity 2026	1,353	1,353	1,353	1,353
Measure Quantity 2027	1,353	1,353	1,353	1,353
Units of Measurement	Customer	Customer	Product	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%

Table 12. Smart Students Program Forecasting Assumptions Continued

Measure Type	FutureWise Kit		
	LED #1	LED #2	LED #3
Measure Life (years)	30.6	30.6	30.6
Incentive per avg participant (\$) 2025	Kit cost = \$43.86		
Incentive per avg participant (\$) 2026	Kit cost = \$43.86		
Incentive per avg participant (\$) 2027	Kit cost = \$43.86		
Annual kWh	6.7	5.5	5.2
Annual kW	0.001	0.001	0.001
Measure Quantity 2025	1,353	1,353	1,353
Measure Quantity 2026	1,353	1,353	1,353
Measure Quantity 2027	1,353	1,353	1,353
Units of Measurement	Product	Product	Product
Free-ridership	0.00%	0.00%	0.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 13. 2025 Smart Students Program Projections

Year	Annual Participants ¹⁷	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	4,453	55	491,200	\$114,709	\$20,171	\$134,880
2026	-	27	347,709	-	-	-
2027	-	22	269,746	-	-	-
2028	-	22	269,746	-	-	-
2029	-	22	269,746	-	-	-
2030	-	22	269,746	-	-	-
2031	-	22	269,746	-	-	-
2032	-	16	214,231	-	-	-
2033	-	16	214,231	-	-	-
2034	-	16	214,231	-	-	-
2035	-	16	77,045	-	-	-
2036	-	16	77,045	-	-	-
2037	-	16	77,045	-	-	-
2038	-	16	77,045	-	-	-
2039	-	16	77,045	-	-	-
2040	-	16	77,045	-	-	-
2041	-	16	77,045	-	-	-
2042	-	16	77,045	-	-	-
2043	-	16	77,045	-	-	-
2044	-	16	77,045	-	-	-
2045	-	16	77,045	-	-	-
2046	-	16	77,045	-	-	-
2047	-	16	77,045	-	-	-
2048	-	16	77,045	-	-	-
2049	-	16	77,045	-	-	-
2050	-	16	77,045	-	-	-
2051	-	16	77,045	-	-	-
2052	-	16	77,045	-	-	-
2053	-	16	77,045	-	-	-
2054	-	16	77,045	-	-	-
2055	-	16	77,045	-	-	-
Lifetime kWh			4,448,280			

¹⁷ Projected number of educational kits (LivingWise: 3,100; FutureWise: 1,353).

Table 14. 2026 Smart Students Program Projections

Year	Annual Participants¹⁸	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	4,453	55	491,200	\$114,709	\$20,171	\$134,880
2027	-	27	347,709	-	-	-
2028	-	22	269,746	-	-	-
2029	-	22	269,746	-	-	-
2030	-	22	269,746	-	-	-
2031	-	22	269,746	-	-	-
2032	-	22	269,746	-	-	-
2033	-	16	214,231	-	-	-
2034	-	16	214,231	-	-	-
2035	-	16	214,231	-	-	-
2036	-	16	77,045	-	-	-
2037	-	16	77,045	-	-	-
2038	-	16	77,045	-	-	-
2039	-	16	77,045	-	-	-
2040	-	16	77,045	-	-	-
2041	-	16	77,045	-	-	-
2042	-	16	77,045	-	-	-
2043	-	16	77,045	-	-	-
2044	-	16	77,045	-	-	-
2045	-	16	77,045	-	-	-
2046	-	16	77,045	-	-	-
2047	-	16	77,045	-	-	-
2048	-	16	77,045	-	-	-
2049	-	16	77,045	-	-	-
2050	-	16	77,045	-	-	-
2051	-	16	77,045	-	-	-
2052	-	16	77,045	-	-	-
2053	-	16	77,045	-	-	-
2054	-	16	77,045	-	-	-
2055	-	16	77,045	-	-	-
2056	-	16	77,045	-	-	-
Lifetime kWh			4,448,280			

¹⁸ Projected number of educational kits (LivingWise: 3,100; FutureWise: 1,353).

Table 15. 2027 Smart Students Program Projections

Year	Annual Participants¹⁹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	4,453	55	491,200	\$114,709	\$20,171	\$134,880
2028	-	27	347,709	-	-	-
2029	-	22	269,746	-	-	-
2030	-	22	269,746	-	-	-
2031	-	22	269,746	-	-	-
2032	-	22	269,746	-	-	-
2033	-	22	269,746	-	-	-
2034	-	16	214,231	-	-	-
2035	-	16	214,231	-	-	-
2036	-	16	214,231	-	-	-
2037	-	16	77,045	-	-	-
2038	-	16	77,045	-	-	-
2039	-	16	77,045	-	-	-
2040	-	16	77,045	-	-	-
2041	-	16	77,045	-	-	-
2042	-	16	77,045	-	-	-
2043	-	16	77,045	-	-	-
2044	-	16	77,045	-	-	-
2045	-	16	77,045	-	-	-
2046	-	16	77,045	-	-	-
2047	-	16	77,045	-	-	-
2048	-	16	77,045	-	-	-
2049	-	16	77,045	-	-	-
2050	-	16	77,045	-	-	-
2051	-	16	77,045	-	-	-
2052	-	16	77,045	-	-	-
2053	-	16	77,045	-	-	-
2054	-	16	77,045	-	-	-
2055	-	16	77,045	-	-	-
2056	-	16	77,045	-	-	-
2057	-	16	77,045	-	-	-
Lifetime kWh			4,448,280			

¹⁹ Projected number of educational kits (LivingWise: 3,100; FutureWise: 1,353).

Cost-effectiveness per year is shown in the table below.

Table 16. Smart Students Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	0.75	1.33	0.75	1.33	0.75	1.33
Total Benefits (\$000s)	101	179	102	179	101	179
Total Costs (\$000s)	135	135	135	135	135	135

Residential Comprehensive Program

Program Overview and Goals

The Residential Comprehensive Program seeks to generate energy and demand savings for residential customers through the promotion of comprehensive energy efficiency upgrades.

This proposed program will continue to offer rebates for the installation of various HVAC measures, including high efficiency evaporative coolers, central or mini-split air conditioners or heat pumps, and ENERGY STAR room air conditioners. It also rebates several other ENERGY STAR measures, such as cool roofs, heat pump water heaters, induction cooktops, pool pumps, smart thermostats, and windows. Other eligible measures include attic insulation, attic encapsulation, floor insulation, duct sealing, air infiltration reduction, solar attic fans, and solar screens.

EPE seeks to accomplish the following objectives through the Residential Comprehensive Program:

- Long-term and permanent changes in behavior, attitudes, awareness, and knowledge of energy efficiency;
- Peak electric demand reduction;
- Energy cost savings and cost-effectiveness;
- Encourage comprehensive upgrades (customers installing more than one measure);
- Increase customer awareness of the benefits of energy efficient equipment;
- Increase customer awareness of the ENERGY STAR label; and
- Encourage private sector delivery of energy efficient equipment.

The program is designed to facilitate the installation of a wide range of cost-effective measures.

Implementation and Administration Plan

The implementation of the Residential Comprehensive Program consists of the following tasks:

- Marketing and promotion to customers;
- Outreach to contractors;
- Application processing; and
- Program tracking and reporting.

The Residential Comprehensive Program will be marketed to all prospective residential participants, encouraging customers to increase their homes' efficiency. It will also encourage customers to implement additional measures through this program. In addition, EPE will offer outreach to local contractors to make them aware of the program's offerings. Applications are received via online submission or mail, then reviewed to confirm the applications meet the requirements of the program.

Assignment of Responsibilities

EPE will provide marketing and program outreach efforts for all measures. EPE will continue to use program implementers to process applications and track the program energy and demand savings. Frontier will also maintain the epesaver.com website for EPE. Savings are calculated using a deemed savings approach in compliance with the NM TRM where applicable. Other state TRMs are also referenced for select measures. EPE performs verification processes through onsite inspections post-installation to

confirm that the installations reported in applications did occur. Evaluation, measurement, and further verification processes will be carried out by the statewide evaluator who will provide reviews.

Target Market Segment and Marketing Plan

This program targets existing residential customers. New construction is not eligible for this program.

The program will be marketed to all EPE residential customers. Marketing activities will promote the availability of the program, energy savings to the customer, and available rebates through the program. Mechanisms used to promote the program may include direct mail (including bill stuffers), EPE website, media advertising, and in-store displays.

Participation Requirements

All EPE residential customers with existing homes and equipment are eligible to participate in this program. Depending upon the measure, homes may be required to have refrigerated air conditioning or evaporative cooling with resistance heating to participate. Measure specific requirements are established based on the TRM. New home construction is excluded from this program.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The tables below detail the measure life, incentive levels, projected gross annual savings at the meter per participant unit, measure quantity/participation levels, and free-ridership used to calculate program savings. Sources for each of these assumptions are found in Appendix A.

Table 17. Residential Comprehensive Program Forecasting Assumptions

Measure Type	Air Infiltration Reduction	Cool Roofs	Duct Sealing	Evaporative Cooling	Heat Pump Water Heaters
Measure Life (years)	11	15	18	15	13
Incentive per avg participant (\$) 2025	\$56	\$249	\$86	\$600	\$300
Incentive per avg participant (\$) 2026	\$56	\$249	\$86	\$600	\$300
Incentive per avg participant (\$) 2027	\$56	\$249	\$86	\$600	\$300
Annual kWh	121	269	315	3,878	3,282
Annual kW	0.06	0.19	0.13	2.46	0.16
Measure Quantity 2025	25	25	50	500	25
Measure Quantity 2026	25	25	50	500	25
Measure Quantity 2027	25	25	50	500	25
Units of Measurement	Project	Project	Project	Product	Product
Free-ridership	44.86%	44.86%	44.86%	44.86%	44.86%

Table 18. Residential Comprehensive Program Forecasting Assumptions Continued

Measure Type	HVAC (AC)	HVAC (HP)	Induction Cooking	Pool Pumps	Room Air Conditioners
Measure Life (years)	18	15	16	7	10.5
Incentive per avg participant (\$) 2025	\$349	\$413	\$50	\$300	\$50
Incentive per avg participant (\$) 2026	\$349	\$413	\$50	\$300	\$50
Incentive per avg participant (\$) 2027	\$349	\$413	\$50	\$300	\$50
Annual kWh	581	2,075	12	848	43
Annual kW	0.57	0.31	-	0.83	0.06
Measure Quantity 2025	300	200	25	25	26
Measure Quantity 2026	300	200	25	25	26
Measure Quantity 2027	300	200	25	25	26
Units of Measurement	Product	Product	Product	Product	Product
Free-ridership	44.86%	44.86%	44.86%	44.86%	44.86%

Table 19. Residential Comprehensive Program Forecasting Assumptions Continued

Measure Type	Smart Thermostats	Solar Attic Fans	Solar Screens	Windows
Measure Life (years)	10	15	10	25
Incentive per avg participant (\$) 2025	\$50	\$100	\$98	\$414
Incentive per avg participant (\$) 2026	\$50	\$100	\$98	\$414
Incentive per avg participant (\$) 2027	\$50	\$100	\$98	\$414
Annual kWh	510	325	563	661
Annual kW	-	0.24	0.32	0.53
Measure Quantity 2025	200	25	25	100
Measure Quantity 2026	200	25	25	100
Measure Quantity 2027	200	25	25	100
Units of Measurement	Product	Product	Project	Project
Free-ridership	44.86%	44.86%	44.86%	44.86%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 20. 2025 Residential Comprehensive Program Projections

Year	Annual Participants ²⁰	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	1,551	935	1,687,161	\$572,965	\$351,740	\$924,705
2026	-	935	1,687,161	-	-	-
2027	-	935	1,687,161	-	-	-
2028	-	935	1,687,161	-	-	-
2029	-	935	1,687,161	-	-	-
2030	-	935	1,687,161	-	-	-
2031	-	935	1,687,161	-	-	-
2032	-	922	1,674,598	-	-	-
2033	-	922	1,674,598	-	-	-
2034	-	922	1,674,598	-	-	-
2035	-	918	1,605,905	-	-	-
2036	-	916	1,603,456	-	-	-
2037	-	916	1,603,456	-	-	-
2038	-	913	1,554,855	-	-	-
2039	-	913	1,554,855	-	-	-
2040	-	136	151,872	-	-	-
2041	-	136	151,694	-	-	-
2042	-	136	151,694	-	-	-
2043	-	31	39,161	-	-	-
2044	-	31	39,161	-	-	-
2045	-	31	39,161	-	-	-
2046	-	31	39,161	-	-	-
2047	-	31	39,161	-	-	-
2048	-	31	39,161	-	-	-
2049	-	31	39,161	-	-	-
Lifetime kWh			25,485,835			

²⁰ Projected number of installed measures based on typical average projects (does not represent number of homes).

Table 21. 2026 Residential Comprehensive Program Projections

Year	Annual Participants²¹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	1,551	935	1,687,161	\$572,965	\$351,740	\$924,705
2027	-	935	1,687,161	-	-	-
2028	-	935	1,687,161	-	-	-
2029	-	935	1,687,161	-	-	-
2030	-	935	1,687,161	-	-	-
2031	-	935	1,687,161	-	-	-
2032	-	935	1,687,161	-	-	-
2033	-	922	1,674,598	-	-	-
2034	-	922	1,674,598	-	-	-
2035	-	922	1,674,598	-	-	-
2036	-	918	1,605,905	-	-	-
2037	-	916	1,603,456	-	-	-
2038	-	916	1,603,456	-	-	-
2039	-	913	1,554,855	-	-	-
2040	-	913	1,554,855	-	-	-
2041	-	136	151,872	-	-	-
2042	-	136	151,694	-	-	-
2043	-	136	151,694	-	-	-
2044	-	31	39,161	-	-	-
2045	-	31	39,161	-	-	-
2046	-	31	39,161	-	-	-
2047	-	31	39,161	-	-	-
2048	-	31	39,161	-	-	-
2049	-	31	39,161	-	-	-
2050	-	31	39,161	-	-	-
Lifetime kWh			25,485,835			

²¹ Projected number of installed measures based on typical average projects (does not represent number of homes).

Table 22. 2027 Residential Comprehensive Program Projections

Year	Annual Participants ²²	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	1,551	935	1,687,161	\$572,965	\$351,740	\$924,705
2028	-	935	1,687,161	-	-	-
2029	-	935	1,687,161	-	-	-
2030	-	935	1,687,161	-	-	-
2031	-	935	1,687,161	-	-	-
2032	-	935	1,687,161	-	-	-
2033	-	935	1,687,161	-	-	-
2034	-	922	1,674,598	-	-	-
2035	-	922	1,674,598	-	-	-
2036	-	922	1,674,598	-	-	-
2037	-	918	1,605,905	-	-	-
2038	-	916	1,603,456	-	-	-
2039	-	916	1,603,456	-	-	-
2040	-	913	1,554,855	-	-	-
2041	-	913	1,554,855	-	-	-
2042	-	136	151,872	-	-	-
2043	-	136	151,694	-	-	-
2044	-	136	151,694	-	-	-
2045	-	31	39,161	-	-	-
2046	-	31	39,161	-	-	-
2047	-	31	39,161	-	-	-
2048	-	31	39,161	-	-	-
2049	-	31	39,161	-	-	-
2050	-	31	39,161	-	-	-
2051	-	31	39,161	-	-	-
Lifetime kWh			25,485,835			

Cost-effectiveness per year is shown in the table below.

Table 23. Residential Comprehensive Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.64	2.16	1.66	2.17	1.67	2.19
Total Benefits (\$000s)	1,516	1,994	1,533	2,010	1,547	2,024
Total Costs (\$000s)	925	925	925	925	925	925

²² Projected number of installed measures based on typical average projects (does not represent number of homes).

Residential Products Program

Program Overview and Goals

The Residential Products Program (formerly the Residential Lighting Program) provides incentives in the form of markdowns at retail locations. The program will continue to encourage customers to replace their existing inefficient light bulbs with more energy efficient Light Emitting Diodes (“LED”) lighting and will now also provide customers with markdowns on additional high-efficiency products. The program may expand to include ENERGY STAR products, such as air purifiers, bathroom ventilation fans, and ceiling fans. Other retail measures being considered include, but are not limited to, advanced power strips, cinch door seals and door sweeps, insulating foam sealant spray cans, and window film rolls. Retail locations participating in this program will provide a markdown incentive at the point of purchase.

Implementation and Administration Plan

Assignment of Responsibilities

EPE plans to continue its contract with CLEAResult Consulting to provide outreach and program administration.

Target Market Segment and Marketing Plan

The implementer will continue to promote the Residential Products Program through point-of-purchase displays in stores. Additionally, EPE will continue to partner with the community to promote energy efficiency and provide free LED light bulbs and other energy savings products at events in areas across the state.

Participation Requirements

Participating retail location must be located within EPE’s New Mexico service territory.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The below table details the estimated useful life (“EUL” or “measure life”), incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 24. Residential Products Program Forecasting Assumptions

Measure Type	Advanced Power Strips	Air Purifiers	Bath Ventilation Fans	Caulking/ Sealant	Ceiling Fans
Measure Life (years)	7	9	19	20	10
Incentive per avg participant (\$) 2025	\$15	\$55	\$33	\$3	\$33
Incentive per avg participant (\$) 2026	\$15	\$55	\$33	\$3	\$33
Incentive per avg participant (\$) 2027	\$15	\$55	\$33	\$3	\$33
Annual kWh	67	349	27	22	31
Annual kW	0.01	0.06	0.003	0.003	0.01
Measure Quantity 2025	250	250	50	500	250
Measure Quantity 2026	250	250	50	500	250
Measure Quantity 2027	250	250	50	500	250
Units of Measurement	Product	Product	Product	Product	Product
Free-ridership	40.00%	40.00%	40.00%	40.00%	40.00%

Table 25. Residential Products Program Forecasting Assumptions

Measure Type	Door Sweeps	LED Lighting	LED Nightlights	Water Coolers	Weather Stripping
Measure Life (years)	20	29.7	8	10	20
Incentive per avg participant (\$) 2025	\$3	\$2	\$2	\$33	\$6
Incentive per avg participant (\$) 2026	\$3	\$2	\$2	\$33	\$6
Incentive per avg participant (\$) 2027	\$3	\$2	\$2	\$33	\$6
Annual kWh	29	14	27	246	11
Annual kW	0.01	0.002	0.00	0.03	0.001
Measure Quantity 2025	500	132,131	500	25	500
Measure Quantity 2026	500	132,131	500	25	500
Measure Quantity 2027	500	132,131	500	25	500
Units of Measurement	Product	Product	Product	Product	Product
Free-ridership	40.00%	40.00%	40.00%	40.00%	40.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 26. 2025 Residential Products Program Projections

Year	Annual Participants ²³	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	134,956	213	1,272,250	\$255,534	\$158,968	\$414,502
2026	-	213	1,272,250	-	-	-
2027	-	213	1,272,250	-	-	-
2028	-	213	1,272,250	-	-	-
2029	-	213	1,272,250	-	-	-
2030	-	213	1,272,250	-	-	-
2031	-	213	1,272,250	-	-	-
2032	-	211	1,261,471	-	-	-
2033	-	211	1,252,835	-	-	-
2034	-	202	1,196,541	-	-	-
2035	-	201	1,187,587	-	-	-
2036	-	201	1,187,587	-	-	-
2037	-	201	1,187,587	-	-	-
2038	-	201	1,187,587	-	-	-
2039	-	201	1,187,587	-	-	-
2040	-	201	1,187,587	-	-	-
2041	-	201	1,187,587	-	-	-
2042	-	201	1,187,587	-	-	-
2043	-	201	1,187,587	-	-	-
2044	-	200	1,186,721	-	-	-
2045	-	197	1,166,613	-	-	-
2046	-	197	1,166,613	-	-	-
2047	-	197	1,166,613	-	-	-
2048	-	197	1,166,613	-	-	-
2049	-	197	1,166,613	-	-	-
2050	-	197	1,166,613	-	-	-
2051	-	197	1,166,613	-	-	-
2052	-	197	1,166,613	-	-	-
2053	-	197	1,166,613	-	-	-
2054	-	197	1,166,613	-	-	-
Lifetime kWh			36,157,731			

²³ Projected number of measures.

Table 27. 2026 Residential Products Program Projections

Year	Annual Participants²⁴	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	134,956	213	1,272,250	\$255,534	\$158,968	\$414,502
2027	-	213	1,272,250	-	-	-
2028	-	213	1,272,250	-	-	-
2029	-	213	1,272,250	-	-	-
2030	-	213	1,272,250	-	-	-
2031	-	213	1,272,250	-	-	-
2032	-	213	1,272,250	-	-	-
2033	-	211	1,261,471	-	-	-
2034	-	211	1,252,835	-	-	-
2035	-	202	1,196,541	-	-	-
2036	-	201	1,187,587	-	-	-
2037	-	201	1,187,587	-	-	-
2038	-	201	1,187,587	-	-	-
2039	-	201	1,187,587	-	-	-
2040	-	201	1,187,587	-	-	-
2041	-	201	1,187,587	-	-	-
2042	-	201	1,187,587	-	-	-
2043	-	201	1,187,587	-	-	-
2044	-	201	1,187,587	-	-	-
2045	-	200	1,186,721	-	-	-
2046	-	197	1,166,613	-	-	-
2047	-	197	1,166,613	-	-	-
2048	-	197	1,166,613	-	-	-
2049	-	197	1,166,613	-	-	-
2050	-	197	1,166,613	-	-	-
2051	-	197	1,166,613	-	-	-
2052	-	197	1,166,613	-	-	-
2053	-	197	1,166,613	-	-	-
2054	-	197	1,166,613	-	-	-
2055	-	197	1,166,613	-	-	-
Lifetime kWh			36,157,731			

²⁴ Projected number of measures.

Table 28. 2027 Residential Products Program Projections

Year	Annual Participants²⁵	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	134,956	213	1,272,250	\$255,534	\$158,968	\$414,502
2028	-	213	1,272,250	-	-	-
2029	-	213	1,272,250	-	-	-
2030	-	213	1,272,250	-	-	-
2031	-	213	1,272,250	-	-	-
2032	-	213	1,272,250	-	-	-
2033	-	213	1,272,250	-	-	-
2034	-	211	1,261,471	-	-	-
2035	-	211	1,252,835	-	-	-
2036	-	202	1,196,541	-	-	-
2037	-	201	1,187,587	-	-	-
2038	-	201	1,187,587	-	-	-
2039	-	201	1,187,587	-	-	-
2040	-	201	1,187,587	-	-	-
2041	-	201	1,187,587	-	-	-
2042	-	201	1,187,587	-	-	-
2043	-	201	1,187,587	-	-	-
2044	-	201	1,187,587	-	-	-
2045	-	201	1,187,587	-	-	-
2046	-	200	1,186,721	-	-	-
2047	-	197	1,166,613	-	-	-
2048	-	197	1,166,613	-	-	-
2049	-	197	1,166,613	-	-	-
2050	-	197	1,166,613	-	-	-
2051	-	197	1,166,613	-	-	-
2052	-	197	1,166,613	-	-	-
2053	-	197	1,166,613	-	-	-
2054	-	197	1,166,613	-	-	-
2055	-	197	1,166,613	-	-	-
2056	-	197	1,166,613	-	-	-
Lifetime kWh			36,157,731			

²⁵ Projected number of measures.

Cost-effectiveness per year is shown in the table below.

Table 29. Residential Products Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.81	2.95	1.83	2.96	1.84	2.98
Total Benefits (\$000s)	751	1,222	758	1,229	762	1,234
Total Costs (\$000s)	415	415	415	415	415	415

ENERGY STAR® New Homes Program

Program Overview and Goals

The ENERGY STAR New Homes Program leverages a nationally-recognized brand to improve residential new construction practices. EPE's ENERGY STAR New Homes Program generates energy and demand savings for residential customers through the promotion of high efficiency home building practices. The purpose of the ENERGY STAR New Homes Program is to provide incentives for building houses that meet current ENERGY STAR standards and high-performance standards set by EPE.

The objective of the ENERGY STAR New Homes Program is to make home builders and homebuyers aware of the benefits and comforts of high efficiency home building practices. The program is designed to increase the overall efficiency of customer homes in compliance with the ENERGY STAR New Home guidelines.

EPE also seeks to accomplish the following objectives and goals through the ENERGY STAR New Homes Program:

- Achieve customer energy and cost savings;
- Peak electric demand reduction;
- Increase customer awareness of, and demand for ENERGY STAR homes; and
- Increase the number of builders having the technical capacity to build ENERGY STAR homes.

There are three incentive paths in this program that homebuilders can choose from, depending upon which best fits their needs: (1) Prescriptive, (2) Performance, or (3) All-Electric Performance. The measure-specific Prescriptive Path provides incentives based on above-code installation of a combination of measures including ENERGY STAR lighting, refrigerated air conditioning, radiant barrier, ENERGY STAR refrigerators and insulation. The Performance Path provides tiered incentive levels for new homes that exceed the 2018 International Energy Conservation Code. In addition to providing incentives to all-electric homes based on improvements over code requirements, the All-Electric Performance Path also provides rebates for ENERGY STAR thermostats and pool pumps. The minimum tier for homebuilders to qualify for the Performance Path is ten percent above the standard. EPE also plans to continue providing a higher incentive to homebuilders that construct low-income housing and add incentives promoting all-electric and manufactured homes.

The incentives for this program are paid directly to the homebuilder or, upon their approval, to one of their subcontractors.

ENERGY STAR and DOE Zero Energy Ready™ Manufactured New Homes Midstream Program

An equitable energy transition for all starts with affordable, quality, energy efficient manufactured new homes. This pilot program offers an opportunity to diversify the new homes program by reducing the energy burden of traditionally underserved customers. New manufactured homes will help address a shortage of affordable housing in Justice40 and disadvantaged communities. Beyond savings, this program will support low to moderate-income families by providing affordable, high-quality housing options, contributing to community development and equity.

Manufactured New Homes participants are comprised of manufacturers, community owners, retailers, and HVAC industry partners. A midstream model incentivizes the group with the most influence on purchasing decisions, the community owners and retailers, to promote ENERGY STAR and DOE Zero

Energy Ready compliant homes. The 2025-2027 program years will offer tiered incentives based on the number of electric measures installed in the home, with the highest incentives based offered to all-electric homes with heat pump water heaters and HVAC systems. This model fosters a collaboration with manufacturers, retailers, and other stakeholders to drive market transformation towards more energy efficient housing solutions.

Implementation and Administration Plan

Implementation of the ENERGY STAR New Home Program consists of the following tasks:

- Marketing and promotion to customers;
- Outreach to contractors;
- Application processing; and
- Program tracking and reporting.

The program will be marketed to applicable residential customers and local home builders, encouraging customers to recognize the benefits of the different paths of the program and contractors to acknowledge the opportunities participating in the program could offer. All application processing and program tracking and reporting will be administered by an implementer. Homes that meet the criteria and participate in the program will be tracked in a database administered by the program implementer.

Assignment of Responsibilities

EPE will provide marketing and program outreach efforts in conjunction with the implementer. EPE has contracted with ICF Resources LLC (“ICF”) to implement this program. ICF and EPE will perform verification processes through a sample of onsite inspections at construction completion to confirm that the installations reported did occur and that homes met the program criteria. Evaluation, measurement, and further verification processes will be carried out by the statewide evaluator who will provide reviews.

Target Market Segment and Marketing Plan

This program targets new construction residential single and multifamily homes.

The program will be marketed to applicable residential customers and local home builders. Marketing activities will promote the availability of the program, the energy savings to the customer, and the available incentives of the program. Mechanisms that may be used to promote the program may include the EPE website, media, and advertising.

Participation Requirements

To participate in this program, a homebuilder will submit home applications through the Performance or Prescriptive Path. An approved Performance Path home must achieve a minimum of ten percent above IECC 2018 code requirements and by incorporating a variety of measures including: tight construction and ducts, effective insulation systems, efficient heating and cooling systems, high-performance windows, and ENERGY STAR appliances and products. HERS Rater independent testing of energy performance is required for each Performance Path home, and each home is eligible for a bonus incentive payout to the homebuilder if it becomes an ENERGY STAR Certified Home, Version 3.1 (Rev.13). An approved Prescriptive Path home receives incentives for the installation of above-code products in new construction homes. Prescriptive Path incentive payments differ by measure type and measure quantity.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The table below details the measure life, incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 30. ENERGY STAR New Homes Program Forecasting Assumptions²⁶

Measure Type	Prescriptive Path				
	Air Conditioners 15.2-16.2 SEER2	Air Conditioners, 16.3-16.9 SEER2	Heat Pumps, 15.2-16.2 SEER2	Refrigerators	Smart Thermostats
Measure Life (years)	18	18	15	16	10
Incentive rate per unit (\$) 2025	\$45/ton	\$85/ton	\$145/ton	\$12/product	\$50/product
Incentive rate per unit (\$) 2026	\$45/ton	\$85/ton	\$145/ton	\$12/product	\$50/product
Incentive rate per unit (\$) 2027	\$45/ton	\$85/ton	\$145/ton	\$12/product	\$50/product
Annual kWh	406	552	1,422	54	686
Annual kW	0.20	0.22	0.27	0.01	0.08
Measure Quantity 2025	240	75	60	10	50
Measure Quantity 2026	252	78	63	10	52
Measure Quantity 2027	264	81	66	10	54
Units of Measurement	Product	Product	Product	Product	Product
Free-ridership	29.17%	29.17%	29.17%	29.17%	29.17%

²⁶ Forecasting assumptions are provided by EPE's implementer, including projected incentive rates per measure and program path. To calculate cost-effectiveness, Frontier used total program-level projected incentives based on these implementer-provided incentive rates rather than calculating incentives per average participant based on previous year results.

Table 31. ENERGY STAR New Homes Program Forecasting Assumptions Continued

Measure Type	Prescriptive Path			
	Radiant Barriers	Heat Pump Water Heaters	Solar Attic Fans	Induction Cooking
Measure Life (years)	25	13	15	16
Incentive rate per unit (\$) 2025	\$50/home	\$1,000/product	\$100/product	\$10/unit
Incentive rate per unit (\$) 2026	\$50/home	\$1,000/product	\$100/product	\$10/unit
Incentive rate per unit (\$) 2027	\$50/home	\$1,000/product	\$100/product	\$10/unit
Annual kWh	264	3,426	325	12
Annual kW	0.03	0.39	0.04	0.001
Measure Quantity 2025	10	60	3	1
Measure Quantity 2026	10	63	3	1
Measure Quantity 2027	10	66	3	1
Units of Measurement	Residence	Product	Product	Product
Free-ridership	29.17%	29.17%	29.17%	29.17%

Table 32. ENERGY STAR New Homes Program Forecasting Assumptions Continued

Measure Type	Performance Path (Whole House)			
	5% Above Code	15% Above Code	20% Above Code	Smart Thermostats
Measure Life (years)	23	23	23	10
Incentive rate per unit (\$) 2025	\$0.50/kWh	\$0.50/kWh \$150/home	\$0.50/kWh \$200/home	\$50/product
Incentive rate per unit (\$) 2026	\$0.50/kWh	\$0.50/kWh \$150/home	\$0.50/kWh \$200/home	\$50/product
Incentive rate per unit (\$) 2027	\$0.50/kWh	\$0.50/kWh \$150/home	\$0.50/kWh \$200/home	\$50/product
Annual kWh	343	377	446	385
Annual kW	0.24	0.24	0.24	-
Measure Quantity 2025	60	60	60	50
Measure Quantity 2026	60	60	60	53
Measure Quantity 2027	60	60	60	55
Units of Measurement	Residence	Residence	Residence	Product
Free-ridership	29.17%	29.17%	29.17%	29.17%

Table 33. ENERGY STAR New Homes Program Forecasting Assumptions Continued

Measure Type	Performance Path (All Electric)		Manufactured Homes Pilot
	All Electric Home	Smart Thermostats	
Measure Life (years)	23	10	23
Incentive rate per unit (\$) 2025	\$0.90/kWh	\$50/product	\$150-\$3,050/ home (varies)
Incentive rate per unit (\$) 2026	\$0.90/kWh	\$50/product	\$150-\$3,050/ home (varies)
Incentive rate per unit (\$) 2027	\$0.90/kWh	\$50/product	\$150-\$3,050/ home (varies)
Annual kWh	2,033	686	180,762
Annual kW	0.66	0.08	19.55
Measure Quantity 2025	5	5	1
Measure Quantity 2026	5	5	1
Measure Quantity 2027	5	5	1
Units of Measurement	Residence	Product	Program
Free-ridership	29.17%	29.17%	0.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 34. 2025 ENERGY STAR New Homes Program Projections

Year	Annual Participants ²⁷	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	817	140	628,550	\$269,762	\$267,880	\$537,642
2026	-	140	628,550	-	-	-
2027	-	140	628,550	-	-	-
2028	-	140	628,550	-	-	-
2029	-	140	628,550	-	-	-
2030	-	140	628,550	-	-	-
2031	-	140	628,550	-	-	-
2032	-	140	628,550	-	-	-
2033	-	140	628,550	-	-	-
2034	-	140	628,550	-	-	-
2035	-	137	585,183	-	-	-
2036	-	137	585,183	-	-	-
2037	-	137	585,183	-	-	-
2038	-	119	428,780	-	-	-
2039	-	119	428,780	-	-	-
2040	-	106	363,146	-	-	-
2041	-	106	362,723	-	-	-
2042	-	106	362,723	-	-	-
2043	-	57	257,149	-	-	-
2044	-	57	257,149	-	-	-
2045	-	57	257,149	-	-	-
2046	-	57	257,149	-	-	-
2047	-	57	257,149	-	-	-
2048	-	-	2,008	-	-	-
2049	-	-	2,008	-	-	-
Lifetime kWh			11,276,964			

²⁷ Projected number of performance path homes, manufactured homes, and prescriptive measure units as provided by the program implementer.

Table 35. 2026 ENERGY STAR New Homes Program Projections

Year	Annual Participants²⁸	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	846	139	621,157	\$276,694	\$267,880	\$544,574
2027	-	139	621,157	-	-	-
2028	-	139	621,157	-	-	-
2029	-	139	621,157	-	-	-
2030	-	139	621,157	-	-	-
2031	-	139	621,157	-	-	-
2032	-	139	621,157	-	-	-
2033	-	139	621,157	-	-	-
2034	-	139	621,157	-	-	-
2035	-	139	621,157	-	-	-
2036	-	135	575,867	-	-	-
2037	-	135	575,867	-	-	-
2038	-	135	575,867	-	-	-
2039	-	116	411,644	-	-	-
2040	-	116	411,644	-	-	-
2041	-	103	342,765	-	-	-
2042	-	103	342,342	-	-	-
2043	-	103	342,342	-	-	-
2044	-	51	231,804	-	-	-
2045	-	51	231,804	-	-	-
2046	-	51	231,804	-	-	-
2047	-	51	231,804	-	-	-
2048	-	51	231,804	-	-	-
2049	-	-	2,008	-	-	-
2050	-	-	2,008	-	-	-
Lifetime kWh			10,952,939			

²⁸ Projected number of performance path homes, manufactured homes, and prescriptive measure units as provided by the program implementer.

Table 36. 2027 ENERGY STAR New Homes Program Projections

Year	Annual Participants ²⁹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	874	137	613,884	\$284,226	\$267,880	\$552,106
2028	-	137	613,884	-	-	-
2029	-	137	613,884	-	-	-
2030	-	137	613,884	-	-	-
2031	-	137	613,884	-	-	-
2032	-	137	613,884	-	-	-
2033	-	137	613,884	-	-	-
2034	-	137	613,884	-	-	-
2035	-	137	613,884	-	-	-
2036	-	137	613,884	-	-	-
2037	-	133	566,964	-	-	-
2038	-	133	566,964	-	-	-
2039	-	133	566,964	-	-	-
2040	-	114	394,921	-	-	-
2041	-	114	394,921	-	-	-
2042	-	100	322,797	-	-	-
2043	-	100	322,374	-	-	-
2044	-	100	322,374	-	-	-
2045	-	46	206,873	-	-	-
2046	-	46	206,873	-	-	-
2047	-	46	206,873	-	-	-
2048	-	46	206,873	-	-	-
2049	-	46	206,873	-	-	-
2050	-	-	2,008	-	-	-
2051	-	-	2,008	-	-	-
Lifetime kWh			10,635,498			

Cost-effectiveness per year is shown in the table below.

Table 37. ENERGY STAR New Homes Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	0.65	1.00	0.63	0.98	0.61	0.95
Total Benefits (\$000s)	347	539	343	531	338	522
Total Costs (\$000s)	538	538	545	545	552	552

²⁹ Projected number of performance path homes, manufactured homes, and prescriptive measure units as provided by the program implementer.

Marketplace Program

Program Overview and Goals

The Marketplace is a standalone program which provides eligible customers instant rebates through an online marketplace for deemed energy efficiency products. This program offers customers an energy saving kit (consisting of LEDs, faucet aerators, showerheads, and advanced power strips) and potential individual energy efficient products including advanced power strips, air purifiers, faucet aerators, LED lighting, low-flow showerheads, room air conditioners, smart thermostats, water heater pipe insulation, and several weatherization products. Some of these measures are packaged and sold as energy efficiency kits.

The goal of this program design is to create a flexible implementation strategy offering customers manufacturer discounted prices on variety of energy efficiency products, coupled with energy efficiency rebates to reduce out-of-pocket costs and offers customers a convenient trusted online marketplace. This program also provides a streamlined path for customers to enroll their newly acquired smart thermostats into the Residential Load Management Program.

Implementation and Administration Plan

Assignment of Responsibilities

EPE will contract with Uplight to implement the Marketplace. This third-party implementer will work with EPE to design, market, and execute the program.

Target Market Segment and Marketing Plan

This program targets existing residential customers.

Marketing activities will promote the availability of the program, energy savings to the customer, and available rebates through the program.

Participation Requirements

Participant must receive electric service from EPE under a residential rate class to purchase energy efficiency products through the online marketplace.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The below table details the estimated useful life (“EUL” or “measure life”), incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 38. Marketplace Program Forecasting Assumptions

Measure Type	Advanced Power Strips	Air Purifiers	Bath Ventilation Fans	Caulking/ Sealant	DHW Pipe Insulation
Measure Life (years)	7	9	19	20	13
Incentive per avg participant (\$) 2025	\$14	\$74	\$33	\$3	\$4
Incentive per avg participant (\$) 2026	\$14	\$74	\$33	\$3	\$4
Incentive per avg participant (\$) 2027	\$14	\$74	\$33	\$3	\$4
Annual kWh	67	349	27	22	22
Annual kW	0.01	0.06	0.003	0.003	0.003
Measure Quantity 2025	100	100	50	50	50
Measure Quantity 2026	100	100	50	50	50
Measure Quantity 2027	100	100	50	50	50
Units of Measurement	Product	Product	Product	Product	Product
Free-ridership	31.00%	31.00%	31.00%	31.00%	31.00%

Table 39. Marketplace Program Forecasting Assumptions Continued

Measure Type	Door Sweeps	Energy Savings Kits ³⁰	LED Lighting	Low-Flow Showerheads
Measure Life (years)	20	14.9	29.7	10
Incentive per avg participant (\$) 2025	\$3	\$19	\$2	\$6
Incentive per avg participant (\$) 2026	\$3	\$19	\$2	\$6
Incentive per avg participant (\$) 2027	\$3	\$19	\$2	\$6
Annual kWh	29	361	14	226
Annual kW	0.01	0.03	0.002	-
Measure Quantity 2025	50	50	505	50
Measure Quantity 2026	50	50	505	50
Measure Quantity 2027	50	50	505	50
Units of Measurement	Product	Product	Product	Product
Free-ridership	31.00%	31.00%	33.00%	31.00%

³⁰ Kit components include LEDs (6), faucet aerator (1), low-flow showerhead (1), and advanced power strip (1).

Table 40. Marketplace Program Forecasting Assumptions Continued

Measure Type	Room Air Conditioners	Smart Thermostats	Temperature Sensitive Restrictor Valves	Weather Stripping
Measure Life (years)	10.5	10	10	20
Incentive per avg participant (\$) 2025	\$50	\$50	\$13	\$6
Incentive per avg participant (\$) 2026	\$50	\$50	\$13	\$6
Incentive per avg participant (\$) 2027	\$50	\$50	\$13	\$6
Annual kWh	177	638	195	11
Annual kW	0.23	-	0.003	0.001
Measure Quantity 2025	100	1,614	50	50
Measure Quantity 2026	100	1,614	50	50
Measure Quantity 2027	100	1,614	50	50
Units of Measurement	Product	Product	Product	Product
Free-ridership	31.00%	31.00%	31.00%	31.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 41. 2025 Marketplace Program Projections

Year	Annual Participants ³¹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	2,819	25	845,112	\$99,759	\$120,464	\$220,223
2026	-	25	845,112	-	-	-
2027	-	25	845,112	-	-	-
2028	-	25	845,112	-	-	-
2029	-	25	845,112	-	-	-
2030	-	25	845,112	-	-	-
2031	-	25	845,112	-	-	-
2032	-	24	840,154	-	-	-
2033	-	24	840,154	-	-	-
2034	-	20	814,258	-	-	-
2035	-	20	35,618	-	-	-
2036	-	3	22,492	-	-	-
2037	-	3	22,492	-	-	-
2038	-	3	21,662	-	-	-
2039	-	3	21,662	-	-	-
2040	-	1	8,288	-	-	-
2041	-	1	8,288	-	-	-
2042	-	1	8,288	-	-	-
2043	-	1	8,288	-	-	-
2044	-	1	7,291	-	-	-
2045	-	1	4,979	-	-	-
2046	-	1	4,979	-	-	-
2047	-	1	4,979	-	-	-
2048	-	1	4,979	-	-	-
2049	-	1	4,979	-	-	-
2050	-	1	4,979	-	-	-
2051	-	1	4,979	-	-	-
2052	-	1	4,979	-	-	-
2053	-	1	4,979	-	-	-
2054	-	1	4,979	-	-	-
Lifetime kWh			8,624,507			

³¹ Proposed number of measures.

Table 42. 2026 Marketplace Program Projections

Year	Annual Participants³²	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	2,819	25	845,112	\$99,759	\$120,464	\$220,223
2027	-	25	845,112	-	-	-
2028	-	25	845,112	-	-	-
2029	-	25	845,112	-	-	-
2030	-	25	845,112	-	-	-
2031	-	25	845,112	-	-	-
2032	-	25	845,112	-	-	-
2033	-	24	840,154	-	-	-
2034	-	24	840,154	-	-	-
2035	-	20	814,258	-	-	-
2036	-	20	35,618	-	-	-
2037	-	3	22,492	-	-	-
2038	-	3	22,492	-	-	-
2039	-	3	21,662	-	-	-
2040	-	3	21,662	-	-	-
2041	-	1	8,288	-	-	-
2042	-	1	8,288	-	-	-
2043	-	1	8,288	-	-	-
2044	-	1	8,288	-	-	-
2045	-	1	7,291	-	-	-
2046	-	1	4,979	-	-	-
2047	-	1	4,979	-	-	-
2048	-	1	4,979	-	-	-
2049	-	1	4,979	-	-	-
2050	-	1	4,979	-	-	-
2051	-	1	4,979	-	-	-
2052	-	1	4,979	-	-	-
2053	-	1	4,979	-	-	-
2054	-	1	4,979	-	-	-
2055	-	1	4,979	-	-	-
Lifetime kWh			8,624,507			

³² Proposed number of measures.

Table 43. 2027 Marketplace Program Projections

Year	Annual Participants³³	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	2,819	25	845,112	\$99,759	\$120,464	\$220,223
2028	-	25	845,112	-	-	-
2029	-	25	845,112	-	-	-
2030	-	25	845,112	-	-	-
2031	-	25	845,112	-	-	-
2032	-	25	845,112	-	-	-
2033	-	25	845,112	-	-	-
2034	-	24	840,154	-	-	-
2035	-	24	840,154	-	-	-
2036	-	20	814,258	-	-	-
2037	-	20	35,618	-	-	-
2038	-	3	22,492	-	-	-
2039	-	3	22,492	-	-	-
2040	-	3	21,662	-	-	-
2041	-	3	21,662	-	-	-
2042	-	1	8,288	-	-	-
2043	-	1	8,288	-	-	-
2044	-	1	8,288	-	-	-
2045	-	1	8,288	-	-	-
2046	-	1	7,291	-	-	-
2047	-	1	4,979	-	-	-
2048	-	1	4,979	-	-	-
2049	-	1	4,979	-	-	-
2050	-	1	4,979	-	-	-
2051	-	1	4,979	-	-	-
2052	-	1	4,979	-	-	-
2053	-	1	4,979	-	-	-
2054	-	1	4,979	-	-	-
2055	-	1	4,979	-	-	-
2056	-	1	4,979	-	-	-
Lifetime kWh			8,624,507			

³³ Proposed number of measures.

Cost-effectiveness per year is shown in the table below.

Table 44. Marketplace Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	0.80	1.65	0.80	1.65	0.79	1.64
Total Benefits (\$000s)	177	364	177	364	175	362
Total Costs (\$000s)	220	220	220	220	220	220

Residential Load Management Program

Program Overview and Goals

This program offers residential customers an opportunity to reduce their home's demand and energy usage by enrolling in a voluntary load management program. Eligible customers will receive a rebate for enrolling an existing qualifying internet-enabled smart thermostat for load management events or for the purchase and enrollment of a new internet-enabled smart thermostats. Additionally, EPE is investigating the potential to expand program offerings to include room air conditioners and domestic hot equipment. The program goal is to reduce peak demand while offering customers energy saving opportunities.

Implementation and Administration Plan

The Residential Load Management Program will use an online website to enroll and validate prospective residential participants. Through the online website, a participant can purchase a new unit or enroll an existing unit under guidelines, including:

- Residential customers must receive electric service within El Paso Electric Company's New Mexico service territory and have a central refrigerated air conditioning system connected to an eligible internet-enabled smart thermostat, room air conditioner, or other equipment.
- Participant can receive an incentive up to \$75; \$50 for the purchase and \$25 for enrollment of an eligible unit through the online website. If a participant does not install the device purchased through the online website and connect to Wi-Fi within 90 days of purchase, EPE may pull back the enrollment incentive of \$25. Participant can enroll an existing eligible device to participate in the program and receive a \$25 enrollment incentive.
- The season would commence annually on June 1st and continue through September 30th. The event may be continuous or segmented throughout the weekday, with any segment lasting a maximum of four (4) hours in duration, for a maximum of twelve (14) events per season.
- EPE may only call an event on non-holiday weekdays during the hours of 1:00 p.m. to 8:00 p.m. MDT.

Assignment of Responsibilities

EPE has contracted with Uplight, Inc. to implement the turn-key Residential Load Management Program. EPE will oversee program implementation and budget processes at all times. EPE will define who may schedule, manage, and change load management events utilizing the roles-based permissions of the program manager tool. The implementer will provide event and program reporting to EPE on event parameters and demand reduction.

Target Market Segment and Marketing Plan

The proposed Residential Load Management Program will initially be available on a voluntary basis to residential customers taking service under EPE's New Mexico Rate No. 01-Residential Service Rate and who have refrigerated air conditioning (for smart thermostats), room air conditioning, or other eligible equipment.

Potential participants will be contacted through EPE marketing campaigns and social media. In addition, the program implementer will play a vital role in outreach. Uplight will use a multi-faceted, integrated campaign strategy to drive awareness across the EPE service area. This will include email marketing, website referrals, and public relations campaigns, as well as secondary marketing strategies such as Facebook and Instagram ads, search engine optimization and Gmail-sponsored ads. Uplight's customer

acquisition approach will use a combination of digital advertisement, messaging through device manufacturers, and email promotions to acquire rebate participants. Uplight may also employ recruitment tactics in utility newsletters, direct mail, and paid media.

Participation Requirements

Residential customers who have central refrigerated air conditioning controlled by an eligible internet-enabled smart thermostat or an eligible window air conditioner.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The table below details the measure life, incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and net-to-gross assumptions.

Eligible measures fall into one of two categories: (A) load management or (B) new measure purchases.

The balance of participants and new enrollees per measure type via EPE's program website are projections. Actual participation rates and balance between existing and new enrollees may vary.

Table 45. Residential Load Management ("LM") Program Forecasting Assumptions

Measure Type	Smart Thermostat LM	Smart Thermostats	Room AC LM	Room AC	DHW LM
Measure Life (years)	1	10	1	10.5	1
Incentive per avg participant (\$) 2025	\$25	\$50	\$25	\$50	\$25
Incentive per avg participant (\$) 2026	\$25	\$50	\$25	\$50	\$25
Incentive per avg participant (\$) 2027	\$25	\$50	\$25	\$50	\$25
Annual kWh	-	638	-	68	-
Annual kW	0.89	-	0.87	0.09	0.40
Measure Quantity 2025	7,753	250	25	25	25
Measure Quantity 2026	8,589	250	25	25	25
Measure Quantity 2027	9,508	250	25	25	25
Units of Measurement	Enrolled units	New units purchased	Enrolled units	New units purchased	Enrolled units
Free-ridership	0.00%	0.00%	0.00%	0.00%	0.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 46. 2025 Residential Load Management Program Projections

Year	Annual Participants ³⁴	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	7,803	7,533	173,120	\$208,825	\$244,005	\$452,830
2026	-	2	173,120	-	-	-
2027	-	2	173,120	-	-	-
2028	-	2	173,120	-	-	-
2029	-	2	173,120	-	-	-
2030	-	2	173,120	-	-	-
2031	-	2	173,120	-	-	-
2032	-	2	173,120	-	-	-
2033	-	2	173,120	-	-	-
2034	-	2	173,120	-	-	-
2035	-	2	1,826	-	-	-
Lifetime kWh			1,733,029			

Table 47. 2026 Residential Load Management Program Projections

Year	Annual Participants ³⁵	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	8,639	8,341	173,120	\$229,725	\$265,559	\$495,284
2027	-	2	173,120	-	-	-
2028	-	2	173,120	-	-	-
2029	-	2	173,120	-	-	-
2030	-	2	173,120	-	-	-
2031	-	2	173,120	-	-	-
2032	-	2	173,120	-	-	-
2033	-	2	173,120	-	-	-
2034	-	2	173,120	-	-	-
2035	-	2	173,120	-	-	-
2036	-	2	1,826	-	-	-
Lifetime kWh			1,733,029			

³⁴ Projected number of customers.

³⁵ Projected number of customers.

Table 48. 2027 Residential Load Management Program Projections

Year	Annual Participants ³⁶	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	9,558	9,230	173,120	\$252,700	\$289,282	\$541,982
2028	-	2	173,120	-	-	-
2029	-	2	173,120	-	-	-
2030	-	2	173,120	-	-	-
2031	-	2	173,120	-	-	-
2032	-	2	173,120	-	-	-
2033	-	2	173,120	-	-	-
2034	-	2	173,120	-	-	-
2035	-	2	173,120	-	-	-
2036	-	2	173,120	-	-	-
2037	-	2	1,826	-	-	-
Lifetime kWh			1,733,029			

Cost-effectiveness per year is shown in the table below.

Table 49. Residential Load Management Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.93	2.02	1.98	2.06	2.03	2.10
Total Benefits (\$000s)	875	913	981	1,019	1,101	1,139
Total Costs (\$000s)	453	453	495	495	542	542

³⁶ Projected number of customers.

EnergySaver Program

Program Overview and Goals

EPE's EnergySaver Program seeks to generate energy and demand savings for low-income residential customers through the installation of cost-effective measures in eligible residences. Depending on home heating and cooling types, a variety of energy efficiency measures are offered at no cost, including air infiltration reduction, duct sealing, evaporative cooling, insulation, LED lighting, smart thermostats, and other measures. Homes with electric water heaters may also be eligible for low-flow showerheads and bathroom and kitchen faucet aerators. EPE plans to potentially offer solar attic fans and room air conditioners as new measures.

The purpose of the EnergySaver Program is to help EPE low-income residential customers make their homes more energy efficient, increase comfort levels, and reduce utility bills. The primary goal of this program is to achieve cost-effective reduction in energy consumption and peak demand. EPE also seeks to accomplish the following objectives through the EnergySaver Program:

- Achieve customer energy and cost savings;
- Educate customers on the benefits of continued or expanded energy efficiency and conservation efforts; and
- Supplement the resources of existing state, federal, and nonprofit programs to allow more energy efficiency measures to be completed in eligible homes.

Implementation and Administration Plan

The implementation of the EnergySaver Program consists of the following tasks:

- Marketing, promotion, and outreach to eligible customers;
- Customer service and scheduling;
- Direct installation of energy efficiency services to customers; and
- Program tracking and reporting.

The program will be marketed to all low-income residential customers. EPE will contract with Frontier to implement the EnergySaver Program through Participating Service Provider(s). Frontier has demonstrated experience and effectiveness in the design, administration and provision of low-income measures and programs, along with experience in identifying and conducting outreach to low-income households. Frontier will work with Participating Service Provider(s) to provide outreach to eligible low-income customers.

Assignment of Responsibilities

For the EnergySaver Program, EPE and Frontier will provide marketing, promotion and program outreach efforts. Participating Service Provider(s) will be responsible for scheduling and performing installations of energy efficiency measures and educating customers on the benefits of energy efficiency and conservation efforts. Homes participating in this program will be tracked in an online database administered by Frontier. Frontier will provide EPE with customer information, as well as data on the measures installed for each customer.

Savings are calculated using a deemed savings approach. EPE performs verification processes through onsite inspections post installation to confirm that the installations reported in applications did occur.

Evaluation, measurement, and further verification processes will be carried out by the statewide evaluator who will provide reviews.

Target Market Segment and Marketing Plan

This program targets low-income residential customers that are at or below 200% of the Federal Poverty Guidelines. Eligible customers may be homeowners or renters. Low-income single-family homes, multifamily homes, townhomes, duplexes, apartments, or manufactured homes meeting the poverty guidelines are eligible for this program.

Marketing activities will promote the availability of the program and the energy savings to the customer. Mechanisms that may be used to promote the program may include direct mail (bill stuffers), the EPE website, media advertising, and community outreach.

Participation Requirements

Only customers at or below 200% of the Federal Poverty Guidelines are eligible to participate in this program. Each year the Federal Poverty Guidelines are published in the Federal Register.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The tables below detail the measure life, incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 50. EnergySaver Program Forecasting Assumptions

Measure Type	Advanced Power Strips	Air Infiltration Reduction	DHW Pipe Insulation	DHW Tank Insulation	Duct Sealing
Measure Life (years)	7	11	13	7	18
Incentive per avg participant (\$) 2025	\$34	\$66	\$27	\$227	\$300
Incentive per avg participant (\$) 2026	\$34	\$66	\$27	\$227	\$300
Incentive per avg participant (\$) 2027	\$34	\$66	\$27	\$227	\$300
Annual kWh	61	121	49	412	545
Annual kW	0.01	0.06	0.01	0.05	0.25
Measure Quantity 2025	222	79	44	59	86
Measure Quantity 2026	222	79	44	59	86
Measure Quantity 2027	222	79	44	59	86
Units of Measurement	Product	Residence	Residence	Product	Residence
Free-ridership	0.00%	0.00%	0.00%	0.00%	0.00%

Table 51. EnergySaver Program Forecasting Assumptions Continued

Measure Type	Evaporative Cooling	Faucet Aerators	Insulation (Attic)	LED Lighting	LED Nightlights
Measure Life (years)	15	10	30	30.6	8
Incentive per avg participant (\$) 2025	\$2,133	\$8	\$152	\$8	\$16
Incentive per avg participant (\$) 2026	\$2,133	\$8	\$152	\$8	\$16
Incentive per avg participant (\$) 2027	\$2,133	\$8	\$152	\$8	\$16
Annual kWh	3,878	14	276	14	30
Annual kW	2.46	-	0.23	0.002	-
Measure Quantity 2025	190	133	22	4,418	100
Measure Quantity 2026	190	133	22	4,418	100
Measure Quantity 2027	190	133	22	4,418	100
Units of Measurement	Product	Product	Residence	Product	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%	0.00%

Table 52. EnergySaver Program Forecasting Assumptions Continued

Measure Type	Low-Flow Showerheads	Room Air Conditioners	Smart Thermostats	Solar Attic Fans
Measure Life (years)	10	10.5	10	15
Incentive per avg participant (\$) 2025	\$116	\$37	\$297	\$179
Incentive per avg participant (\$) 2026	\$116	\$37	\$297	\$179
Incentive per avg participant (\$) 2027	\$116	\$37	\$297	\$179
Annual kWh	211	68	539	325
Annual kW	-	0.09	-	0.24
Measure Quantity 2025	106	50	15	5
Measure Quantity 2026	106	50	15	5
Measure Quantity 2027	106	50	15	5
Units of Measurement	Product	Product	Product	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 53. 2025 EnergySaver Program Projections

Year	Annual Participants ³⁷	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	326	563	1,033,656	\$529,315	\$167,137	\$696,452
2026	-	563	1,033,656	-	-	-
2027	-	563	1,033,656	-	-	-
2028	-	563	1,033,656	-	-	-
2029	-	563	1,033,656	-	-	-
2030	-	563	1,033,656	-	-	-
2031	-	563	1,033,656	-	-	-
2032	-	559	992,905	-	-	-
2033	-	559	989,726	-	-	-
2034	-	559	989,726	-	-	-
2035	-	559	955,092	-	-	-
2036	-	549	941,189	-	-	-
2037	-	549	941,189	-	-	-
2038	-	549	938,859	-	-	-
2039	-	549	938,859	-	-	-
2040	-	42	145,685	-	-	-
2041	-	42	145,685	-	-	-
2042	-	42	145,685	-	-	-
2043	-	19	95,332	-	-	-
2044	-	19	95,332	-	-	-
2045	-	19	95,332	-	-	-
2046	-	19	95,332	-	-	-
2047	-	19	95,332	-	-	-
2048	-	19	95,332	-	-	-
2049	-	19	95,332	-	-	-
2050	-	19	95,332	-	-	-
2051	-	19	95,332	-	-	-
2052	-	19	95,332	-	-	-
2053	-	19	95,332	-	-	-
2054	-	19	95,332	-	-	-
2055	-	13	88,822	-	-	-
Lifetime kWh			16,592,995			

³⁷ Projected number of residences.

Table 54. 2026 EnergySaver Program Projections

Year	Annual Participants³⁸	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	326	563	1,033,656	\$529,315	\$167,137	\$696,452
2027	-	563	1,033,656	-	-	-
2028	-	563	1,033,656	-	-	-
2029	-	563	1,033,656	-	-	-
2030	-	563	1,033,656	-	-	-
2031	-	563	1,033,656	-	-	-
2032	-	563	1,033,656	-	-	-
2033	-	559	992,905	-	-	-
2034	-	559	989,726	-	-	-
2035	-	559	989,726	-	-	-
2036	-	559	955,092	-	-	-
2037	-	549	941,189	-	-	-
2038	-	549	941,189	-	-	-
2039	-	549	938,859	-	-	-
2040	-	549	938,859	-	-	-
2041	-	42	145,685	-	-	-
2042	-	42	145,685	-	-	-
2043	-	42	145,685	-	-	-
2044	-	19	95,332	-	-	-
2045	-	19	95,332	-	-	-
2046	-	19	95,332	-	-	-
2047	-	19	95,332	-	-	-
2048	-	19	95,332	-	-	-
2049	-	19	95,332	-	-	-
2050	-	19	95,332	-	-	-
2051	-	19	95,332	-	-	-
2052	-	19	95,332	-	-	-
2053	-	19	95,332	-	-	-
2054	-	19	95,332	-	-	-
2055	-	19	95,332	-	-	-
2056	-	13	88,822	-	-	-
Lifetime kWh			16,592,995			

³⁸ Projected number of residences.

Table 55. 2027 EnergySaver Program Projections

Year	Annual Participants³⁹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	326	563	1,033,656	\$529,315	\$167,137	\$696,452
2028	-	563	1,033,656	-	-	-
2029	-	563	1,033,656	-	-	-
2030	-	563	1,033,656	-	-	-
2031	-	563	1,033,656	-	-	-
2032	-	563	1,033,656	-	-	-
2033	-	563	1,033,656	-	-	-
2034	-	559	992,905	-	-	-
2035	-	559	989,726	-	-	-
2036	-	559	989,726	-	-	-
2037	-	559	955,092	-	-	-
2038	-	549	941,189	-	-	-
2039	-	549	941,189	-	-	-
2040	-	549	938,859	-	-	-
2041	-	549	938,859	-	-	-
2042	-	42	145,685	-	-	-
2043	-	42	145,685	-	-	-
2044	-	42	145,685	-	-	-
2045	-	19	95,332	-	-	-
2046	-	19	95,332	-	-	-
2047	-	19	95,332	-	-	-
2048	-	19	95,332	-	-	-
2049	-	19	95,332	-	-	-
2050	-	19	95,332	-	-	-
2051	-	19	95,332	-	-	-
2052	-	19	95,332	-	-	-
2053	-	19	95,332	-	-	-
2054	-	19	95,332	-	-	-
2055	-	19	95,332	-	-	-
2056	-	19	95,332	-	-	-
2057	-	13	88,822	-	-	-
Lifetime kWh			16,592,995			

³⁹ Projected number of residences.

Cost-effectiveness per year is shown in the table below.

Because this program is targeted to low-income customers, EPE assumed that twenty percent (20%) of the calculated energy savings is the reasonable value of reductions in working capital, reduced collection costs, lower bad-debt expense, improved customer service, effectiveness, and other appropriate factors qualifying as utility system economic benefits. As a result, the total program benefits were increased by 20%. The UCT results reflect this increase.

Table 56. EnergySaver Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.39	1.75	1.40	1.76	1.42	1.77
Total Benefits (\$000s)	968	1,216	979	1,226	986	1,234
Total Costs (\$000s)	696	696	696	696	696	696

EnergySmart Program

Program Overview and Goals

The EnergySmart Program serves EPE’s low-income customers in both single family and multi-family applications. Holistically designed to address vital energy efficiency needs, the program will be implemented by the NM Mortgage Finance Authority (“MFA”) which is a self-supporting quasi-governmental entity that assists low-income customers in accessing additional funds and financing to help pay for deeper retrofits to get high levels of energy savings. Along with EPE program funding, the EnergySmart Program will leverage the United States Department of Energy (“DOE”), Low Income Home Energy Assistance Program (“LIHEAP”), federal green loan incentives, tax credits and deductions, and energy financing such as Property Assessed Clean Energy (“PACE”), Energy Performance Contracts (“EPC”), and Power Purchase Agreements (“PPA”).

Implementation and Administration Plan

Assignment of Responsibilities

MFA will subcontract with Southwestern Regional Housing and Community Development Corporation (“SRHCDC”) to implement both the single-family and multi-family aspects of this program. SRHCDC has been in operation since 2001 and has partnered with MFA utilizing the HOME Investment Partnerships Program (“HOME”) funds to serve low-income families since that time. For single-family homes, the program provides home energy audits utilizing the National Energy Assessment Tool (“NEAT”) modeling to determine costs and savings estimates. For multi-family projects, SRHCDC provides turn-key energy efficiency retrofit services to customers, including outreach, qualification and enrollments, energy audits, audit reporting using Targets Retrofit Energy Assessment Tool (“TREAT”) modeling to determine costs and savings estimates, supervision of the ECM installation services, rebate processing, data tracking and reporting, and financing assistance.

Target Market Segment and Marketing Plan

This program targets low-income residential customers that are at or below 200% of the Federal Poverty Guidelines. Eligible customers may be homeowners or renters. Low-income single-family homes, multifamily homes, townhomes, duplexes, apartments, or manufactured homes meeting the poverty guidelines are eligible for this program.

Participation Requirements

Only customers at or below 200% of the Federal Poverty Guidelines are eligible to participate in this program. Each year the Federal Poverty Guidelines are published in the Federal Register.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The below table details the estimated useful life (“EUL” or “measure life”), incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Select measure EULs may differ from those provided in Appendix A because they are based on program implementation values sourced from the NEAT and TREAT weatherization audit tools.

Table 57. EnergySmart Program Forecasting Assumptions

Measure Type	Air Infiltration Reduction	DHW Pipe Insulation	DHW Tank Insulation	Duct Sealing
Measure Life (years)	10	13	7	18
Incentive per avg participant (\$) 2025	\$95	\$14	\$179	\$268
Incentive per avg participant (\$) 2026	\$95	\$14	\$179	\$268
Incentive per avg participant (\$) 2027	\$95	\$14	\$179	\$268
Annual kWh	261	34	413	596
Annual kW	-	0.0006	0.0004	-
Measure Quantity 2025	32	124	126	4
Measure Quantity 2026	32	124	126	4
Measure Quantity 2027	32	124	126	4
Units of Measurement	Residence	Residence	Product	Residence
Free-ridership	0.00%	0.00%	0.00%	0.00%

Table 58. EnergySmart Program Forecasting Assumptions Continued

Measure Type	Faucet Aerators	Insulation (Attic)	Insulation (Floor)	LED Lighting
Measure Life (years)	5	30	30	20
Incentive per avg participant (\$) 2025	\$14	\$72	\$198	\$15
Incentive per avg participant (\$) 2026	\$14	\$72	\$198	\$15
Incentive per avg participant (\$) 2027	\$14	\$72	\$198	\$15
Annual kWh	33	96	264	35
Annual kW	-	-	-	0.075
Measure Quantity 2025	245	9	1	2,172
Measure Quantity 2026	245	9	1	2,172
Measure Quantity 2027	245	9	1	2,172
Units of Measurement	Product	Residence	Residence	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%

Table 59. EnergySmart Program Forecasting Assumptions Continued

Measure Type	Low-Flow Showerheads	Replacement Heater ECMs	Smart Thermostats	Windows
Measure Life (years)	10	15	10	25
Incentive per avg participant (\$) 2025	\$89	\$3,377	\$118	\$98
Incentive per avg participant (\$) 2026	\$89	\$3,377	\$118	\$98
Incentive per avg participant (\$) 2027	\$89	\$3,377	\$118	\$98
Annual kWh	219	7,652	269	156
Annual kW	-	1.42	0.05	-
Measure Quantity 2025	122	89	110	4
Measure Quantity 2026	122	89	110	4
Measure Quantity 2027	122	89	110	4
Units of Measurement	Product	Product	Product	Product
Free-ridership	0.00%	0.00%	0.00%	0.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 60. 2025 EnergySmart Program Projections

Year	Annual Participants ⁴⁰	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	45	319	956,552	\$389,421	\$62,687	\$452,108
2026	-	319	956,552	-	-	-
2027	-	319	956,552	-	-	-
2028	-	319	956,552	-	-	-
2029	-	319	956,552	-	-	-
2030	-	319	947,885	-	-	-
2031	-	319	947,885	-	-	-
2032	-	319	892,087	-	-	-
2033	-	319	892,087	-	-	-
2034	-	319	892,087	-	-	-
2035	-	312	822,683	-	-	-
2036	-	312	822,683	-	-	-
2037	-	312	822,683	-	-	-
2038	-	312	818,121	-	-	-
2039	-	312	818,121	-	-	-
2040	-	176	86,611	-	-	-
2041	-	176	86,611	-	-	-
2042	-	176	86,611	-	-	-
2043	-	176	84,269	-	-	-
2044	-	176	84,269	-	-	-
2045	-	-	1,843	-	-	-
2046	-	-	1,843	-	-	-
2047	-	-	1,843	-	-	-
2048	-	-	1,843	-	-	-
2049	-	-	1,843	-	-	-
2050	-	-	1,229	-	-	-
2051	-	-	1,229	-	-	-
2052	-	-	1,229	-	-	-
2053	-	-	1,229	-	-	-
2054	-	-	1,229	-	-	-
Lifetime kWh			13,902,807			

⁴⁰ Projected number of projects (residences or multifamily complexes).

Table 61. 2026 EnergySmart Program Projections

Year	Annual Participants⁴¹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	45	319	956,552	\$389,421	\$62,687	\$452,108
2027	-	319	956,552	-	-	-
2028	-	319	956,552	-	-	-
2029	-	319	956,552	-	-	-
2030	-	319	956,552	-	-	-
2031	-	319	947,885	-	-	-
2032	-	319	947,885	-	-	-
2033	-	319	892,087	-	-	-
2034	-	319	892,087	-	-	-
2035	-	319	892,087	-	-	-
2036	-	312	822,683	-	-	-
2037	-	312	822,683	-	-	-
2038	-	312	822,683	-	-	-
2039	-	312	818,121	-	-	-
2040	-	312	818,121	-	-	-
2041	-	176	86,611	-	-	-
2042	-	176	86,611	-	-	-
2043	-	176	86,611	-	-	-
2044	-	176	84,269	-	-	-
2045	-	176	84,269	-	-	-
2046	-	-	1,843	-	-	-
2047	-	-	1,843	-	-	-
2048	-	-	1,843	-	-	-
2049	-	-	1,843	-	-	-
2050	-	-	1,843	-	-	-
2051	-	-	1,229	-	-	-
2052	-	-	1,229	-	-	-
2053	-	-	1,229	-	-	-
2054	-	-	1,229	-	-	-
2055	-	-	1,229	-	-	-
Lifetime kWh			13,902,807			

⁴¹ Projected number of projects (residences or multifamily complexes).

Table 62. 2027 EnergySmart Program Projections

Year	Annual Participants⁴²	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	45	319	956,552	\$389,421	\$62,687	\$452,108
2028	-	319	956,552	-	-	-
2029	-	319	956,552	-	-	-
2030	-	319	956,552	-	-	-
2031	-	319	956,552	-	-	-
2032	-	319	947,885	-	-	-
2033	-	319	947,885	-	-	-
2034	-	319	892,087	-	-	-
2035	-	319	892,087	-	-	-
2036	-	319	892,087	-	-	-
2037	-	312	822,683	-	-	-
2038	-	312	822,683	-	-	-
2039	-	312	822,683	-	-	-
2040	-	312	818,121	-	-	-
2041	-	312	818,121	-	-	-
2042	-	176	86,611	-	-	-
2043	-	176	86,611	-	-	-
2044	-	176	86,611	-	-	-
2045	-	176	84,269	-	-	-
2046	-	176	84,269	-	-	-
2047	-	-	1,843	-	-	-
2048	-	-	1,843	-	-	-
2049	-	-	1,843	-	-	-
2050	-	-	1,843	-	-	-
2051	-	-	1,843	-	-	-
2052	-	-	1,229	-	-	-
2053	-	-	1,229	-	-	-
2054	-	-	1,229	-	-	-
2055	-	-	1,229	-	-	-
2056	-	-	1,229	-	-	-
Lifetime kWh			13,902,807			

⁴² Projected number of projects (residences or multifamily complexes).

Cost-effectiveness per year is shown in the table below.

Because this program is targeted to low-income customers, EPE assumed that twenty percent (20%) of the calculated energy savings is the reasonable value of reductions in working capital, reduced collection costs, lower bad-debt expense, improved customer service, effectiveness, and other appropriate factors qualifying as utility system economic benefits. As a result, the total program benefits were increased by 20%. The UCT results reflect this increase.

Table 63. EnergySmart Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	0.97	1.44	0.97	1.45	0.97	1.45
Total Benefits (\$000s)	437	652	439	655	440	656
Total Costs (\$000s)	452	452	452	452	452	452

EPE 2025-2027 Commercial Program Portfolio

EPE's Commercial Energy Efficiency Program portfolio includes the following programs:

- Commercial Comprehensive;
- SCORE Plus; and
- Commercial Load Management.

Commercial Comprehensive Program

Program Overview and Goals

The Commercial Comprehensive Program will focus on the small business market segment of EPE's service territory to reduce peak demand and energy use in their facilities. Specifically, the program will target customers with an average demand of less than or equal to 100 kW. EPE's commercial direct rebates include Heating, Ventilation, and Air Conditioning ("HVAC") retrofits, variable frequency drives, and energy management. The program also includes energy efficiency measures, such as cool roofs, exterior door air infiltration reduction, LED lighting, refrigeration equipment, water conservation measures, and window treatments. Rebates are also available for ENERGY STAR products, including food service equipment and pool pumps. Both new construction and retrofit projects are accepted through this program. Incentives and rebates are paid directly to the customer or, upon customer approval, may be paid to the contractors that perform the installation.

Implementation and Administration Plan

EPE has contracted with Frontier to provide a turn-key program design for the 2025-2027 program years. As a result, Frontier will provide:

- Marketing, promotion, and outreach to eligible customers;
- Customer service and inspection scheduling;
- Invoicing and rebate payment; and
- Program tracking and reporting.

Additionally, Frontier will offer outreach to local contractors to make them aware of this program, as well as encourage them to use the program incentives as a marketing tool to get customer participation. All application processing, program tracking and reporting will also be administered by Frontier. Applications will be received through the mail or electronically via e-mail or online tracking databases and reviewed to confirm the applications meet the requirements of the program. The accepted applications are tracked in a Frontier database and payments are processed.

Assignment of Responsibilities

Frontier will be responsible for marketing the program to targeted customers, providing assistance to the participants in all stages of their projects, and completing incentive administration, program tracking, pre- and post-inspections, reporting, and other verification duties. EPE will refer potential projects to Frontier, including leads identifying prospective participants such as contractors and eligible local businesses, and may provide verification services. EPE will maintain oversight of the program and budget processes at all times.

Frontier will process all applications for incentives and rebates and provide all tracking through an online tracking system. Frontier will also calculate savings and administer rebate payments.

For each project, participating contractors and customers, with Frontier's assistance, will provide information on the pre- and post-installation equipment, application materials, and other building-related information as needed.

Target Market Segment and Marketing Plan

Frontier will create and execute an outreach strategy to recruit program participants and will market this program by:

- Engaging market actors (contractors) through outreach and training;
- Directing marketing to specific customers and customer groups, including in-person visits, advertisements and articles in local publications and local business media, and distribution of program materials through trade and business associations;
- Providing program materials on the EPE website; and
- Providing workshops and training events for contractors and customers.

Marketing mechanisms may also include kick-off meetings, marketing events, e-mail distributions, bill inserts, media and other advertising, in coordination with EPE.

Participation Requirements

All commercial customers that take service from EPE in its New Mexico service territory with an average demand of less than or equal to 100 kW are eligible for this program. For approved projects, EPE also extends program rebates to commercial customers for with an average demand greater than 100 kW. Program participants will be required to follow program participation processes for this program to ensure an understanding of their responsibilities while participating in the program. Measure-level eligibility requirements may also apply.

Participants will be informed of the program requirements as a condition of project acceptance into the program. With guidance provided by Frontier as necessary, participants will execute all necessary documents, including the execution of all pre-installation documentation describing the project to be undertaken and sufficient information to enable estimation of savings associated with the project. Frontier will inform customers that any third-party contractor used to install the project is under contract to the participant and not to EPE. The acknowledgement of required pre- and post- installation inspections by program staff must also be obtained prior to program acceptance.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The tables below detail the measure life, incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 64. Commercial Comprehensive Program Forecasting Assumptions

Measure Type	Cool Roofs	Dehumidifiers	Evaporative Cooling	Evaporator Fan Controls	Exterior Door Air Infiltration
Measure Life (years)	15	10	15	16	11
Incentive per avg participant (\$) 2025	\$645	\$1,589	\$500	\$242	\$6,712

Incentive per avg participant (\$) 2026	\$645	\$1,589	\$500	\$242	\$6,712
Incentive per avg participant (\$) 2027	\$645	\$1,589	\$500	\$242	\$6,712
Annual kWh	3,586	17,118	2,677	3,166	135,509
Annual kW	0.91	2.20	2.10	0.36	6.47
Measure Quantity 2025	1	10	11	1	1
Measure Quantity 2026	1	10	11	1	1
Measure Quantity 2027	1	10	11	1	1
Units of Measurement	Project	Product	Product	Project	Project
Free-ridership	18.44%	18.44%	18.44%	18.44%	18.44%

Table 65. Commercial Comprehensive Program Forecasting Assumptions Continued

Measure Type	HVAC DX AC/HPs	HVAC VFDs	Lighting & Controls	Pool Pumps	Refrigerated Door Reach-ins
Measure Life (years)	15	15	14.2	10	12
Incentive per avg participant (\$) 2025	\$1,695	\$1,683	\$3,058	\$450	\$230
Incentive per avg participant (\$) 2026	\$1,695	\$1,683	\$3,058	\$450	\$230
Incentive per avg participant (\$) 2027	\$1,695	\$1,683	\$3,058	\$450	\$230
Annual kWh	5,747	16,050	28,703	4,488	3,981
Annual kW	1.98	1.82	4.71	1.02	0.43
Measure Quantity 2025	10	1	80	1	1
Measure Quantity 2026	10	1	80	1	1
Measure Quantity 2027	10	1	80	1	1
Units of Measurement	Product	Project	Project	Product	Project
Free-ridership	18.44%	18.44%	18.44%	18.44%	18.44%

Table 66. Commercial Comprehensive Program Forecasting Assumptions Continued

Measure Type	Refrigerator Door Gaskets	Roof Insulation	Smart Thermostats	Window Treatments
Measure Life (years)	4	20	11	10
Incentive per avg participant (\$) 2025	\$328	\$113	\$100	\$2,000
Incentive per avg participant (\$) 2026	\$328	\$113	\$100	\$2,000
Incentive per avg participant (\$) 2027	\$328	\$113	\$100	\$2,000
Annual kWh	1,820	626	593	2,473
Annual kW	0.21	0.38	0.51	1.58
Measure Quantity 2025	1	1	12	1
Measure Quantity 2026	1	1	12	1
Measure Quantity 2027	1	1	12	1
Units of Measurement	Project	Project	Product	Project
Free-ridership	18.44%	18.44%	18.44%	18.44%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 67. 2025 Commercial Comprehensive Program Annual Impact Projections

Year	Annual Participants ⁴³	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	132	410	2,398,000	\$297,390	\$162,708	\$460,099
2026	-	410	2,398,000	-	-	-
2027	-	410	2,398,000	-	-	-
2028	-	410	2,398,000	-	-	-
2029	-	409	2,396,405	-	-	-
2030	-	409	2,396,405	-	-	-
2031	-	409	2,396,405	-	-	-
2032	-	409	2,396,405	-	-	-
2033	-	409	2,396,405	-	-	-
2034	-	409	2,396,405	-	-	-
2035	-	388	2,240,343	-	-	-
2036	-	378	2,116,436	-	-	-
2037	-	377	2,112,949	-	-	-
2038	-	377	2,112,949	-	-	-
2039	-	45	101,355	-	-	-
2040	-	1	3,321	-	-	-
2041	-	-	548	-	-	-
2042	-	-	548	-	-	-
2043	-	-	548	-	-	-
2044	-	-	548	-	-	-
Lifetime kWh			32,659,976			

⁴³ Projected number of sites.

Table 68. 2026 Commercial Comprehensive Program Annual Impact Projections

Year	Annual Participants⁴⁴	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	132	410	2,398,000	\$297,390	\$162,708	\$460,099
2027	-	410	2,398,000	-	-	-
2028	-	410	2,398,000	-	-	-
2029	-	410	2,398,000	-	-	-
2030	-	409	2,396,405	-	-	-
2031	-	409	2,396,405	-	-	-
2032	-	409	2,396,405	-	-	-
2033	-	409	2,396,405	-	-	-
2034	-	409	2,396,405	-	-	-
2035	-	409	2,396,405	-	-	-
2036	-	388	2,240,343	-	-	-
2037	-	378	2,116,436	-	-	-
2038	-	377	2,112,949	-	-	-
2039	-	377	2,112,949	-	-	-
2040	-	45	101,355	-	-	-
2041	-	1	3,321	-	-	-
2042	-	-	548	-	-	-
2043	-	-	548	-	-	-
2044	-	-	548	-	-	-
2045	-	-	548	-	-	-
Lifetime kWh			32,659,976			

⁴⁴ Projected number of sites.

Table 69. 2027 Commercial Comprehensive Program Annual Impact Projections

Year	Annual Participants ⁴⁵	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	132	410	2,398,000	\$297,390	\$162,708	\$460,099
2028	-	410	2,398,000	-	-	-
2029	-	410	2,398,000	-	-	-
2030	-	410	2,398,000	-	-	-
2031	-	409	2,396,405	-	-	-
2032	-	409	2,396,405	-	-	-
2033	-	409	2,396,405	-	-	-
2034	-	409	2,396,405	-	-	-
2035	-	409	2,396,405	-	-	-
2036	-	409	2,396,405	-	-	-
2037	-	388	2,240,343	-	-	-
2038	-	378	2,116,436	-	-	-
2039	-	377	2,112,949	-	-	-
2040	-	377	2,112,949	-	-	-
2041	-	45	101,355	-	-	-
2042	-	1	3,321	-	-	-
2043	-	-	548	-	-	-
2044	-	-	548	-	-	-
2045	-	-	548	-	-	-
2046	-	-	548	-	-	-
Lifetime kWh			32,659,976			

Cost-effectiveness per year is shown in the table below.

Table 70. Commercial Comprehensive Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	2.14	3.53	2.15	3.54	2.15	3.55
Total Benefits (\$000s)	982	1,623	989	1,630	991	1,632
Total Costs (\$000s)	460	460	460	460	460	460

⁴⁵ Projected number of sites.

SCORE Plus Program

Program Overview and Goals

EPE will implement the SCORE Plus Program as part of its EE/LM Plan to further increase the availability of energy efficiency programs across customer classes and customer types. One of the main goals of the program is to increase participation by targeting commercial customers with an average demand of greater than 100 kW, with a special emphasis on the customers that lack the knowledge and/or personnel to properly evaluate and implement energy efficiency measures. The SCORE Plus Program will also target customers in the education and governmental market segments. EPE's focus is to encourage eligible customers to reduce their peak demand and energy use in their facilities.

The program provides incentives for a wide range of energy efficiency measures including lighting, HVAC, equipment controls, strategic energy management ("SEM"), and custom projects. This program also provides customers with technical support, facility energy benchmarking, and Energy Planning Workshops to selected customers. New construction and retrofit projects are accepted in this program. Incentives are paid directly to the customer or, upon customer approval, can be paid to the contractors that perform the installation.

EPE will continue offering a Building Operating Certification training to participants. The goal is to help commercial customers learn how to further reduce their energy usage and take a systematic approach to improving their energy performance. This certification will provide technical training on subjects such as building science, HVAC systems, energy management systems, and related topics.

Implementation and Administration Plan

The SCORE Plus Program will achieve its goals by offering direct support, tools, and the training necessary for customers and their contractors to:

- Identify, evaluate, and undertake efficiency improvements;
- Identify best practices to maximize long-term savings;
- Properly evaluate energy efficiency proposals; and
- Publicize their accomplishments in energy efficiency.

This program will offer incentives to participating customers based on the savings achieved through the project. Incentives for this program will be less than those offered through the Commercial Comprehensive Program; however, the implementer will provide supporting services that will lighten the administrative load for the participating school or business, making customers more receptive to possible energy efficiency projects.

Those services provided to the customer, depending upon customer need, will likely include assistance with the following:

- Energy usage benchmarking;
- Identifying and evaluating energy-efficiency opportunities;
- Developing or integrating with existing long-term energy plans;
- Completing and submitting project documentation necessary to receive incentives regardless if the project/measure is generated by a contractor, EPE or the implementer; and

- Making the community aware of the accomplishments and benefits of participating customers.

Assignment of Responsibilities

EPE has contracted with CLEAResult for the implementation of this program. To deliver the SCORE Plus Program, the implementer will be responsible for marketing the program to the targeted customers, providing assistance to the participants in all stages of their projects, and completing a large part of the incentive administration, program tracking and reporting, and verification duties. EPE will assist in the identification and recruitment of prospective participants and may provide verification services. EPE will maintain oversight of the program implementation and budget processes at all times.

Target Market Sector and Marketing Plan

This program is designed to attract participants from the educational, government, and private commercial sectors. The commercial and industrial customers targeted by this program will have an average demand greater than 100 kW. All school and governmental entities are also eligible to participate.

Commercial Sector

The implementer will create and execute an outreach strategy to recruit program participants. Outreach will take several forms, including coordination with EPE key accounts and public affairs personnel, outreach to energy efficiency service providers, and statewide organizations. CLEAResult will also directly contact eligible customers to inform them of the program's benefits and to identify possible projects at their facilities.

Education and Local Government Sectors

EPE and the implementer will help to identify target school districts and governmental entities in EPE's service territory and conduct recruitment meetings. It is anticipated that much of the outreach activity will be educational and use case studies from other school districts' and governmental entities' successful energy efficiency projects as illustrations of the processes and concepts involved. Further, it will be conveyed that the program's role is to provide customers with guidance and support consistently throughout the entire process of planning, implementing, and verifying energy efficiency improvements.

Participation Requirements

All schools, governmental entities, and commercial customers with an average annual demand of greater than 100 kW that take service from EPE in its New Mexico service territory are eligible for this program. Program participants will be required to follow program participation processes for the SCORE Plus Program to ensure an understanding of their responsibilities while participating in the program.

Participants will be informed of program requirements prior to the acceptance of their projects into the program. Participant requirements include the execution of all pre-installation documentation describing the project to be undertaken, the estimated savings and incentives associated with the project, and acknowledgment that any third-party contractor used to install the project is under contract to the participant and not to the program implementer or to EPE.

The acknowledgement of required pre- and post- installation inspections by the program implementer and/or EPE must also be obtained prior to project acceptance.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The tables below detail the measure life, incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 71. SCORE Plus Program Forecasting Assumptions

Measure Type	Cool Roofs	Dehumidifiers	Evaporative Cooling	Exterior Door Air Infiltration
Measure Life (years)	15	12	15	11
Incentive per avg participant (\$) 2025	\$464	\$1,743	\$500	\$21,863
Incentive per avg participant (\$) 2026	\$464	\$1,743	\$500	\$21,863
Incentive per avg participant (\$) 2027	\$464	\$1,743	\$500	\$21,863
Annual kWh	3,586	16,218	2,677	234,193
Annual kW	0.91	2.08	2.10	11.18
Measure Quantity 2025	3	50	2	2
Measure Quantity 2026	3	50	2	2
Measure Quantity 2027	3	50	2	2
Units of Measurement	Project	Product	Product	Project
Free-ridership	39.07%	39.07%	39.07%	39.07%

Table 72. SCORE Plus Program Forecasting Assumptions Continued

Measure Type	HVAC Chillers	HVAC DX ACs	HVAC DX HPs	HVAC Tune-ups	HVAC VFDs
Measure Life (years)	25	15	15	3	15
Incentive per avg participant (\$) 2025	\$59,400	\$185	\$231	\$201	\$3,595
Incentive per avg participant (\$) 2026	\$59,400	\$185	\$231	\$201	\$3,595
Incentive per avg participant (\$) 2027	\$59,400	\$185	\$231	\$201	\$3,595
Annual kWh	295,305	773	838	1,457	34,290
Annual kW	18.81	0.22	0.41	1.21	3.89
Measure Quantity 2025	2	30	50	298	5
Measure Quantity 2026	2	30	50	298	5
Measure Quantity 2027	2	30	50	298	5
Units of Measurement	Product	Product	Product	Product	Project
Free-ridership	39.07%	39.07%	39.07%	39.07%	39.07%

Table 73. SCORE Plus Program Forecasting Assumptions Continued

Measure Type	Lighting (Indoor Ag)	Lighting (Standard)	SEM	Window Treatments
Measure Life (years)	9.5	15.9	1	10
Incentive per avg participant (\$) 2025	\$80,581	\$10,340	\$12,000	\$1,086
Incentive per avg participant (\$) 2026	\$80,581	\$10,340	\$12,000	\$1,086
Incentive per avg participant (\$) 2027	\$80,581	\$10,340	\$12,000	\$1,086
Annual kWh	1,069,439	104,534	300,000	5,903
Annual kW	172.60	8.94	40.00	3.34
Measure Quantity 2025	5	18	5	5
Measure Quantity 2026	5	18	5	5
Measure Quantity 2027	5	18	5	5
Units of Measurement	Project	Project	Customer	Project
Free-ridership	39.07%	39.07%	39.07%	39.07%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 74. 2025 SCORE Plus Program Projections

Year	Annual Participants ⁴⁶	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	112	1,198	7,402,907	\$1,001,049	\$987,641	\$1,988,690
2026	-	1,066	6,421,221	-	-	-
2027	-	1,066	6,421,221	-	-	-
2028	-	828	6,137,006	-	-	-
2029	-	828	6,137,006	-	-	-
2030	-	828	6,137,006	-	-	-
2031	-	828	6,137,006	-	-	-
2032	-	828	6,137,006	-	-	-
2033	-	828	6,137,006	-	-	-
2034	-	828	6,137,006	-	-	-
2035	-	249	2,618,179	-	-	-
2036	-	234	2,311,640	-	-	-
2037	-	165	1,780,957	-	-	-
2038	-	165	1,780,957	-	-	-
2039	-	165	1,780,957	-	-	-
2040	-	131	1,617,964	-	-	-
2041	-	25	386,529	-	-	-
2042	-	25	386,529	-	-	-
2043	-	25	386,529	-	-	-
2044	-	25	386,529	-	-	-
2045	-	25	386,529	-	-	-
2046	-	25	386,529	-	-	-
2047	-	25	386,529	-	-	-
2048	-	25	386,529	-	-	-
2049	-	25	386,529	-	-	-
Lifetime kWh			78,573,805			

⁴⁶ Projected number of sites.

Table 75. 2026 SCORE Plus Program Projections

Year	Annual Participants⁴⁷	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	112	1,198	7,402,907	\$1,001,049	\$1,254,510	\$2,255,559
2027	-	1,066	6,421,221	-	-	-
2028	-	1,066	6,421,221	-	-	-
2029	-	828	6,137,006	-	-	-
2030	-	828	6,137,006	-	-	-
2031	-	828	6,137,006	-	-	-
2032	-	828	6,137,006	-	-	-
2033	-	828	6,137,006	-	-	-
2034	-	828	6,137,006	-	-	-
2035	-	828	6,137,006	-	-	-
2036	-	249	2,618,179	-	-	-
2037	-	234	2,311,640	-	-	-
2038	-	165	1,780,957	-	-	-
2039	-	165	1,780,957	-	-	-
2040	-	165	1,780,957	-	-	-
2041	-	131	1,617,964	-	-	-
2042	-	25	386,529	-	-	-
2043	-	25	386,529	-	-	-
2044	-	25	386,529	-	-	-
2045	-	25	386,529	-	-	-
2046	-	25	386,529	-	-	-
2047	-	25	386,529	-	-	-
2048	-	25	386,529	-	-	-
2049	-	25	386,529	-	-	-
2050	-	25	386,529	-	-	-
Lifetime kWh			78,573,805			

⁴⁷ Projected number of sites.

Table 76. 2027 SCORE Plus Program Projections

Year	Annual Participants ⁴⁸	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	112	1,198	7,402,907	\$1,001,049	\$1,537,129	\$2,538,178
2028	-	1,066	6,421,221	-	-	-
2029	-	1,066	6,421,221	-	-	-
2030	-	828	6,137,006	-	-	-
2031	-	828	6,137,006	-	-	-
2032	-	828	6,137,006	-	-	-
2033	-	828	6,137,006	-	-	-
2034	-	828	6,137,006	-	-	-
2035	-	828	6,137,006	-	-	-
2036	-	828	6,137,006	-	-	-
2037	-	249	2,618,179	-	-	-
2038	-	234	2,311,640	-	-	-
2039	-	165	1,780,957	-	-	-
2040	-	165	1,780,957	-	-	-
2041	-	165	1,780,957	-	-	-
2042	-	131	1,617,964	-	-	-
2043	-	25	386,529	-	-	-
2044	-	25	386,529	-	-	-
2045	-	25	386,529	-	-	-
2046	-	25	386,529	-	-	-
2047	-	25	386,529	-	-	-
2048	-	25	386,529	-	-	-
2049	-	25	386,529	-	-	-
2050	-	25	386,529	-	-	-
2051	-	25	386,529	-	-	-
Lifetime kWh			78,573,805			

Cost effectiveness per year is shown in the table below.

Table 77. SCORE Plus Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.10	1.90	0.98	1.68	0.87	1.49
Total Benefits (\$000s)	2,196	3,770	2,209	3,783	2,205	3,779
Total Costs (\$000s)	1,989	1,989	2,256	2,256	2,538	2,538

⁴⁸ Projected number of sites.

Commercial Load Management Program

Program Overview and Goals

This program allows participating commercial customers to provide on-call, voluntary curtailment of electric consumption during peak demand periods in return for incentive payments. Incentives are based on verified demand savings that customers can achieve in response to notifications of voluntary curtailment events by EPE. Demand savings and incentive payment amounts are based on the actual, verified load curtailments.

Implementation and Administration Plan

The Commercial Load Management Program will achieve its goals by identifying, marketing, and evaluate prospective commercial participants:

- Identify, develop a detailed site assessment of the load management potential of participant;
- Identify, facility enablement service upgrades, and performance cash incentive payments specific to Participant's site;
- Installation of facility enablement services as determined in the site assessment;
- Provide dispatch management services during the annual event period; and
- Calculate, measure and verify actual load curtailment.

This program will offer non-cash facility enablement and cash incentives to participating customers based on the actual verified load curtailment.

Facility enablement services shall be specific to each Participant and based on individual site requirements. Facility enablement services may include, as applicable:

- Installation of controls at the site;
- Programing to enable load shedding and building control sequences;
- Integration of controls or systems as needed; and
- Connecting sites to real time grid services software platform.

Assignment of Responsibilities

EPE has contracted with Trane to implement this program. To deliver the Commercial Load Management Program, the implementer will be responsible for program management, marketing the program, participant identification, participant outreach, site assessment, participant enrollment, facility enablement services, dispatch management, program tracking and reporting, verification duties, and incentive administration. EPE will assist in the marketing, identification and recruitment of prospective participants, and may provide verification services. EPE will oversee program implementation and budget processes at all times.

Target Market Segment and Marketing Plan

This program is designed to attract commercial participants from the educational, government, and private commercial sectors.

Commercial Sector

The implementer will create and execute an outreach strategy to recruit program participants. Outreach will take several forms, including coordination with EPE. Trane will also directly contact eligible customers to inform them of the program's benefits.

Education and Local Government Sectors

EPE and the implementer will help to identify target school districts and governmental entities in EPE's service territory and conduct recruitment meetings.

Participation Requirements

All commercial customers, schools, and governmental entities with load management potential that take service from EPE in its New Mexico service territory are eligible for this program. Program participants will be required to execute a Participant Agreement for the Commercial Load Management Program to ensure an understanding of their responsibilities as a participant in the program.

Participants will be informed of their program requirements prior to the execution of the Participant Agreement for the Commercial Load Management Program. Participant requirements include the voluntary load curtailment, in exchange for a one-time non-cash facility enablement services, and cash performance incentives for verified load curtailment.

Program Assumptions and Cost-Effectiveness

Program Timeframe

For planning purposes, three years (2025-2027) of program implementation has been assumed.

Program Forecasting Assumptions

The table below details the measure life, incentive levels, projected gross annual savings at the meter per participant, measure quantity/participation levels, and free-ridership. Sources for each of these assumptions are found in Appendix A.

Table 78. Commercial Load Management Program Forecasting Assumptions

Measure Type	Load Management
Measure Life (years)	1
Incentive per avg participant (\$) 2025	\$6,862
Incentive per avg participant (\$) 2026	\$6,862
Incentive per avg participant (\$) 2027	\$6,862
Annual kWh	624
Annual kW	171
Measure Quantity 2025	23
Measure Quantity 2026	23
Measure Quantity 2027	23
Units of Measurement	Sites
Free-ridership	0.00%

Projected Program Savings and Cost-effectiveness

Projected participation, net savings at the source (annual and lifetime), and costs are shown in the tables below.

Table 79. 2025 Commercial Load Management Program Projections

Year	Annual Participants ⁴⁹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2025	23	4,248	15,413	\$157,826	\$164,958	\$322,784
Lifetime kWh			15,413			

Table 80. 2026 Commercial Load Management Program Projections

Year	Annual Participants ⁵⁰	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2026	23	4,248	15,413	\$157,826	\$164,958	\$322,784
Lifetime kWh			15,413			

Table 81. 2027 Commercial Load Management Program Projections

Year	Annual Participants ⁵¹	Annual kW	Annual kWh	Annual Rebate Costs (\$)	Annual Admin Costs (\$)	Total Annual Costs (\$)
2027	23	4,248	15,413	\$157,826	\$164,958	\$322,784
Lifetime kWh			15,413			

⁴⁹ Number of sites.

⁵⁰ Number of sites.

⁵¹ Number of sites.

Cost-effectiveness per year is shown in the table below.

Table 82. Commercial Load Management Program Cost-Effectiveness Analysis

Cost-Effectiveness Metric	2025		2026		2027	
	Standard UCT	With Emissions	Standard UCT	With Emissions	Standard UCT	With Emissions
Benefit/Cost Ratio	1.47	1.47	1.50	1.50	1.52	1.53
Total Benefits (\$000s)	475	475	483	484	492	492
Total Costs (\$000s)	323	323	323	323	323	323

Appendix A: Cost-Effectiveness Inputs

Residential Programs Inputs

Table 83. Residential Measure Lives and Savings Sources

Measure	Measure Life	Savings Source
<i>Domestic Hot Water</i>		
Faucet Aerators	10.0	NM TRM 2023
Heat Pump Water Heaters	13.0	NM TRM 2023
Low-Flow Showerheads	10.0	NM TRM 2023
Pipe Insulation	13.0	NM TRM 2023
Tank Insulation	7.0	NM TRM 2023
Temperature Sensitive Restrictor Valves	10.0	Texas TRM 11.0
Water Heater Temperature Setback	2.0	IL TRM 12.0
<i>ENERGY STAR New Homes</i>		
ENERGY STAR New Homes (Whole Home)	23.0	Texas TRM 11.0
<i>Envelope</i>		
Air Infiltration Reduction	11.0	NM TRM 2023
Cool Roofs	15.0	NM TRM 2023
Insulation (Attic)	30.0	NM TRM 2023
Insulation (Floor)	30.0	NM TRM 2023
Prescriptive Weatherization	20.0	IL TRM 12.0
Radiant Barriers	25.0	TX TRM 11.0
Solar Attic Fans	15.0	NM TRM 2023
Solar Screens	10.0	NM TRM 2023
Windows	25.0	NM TRM 2023
<i>HVAC</i>		
Air Conditioners	18.0	NM TRM 2023
Duct Sealing	18.0	NM TRM 2023
Evaporative Cooling	15.0	NM TRM 2023
Heat Pumps	15.0	NM TRM 2023
Heater Replacement	15.0	Default for most HVAC measures
Room Air Conditioners	10.5	NM TRM 2023
Smart Thermostat	10.0	NM TRM 2023
Thermostat Setback	1.0	Default assumption for most behavioral measures

<i>Lighting</i>		
Light Emitting Diodes (“LEDs”)	20.8-30.6	NM TRM 2023; vary based on lamp rated life (hr)
LED Nightlights	8.0	NM TRM 2023
<i>Other</i>		
Advanced Power Strips	7.0	NM TRM 2023
Air Purifiers	9.0	TX TRM 11.0
Bath Ventilation Fans	19.0	NM TRM 2023
Ceiling Fans	10.0	TX TRM 11.0
Induction Cooking	16.0	NM TRM 2023
Load Management	1.0	NM PY23 EM&V Report
Pool Pumps	7.0	NM TRM 2023
Refrigerators	16.0	TX TRM 11.0
Water Coolers	10.0	IL TRM 12.0

Table 84. Residential Net-to-Gross Ratios (“NTGR”) and Free Ridership

Program	NTGR	Free-Ridership	Source
Smart Students	100.00%	0.00%	NM PY23 EM&V Report
Residential Comprehensive	55.14%	44.86%	NM PY23 EM&V Report
Residential Products	60.00%	40.00%	NM PY23 EM&V Report
ENERGY STAR New Homes (Manufactured Homes Pilot)	100.00%	0.00%	Default assumption for low-income
ENERGY STAR New Homes (Other Program Paths)	70.83%	29.17%	NM PY23 EM&V Report
Marketplace (Lighting)	67.00%	33.00%	NM PY23 EM&V Report
Marketplace (Non-lighting)	69.00%	31.00%	NM PY23 EM&V Report
Residential Load Management	100.00%	0.00%	NM PY23 EM&V Report
EnergySaver	100.00%	0.00%	NM PY23 EM&V Report
EnergySmart	100.00%	0.00%	NM PY23 EM&V Report

Commercial Programs Inputs

Table 85. Commercial Measure Lives and Savings Sources

Measure	Measure Life	Savings Source
Envelope		
Cool Roofs	15.0	NM TRM 2023
Entrance and Exit Door Air Infiltration	11.0	NM TRM 2023
Insulation (Roof)	20.0	IL TRM 12.0
Window Treatments (Solar Screen/Film)	10.0	NM TRM 2023
HVAC		
Air Conditioners and Heat Pumps	15.0	NM TRM 2023
Chiller (Centrifugal)	25.0	NM TRM 2023
Evaporative Cooling	15.0	NM TRM 2023
HVAC Tune-ups	3.0	TX TRM 11.0
Smart Thermostats	11.0	NM TRM 2023
Variable Frequency Drive on HVAC Air Handling Units	15.0	NM TRM 2023
Lighting		
Indoor Agricultural Lighting	9.5	NM TRM 2023
Standard Lighting and Lighting Controls (Commercial Comprehensive)	14.2 (weighted)	NM TRM 2023
Standard Lighting and Lighting Controls (SCORE Plus)	12.3 (weighted)	NM TRM 2023
Refrigeration		
Evaporator Fan Controls	16.0	NM TRM 2023
Refrigerated Door Gaskets	4.0	NM EM&V Memo
Solid and Glass Door Reach-ins	12.0	NM TRM 2023
Other		
Dehumidifiers	10.0	NM EM&V Memo
Load Management	1.0	NM PY23 EM&V Report
Pool Pumps	10.0	NM TRM 2023
Strategic Energy Management (SEM)	1.0	Default assumption for most behavioral measures

Table 86. Commercial NTGR and Free Ridership

Program	NTGR	Free-Ridership	Source
Commercial Comprehensive	81.56%	18.44%	NM PY23 EM&V Report
SCORE Plus	60.93%	39.07%	NM PY23 EM&V Report
Commercial Load Management	100.00%	0.00%	NM PY23 EM&V Report

Appendix B: Discount Rates

Utility Discount Rate

EPE used a discount rate of 7.18 percent to calculate the present value of costs and benefits for the UCT calculation, as shown in EPE witness Adrian Hernandez's Exhibit AH-2. All other factors held constant, the higher the discount rate, the lower the UCT value.

Appendix C: Avoided Costs

Utility Avoided Costs

To determine the cost-effectiveness of its EE/LM Plan, EPE calculated the avoided energy and capacity costs associated with its Programs. EPE's Market Development and Resource Strategy Department developed the avoided energy and capacity costs included in the EE/LM Plan.

A. Avoided Energy Costs

EPE uses AURORA, a widely accepted industry modeling tool, to determine the value of avoided energy. Input data for AURORA includes EPE's monthly native load demand forecasts, generating unit characteristics, anticipated future fuel prices, generator unit maintenance schedules, spinning reserve requirements, market purchase power capabilities, and specific off-system firm purchases and firm sales. AURORA evaluates the unit data, fuel and purchased power costs, and availability of the modeled generation units to identify the most economical manner to dispatch system and purchases power to meet EPE's expected demand. EPE uses the Marginal Energy Cost option in AURORA to identify the most economical marginal energy prices to produce the next megawatt of electricity. EPE's avoided energy costs associated with EE Programs is a weighted-average of on-peak and off-peak avoided costs based on the marginal energy prices calculated in AURORA.

B. Avoided Capacity Costs

EPE calculated avoided capacity costs considering future resource needs and forecasted generation additions to the EPE system. EPE then estimated capital costs for the forecasted generation additions. EPE calculated the levelized cost of capital by taking into consideration factors such as the capacity addition's estimated total installed cost, capital expenditure cash flow, estimated insurance and property tax costs, and book and tax depreciation. This levelized cost is escalated or de-escalated to provide an estimated yearly levelized cost of capital that is used for EPE's annual avoided capacity cost associated with the EE/LM Plan.

EPE's forecasted avoided energy and capacity costs are presented in the following table.

Table 87: Avoided Costs

Year	Avoided Energy (\$/kWh)	Avoided Capacity (\$/kW)
2025	\$0.0244	\$111.73
2026	\$0.0263	\$113.70
2027	\$0.0235	\$115.71
2028	\$0.0240	\$117.76
2029	\$0.0218	\$119.84
2030	\$0.0273	\$121.95
2031	\$0.0264	\$123.71
2032	\$0.0214	\$125.50
2033	\$0.0219	\$127.32
2034	\$0.0223	\$129.16
2035	\$0.0228	\$131.02
2036	\$0.0233	\$132.47
2037	\$0.0238	\$133.92
2038	\$0.0243	\$135.39
2039	\$0.0248	\$136.88
2040	\$0.0253	\$138.39
2041	\$0.0258	\$139.91
2042	\$0.0263	\$141.45
2043	\$0.0269	\$143.00
2044	\$0.0274	\$144.58
2045	\$0.0280	\$146.17
2046	\$0.0286	\$147.77
2047	\$0.0291	\$149.40
2048	\$0.0297	\$151.04
2049	\$0.0304	\$152.70
2050	\$0.0310	\$154.38
2051	\$0.0316	\$156.08
2052	\$0.0323	\$157.80
2053	\$0.0329	\$159.53
2054	\$0.0336	\$161.29
2055	\$0.0343	\$163.06
2056	\$0.0350	\$164.85
2057	\$0.0358	\$166.67

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC)
COMPANY'S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)
)
EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)

Case No. 24-00154-UT

DECLARATION OF DEREK R. NEUMANN IN SUPPORT OF
THE FOREGOING DIRECT TESTIMONY IN EL PASO
ELECTRIC'S APPLICATION FOR APPROVAL OF ITS 2025-2027
ENERGY EFFICIENCY AND LOAD MANAGEMENT PLAN, UTILITY
INCENTIVE AND REVISED RATE NO. 17-EFFICIENT USE OF
ENERGY RECOVERY FACTOR

I *Derek R. Neumann*, pursuant to Rule 1-011 NMRA, state as follows:

1. I affirm in writing under penalty of perjury under the laws of the State of New Mexico that the following statements are true and correct.
2. I am over 18 years of age and have personal knowledge of the facts stated herein. I am employed by Frontier Energy as a *Senior Engineer*.
3. The foregoing Direct Testimony of Derek R. Neumann, together with all exhibits sponsored therein and attached thereto, is true and accurate based on my knowledge and belief.
4. I submit this Declaration, based upon my personal knowledge and upon information and belief, in support of EPE's *Application for Approval of Its 2025-2027 Energy Efficiency and Load Management Plan, Utility Incentive and Revised Rate No. 17-Efficient Use of Energy Recovery Factor*.

FURTHER, DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 29, 2024.

/s/ *Derek R. Neumann*

DEREK R. NEUMANN

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC)
COMPANY'S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17-EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)
)
EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)

Case No. 24-00154-UT

DIRECT TESTIMONY

OF

ADRIAN HERNANDEZ

ON BEHALF OF

EL PASO ELECTRIC COMPANY

JULY 29, 2024

TABLE OF CONTENTS

<u>Subject</u>	<u>Page</u>
I. INTRODUCTION AND QUALIFICATIONS.....	1
II. PURPOSE OF DIRECT TESTIMONY	3
III. DISCOUNT RATE USED FOR UCT	4
IV. BACKGROUND FROM CASE NO. 21-00114-UT	4
V. 2023 PLAN YEAR RECONCILIATION.....	7
VI. PROPOSED RATE NO. 17 – EUERF.....	11
VII. CONCLUSION	15

EXHIBITS

Exhibit AH-1 Copy of Advice Notice 302

Exhibit AH-2 Discount Rate

Exhibit AH-3 Cumulative Reconciliation Summary

Exhibit AH-4 Reconciliation of 2023 Collections, Expenditures, and Utility Incentive

Exhibit AH-5 Efficient Use of Energy Recovery Factor Calculation

Exhibit AH-6 Bill Impact of the Proposed Efficient Use of Energy Recovery Factor

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

I. INTRODUCTION AND QUALIFICATIONS

Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Adrian Hernandez. My business address is 100 North Stanton Street,
El Paso, Texas, 79901.

Q2. HOW ARE YOU EMPLOYED?

A. I am employed by El Paso Electric Company ("EPE" or the "Company") as a
Principal Rate Analyst.

**Q3. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL
BACKGROUND AND EXPERIENCE.**

A. In May 2007, I graduated from the University of Texas at Austin with a Bachelor of
Business Administration in Accounting and a minor in Finance. In August 2011, I
earned a Master of Accountancy degree from the University of Texas at El Paso. In
2014, I received a graduate certificate from New Mexico State University ("NMSU")
in Public Utility Regulation & Economics. I pursued further studies at NMSU,
completing the Master of Business Administration program in December 2017.
Finally, I hold a Certified Public Accountant license issued by the State of Texas
which mandates ongoing training hours for license renewal.

After earning my Bachelor's degree, I was employed by BearingPoint Inc., in
the Washington, D.C., metro area, where I worked as a business analyst in that
company's public services division. In June 2008, I moved to El Paso, Texas, and
was employed as a Cost Accountant for Helen of Troy Limited. Thereafter, in

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 August 2009, I accepted a job as a regulatory accountant with EPE. My duties as a
2 regulatory accountant consisted of preparing and reviewing jurisdictional regulatory
3 accounting, fuel and operational reports, schedules, and supporting work papers. I
4 worked extensively on fuel related matters, such as accounting for fuel expenses,
5 monitoring the over/under collection of fuel, and preparing any fuel related regulatory
6 filings. In 2014, I joined the Rates and Regulatory Affairs Department and was later
7 promoted to Senior Rate Analyst in 2016. In June 2022, I was promoted to Principal
8 Rate Analyst.

9
10 **Q4. WHAT ARE YOUR RESPONSIBILITIES WITH EPE?**

11 **A.** As a Principal Rate Analyst in the Rates and Regulatory Affairs Department, my
12 responsibilities are to perform or assist in the preparation of economic, statistical,
13 cost, and rate design studies; to develop models and methodologies for cost of
14 service, profitability, and pricing studies; and to perform annualization and cost of
15 service studies, rate design, and revenue forecasts. I participate in regulatory filings
16 like base rate cases, fuel rate revisions, energy efficiency and advanced metering.

17
18 **Q5. HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE UTILITY**
19 **REGULATORY BODIES?**

20 **A.** Yes, I have filed testimony and testified before the New Mexico Public Regulation
21 Commission ("NMPRC" or "Commission"). I have also filed testimony with the
22 Public Utility Commission of Texas.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

II. PURPOSE OF DIRECT TESTIMONY

Q6. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my direct testimony is as follows:

- To present EPE's discount rate used to calculate the Utility Cost Test ("UCT") for EPE's proposed 2025-2027 Energy Efficiency and Load Management Plan ("EE/LM Plan").
- To reconcile EPE's 2023 plan year tariff rider collections, plan year expenditures, and the utility incentive.
- To support EPE's proposed revision to Rate No. 17 – Efficient Use of Energy Recovery Factor ("EUERF") pursuant to 17.7.2.13 NMAC.

Q7. ARE YOU SPONSORING ANY EXHIBITS IN SUPPORT OF YOUR DIRECT TESTIMONY?

A. Yes. I am sponsoring the following exhibits:

- Exhibit AH-1 Copy of Advice Notice 302;
- Exhibit AH-2 Discount Rate;
- Exhibit AH-3 Cumulative Reconciliation Summary
- Exhibit AH-4 Reconciliation of 2023 Collections, Expenditures, and Utility Incentive;
- Exhibit AH-5 Efficient Use of Energy Recovery Factor Calculation; and
- Exhibit AH-6 Bill Impact of the Proposed Efficient Use of Energy Recovery Factor.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

III. DISCOUNT RATE USED FOR UCT

Q8. WHAT IS THE DISCOUNT RATE THAT EPE USED IN ITS UCT CALCULATION?

A. EPE's discount rate is commission-approved weighted average cost of capital ("WACC") of 7.18 percent from Case No. 20-00104-UT, as shown Exhibit AH-2. It is required by statute that the discount rate not be adjusted for taxes.

IV. BACKGROUND FROM CASE NO. 21-00114-UT

Q9. WHAT ISSUES DID YOU COVER IN CASE NO. 21-00114-UT?

A. The primary issues from Case No. 21-00114-UT that I testified about were:

- EPE's 2020 plan year reconciliation and treatment of cumulative overage
- Utility incentive mechanism; and
- Carrying charges

Q10. PLEASE GIVE A BRIEF HISTORY OF EPE'S RECONCILIATION AND THE TREATMENT OF OVERAGES (AND UNDERAGES)?

A. In previous EE/LM filings (prior to Case No. 21-00114-UT), EPE was required to reduce overages (or add underages) to its next plan year budget. However, this approach never actually addressed the issue related to over/under collections of the tariff and it made tracking more difficult since the overage or underage would apply to plan year budgets two years after they occurred. Therefore, EPE proposed a new reconciliation approach to track every plan year and roll over a cumulative over/under-collection balance. The cumulative balance in Case No. 21-00114-UT

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 was a cumulative overage of \$902,001 and EPE proposed to adjust its EUERF rate to
2 include a reconciliation rate element to address the overage through its tariff
3 collections. EPE agreed in rebuttal to reduce the reconciliation element by half to
4 limit the recovery impact of the cumulative overage.

5
6 **Q11. WHAT WAS THE RECOMMENDED DECISION AND FINAL ORDER IN**
7 **CASE NO. 21-00114-UT SPECIFICALLY RELATED TO EPE'S 2020**
8 **RECONCILIATION AND THE TREATMENT OF THE CUMULATIVE**
9 **OVERAGE?**

10 **A.** EPE's reconciliation calculation resulting the cumulative overage of \$902,001 was
11 approved. The inclusion of a reconciliation element in the EUERF rate was also
12 approved, but according to the recommended decision, "it should be collected over
13 two years, reducing the reconciliation element by half."

14 EPE put this new approach into practice with its Advice Notice No. 287 filing
15 on June 1, 2023, where EPE reduced the EUERF from 4.3583% to 3.3844%.

16
17 **Q12. PLEASE GIVE A BRIEF HISTORY OF EPE'S UTILITY INCENTIVE**
18 **MECHANISM.**

19 **A.** EPE's initial proposal in Case No. 21-00114-UT was to continue the incentive
20 mechanism approved by the Commission in Case No. 18-00116-UT with a minor
21 modification to use the latest commission approved weighted average ("WACC") cost
22 of capital of 7.18%. With this change to the WACC, EPE's baseline incentive was
23 scaled down to 6.6% starting at 12 GWh. However, in rebuttal EPE agreed to accept

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 Staff's recommendation to modify its proposed sliding scale incentive mechanism to
2 begin the baseline incentive of 6.6% at 16 GWh.

3

4 **Q13. WHAT WAS THE RECOMMENDED DECISION AND FINAL ORDER IN**
5 **CASE NO. 21-00114-UT SPECIFICALLY RELATED TO EPE'S UTILITY**
6 **INCENTIVE MECHANISM?**

7 **A.** It was ordered that EPE use the sliding scale that EPE proposed, but with Staff's
8 beginning baseline incentive at 16 GWh.

9

10 **Q14. PLEASE GIVE A BRIEF HISTORY OF CARRYING CHARGES.**

11 **A.** In Case No. 18-00116-UT, the Recommended Decision and Final Order directed EPE
12 to address the issue of carrying charges in its testimony, including appropriate rates
13 and to what costs carrying charges should apply. Therefore, in Case No. 21-00114-
14 UT, EPE complied with the order and provided the calculation of carrying charges
15 and proposed the rate to be used if the Commission chose to order EPE to incorporate
16 carrying charges as part of its plan year reconciliations and in its EUERF. However,
17 EPE made it very clear in both direct and rebuttal testimony that EPE was not
18 proposing to include carrying charges as part of its reconciliation of over or under
19 collections or to include it in its EUERF.

20

21 **Q15. WHAT WAS THE RECOMMENDED DECISION AND FINAL ORDER IN**
22 **CASE NO. 21-00114-UT SPECIFICALLY RELATED TO CARRYING**
23 **CHARGES?**

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 **A.** EPE was not ordered to include carrying charges. There was no mention of carrying
2 charges in the orders or even a requirement for EPE to continue to address the issue
3 of carrying charges like in Case No. 18-00116-UT.

4

5 **Q16. HAS EPE COMPLIED WITH THE RECOMMENDED DECISION AND**
6 **FINAL ORDER IN CASE NO. 21-00114-UT?**

7 **A.** Yes. The Recommended Decision and Final Order in Case No. 21-00114-UT
8 requires:

9 1. EPE's sliding scale incentive proposal, as modified to accept Staff's
10 beginning baseline incentive at 16 GWh, based on EPE's program costs and
11 satisfactory program performance.

12 2. Regarding reconciliation of the historical overages (or underages), it should be
13 collected over two years, reducing the reconciliation element included in the
14 EUERF factor by half.

15 EPE is proposing to use the utility incentive as ordered. For the tariff reconciliation,
16 EPE is proposing treatment for the 2023 underage in this proceeding similar to EPE's
17 reduction of its tariff in Advice Notice No. 287, filed on June 1, 2023.

18

19 **V. 2023 PLAN YEAR RECONCILIATION**

20 **Q17. DID EPE RECONCILE 2023 PLAN YEAR EXPENDITURES AND**
21 **COLLECTIONS CONSISTENT WITH THE COMMISSION'S FINAL**
22 **ORDER IN EPE'S MOST RECENT EE/LM PLAN APPLICATION**
23 **PROCEEDING, CASE NO. 21-00114-UT?**

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 **A.** Yes. EPE has continued to use the reconciliation methodology established and
2 approved in Case No. 21-00114-UT. As shown in Exhibit AH-3, the 2020
3 cumulative overage of \$902,001 is the beginning balance of this reconciliation period
4 which covers three full years from January 2021 through December 2023.

5

6 **Q18. WHAT WAS THE RESULT OF THIS RECONCILIATION?**

7 **A.** In reconciling the expenditure and collection amounts for 2021, 2022, and 2023 EPE
8 determined that there was a \$1,917,236 cumulative underage as of December 2023.
9 As defined in 17.7.2.7 NMAC, "plan year underage means the public utility's actual
10 prior plan year collections that exceeded the same plan year's actual expenditures."
11 Consistent with the Commission's Final Order from Case No. 21-00114-UT, EPE is
12 proposing to address the cumulative 2023 cumulative underage through its EUERF
13 tariff collections instead of affecting the proposed plan year budgets for 2025, 2026,
14 and 2027.

15

16 **Q19. GIVEN THAT THIS IS A CUMULATIVE RECONCILIATION, ARE THERE**
17 **ANY IMPORTANT THINGS TO POINT OUT FROM THE 2022 PLAN YEAR**
18 **BEFORE YOU GO OVER THE 2023 PLAN YEAR?**

19 **A.** Yes. As explained by EPE witness Silva, Plan year 2022 was a difficult year for EPE
20 to fully implement its programs and achieve energy savings goals. Since EPE did not
21 reach its savings goal in 2022, EPE was unable to claim the utility incentive. This
22 also contributed to EPE's large underage as of 2022 which led to EPE's modification
23 to reduce the EUERF in its Advice Notice No. 287 filing on June 1, 2023.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1

2 **Q20. IN PERFORMING THIS RECONCILIATION, WHAT AMOUNTS DID EPE**
3 **INCLUDE IN THE 2023 PLAN YEAR EXPENDITURES?**

4 **A.** The 2023 plan year expenditures approved for recovery by the Commission in Case
5 No. 21-00114-UT include customer incentives, administrative, marketing, and M&V
6 costs totaling \$5,566,077. \$5,354,121 of the total was recovered through the EUERF,
7 and \$211,956 of administration costs was recovered through base rates. 2023 plan
8 year expenditures are shown in Exhibit AH-4, page 3.

9

10 **Q21. WHAT UTILITY INCENTIVE AMOUNT DID THE COMMISSION**
11 **APPROVE FOR THE 2023 PLAN YEAR AND HOW IS THAT INCENTIVE**
12 **AMOUNT REFLECTED IN THE 2023 RECONCILIATION?**

13 **A.** EPE's Commission-approved baseline incentive was 6.6 percent for verified annual
14 savings of 16 Gigawatt-hours ("GWh"), with an adder incentive of 0.075 percent for
15 each 1.0 GWh of additional energy savings, up to a maximum of 7.18 percent.
16 Because EPE's 2023 verified annual savings were 17.6 GWh (rounded to 17 GWh),
17 the utility incentive increased by 0.075 percent to 6.675 percent. This results in a
18 utility incentive amount of \$371,536 for the 2023 plan year. This mechanism, which
19 was approved in Case No. 21-00114-UT, is shown in Exhibit AH-4, page 4.

20

21 **Q22. IN PERFORMING THIS RECONCILIATION, WHAT AMOUNTS DID EPE**
22 **INCLUDE IN THE 2023 PLAN YEAR COLLECTIONS?**

23 **A.** The 2023 plan year collections include all EUERF tariff revenues recovered in 2023

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 amounting to \$5,471,863, and \$211,956 in administration costs which were not
2 recovered via the EUERF. Exhibit AH-4, page 2, details the EUERF tariff revenues
3 by rate class.

4
5 **Q23. HAS EPE PROVIDED A MONTHLY RECONCILIATION OF 2023 PLAN**
6 **YEAR PROGRAM COSTS AND COLLECTIONS?**

7 **A.** Yes. Exhibit AH-4, page 1, shows the monthly reconciliation for the year 2023
8 resulting in an underage of \$1,917,236. As previously stated, EPE calculated its 2023
9 cumulative underage on a monthly basis beginning in January 2021 through
10 December 2023 as shown on Exhibit AH-3. This approach is consistent with the one
11 approved in EPE's previous EE/LM filing (Case No. 21-00114-UT).

12
13 **Q24. HOW DOES EPE PROPOSE TO TREAT THE 2023 PLAN YEAR**
14 **UNDERAGE?**

15 **A.** As explained in EPE witness Silva's direct testimony, EPE is seeking a variance
16 related to the treatment of overages and underages to reconcile them through the
17 EUERF instead of subtracting or adding them to future plan year budgets.

18 Similar to the previous filing, EPE's proposal is to include the 2023
19 cumulative underage as a separate rate element in the proposed EUERF rate for 2025
20 instead of adding it to EPE's 2025 EE/LM plan year budget. This methodology was
21 approved in EPE's most recent EE/LM plan application filing, Case No. 21-00114-
22 UT, as discussed above. This will help EPE track tariff over/under collections and
23 make it easier to reconcile and modify the tariff when necessary.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1

2 **Q25. DID EPE INCLUDE ANY CARRYING COSTS IN ITS 2023**
3 **RECONCILIATION?**

4 A. No. As discussed previously, EPE was not ordered to include carrying costs or even
5 to address the topic of carrying costs in its last EE/LM proceeding.

6

7 **Q26. IS EPE REQUESTING APPROVAL OF THE 2023 RECONCILIATION?**

8 A. Yes.

9

10 **VI. PROPOSED RATE NO. 17 – EUERF**

11 **Q27. WHAT REVENUES DID EPE USE TO CALCULATE THE PROPOSED**
12 **EUERF?**

13 A. In accordance with the Final Order from Case No. 16-00185-UT, the plan year budget
14 for 2025 is based on the 2023 historical revenues.¹ To be consistent, I also use these
15 2023 historical revenues to determine the proposed 2025 EUERF.

16 As shown in Exhibit AH-5, page 2, EPE's total New Mexico 2023 revenues
17 were \$155,493,312. However, as discussed below, certain rate classes are not eligible
18 to participate in EPE's EE/LM programs, resulting in total eligible revenues of
19 \$148,326,104 from rate classes that are eligible to participate in energy efficiency
20 programs.

21

22 **Q28. WHICH RATE CLASSES ARE NOT ELIGIBLE TO PARTICIPATE IN**

¹ NMPRC Case No. 16-00185-UT, Recommended Decision ¶ H (Jan. 12, 2017).

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 EPE'S ENERGY EFFICIENCY PROGRAMS?

2 **A.** Two rate classes are not eligible to participate in EPE's EE/LM programs. The first is
3 Rate Class 10 – Military Research and Development, which as a result of Case
4 No. 11-00047-UT, the Final Order states "shall not participate in the energy
5 efficiency programs" and "shall not be assessed the energy efficiency rate rider"².
6 The second is Rate Class 12 – Private Area Lighting because the facilities under this
7 rate are company-owned.

8 Additionally, Rate Class 42 Experimental EV Charging will not be eligible
9 because participation in energy efficiency programs will be through their main rate
10 schedule.

11

12 **Q29. ON WHAT BASIS DOES EPE EXCLUDE REVENUES FROM THESE TWO**
13 **INELIGIBLE RATE CLASSES FROM ITS NEW MEXICO REVENUES**
14 **FROM ITS EE/LM PROGRAM BUDGET?**

15 **A.** As stated in 17.7.2.13(A) NMAC, "recovery of program costs shall only be from
16 customer classes with an opportunity to participate in approved measures and
17 programs."

18

19 **Q30. IS THE EUERF INAPPLICABLE TO ANY OTHER RATE SCHEDULES?**

² Section G in Case No. 11-00047-UT Final Order Adopting Certification of Partial Stipulation and Recommended Decision.

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 **A.** Yes. The EUERF is not applicable to Rate Schedule Nos. 21 through 24. These are
2 rate schedules related to cogeneration, and these customers pay the EUERF through
3 their standard rate schedule.

4
5 **Q31. WHAT IS THE RESULTING PERCENT USED TO CALCULATE THE**
6 **EUERF?**

7 **A.** As discussed above, EPE's estimated eligible revenues are \$148,326,104. After
8 applying the budget percentage of 4.453 percent, the estimated budget for 2025 is
9 \$6,604,915 (\$148,326,104 multiplied by 4.453 percent). This calculation is shown in
10 more detail in Exhibit AH-5, page 2.

11
12 **Q32. GIVEN THE INCREASE TO THE 2023 BUDGET PERCENTAGE, DOES EPE**
13 **ANTICIPATE THAT A CUSTOMER CAP WILL APPLY IN 2025?**

14 **A.** Yes, it is certainly possible that the customer cap of \$75,000 will be reached by a
15 single customer before the end of calendar year 2025. EPE will monitor this each
16 calendar year to ensure that customers are capped at \$75,000.

17
18 **Q33. WHAT UTILITY INCENTIVE PERCENTAGE IS EPE USING TO**
19 **CALCULATE THE PROPOSED EUERF?**

20 **A.** As ordered in Case No. 21-00114-UT, the new baseline incentive will start at 16
21 GWh and the incentive will be scaled down to 6.60 percent and move up by 0.075%
22 with each GWh until it caps off at 7.18% at 24 GWh. The proposed utility incentive
23 amounts to \$435,924 (\$6,604,915 multiplied by 6.60 percent) as shown in Exhibit

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

AH-5, page 3. Consistent with the mechanism approved for 2023, any additional increment will not be added until the savings are verified after the 2025 plan year.

Q34. FOR ILLUSTRATIVE PURPOSES ONLY, HAS EPE CALCULATED THE EUERF WITH ADMINISTRATIVE COSTS RECOVERED IN BASE RATES TO SHOW THE IMPACT ON EPE'S BUDGET PERCENT?

A. Yes.

Q35. WHAT IS EPE'S PROPOSED RATE EUERF?

A. EPE is proposing a revised EUERF of 3.9577 percent. The calculation is shown in Exhibit AH-5, page 1.

Q36. WHAT RATE ELEMENTS ARE INCLUDED IN EPE'S PROPOSED EUERF RATE?

A. EPE's proposed EUERF rate of 3.9577 percent is comprised of four rate elements: (1) 4.4530 percent for the percentage of customer billings budgeted for the 2025 plan year, (2) 0.2939 percent for EPE's 2025 baseline energy efficiency utility incentive, (3) -0.1429 percent to remove the administration costs not recovered through the EUERF, and (4) -0.6463 percent to reconcile the cumulative underage (reduced by half as ordered in Case No. 21-00114-UT). This breakout is shown at the bottom of Exhibit AH-5, page 1.

Q37. HAVE YOU PROVIDED A PROPOSED EUERF TARIFF AND ADVICE

1 NOTICE?

2 **A.** Yes. Exhibit AH-1 contains a copy of EPE's Advice Notice 302 which EPE filed
3 concurrent with this application containing the proposed EUERF tariff for billing in
4 2025.

5

6 **Q38. HOW DOES THE PROPOSED EUERF IMPACT A TYPICAL RESIDENTIAL**
7 **CUSTOMER BILL?**

8 **A.** For a typical residential customer using a monthly average of 700 kilowatt-hours, an
9 EUERF of 3.9577 percent of pre-tax bills would represent \$2.66 of the monthly bill.
10 This is an increase of \$0.39 over the current EUERF charge of \$2.28, or a 0.6 percent
11 increase relative to the total current bill. Bill impacts for other usage levels for
12 residential customers and for non-residential customers are shown in Exhibit AH-6.

13

14 **O39. HAS EPE PROPOSED AN EUERF FOR 2026 AND 2027?**

15 **A.** No. EPE is not proposing EUERFs specifically for 2026 or 2027 in this proceeding.
16 The EUERF will remain the same, but EPE will evaluate whether an update to the
17 tariff is necessary in its annual reports.

18

19

VII. CONCLUSION

20 **Q40. PLEASE SUMMARIZE YOUR DIRECT TESTIMONY.**

21 **A.** EPE reconciled its 2023 plan year, and the resulting underage will not be added to its
22 2025 plan year budget. Instead, EPE is proposing to include the cumulative underage

**EL PASO ELECTRIC COMPANY
DIRECT TESTIMONY OF
ADRIAN HERNANDEZ**

1 of \$1,917,236 in the EUERF. Finally, EPE requests approval for its revised EUERF
2 of 3.9577 percent.

3

4 **Q41. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5 **A.** Yes, it does.

EL PASO ELECTRIC COMPANY

ADVICE NOTICE NO. 302

PAGE 1 OF 1

**NEW MEXICO PUBLIC REGULATION COMMISSION
OF THE STATE OF NEW MEXICO**

El Paso Electric Company (EPE) hereby gives notice to the public and the Commission of the filing and publishing of the following changes in its Rates, which are attached hereto:

RATES

Rate Number	Title of Rate	Cancelling Rate Number	Date Effective
14 th Revised Rate No. 17	Efficient Use of Energy Recovery Factor (EUERF)	13 th Revised Rate No. 17	01/01/2025

X

Advice Notice No. 302

Signature/Title /s/James Schichtl

James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

EL PASO ELECTRIC COMPANY
REVISED TABLE OF CONTENTS

RATE SCHEDULES

PAGE 1 OF 2

Rate Schedule Number	Title	
14 th Revised Rate 1	Residential Service Rate	
16 th Revised Rate 3	Small General Service Rate	
16 th Revised Rate 4	General Service Rate	
16 th Revised Rate 5	Irrigation Service Rate	
13 th Revised Rate 7	City and County Service Rate	
13 th Revised Rate 8	Water, Sewage, Storm Sewage Pumping or Sewage Disposal Rate	
13 th Revised Rate 9	Large Power Service Rate	
15 th Revised Rate 10	Military Research and Development Power Rate	
14 th Revised Rate 11	Street Lighting Service Rate	
14 th Revised Rate 12	Private Area Lighting Rate	
11 th Revised Rate 15	Miscellaneous Service Charges	
44 th Revised Rate 16	Purchased Power Service	
14 th Revised Rate 17	Efficient Use of Energy Recovery Factor (EUERF)	X
20 th Revised Rate 18	Fuel and Purchased Power Cost Adjustment Clause (FPPCAC)	
12 th Revised Rate 19	Seasonal Agriculture Processing Service Rate	
11 th Revised Rate 21	Supplementary Power Service for Cogeneration and Small Power Production Facilities	
12 th Revised Rate 22	Backup Power Service for Cogeneration and Small Power Production Facilities	

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

EL PASO ELECTRIC COMPANY

REVISED TABLE OF CONTENTS

RATE SCHEDULES

PAGE 2 OF 2

12 th Revised Rate 23	Maintenance Power Service for Cogeneration and Small Power Production Facilities
12 th Revised Rate 24	Curtailable Power Service for Cogeneration and Small Power Production Facilities
10 th Revised Rate 25	Outdoor Recreational Lighting Service Rate
9 th Revised Rate 26	State University Service Rate
7 th Revised Rate 29	Noticed Interruptible Service for Rate Large Power Service
7 th Revised Rate 30	Load Retention Rate
7 th Revised Rate 38	Renewable Portfolio Standard (RPS) Cost Rider
Original Rate 38.1	Renewable Portfolio Standard (RPS) Cost Rider (Credit) / Surcharge
1 st Revised Rate 39	Economic Development Rate
1 st Revised Rate 41	Federal Tax Credit Factor (FTCF)
1 st Revised Rate 42	Experimental Electric Vehicle Charging Rate (EEVC)
1 st Revised Rate 44	Transportation Electrification Plan (TEP) Cost Rider
2 nd Revised Rate 46	Advanced Metering System Rider (AMS)
Original Rate 47	Community Solar Program Rate

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

**EL PASO ELECTRIC COMPANY
FOURTEENTH REVISED RATE NO. 17
CANCELLING THIRTEENTH REVISED RATE NO. 17**

X
X

EFFICIENT USE OF ENERGY RECOVERY FACTOR (EUERF)

Page 1 of 2

APPLICABILITY

This rate schedule is applicable to electric service billed under the rate schedules indicated below.

Pursuant to the New Mexico Public Regulation Commission Rule 17.7.2, the EUERF allows the Company to recover the cost of energy efficiency programs from the customer classes with an opportunity to participate under such programs.

TERRITORY

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

EUERF MONTHLY FACTOR

The monthly charge for the EUERF hereunder shall be comprised of the following rate charges, not to exceed \$75,000 per customer per year.

<u>Rate No.</u>	<u>Rate Schedule Description</u>	<u>Total EUERF per Pre-Tax Charges</u>	
01	Residential Service Rate	3.9577%	X
03	Small General Service Rate	3.9577%	X
04	General Service Rate	3.9577%	X
05	Irrigation Service Rate	3.9577%	X
07	City and County Service Rate	3.9577%	X
08	Water, Sewage, Storm Sewage Pumping or Sewage Disposal Rate	3.9577%	X
09	Large Power Service Rate	3.9577%	X

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory Operations and Resource Strategy

**EL PASO ELECTRIC COMPANY
FOURTEENTH REVISED RATE NO. 17
CANCELLING THIRTEENTH REVISED RATE NO. 17**

X
X

EFFICIENT USE OF ENERGY RECOVERY FACTOR (EUERF)

Page 2 of 2

11	Street Lighting Service Rate	3.9577%	X
19	Seasonal Agriculture Processing Service Rate	3.9577%	X
25	Outdoor Recreational Lighting Service Rate	3.9577%	X
26	State University Service Rate	3.9577%	X
29	Noticed Interruptible Service Rate for Large Power Service	3.9577%	X
30	Load Retention Rate	3.9577%	X

Advice Notice No. 302

Signature/Title /s/James Schichtl
James Schichtl
Vice President – Regulatory
Operations and Resource Strategy

EL PASO ELECTRIC COMPANY
2023 NEW MEXICO ENERGY EFFICIENCY FILING
WEIGHTED AVERAGE COST OF CAPITAL
APPROVED IN CASE NO. 20-00104-UT

EXHIBIT AH-2
PAGE 1 OF 1

	(a)	(b)	(c)	(d)	(e)
Line	Description	Percent of Total	Cost of Capital	Weighted Avg. Cost of Capital	
1	Long-term Debt	50.79%	5.42%	2.75%	
2	Common Equity	<u>49.21%</u>	9.00%	<u>4.43%</u>	
3	Total	<u>100.00%</u>		<u>7.18%</u>	

Amounts may not add or tie due to rounding.

EL PASO ELECTRIC COMPANY
ENERGY EFFICIENCY RECONCILIATION
FROM JANUARY 2021 THROUGH DECEMBER 2023

EXHIBIT AH-3
PAGE 1 OF 1

	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Monthly Summary							
Month	EUERF Program Expenses	Admin. Expenses Through Base	Utility Incentive	EUERF Recovery	Recovery Through Base	Monthly Activity (f) = (a) + (b) + (c) - (e) - (d)	Cumulative Overage/ (Underage)
Beg. Bal.							\$902,001
January 2021	\$56,631	\$18,995	\$5,369	\$451,411	\$18,995	(\$389,411)	512,590
February	70,618	18,995	6,363	380,840	18,995	(303,859)	208,731
March	173,320	18,995	13,654	320,502	18,995	(133,528)	75,203
April	316,542	18,995	23,823	328,616	18,995	11,749	86,952
May	214,882	18,995	16,605	394,496	18,995	(163,009)	(76,057)
June	361,448	18,995	27,011	517,389	18,995	(128,930)	(204,987)
July	381,828	18,995	28,458	700,969	18,995	(290,683)	(495,670)
August	201,695	18,995	15,669	684,827	18,995	(467,463)	(963,132)
September	234,813	18,995	18,020	578,101	18,995	(325,268)	(1,288,400)
October	350,839	18,995	26,258	382,858	18,995	(5,761)	(1,294,161)
November	387,830	18,995	28,885	300,541	18,995	116,174	(1,177,987)
December	1,460,690	18,997	105,058	338,142	18,997	1,227,606	49,619
January 2022	9,583	17,663	0	374,956	17,663	(365,373)	(315,754)
February	52,298	17,663	0	332,146	17,663	(279,848)	(595,602)
March	124,594	17,663	0	335,170	17,663	(210,576)	(806,178)
April	164,107	17,663	0	309,647	17,663	(145,540)	(951,718)
May	88,819	17,663	0	332,410	17,663	(243,591)	(1,195,309)
June	318,240	17,663	0	644,123	17,663	(325,883)	(1,521,192)
July	159,691	17,663	0	799,485	17,663	(639,794)	(2,160,986)
August	216,322	17,663	0	901,413	17,663	(685,091)	(2,846,077)
September	268,042	17,663	0	697,249	17,663	(429,207)	(3,275,284)
October	178,314	17,663	0	446,242	17,663	(267,928)	(3,543,212)
November	231,930	17,663	0	277,625	17,663	(45,695)	(3,588,907)
December 2022	1,743,266	17,663	0	325,389	17,663	1,417,877	(2,171,030)
January 2023	338,136	17,663	23,750	423,820	17,663	(61,934)	(2,232,964)
February	222,907	17,663	16,058	529,363	17,663	(290,398)	(2,523,361)
March	578,884	17,663	39,819	192,685	17,663	426,019	(2,097,343)
April	131,455	17,663	9,954	227,191	17,663	(85,782)	(2,183,125)
May	315,084	17,663	22,211	293,709	17,663	43,586	(2,139,538)
June	198,846	17,663	14,452	468,664	17,663	(255,366)	(2,394,905)
July	906,893	17,663	61,714	667,017	17,663	301,590	(2,093,314)
August	157,424	17,663	11,687	805,103	17,663	(635,992)	(2,729,307)
September	1,045,082	17,663	70,938	741,776	17,663	374,244	(2,355,063)
October	482,847	17,663	33,409	425,377	17,663	90,879	(2,264,183)
November	461,855	17,663	32,008	369,804	17,663	124,058	(2,140,125)
December	514,707	17,663	35,536	327,354	17,663	222,888	(1,917,236)

	(a)	(b)	(c)	(d)	(e)	(f)
Monthly Summary						
Month	EUERF Program Expenses	Admin. Expenses Through Base	Utility Incentive 6.675%	EUERF Recovery	Recovery Through Base	Overage/ (Underage)
Beg. Bal.						(\$2,171,030)
January 2023	\$338,136	\$17,663	\$23,750	\$423,820	\$17,663	(2,232,964)
February	222,907	17,663	16,058	529,363	17,663	(2,523,361)
March	578,884	17,663	39,819	192,685	17,663	(2,097,343)
April	131,455	17,663	9,954	227,191	17,663	(2,183,125)
May	315,084	17,663	22,211	293,709	17,663	(2,139,538)
June	198,846	17,663	14,452	468,664	17,663	(2,394,905)
July	906,893	17,663	61,714	667,017	17,663	(2,093,314)
August	157,424	17,663	11,687	805,103	17,663	(2,729,307)
September	1,045,082	17,663	70,938	741,776	17,663	(2,355,063)
October	482,847	17,663	33,409	425,377	17,663	(2,264,183)
November	461,855	17,663	32,008	369,804	17,663	(2,140,125)
December	514,707	17,663	35,536	327,354	17,663	(\$1,917,236)
Total	\$5,354,121	\$211,956	\$371,536	\$5,471,863	\$211,956	

EL Paso Electric Company
New Mexico Energy Efficiency Revenue By Month & Rate Class
For the 2023 Program Year

2023 New Mexico EUERF Revenue By Month and Major Rate Class

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total
Rate Class 01	245,776	287,699	109,426	115,899	148,921	240,044	383,165	455,938	386,354	213,800	174,504	171,461	2,932,987
Rate Class 03	58,269	71,291	34,616	39,943	48,861	75,671	87,291	102,714	95,259	62,246	54,942	48,891	779,995
Rate Class 04	63,691	86,441	27,731	32,524	47,372	80,011	96,968	116,186	113,044	68,682	67,137	54,406	854,193
Rate Class 05	2,464	4,392	2,625	8,234	14,207	12,528	17,088	24,627	22,792	14,905	8,208	2,869	134,939
Rate Class 07	13,620	18,454	7,150	9,014	11,237	16,226	18,581	26,045	25,131	15,933	15,018	11,528	187,937
Rate Class 08	3,720	12,556	2,545	4,129	5,730	6,610	9,290	10,753	10,245	7,316	7,566	7,176	87,636
Rate Class 09	24,069	39,933	3,406	9,892	15,326	27,614	40,715	49,713	71,000	32,133	29,641	24,350	367,791
Rate Class 11	1,214	1,500	968	1,087	1,144	1,046	963	1,066	1,031	1,089	1,154	1,076	13,338
Rate Class 19	4,985	1,331	449	396	755	2,798	3,101	6,962	3,156	1,187	4,780	5,474	35,373
Rate Class 25	116	158	120	673	156	138	160	201	268	299	261	124	2,675
Rate Class 26	5,896	5,607	3,648	5,400	-	5,977	9,696	10,898	13,497	7,786	6,595	-	75,000
TOTAL	423,820	529,363	192,685	227,191	293,709	468,664	667,017	805,103	741,776	425,377	369,804	327,354	5,471,863

Programs	Administration	Marketing and R&D	M&V	Customer Incentives	Total Program Expenses
Educational					
Smart Students Program	\$ 131,642	\$ 4,185	\$ 18,619	\$ 272,422	\$ 426,868
Residential					
Residential Comprehensive Program	\$ 144,514	\$ 7,605	\$ 20,573	\$ 301,009	\$ 473,702
Residential Lighting Program	\$ 168,949	\$ 7,220	\$ 19,530	\$ 285,745	\$ 481,443
ENERGY STAR New Homes Program	\$ 174,393	\$ 4,978	\$ 13,466	\$ 197,025	\$ 389,861
Marketplace Program	\$ 126,980	\$ 170	\$ 460	\$ 6,736	\$ 134,347
Residential Load Management	\$ 183,460	\$ 3,125	\$ 8,453	\$ 123,675	\$ 318,712
Low Income					
NM EnergySaver Program	\$ 39,946	\$ 5,422	\$ 14,667	\$ 214,595	\$ 274,629
EnergySmart Program	\$ 54,483	\$ 9,429	\$ 25,505	\$ 373,178	\$ 462,595
Commercial					
Commercial Comprehensive	\$ 160,859	\$ 5,969	\$ 16,148	\$ 236,263	\$ 419,238
SCORE Plus Program	\$ 1,005,741	\$ 22,972	\$ 62,141	\$ 909,206	\$ 2,000,059
Commercial Load Management	\$ 132,330	\$ 1,208	\$ 3,268	\$ 47,816	\$ 184,622
TOTAL	\$ 2,323,296	\$ 72,284	\$ 202,828	\$ 2,967,668	\$ 5,566,077

EL PASO ELECTRIC COMPANY
UTILITY INCENTIVE MECHANISM - ESTIMATED BASELINE

EXHIBIT AH-4
PAGE 4 OF 4

Line	Projected annual savings (GWh)	Budgeted Plan Year 2022 Total Expenditures	Profit incentive % (of program costs)	Profit incentive opportunity (\$)	Incremental addition (\$)	
1	16	\$5,566,077	6.6000%	\$367,361		Baseline Incentive
2	17	\$5,566,077	6.6750%	\$371,536	\$4,175	
3	18	\$5,566,077	6.7500%	\$375,710	\$4,175	
4	19	\$5,566,077	6.8250%	\$379,885	\$4,175	
5	20	\$5,566,077	6.9000%	\$384,059	\$4,175	
6	21	\$5,566,077	6.9750%	\$388,234	\$4,175	
7	22	\$5,566,077	7.0500%	\$392,408	\$4,175	
8	23	\$5,566,077	7.1250%	\$396,583	\$4,175	
9	24	\$5,566,077	7.1800%	\$399,644	\$3,061	
10	25	\$5,566,077	7.1800%	\$399,644	\$0	

<u>Line</u>	<u>Description</u>	<u>Amount</u>	<u>Formula or Reference</u>
1	2023 Total New Mexico Revenues	\$155,493,312	Exhibit AH-4, Page 2
2	Less: Revenue Not Subject to EUERF	(7,167,208)	Exhibit AH-4, Page 2
3	2023 Revenues Subject to EUERF	\$148,326,104	L1 + L2
4	Percent of Billings	4.4530%	Between 3%-5%
5	2025 EE/LM Annual Budget	\$6,604,915	L3 x L4
6	Utility Incentive Baseline Percentage	6.60%	Exhibit AH-4, Page 3
7	Estimated Utility Incentive Recovered in EUERF	\$435,924	L5 x L6
8	Less: Admin. Costs Not Recovered Through EUERF	(211,956)	(A)
9	2023 Cumulative Underage Amount	(\$1,917,236)	Exhibit AH-3
10	Reduced by Half	50%	
11	Cumulative Underage Amount Included in EUERF	\$ (958,618)	L9 x L10
12	Annual Amount to be Collected through EUERF	\$5,870,266	L5 + L7 + L8 + L11
13	Proposed Efficient Use of Energy Recovery Factor	3.9577%	L12 ÷ L3
<u>EUERF Components</u>			
14	2025-2027 EE/LM Annual Budget	4.4530%	L5 ÷ L3
15	Utility Incentive %	0.2939%	L7 ÷ L3
16	Costs Not Recovered in EUERF %	-0.1429%	L8 ÷ L3
17	2023 Cumulative Underage %	-0.6463%	L11 ÷ L3
18	Proposed Efficient Use of Energy Recovery Factor	3.9577%	L14 + L15 + L16 + L17

Total EE Admin Costs (Payroll, benefits)	\$1,037,167
New Mexico LABOR Allocator	0.20436
New Mexico Internal Admin Costs	\$211,956 (A)

RATE CLASS	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	2023 TOTAL
01-RESIDENTIAL	\$5,643,742	\$6,614,168	\$2,510,155	\$2,658,753	\$3,416,066	\$5,507,074	\$11,303,953	\$13,469,717	\$11,422,990	\$6,316,052	\$5,153,011	\$5,066,517	\$79,082,197
03-SMALL GENERAL	1,331,572	1,647,601	806,659	929,681	1,135,632	1,753,317	2,592,242	3,069,187	2,835,624	1,860,316	1,647,710	1,443,163	21,052,703
04-GENERAL SERVICE	1,486,461	1,989,567	640,383	769,834	1,094,216	1,841,181	2,865,027	3,439,324	3,416,361	2,017,647	1,981,067	1,616,951	23,158,019
05-IRRIGATION	56,503	100,744	60,223	188,930	325,970	287,167	486,339	728,062	673,575	440,597	242,596	84,869	3,675,577
07-CITY & COUNTY	312,487	423,486	164,051	206,822	257,832	372,313	548,835	769,133	743,423	470,791	443,747	340,118	5,053,038
08-PUMPING	85,363	288,110	58,389	94,733	131,481	151,659	272,595	313,477	303,477	232,179	223,548	212,029	2,367,037
09-LARGE POWER	529,139	881,248	79,750	222,643	351,080	649,790	1,200,044	1,451,130	1,854,370	905,305	834,167	687,842	9,646,507
10-MILITARY	344,597	600,457	26,544	153,126	232,940	408,626	880,342	1,067,244	958,524	702,851	424,153	410,063	6,209,467
11-STREET LIGHTING	27,852	34,411	22,206	24,927	26,244	23,988	28,453	31,498	30,631	32,169	34,084	31,803	348,267
12-AREA LIGHTING	81,416	86,473	66,547	70,640	74,167	69,407	80,020	85,888	83,076	86,096	89,693	83,464	956,887
19-SEASONAL AGRICULTURAL	114,379	30,541	10,313	9,086	17,320	64,193	95,456	203,685	93,246	35,083	141,224	161,730	976,255
25-OUTDOOR RECREATIONAL	2,670	3,623	2,748	15,451	3,603	3,166	4,711	5,936	7,922	8,848	7,711	3,660	70,051
26-STATE UNIVERSITY	135,277	128,652	83,709	123,891	171,249	137,147	286,482	322,020	418,726	230,058	263,713	167,349	2,468,270
29-INTERRUPTIBLE	23,109	34,993	(4,255)	4,323	11,923	2,211	21,369	36,159	180,917	44,130	41,658	31,645	428,182
42EV-EXP EV CHARGING	60	82	11	95	57	51	123	140	102	90	44	0	854
NEW MEXICO TOTAL	<u>\$10,174,627</u>	<u>\$12,864,157</u>	<u>\$4,527,433</u>	<u>\$5,472,934</u>	<u>\$7,249,780</u>	<u>\$11,271,289</u>	<u>\$20,665,992</u>	<u>\$24,992,599</u>	<u>\$23,022,962</u>	<u>\$13,382,212</u>	<u>\$11,528,125</u>	<u>\$10,341,203</u>	<u>\$155,493,312</u>
LESS:													
10-MILITARY	(344,597)	(600,457)	(26,544)	(153,126)	(232,940)	(408,626)	(880,342)	(1,067,244)	(958,524)	(702,851)	(424,153)	(410,063)	(6,209,467)
12-AREA LIGHTING	(81,416)	(86,473)	(66,547)	(70,640)	(74,167)	(69,407)	(80,020)	(85,888)	(83,076)	(86,096)	(89,693)	(83,464)	(956,887)
42EV-EXP EV CHARGING	(60)	(82)	(11)	(95)	(57)	(51)	(123)	(140)	(102)	(90)	(44)	0	(854)
INELIGIBLE RATE CLASSES	<u>(426,072)</u>	<u>(687,012)</u>	<u>(93,103)</u>	<u>(223,861)</u>	<u>(307,164)</u>	<u>(478,084)</u>	<u>(960,485)</u>	<u>(1,153,272)</u>	<u>(1,041,702)</u>	<u>(789,037)</u>	<u>(513,890)</u>	<u>(493,527)</u>	<u>(7,167,208)</u>
TOTAL ELIGIBLE REVENUES	<u>\$9,748,554</u>	<u>\$12,177,144</u>	<u>\$4,434,330</u>	<u>\$5,249,074</u>	<u>\$6,942,616</u>	<u>\$10,793,206</u>	<u>\$19,705,507</u>	<u>\$23,839,326</u>	<u>\$21,981,260</u>	<u>\$12,593,175</u>	<u>\$11,014,236</u>	<u>\$9,847,676</u>	<u>\$148,326,104</u>
3% OF ELIGIBLE REVENUES	\$292,457	\$365,314	\$133,030	\$157,472	\$208,278	\$323,796	\$591,165	\$715,180	\$659,438	\$377,795	\$330,427	\$295,430	\$4,449,783
5% OF ELIGIBLE REVENUES	\$487,428	\$608,857	\$221,716	\$262,454	\$347,131	\$539,660	\$985,275	\$1,191,966	\$1,099,063	\$629,659	\$550,712	\$492,384	\$7,416,305
2025 BUDGET PERCENT	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%	4.4530%
2025 PERCENT OF BILLINGS	<u>\$434,100</u>	<u>\$542,244</u>	<u>\$197,459</u>	<u>\$233,740</u>	<u>\$309,153</u>	<u>\$480,618</u>	<u>\$877,480</u>	<u>\$1,061,558</u>	<u>\$978,819</u>	<u>\$560,770</u>	<u>\$490,460</u>	<u>\$438,514</u>	<u>\$6,604,915</u>

EL PASO ELECTRIC COMPANY
UTILITY INCENTIVE MECHANISM - ESTIMATED BASELINE

EXHIBIT AH-5
PAGE 3 OF 3

Line	Projected annual savings (GWh)	Budgeted Plan Year 2025 Total Expenditures	Profit incentive % (of program costs)	Profit incentive opportunity (\$)	Incremental addition (\$)	
1	16	\$6,604,915	6.6000%	\$435,924		Baseline Incentive
2	17	\$6,604,915	6.6750%	\$440,878	\$4,954	
3	18	\$6,604,915	6.7500%	\$445,832	\$4,954	
4	19	\$6,604,915	6.8250%	\$450,785	\$4,954	
5	20	\$6,604,915	6.9000%	\$455,739	\$4,954	
6	21	\$6,604,915	6.9750%	\$460,693	\$4,954	
7	22	\$6,604,915	7.0500%	\$465,647	\$4,954	
8	23	\$6,604,915	7.1250%	\$470,600	\$4,954	
9	24	\$6,604,915	7.1800%	\$474,233	\$3,633	
10	25	\$6,604,915	7.1800%	\$474,233	\$0	

RATE 01 - RESIDENTIAL BILL COMPARISON BY kWh LEVEL (Annual Average)																				
Total			Current								Proposed								Total Bill	
	1st Block	all other	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)
kWh	kWh	kWh																		
0	0	0	\$ 7.00	\$ 1.60		\$ -	\$ -	\$ -	\$ 0.29	\$ 8.89	\$ 7.00	\$ 1.60		\$ -	\$ -	\$ -	\$ 0.34	\$ 8.94	\$ 0.05	0.6%
100	100	0	\$ 7.00	\$ 1.60		\$ 6.19	\$ 1.11	\$ 0.88	\$ 0.57	\$ 17.34	\$ 7.00	\$ 1.60		\$ 6.19	\$ 1.11	\$ 0.88	\$ 0.66	\$ 17.44	\$ 0.10	0.6%
250	250	0	\$ 7.00	\$ 1.60		\$ 15.47	\$ 2.78	\$ 2.19	\$ 0.98	\$ 30.01	\$ 7.00	\$ 1.60		\$ 15.47	\$ 2.78	\$ 2.19	\$ 1.15	\$ 30.18	\$ 0.17	0.6%
500	500	0	\$ 7.00	\$ 1.60		\$ 30.94	\$ 5.55	\$ 4.38	\$ 1.67	\$ 51.14	\$ 7.00	\$ 1.60		\$ 30.94	\$ 5.55	\$ 4.38	\$ 1.96	\$ 51.42	\$ 0.28	0.5%
700	600	100	\$ 7.00	\$ 1.60		\$ 44.84	\$ 7.77	\$ 6.13	\$ 2.28	\$ 69.61	\$ 7.00	\$ 1.60		\$ 44.84	\$ 7.77	\$ 6.13	\$ 2.66	\$ 70.00	\$ 0.39	0.6%
750	600	150	\$ 7.00	\$ 1.60		\$ 48.32	\$ 8.33	\$ 6.56	\$ 2.43	\$ 74.24	\$ 7.00	\$ 1.60		\$ 48.32	\$ 8.33	\$ 6.56	\$ 2.84	\$ 74.66	\$ 0.42	0.6%
1000	600	400	\$ 7.00	\$ 1.60		\$ 67.00	\$ 11.10	\$ 8.75	\$ 3.23	\$ 98.68	\$ 7.00	\$ 1.60		\$ 67.00	\$ 11.10	\$ 8.75	\$ 3.78	\$ 99.23	\$ 0.55	0.6%
2000	600	1400	\$ 7.00	\$ 1.60		\$ 141.68	\$ 22.20	\$ 17.50	\$ 6.43	\$ 196.41	\$ 7.00	\$ 1.60		\$ 141.68	\$ 22.20	\$ 17.50	\$ 7.52	\$ 197.50	\$ 1.09	0.6%
RATE 01 - RESIDENTIAL BILL COMPARISON BY kWh LEVEL (Current Summer: May - Oct, Proposed Summer: Jun - Sep)																				
Total			Current								Proposed								Total Bill	
	1st Block	all other	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)
kWh	kWh	kWh																		
0	0	0	\$ 7.00	\$ 1.60		\$ -	\$ -	\$ -	\$ 0.29	\$ 8.89	\$ 7.00	\$ 1.60		\$ -	\$ -	\$ -	\$ 0.34	\$ 8.94	\$ 0.05	0.6%
100	100	0	\$ 7.00	\$ 1.60		\$ 7.00	\$ 1.11	\$ 0.88	\$ 0.60	\$ 18.18	\$ 7.00	\$ 1.60		\$ 7.00	\$ 1.11	\$ 0.88	\$ 0.70	\$ 18.28	\$ 0.10	0.6%
250	250	0	\$ 7.00	\$ 1.60		\$ 17.50	\$ 2.78	\$ 2.19	\$ 1.05	\$ 32.11	\$ 7.00	\$ 1.60		\$ 17.50	\$ 2.78	\$ 2.19	\$ 1.23	\$ 32.29	\$ 0.18	0.6%
500	500	0	\$ 7.00	\$ 1.60		\$ 34.99	\$ 5.55	\$ 4.38	\$ 1.81	\$ 55.33	\$ 7.00	\$ 1.60		\$ 34.99	\$ 5.55	\$ 4.38	\$ 2.12	\$ 55.64	\$ 0.31	0.6%
700	600	100	\$ 7.00	\$ 1.60		\$ 53.09	\$ 7.77	\$ 6.13	\$ 2.56	\$ 78.15	\$ 7.00	\$ 1.60		\$ 53.09	\$ 7.77	\$ 6.13	\$ 2.99	\$ 78.58	\$ 0.43	0.6%
750	600	150	\$ 7.00	\$ 1.60		\$ 58.25	\$ 8.33	\$ 6.56	\$ 2.77	\$ 84.51	\$ 7.00	\$ 1.60		\$ 58.25	\$ 8.33	\$ 6.56	\$ 3.24	\$ 84.98	\$ 0.47	0.6%
1000	600	400	\$ 7.00	\$ 1.60		\$ 85.35	\$ 11.10	\$ 8.75	\$ 3.85	\$ 117.66	\$ 7.00	\$ 1.60		\$ 85.35	\$ 11.10	\$ 8.75	\$ 4.50	\$ 118.31	\$ 0.65	0.6%
2000	600	1400	\$ 7.00	\$ 1.60		\$ 193.75	\$ 22.20	\$ 17.50	\$ 8.19	\$ 250.25	\$ 7.00	\$ 1.60		\$ 193.75	\$ 22.20	\$ 17.50	\$ 9.58	\$ 251.64	\$ 1.39	0.6%
RATE 01 - RESIDENTIAL BILL COMPARISON BY kWh LEVEL (Current Winter: Nov - Apr, Proposed Non-Summer: Oct - May)																				
Total			Current								Proposed								Total Bill	
			Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)
kWh																				
0			\$ 7.00	\$ 1.60		\$ -	\$ -	\$ -	\$ 0.29	\$ 8.89	\$ 7.00	\$ 1.60		\$ -	\$ -	\$ -	\$ 0.34	\$ 8.94	\$ 0.05	0.6%
100			\$ 7.00	\$ 1.60		\$ 5.78	\$ 1.11	\$ 0.88	\$ 0.55	\$ 16.92	\$ 7.00	\$ 1.60		\$ 5.78	\$ 1.11	\$ 0.88	\$ 0.65	\$ 17.01	\$ 0.09	0.5%
250			\$ 7.00	\$ 1.60		\$ 14.45	\$ 2.78	\$ 2.19	\$ 0.95	\$ 28.96	\$ 7.00	\$ 1.60		\$ 14.45	\$ 2.78	\$ 2.19	\$ 1.11	\$ 29.12	\$ 0.16	0.6%
500			\$ 7.00	\$ 1.60		\$ 28.91	\$ 5.55	\$ 4.38	\$ 1.61	\$ 49.04	\$ 7.00	\$ 1.60		\$ 28.91	\$ 5.55	\$ 4.38	\$ 1.88	\$ 49.31	\$ 0.27	0.6%
700			\$ 7.00	\$ 1.60		\$ 40.71	\$ 7.77	\$ 6.13	\$ 2.14	\$ 65.35	\$ 7.00	\$ 1.60		\$ 40.71	\$ 7.77	\$ 6.13	\$ 2.50	\$ 65.71	\$ 0.36	0.6%
750			\$ 7.00	\$ 1.60		\$ 43.36	\$ 8.33	\$ 6.56	\$ 2.26	\$ 69.11	\$ 7.00	\$ 1.60		\$ 43.36	\$ 8.33	\$ 6.56	\$ 2.65	\$ 69.50	\$ 0.39	0.6%
1000			\$ 7.00	\$ 1.60		\$ 57.82	\$ 11.10	\$ 8.75	\$ 2.92	\$ 89.19	\$ 7.00	\$ 1.60		\$ 57.82	\$ 11.10	\$ 8.75	\$ 3.41	\$ 89.69	\$ 0.50	0.6%
2000			\$ 7.00	\$ 1.60		\$ 115.64	\$ 22.20	\$ 17.50	\$ 5.55	\$ 169.50	\$ 7.00	\$ 1.60		\$ 115.64	\$ 22.20	\$ 17.50	\$ 6.49	\$ 170.44	\$ 0.94	0.6%

RATE 03 - SMALL COMMERCIAL SERVICE (Annual Average)																					
		Load Factor	Current								Proposed								Total Bill		
kWh	kW		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
2,190	15	20%	\$ 14.00	\$ 2.12	\$ 232.44	\$ 45.75	\$ 24.31	\$ 19.17	\$ 11.43	\$ 349.23	\$ 14.00	\$ 2.12	\$ 232.44	\$ 45.75	\$ 24.31	\$ 19.17	\$ 13.37	\$ 351.16	\$ 1.93	0.6%	
4,380	15	40%	\$ 14.00	\$ 2.12	\$ 232.44	\$ 91.51	\$ 48.63	\$ 38.33	\$ 14.45	\$ 441.48	\$ 14.00	\$ 2.12	\$ 232.44	\$ 91.51	\$ 48.63	\$ 38.33	\$ 16.90	\$ 443.93	\$ 2.45	0.6%	
6,570	15	60%	\$ 14.00	\$ 2.12	\$ 232.44	\$ 137.26	\$ 72.94	\$ 57.50	\$ 17.47	\$ 533.74	\$ 14.00	\$ 2.12	\$ 232.44	\$ 137.26	\$ 72.94	\$ 57.50	\$ 20.43	\$ 536.70	\$ 2.96	0.6%	
8,760	15	80%	\$ 14.00	\$ 2.12	\$ 232.44	\$ 183.02	\$ 97.25	\$ 76.67	\$ 20.49	\$ 625.99	\$ 14.00	\$ 2.12	\$ 232.44	\$ 183.02	\$ 97.25	\$ 76.67	\$ 23.96	\$ 629.46	\$ 3.47	0.6%	
3,066	21	20%	\$ 14.00	\$ 2.12	\$ 325.42	\$ 64.06	\$ 34.04	\$ 26.83	\$ 15.79	\$ 482.25	\$ 14.00	\$ 2.12	\$ 325.42	\$ 64.06	\$ 34.04	\$ 26.83	\$ 18.46	\$ 484.93	\$ 2.68	0.6%	
5,071	21	33%	\$ 14.00	\$ 2.12	\$ 325.42	\$ 105.95	\$ 56.30	\$ 44.38	\$ 18.55	\$ 566.71	\$ 14.00	\$ 2.12	\$ 325.42	\$ 105.95	\$ 56.30	\$ 44.38	\$ 21.69	\$ 569.86	\$ 3.15	0.6%	
9,198	21	60%	\$ 14.00	\$ 2.12	\$ 325.42	\$ 192.17	\$ 102.12	\$ 80.50	\$ 24.24	\$ 740.57	\$ 14.00	\$ 2.12	\$ 325.42	\$ 192.17	\$ 102.12	\$ 80.50	\$ 28.36	\$ 744.67	\$ 4.10	0.6%	
12,264	21	80%	\$ 14.00	\$ 2.12	\$ 325.42	\$ 256.23	\$ 136.15	\$ 107.33	\$ 28.47	\$ 869.72	\$ 14.00	\$ 2.12	\$ 325.42	\$ 256.23	\$ 136.15	\$ 107.33	\$ 33.29	\$ 874.55	\$ 4.83	0.6%	
7,300	50	20%	\$ 14.00	\$ 2.12	\$ 774.80	\$ 152.52	\$ 81.04	\$ 63.89	\$ 36.83	\$ 1,125.20	\$ 14.00	\$ 2.12	\$ 774.80	\$ 152.52	\$ 81.04	\$ 63.89	\$ 43.07	\$ 1,131.44	\$ 6.24	0.6%	
14,600	50	40%	\$ 14.00	\$ 2.12	\$ 774.80	\$ 305.03	\$ 162.09	\$ 127.78	\$ 46.90	\$ 1,432.72	\$ 14.00	\$ 2.12	\$ 774.80	\$ 305.03	\$ 162.09	\$ 127.78	\$ 54.85	\$ 1,440.67	\$ 7.95	0.6%	
21,900	50	60%	\$ 14.00	\$ 2.12	\$ 774.80	\$ 457.55	\$ 243.13	\$ 191.67	\$ 56.97	\$ 1,740.24	\$ 14.00	\$ 2.12	\$ 774.80	\$ 457.55	\$ 243.13	\$ 191.67	\$ 66.62	\$ 1,749.89	\$ 9.65	0.6%	
29,200	50	80%	\$ 14.00	\$ 2.12	\$ 774.80	\$ 610.06	\$ 324.18	\$ 255.56	\$ 67.04	\$ 2,047.75	\$ 14.00	\$ 2.12	\$ 774.80	\$ 610.06	\$ 324.18	\$ 255.56	\$ 78.39	\$ 2,059.11	\$ 11.36	0.6%	
RATE 03 - SMALL COMMERCIAL SERVICE (Current Summer: May - Oct, 0 to 50 kW, Proposed Summer: Jun - Sep, 0 to 50 kW)																					
		Load Factor	Current								Proposed								Total Bill		
kWh	kW		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
2,190	15	20%	\$ 14.00	\$ 2.12	\$ 279.45	\$ 86.80	\$ 24.31	\$ 19.17	\$ 14.41	\$ 440.26	\$ 14.00	\$ 2.12	\$ 279.45	\$ 86.80	\$ 24.31	\$ 19.17	\$ 16.85	\$ 442.70	\$ 2.44	0.6%	
4,380	15	40%	\$ 14.00	\$ 2.12	\$ 279.45	\$ 173.59	\$ 48.63	\$ 38.33	\$ 18.82	\$ 574.94	\$ 14.00	\$ 2.12	\$ 279.45	\$ 173.59	\$ 48.63	\$ 38.33	\$ 22.01	\$ 578.13	\$ 3.19	0.6%	
6,570	15	60%	\$ 14.00	\$ 2.12	\$ 279.45	\$ 260.39	\$ 72.94	\$ 57.50	\$ 23.23	\$ 709.63	\$ 14.00	\$ 2.12	\$ 279.45	\$ 260.39	\$ 72.94	\$ 57.50	\$ 27.17	\$ 713.56	\$ 3.93	0.6%	
8,760	15	80%	\$ 14.00	\$ 2.12	\$ 279.45	\$ 347.18	\$ 97.25	\$ 76.67	\$ 27.64	\$ 844.31	\$ 14.00	\$ 2.12	\$ 279.45	\$ 347.18	\$ 97.25	\$ 76.67	\$ 32.32	\$ 848.99	\$ 4.68	0.6%	
3,066	21	20%	\$ 14.00	\$ 2.12	\$ 391.23	\$ 121.51	\$ 34.04	\$ 26.83	\$ 19.96	\$ 609.69	\$ 14.00	\$ 2.12	\$ 391.23	\$ 121.51	\$ 34.04	\$ 26.83	\$ 23.34	\$ 613.08	\$ 3.39	0.6%	
5,071	21	33%	\$ 14.00	\$ 2.12	\$ 391.23	\$ 200.98	\$ 56.30	\$ 44.38	\$ 24.00	\$ 733.00	\$ 14.00	\$ 2.12	\$ 391.23	\$ 200.98	\$ 56.30	\$ 44.38	\$ 28.06	\$ 737.07	\$ 4.07	0.6%	
9,198	21	60%	\$ 14.00	\$ 2.12	\$ 391.23	\$ 364.54	\$ 102.12	\$ 80.50	\$ 32.30	\$ 986.81	\$ 14.00	\$ 2.12	\$ 391.23	\$ 364.54	\$ 102.12	\$ 80.50	\$ 37.78	\$ 992.28	\$ 5.47	0.6%	
12,264	21	80%	\$ 14.00	\$ 2.12	\$ 391.23	\$ 486.05	\$ 136.15	\$ 107.33	\$ 38.48	\$ 1,175.37	\$ 14.00	\$ 2.12	\$ 391.23	\$ 486.05	\$ 136.15	\$ 107.33	\$ 44.99	\$ 1,181.89	\$ 6.52	0.6%	
7,300	50	20%	\$ 14.00	\$ 2.12	\$ 931.50	\$ 289.32	\$ 81.04	\$ 63.89	\$ 46.77	\$ 1,428.64	\$ 14.00	\$ 2.12	\$ 931.50	\$ 289.32	\$ 81.04	\$ 63.89	\$ 54.69	\$ 1,436.56	\$ 7.92	0.6%	
14,600	50	40%	\$ 14.00	\$ 2.12	\$ 931.50	\$ 578.64	\$ 162.09	\$ 127.78	\$ 61.46	\$ 1,877.59	\$ 14.00	\$ 2.12	\$ 931.50	\$ 578.64	\$ 162.09	\$ 127.78	\$ 71.88	\$ 1,888.00	\$ 10.41	0.6%	
21,900	50	60%	\$ 14.00	\$ 2.12	\$ 931.50	\$ 867.95	\$ 243.13	\$ 191.67	\$ 76.16	\$ 2,326.54	\$ 14.00	\$ 2.12	\$ 931.50	\$ 867.95	\$ 243.13	\$ 191.67	\$ 89.06	\$ 2,339.44	\$ 12.90	0.6%	
29,200	50	80%	\$ 14.00	\$ 2.12	\$ 931.50	\$ 1,157.27	\$ 324.18	\$ 255.56	\$ 90.86	\$ 2,775.49	\$ 14.00	\$ 2.12	\$ 931.50	\$ 1,157.27	\$ 324.18	\$ 255.56	\$ 106.25	\$ 2,790.88	\$ 15.39	0.6%	
RATE 03 - SMALL COMMERCIAL SERVICE (Current Winter: Nov - Apr, 0 to 50 kW, Proposed Non-Summer: Oct - May, 0-50 kW)																					
		Load Factor	Current								Proposed								Total Bill		
kWh	kW		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
2,190	15	20%	\$ 14.00	\$ 2.12	\$ 208.93	\$ 25.23	\$ 24.31	\$ 19.17	\$ 9.94	\$ 303.71	\$ 14.00	\$ 2.12	\$ 208.93	\$ 25.23	\$ 24.31	\$ 19.17	\$ 11.63	\$ 305.40	\$ 1.69	0.6%	
4,380	15	40%	\$ 14.00	\$ 2.12	\$ 208.93	\$ 50.47	\$ 48.63	\$ 38.33	\$ 12.27	\$ 374.75	\$ 14.00	\$ 2.12	\$ 208.93	\$ 50.47	\$ 48.63	\$ 38.33	\$ 14.35	\$ 376.83	\$ 2.08	0.6%	
6,570	15	60%	\$ 14.00	\$ 2.12	\$ 208.93	\$ 75.70	\$ 72.94	\$ 57.50	\$ 14.59	\$ 445.79	\$ 14.00	\$ 2.12	\$ 208.93	\$ 75.70	\$ 72.94	\$ 57.50	\$ 17.07	\$ 448.26	\$ 2.47	0.6%	
8,760	15	80%	\$ 14.00	\$ 2.12	\$ 208.93	\$ 100.94	\$ 97.25	\$ 76.67	\$ 16.92	\$ 516.83	\$ 14.00	\$ 2.12	\$ 208.93	\$ 100.94	\$ 97.25	\$ 76.67	\$ 19.79	\$ 519.70	\$ 2.87	0.6%	
3,066	21	20%	\$ 14.00	\$ 2.12	\$ 292.51	\$ 35.33	\$ 34.04	\$ 26.83	\$ 13.70	\$ 418.53	\$ 14.00	\$ 2.12	\$ 292.51	\$ 35.33	\$ 34.04	\$ 26.83	\$ 16.02	\$ 420.85	\$ 2.32	0.6%	
5,071	21	33%	\$ 14.00	\$ 2.12	\$ 292.51	\$ 58.43	\$ 56.30	\$ 44.38	\$ 15.83	\$ 483.57	\$ 14.00	\$ 2.12	\$ 292.51	\$ 58.43	\$ 56.30	\$ 44.38	\$ 18.51	\$ 486.25	\$ 2.68	0.6%	
9,198	21	60%	\$ 14.00	\$ 2.12	\$ 292.51	\$ 105.98	\$ 102.12	\$ 80.50	\$ 20.21	\$ 617.44	\$ 14.00	\$ 2.12	\$ 292.51	\$ 105.98	\$ 102.12	\$ 80.50	\$ 23.64	\$ 620.87	\$ 3.43	0.6%	
12,264	21	80%	\$ 14.00	\$ 2.12	\$ 292.51	\$ 141.31	\$ 136.15	\$ 107.33	\$ 23.47	\$ 716.90	\$ 14.00	\$ 2.12	\$ 292.51	\$ 141.31	\$ 136.15	\$ 107.33	\$ 27.44	\$ 720.87	\$ 3.97	0.6%	
7,300	50	20%	\$ 14.00	\$ 2.12	\$ 696.45	\$ 84.11	\$ 81.04	\$ 63.89	\$ 31.87	\$ 973.49	\$ 14.00	\$ 2.12	\$ 696.45	\$ 84.11	\$ 81.04	\$ 63.89	\$ 37.27	\$ 978.88	\$ 5.39	0.6%	
14,600	50	40%	\$ 14.00	\$ 2.12	\$ 696.45	\$ 168.23	\$ 162.09	\$ 127.78	\$ 39.62	\$ 1,210.29	\$ 14.00	\$ 2.12	\$ 696.45	\$ 168.23	\$ 162.09	\$ 127.78	\$ 46.33	\$ 1,217.00	\$ 6.71	0.6%	
21,900	50	60%	\$ 14.00	\$ 2.12	\$ 696.45	\$ 252.34	\$ 243.13	\$ 191.67	\$ 47.37	\$ 1,447.09	\$ 14.00	\$ 2.12	\$ 696.45	\$ 252.34	\$ 243.13	\$ 191.67	\$ 55.40	\$ 1,455.11	\$ 8.02	0.6%	
29,200	50	80%	\$ 14.00	\$ 2.12	\$ 696.45	\$ 336.46	\$ 324.18	\$ 255.56	\$ 55.12	\$ 1,683.89	\$ 14.00	\$ 2.12	\$ 696.45	\$ 336.46	\$ 324.18	\$ 255.56	\$ 64.46	\$ 1,693.23	\$ 9.34	0.6%	

RATE 03 - SMALL COMMERCIAL ALTERNATE (Annual Average)																					
kWh	kW	Current								Proposed								Total Bill		Differ	Differ(%)
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill				
500		\$ 14.00	\$ 2.12		\$ 43.04	\$ 5.55	\$ 4.38	\$ 2.34	\$ 71.42	\$ 14.00	\$ 2.12		\$ 43.04	\$ 5.55	\$ 4.38	\$ 2.73	\$ 71.82	\$ 0.40	0.6%		
743		\$ 14.00	\$ 2.12		\$ 63.95	\$ 8.25	\$ 6.50	\$ 3.21	\$ 98.04	\$ 14.00	\$ 2.12		\$ 63.95	\$ 8.25	\$ 6.50	\$ 3.75	\$ 98.58	\$ 0.54	0.6%		
2,000		\$ 14.00	\$ 2.12		\$ 172.15	\$ 22.20	\$ 17.50	\$ 7.72	\$ 235.70	\$ 14.00	\$ 2.12		\$ 172.15	\$ 22.20	\$ 17.50	\$ 9.02	\$ 237.00	\$ 1.30	0.6%		
7,000		\$ 14.00	\$ 2.12		\$ 602.53	\$ 77.71	\$ 61.26	\$ 25.64	\$ 783.27	\$ 14.00	\$ 2.12		\$ 602.53	\$ 77.71	\$ 61.26	\$ 29.98	\$ 787.62	\$ 4.35	0.6%		

RATE 03 - SMALL COMMERCIAL ALTERNATE (Current Summer: May - Oct, Proposed Summer: Jun - Sep)																					
kWh	kW	Current								Proposed								Total Bill		Differ	Differ(%)
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill				
500		\$ 14.00	\$ 2.12		\$ 54.70	\$ 5.55	\$ 4.38	\$ 2.73	\$ 83.48	\$ 14.00	\$ 2.12		\$ 54.70	\$ 5.55	\$ 4.38	\$ 3.20	\$ 83.95	\$ 0.47	0.6%		
743		\$ 14.00	\$ 2.12		\$ 81.29	\$ 8.25	\$ 6.50	\$ 3.80	\$ 115.96	\$ 14.00	\$ 2.12		\$ 81.29	\$ 8.25	\$ 6.50	\$ 4.44	\$ 116.60	\$ 0.64	0.6%		
2,000		\$ 14.00	\$ 2.12		\$ 218.82	\$ 22.20	\$ 17.50	\$ 9.30	\$ 283.94	\$ 14.00	\$ 2.12		\$ 218.82	\$ 22.20	\$ 17.50	\$ 10.87	\$ 285.52	\$ 1.58	0.6%		
7,000	alternate rate applicability limit	\$ 14.00	\$ 2.12		\$ 765.87	\$ 77.71	\$ 61.26	\$ 31.17	\$ 952.13	\$ 14.00	\$ 2.12		\$ 765.87	\$ 77.71	\$ 61.26	\$ 36.45	\$ 957.41	\$ 5.28	0.6%		

RATE 03 - SMALL COMMERCIAL ALTERNATE (Current Winter: Nov- Apr, Proposed Non-Summer: Oct - May)																					
kWh	kW	Current								Proposed								Total Bill		Differ	Differ(%)
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill				
500		\$ 14.00	\$ 2.12		\$ 37.20	\$ 5.55	\$ 4.38	\$ 2.14	\$ 65.39	\$ 14.00	\$ 2.12		\$ 37.20	\$ 5.55	\$ 4.38	\$ 2.50	\$ 65.76	\$ 0.37	0.6%		
743		\$ 14.00	\$ 2.12		\$ 55.29	\$ 8.25	\$ 6.50	\$ 2.92	\$ 89.07	\$ 14.00	\$ 2.12		\$ 55.29	\$ 8.25	\$ 6.50	\$ 3.41	\$ 89.57	\$ 0.50	0.6%		
2,000		\$ 14.00	\$ 2.12		\$ 148.82	\$ 22.20	\$ 17.50	\$ 6.93	\$ 211.57	\$ 14.00	\$ 2.12		\$ 148.82	\$ 22.20	\$ 17.50	\$ 8.10	\$ 212.75	\$ 1.18	0.6%		
7,000	alternate rate applicability limit	\$ 14.00	\$ 2.12		\$ 520.87	\$ 77.71	\$ 61.26	\$ 22.88	\$ 698.84	\$ 14.00	\$ 2.12		\$ 520.87	\$ 77.71	\$ 61.26	\$ 26.75	\$ 702.72	\$ 3.88	0.6%		

RATE 04 - GENERAL SERVICE RATE - Secondary (Annual Average, 50 to 800 kW)																						
Load			Current									Proposed									Total Bill	
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)		
7,300	50	20%	\$ 26.00	\$ 4.45	\$ 766.02	\$ 117.22	\$ 81.04	\$ 63.89	\$ 35.83	\$ 1,094.45	\$ 26.00	\$ 4.45	\$ 766.02	\$ 117.22	\$ 81.04	\$ 63.89	\$ 41.90	\$ 1,100.52	\$ 6.07	0.6%		
14,600	50	40%	\$ 26.00	\$ 4.45	\$ 766.02	\$ 234.43	\$ 162.09	\$ 127.78	\$ 44.70	\$ 1,365.47	\$ 26.00	\$ 4.45	\$ 766.02	\$ 234.43	\$ 162.09	\$ 127.78	\$ 52.27	\$ 1,373.04	\$ 7.57	0.6%		
21,900	50	60%	\$ 26.00	\$ 4.45	\$ 766.02	\$ 351.65	\$ 243.13	\$ 191.67	\$ 53.57	\$ 1,636.49	\$ 26.00	\$ 4.45	\$ 766.02	\$ 351.65	\$ 243.13	\$ 191.67	\$ 62.65	\$ 1,645.57	\$ 9.08	0.6%		
29,200	50	80%	\$ 26.00	\$ 4.45	\$ 766.02	\$ 468.86	\$ 324.18	\$ 255.56	\$ 62.44	\$ 1,907.52	\$ 26.00	\$ 4.45	\$ 766.02	\$ 468.86	\$ 324.18	\$ 255.56	\$ 73.02	\$ 1,918.09	\$ 10.57	0.6%		
17,082	117	20%	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 274.29	\$ 189.64	\$ 149.50	\$ 82.46	\$ 2,518.82	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 274.29	\$ 189.64	\$ 149.50	\$ 96.42	\$ 2,532.79	\$ 13.97	0.6%		
37,463	117	44%	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 601.54	\$ 415.91	\$ 327.88	\$ 107.23	\$ 3,275.50	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 601.54	\$ 415.91	\$ 327.88	\$ 125.39	\$ 3,293.66	\$ 18.16	0.6%		
51,246	117	60%	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 822.86	\$ 568.93	\$ 448.50	\$ 123.98	\$ 3,787.21	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 822.86	\$ 568.93	\$ 448.50	\$ 144.98	\$ 3,808.21	\$ 21.00	0.6%		
68,328	117	80%	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 1,097.14	\$ 758.58	\$ 598.01	\$ 144.74	\$ 4,421.40	\$ 26.00	\$ 4.45	\$ 1,792.49	\$ 1,097.14	\$ 758.58	\$ 598.01	\$ 169.26	\$ 4,445.92	\$ 24.52	0.6%		
73,000	500	20%	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 1,172.16	\$ 810.45	\$ 638.90	\$ 349.00	\$ 10,661.16	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 1,172.16	\$ 810.45	\$ 638.90	\$ 408.12	\$ 10,720.28	\$ 59.12	0.6%		
146,000	500	40%	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 2,344.32	\$ 1,620.89	\$ 1,277.79	\$ 437.73	\$ 13,371.38	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 2,344.32	\$ 1,620.89	\$ 1,277.79	\$ 511.88	\$ 13,445.53	\$ 74.15	0.6%		
219,000	500	60%	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 3,516.49	\$ 2,431.34	\$ 1,916.69	\$ 526.45	\$ 16,081.61	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 3,516.49	\$ 2,431.34	\$ 1,916.69	\$ 615.63	\$ 16,170.79	\$ 89.18	0.6%		
292,000	500	80%	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 4,688.65	\$ 3,241.78	\$ 2,555.58	\$ 615.17	\$ 18,791.84	\$ 26.00	\$ 4.45	\$ 7,660.20	\$ 4,688.65	\$ 3,241.78	\$ 2,555.58	\$ 719.38	\$ 18,896.04	\$ 104.20	0.6%		
RATE 04 - GENERAL SERVICE RATE - Secondary (Current Summer: May - Oct, 50 to 800 kW, Proposed Summer: Jun - Sep, 50 to 800 kW)																						
Load			Current									Proposed									Total Bill	
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)		
7,300	50	20%	\$ 26.00	\$ 4.45	\$ 987.00	\$ 211.48	\$ 81.04	\$ 63.89	\$ 46.50	\$ 1,420.36	\$ 26.00	\$ 4.45	\$ 987.00	\$ 211.48	\$ 81.04	\$ 63.89	\$ 54.37	\$ 1,428.24	\$ 7.88	0.6%		
14,600	50	40%	\$ 26.00	\$ 4.45	\$ 987.00	\$ 422.97	\$ 162.09	\$ 127.78	\$ 58.56	\$ 1,788.85	\$ 26.00	\$ 4.45	\$ 987.00	\$ 422.97	\$ 162.09	\$ 127.78	\$ 68.48	\$ 1,798.76	\$ 9.91	0.6%		
21,900	50	60%	\$ 26.00	\$ 4.45	\$ 987.00	\$ 634.45	\$ 243.13	\$ 191.67	\$ 70.62	\$ 2,157.33	\$ 26.00	\$ 4.45	\$ 987.00	\$ 634.45	\$ 243.13	\$ 191.67	\$ 82.59	\$ 2,169.29	\$ 11.96	0.6%		
29,200	50	80%	\$ 26.00	\$ 4.45	\$ 987.00	\$ 845.93	\$ 324.18	\$ 255.56	\$ 82.68	\$ 2,525.81	\$ 26.00	\$ 4.45	\$ 987.00	\$ 845.93	\$ 324.18	\$ 255.56	\$ 96.69	\$ 2,539.81	\$ 14.00	0.6%		
17,082	117	20%	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 494.87	\$ 189.64	\$ 149.50	\$ 107.42	\$ 3,281.47	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 494.87	\$ 189.64	\$ 149.50	\$ 125.62	\$ 3,299.67	\$ 18.20	0.6%		
37,463	117	44%	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 1,085.32	\$ 415.91	\$ 327.88	\$ 141.10	\$ 4,310.24	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 1,085.32	\$ 415.91	\$ 327.88	\$ 165.00	\$ 4,334.14	\$ 23.90	0.6%		
51,246	117	60%	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 1,484.61	\$ 568.93	\$ 448.50	\$ 163.88	\$ 5,005.96	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 1,484.61	\$ 568.93	\$ 448.50	\$ 191.64	\$ 5,033.72	\$ 27.76	0.6%		
68,328	117	80%	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 1,979.49	\$ 758.58	\$ 598.01	\$ 192.10	\$ 5,868.20	\$ 26.00	\$ 4.45	\$ 2,309.58	\$ 1,979.49	\$ 758.58	\$ 598.01	\$ 224.64	\$ 5,900.74	\$ 32.54	0.6%		
73,000	500	20%	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 2,114.84	\$ 810.45	\$ 638.90	\$ 455.70	\$ 13,920.32	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 2,114.84	\$ 810.45	\$ 638.90	\$ 532.89	\$ 13,997.52	\$ 77.20	0.6%		
146,000	500	40%	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 4,229.67	\$ 1,620.89	\$ 1,277.79	\$ 576.32	\$ 17,605.13	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 4,229.67	\$ 1,620.89	\$ 1,277.79	\$ 673.95	\$ 17,702.75	\$ 97.62	0.6%		
219,000	500	60%	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 6,344.51	\$ 2,431.34	\$ 1,916.69	\$ 696.95	\$ 21,289.93	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 6,344.51	\$ 2,431.34	\$ 1,916.69	\$ 815.01	\$ 21,407.99	\$ 118.06	0.6%		
292,000	500	80%	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 8,459.34	\$ 3,241.78	\$ 2,555.58	\$ 817.57	\$ 24,974.73	\$ 26.00	\$ 4.45	\$ 9,870.00	\$ 8,459.34	\$ 3,241.78	\$ 2,555.58	\$ 956.07	\$ 25,113.23	\$ 138.50	0.6%		
RATE 04 - GENERAL SERVICE RATE -Secondary (Current Winter: Nov - Apr, 50 to 800 kW, Proposed Non-Summer: Oct - May, 50 to 800 kW)																						
Load			Current									Proposed									Total Bill	
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)		
7,300	50	20%	\$ 26.00	\$ 4.45	\$ 655.53	\$ 70.08	\$ 81.04	\$ 63.89	\$ 30.49	\$ 931.49	\$ 26.00	\$ 4.45	\$ 655.53	\$ 70.08	\$ 81.04	\$ 63.89	\$ 35.66	\$ 936.66	\$ 5.17	0.6%		
14,600	50	40%	\$ 26.00	\$ 4.45	\$ 655.53	\$ 140.17	\$ 162.09	\$ 127.78	\$ 37.77	\$ 1,153.78	\$ 26.00	\$ 4.45	\$ 655.53	\$ 140.17	\$ 162.09	\$ 127.78	\$ 44.17	\$ 1,160.18	\$ 6.40	0.6%		
21,900	50	60%	\$ 26.00	\$ 4.45	\$ 655.53	\$ 210.25	\$ 243.13	\$ 191.67	\$ 45.05	\$ 1,376.08	\$ 26.00	\$ 4.45	\$ 655.53	\$ 210.25	\$ 243.13	\$ 191.67	\$ 52.68	\$ 1,383.71	\$ 7.63	0.6%		
29,200	50	80%	\$ 26.00	\$ 4.45	\$ 655.53	\$ 280.33	\$ 324.18	\$ 255.56	\$ 52.32	\$ 1,598.37	\$ 26.00	\$ 4.45	\$ 655.53	\$ 280.33	\$ 324.18	\$ 255.56	\$ 61.19	\$ 1,607.23	\$ 8.86	0.6%		
17,082	117	20%	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 163.99	\$ 189.64	\$ 149.50	\$ 69.97	\$ 2,137.50	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 163.99	\$ 189.64	\$ 149.50	\$ 81.83	\$ 2,149.36	\$ 11.86	0.6%		
37,463	117	44%	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 359.66	\$ 415.91	\$ 327.88	\$ 90.29	\$ 2,758.13	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 359.66	\$ 415.91	\$ 327.88	\$ 105.59	\$ 2,773.42	\$ 15.29	0.6%		
51,246	117	60%	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 491.98	\$ 568.93	\$ 448.50	\$ 104.03	\$ 3,177.84	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 491.98	\$ 568.93	\$ 448.50	\$ 121.65	\$ 3,195.46	\$ 17.62	0.6%		
68,328	117	80%	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 655.97	\$ 758.58	\$ 598.01	\$ 121.06	\$ 3,696.00	\$ 26.00	\$ 4.45	\$ 1,533.94	\$ 655.97	\$ 758.58	\$ 598.01	\$ 141.56	\$ 3,716.51	\$ 20.51	0.6%		
73,000	500	20%	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 700.83	\$ 810.45	\$ 638.90	\$ 295.66	\$ 9,031.57	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 700.83	\$ 810.45	\$ 638.90	\$ 345.74	\$ 9,081.66	\$ 50.09	0.6%		
146,000	500	40%	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 1,401.65	\$ 1,620.89	\$ 1,277.79	\$ 368.43	\$ 11,254.51	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 1,401.65	\$ 1,620.89	\$ 1,277.79	\$ 430.84	\$ 11,316.92	\$ 62.41	0.6%		
219,000	500	60%	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 2,102.48	\$ 2,431.34	\$ 1,916.69	\$ 441.20	\$ 13,477.45	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 2,102.48	\$ 2,431.34	\$ 1,916.69	\$ 515.94	\$ 13,552.19	\$ 74.74	0.6%		
292,000	500	80%	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 2,803.30	\$ 3,241.78	\$ 2,555.58	\$ 513.97	\$ 15,700.39	\$ 26.00	\$ 4.45	\$ 6,555.30	\$ 2,803.30	\$ 3,241.78	\$ 2,555.58	\$ 601.03	\$ 15,787.45	\$ 87.06	0.6%		

RATE 04 - GENERAL SERVICE RATE - Primary (Annual Average, 50 to 800 kW)																					
		Load	Current								Proposed								Total Bill		
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
7,300	50	20%	\$ 26.00	\$ 4.45	\$ 709.72	\$ 117.22	\$ 79.00	\$ 63.89	\$ 33.85	\$ 1,034.13	\$ 26.00	\$ 4.45	\$ 709.72	\$ 117.22	\$ 79.00	\$ 63.89	\$ 39.59	\$ 1,039.86	\$ 5.73	0.6%	
14,600	50	40%	\$ 26.00	\$ 4.45	\$ 709.72	\$ 234.43	\$ 158.00	\$ 127.78	\$ 42.66	\$ 1,303.04	\$ 26.00	\$ 4.45	\$ 709.72	\$ 234.43	\$ 158.00	\$ 127.78	\$ 49.88	\$ 1,310.26	\$ 7.22	0.6%	
21,900	50	60%	\$ 26.00	\$ 4.45	\$ 709.72	\$ 351.65	\$ 237.00	\$ 191.67	\$ 51.46	\$ 1,571.95	\$ 26.00	\$ 4.45	\$ 709.72	\$ 351.65	\$ 237.00	\$ 191.67	\$ 60.18	\$ 1,580.67	\$ 8.72	0.6%	
29,200	50	80%	\$ 26.00	\$ 4.45	\$ 709.72	\$ 468.86	\$ 316.00	\$ 255.56	\$ 60.26	\$ 1,840.86	\$ 26.00	\$ 4.45	\$ 709.72	\$ 468.86	\$ 316.00	\$ 255.56	\$ 70.47	\$ 1,851.07	\$ 10.21	0.6%	
53,728	368	20%	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 862.71	\$ 581.44	\$ 470.23	\$ 242.61	\$ 7,410.98	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 862.71	\$ 581.44	\$ 470.23	\$ 283.70	\$ 7,452.07	\$ 41.09	0.6%	
140,011	368	52%	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 2,248.16	\$ 1,515.20	\$ 1,225.38	\$ 346.65	\$ 10,589.38	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 2,248.16	\$ 1,515.20	\$ 1,225.38	\$ 405.38	\$ 10,648.10	\$ 58.72	0.6%	
161,184	368	60%	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 2,588.13	\$ 1,744.33	\$ 1,410.68	\$ 372.19	\$ 11,369.32	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 2,588.13	\$ 1,744.33	\$ 1,410.68	\$ 435.23	\$ 11,432.37	\$ 63.05	0.6%	
214,912	368	80%	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 3,450.85	\$ 2,325.78	\$ 1,880.91	\$ 436.98	\$ 13,348.50	\$ 26.00	\$ 4.45	\$ 5,223.54	\$ 3,450.85	\$ 2,325.78	\$ 1,880.91	\$ 511.00	\$ 13,422.52	\$ 74.02	0.6%	
73,000	500	20%	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 1,172.16	\$ 790.01	\$ 638.90	\$ 329.26	\$ 10,057.97	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 1,172.16	\$ 790.01	\$ 638.90	\$ 385.03	\$ 10,113.74	\$ 55.77	0.6%	
146,000	500	40%	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 2,344.32	\$ 1,580.01	\$ 1,277.79	\$ 417.29	\$ 12,747.06	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 2,344.32	\$ 1,580.01	\$ 1,277.79	\$ 487.98	\$ 12,817.75	\$ 70.69	0.6%	
219,000	500	60%	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 3,516.49	\$ 2,370.02	\$ 1,916.69	\$ 505.32	\$ 15,436.16	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 3,516.49	\$ 2,370.02	\$ 1,916.69	\$ 590.92	\$ 15,521.76	\$ 85.60	0.6%	
292,000	500	80%	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 4,688.65	\$ 3,160.02	\$ 2,555.58	\$ 593.35	\$ 18,125.25	\$ 26.00	\$ 4.45	\$ 7,097.20	\$ 4,688.65	\$ 3,160.02	\$ 2,555.58	\$ 693.86	\$ 18,225.76	\$ 100.51	0.6%	
RATE 04 - GENERAL SERVICE RATE - Primary (Current Summer, May - Oct and 50 to 800 kW, Proposed Summer, Jun - Sep and 50 to 800 kW)																					
		Load	Current								Proposed								Total Bill		
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
7,300	50	20%	\$ 26.00	\$ 4.45	\$ 932.50	\$ 211.48	\$ 79.00	\$ 63.89	\$ 44.58	\$ 1,361.91	\$ 26.00	\$ 4.45	\$ 932.50	\$ 211.48	\$ 79.00	\$ 63.89	\$ 52.14	\$ 1,369.46	\$ 7.55	0.6%	
14,600	50	40%	\$ 26.00	\$ 4.45	\$ 932.50	\$ 422.97	\$ 158.00	\$ 127.78	\$ 56.58	\$ 1,728.27	\$ 26.00	\$ 4.45	\$ 932.50	\$ 422.97	\$ 158.00	\$ 127.78	\$ 66.16	\$ 1,737.86	\$ 9.59	0.6%	
21,900	50	60%	\$ 26.00	\$ 4.45	\$ 932.50	\$ 634.45	\$ 237.00	\$ 191.67	\$ 68.57	\$ 2,094.64	\$ 26.00	\$ 4.45	\$ 932.50	\$ 634.45	\$ 237.00	\$ 191.67	\$ 80.19	\$ 2,106.26	\$ 11.62	0.6%	
29,200	50	80%	\$ 26.00	\$ 4.45	\$ 932.50	\$ 845.93	\$ 316.00	\$ 255.56	\$ 80.56	\$ 2,461.01	\$ 26.00	\$ 4.45	\$ 932.50	\$ 845.93	\$ 316.00	\$ 255.56	\$ 94.21	\$ 2,474.66	\$ 13.65	0.6%	
53,728	368	20%	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 1,556.52	\$ 581.44	\$ 470.23	\$ 321.58	\$ 9,823.42	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 1,556.52	\$ 581.44	\$ 470.23	\$ 376.05	\$ 9,877.90	\$ 54.48	0.6%	
140,011	368	52%	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 4,056.17	\$ 1,515.20	\$ 1,225.38	\$ 463.34	\$ 14,153.73	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 4,056.17	\$ 1,515.20	\$ 1,225.38	\$ 541.82	\$ 14,232.22	\$ 78.49	0.6%	
161,184	368	60%	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 4,669.56	\$ 1,744.33	\$ 1,410.68	\$ 498.12	\$ 15,216.35	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 4,669.56	\$ 1,744.33	\$ 1,410.68	\$ 582.50	\$ 15,300.73	\$ 84.38	0.6%	
214,912	368	80%	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 6,226.08	\$ 2,325.78	\$ 1,880.91	\$ 586.40	\$ 17,912.81	\$ 26.00	\$ 4.45	\$ 6,863.20	\$ 6,226.08	\$ 2,325.78	\$ 1,880.91	\$ 685.73	\$ 18,012.14	\$ 99.33	0.6%	
73,000	500	20%	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 2,114.84	\$ 790.01	\$ 638.90	\$ 436.56	\$ 13,335.75	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 2,114.84	\$ 790.01	\$ 638.90	\$ 510.51	\$ 13,409.70	\$ 73.95	0.6%	
146,000	500	40%	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 4,229.67	\$ 1,580.01	\$ 1,277.79	\$ 556.49	\$ 16,999.42	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 4,229.67	\$ 1,580.01	\$ 1,277.79	\$ 650.76	\$ 17,093.69	\$ 94.27	0.6%	
219,000	500	60%	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 6,344.51	\$ 2,370.02	\$ 1,916.69	\$ 676.43	\$ 20,663.09	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 6,344.51	\$ 2,370.02	\$ 1,916.69	\$ 791.01	\$ 20,777.67	\$ 114.58	0.6%	
292,000	500	80%	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 8,459.34	\$ 3,160.02	\$ 2,555.58	\$ 796.36	\$ 24,326.76	\$ 26.00	\$ 4.45	\$ 9,325.00	\$ 8,459.34	\$ 3,160.02	\$ 2,555.58	\$ 931.26	\$ 24,461.66	\$ 134.90	0.6%	
RATE 04 - GENERAL SERVICE RATE - Primary (Current Winter: Nov - Apr, 50 to 800 kW, Proposed Non-Summer: Oct - May, 50 to 800 kW)																					
		Load	Current								Proposed								Total Bill		
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
7,300	50	20%	\$ 26.00	\$ 4.45	\$ 598.33	\$ 70.08	\$ 79.00	\$ 63.89	\$ 28.49	\$ 870.24	\$ 26.00	\$ 4.45	\$ 598.33	\$ 70.08	\$ 79.00	\$ 63.89	\$ 33.31	\$ 875.07	\$ 4.83	0.6%	
14,600	50	40%	\$ 26.00	\$ 4.45	\$ 598.33	\$ 140.17	\$ 158.00	\$ 127.78	\$ 35.70	\$ 1,090.42	\$ 26.00	\$ 4.45	\$ 598.33	\$ 140.17	\$ 158.00	\$ 127.78	\$ 41.74	\$ 1,096.47	\$ 6.05	0.6%	
21,900	50	60%	\$ 26.00	\$ 4.45	\$ 598.33	\$ 210.25	\$ 237.00	\$ 191.67	\$ 42.90	\$ 1,310.60	\$ 26.00	\$ 4.45	\$ 598.33	\$ 210.25	\$ 237.00	\$ 191.67	\$ 50.17	\$ 1,317.87	\$ 7.27	0.6%	
29,200	50	80%	\$ 26.00	\$ 4.45	\$ 598.33	\$ 280.33	\$ 316.00	\$ 255.56	\$ 50.11	\$ 1,530.78	\$ 26.00	\$ 4.45	\$ 598.33	\$ 280.33	\$ 316.00	\$ 255.56	\$ 58.60	\$ 1,539.27	\$ 8.49	0.6%	
53,728	368	20%	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 515.81	\$ 581.44	\$ 470.23	\$ 203.12	\$ 6,204.75	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 515.81	\$ 581.44	\$ 470.23	\$ 237.53	\$ 6,239.16	\$ 34.41	0.6%	
140,011	368	52%	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 1,344.15	\$ 1,515.20	\$ 1,225.38	\$ 288.31	\$ 8,807.20	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 1,344.15	\$ 1,515.20	\$ 1,225.38	\$ 337.15	\$ 8,856.04	\$ 48.84	0.6%	
161,184	368	60%	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 1,547.42	\$ 1,744.33	\$ 1,410.68	\$ 309.22	\$ 9,445.81	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 1,547.42	\$ 1,744.33	\$ 1,410.68	\$ 361.60	\$ 9,498.19	\$ 52.38	0.6%	
214,912	368	80%	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 2,063.23	\$ 2,325.78	\$ 1,880.91	\$ 362.27	\$ 11,066.34	\$ 26.00	\$ 4.45	\$ 4,403.71	\$ 2,063.23	\$ 2,325.78	\$ 1,880.91	\$ 423.64	\$ 11,127.71	\$ 61.37	0.6%	
73,000	500	20%	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 700.83	\$ 790.01	\$ 638.90	\$ 275.61	\$ 8,419.08	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 700.83	\$ 790.01	\$ 638.90	\$ 322.29	\$ 8,465.77	\$ 46.69	0.6%	
146,000	500	40%	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 1,401.65	\$ 1,580.01	\$ 1,277.79	\$ 347.69	\$ 10,620.89	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 1,401.65	\$ 1,580.01	\$ 1,277.79	\$ 406.58	\$ 10,679.78	\$ 58.89	0.6%	
219,000	500	60%	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 2,102.48	\$ 2,370.02	\$ 1,916.69	\$ 419.76	\$ 12,822.69	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 2,102.48	\$ 2,370.02	\$ 1,916.69	\$ 490.87	\$ 12,893.80	\$ 71.11	0.6%	
292,000	500	80%	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 2,803.30	\$ 3,160.02	\$ 2,555.58	\$ 491.84	\$ 15,024.50	\$ 26.00	\$ 4.45	\$ 5,983.30	\$ 2,803.30	\$ 3,160.02	\$ 2,555.58	\$ 575.16	\$ 15,107.81	\$ 83.31	0.6%	

RATE 05 - IRRIGATION SERVICE RATE (Secondary, Annual Average)																								
Horse		Equiv.		Load Factor	Current								Proposed								Total Bill			
kWh	Power	kW			Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)		
438	7.5	6	10%	\$ 20.00	\$ 2.67		\$ 27.20	\$ 4.86	\$ 3.83	\$ 1.98	\$ 60.54	\$ 20.00	\$ 2.67		\$ 27.20	\$ 4.86	\$ 3.83	\$ 2.32	\$ 60.88	\$ 0.34	0.6%			
876	7.5	6	20%	\$ 20.00	\$ 2.67		\$ 54.39	\$ 9.73	\$ 7.67	\$ 3.20	\$ 97.65	\$ 20.00	\$ 2.67		\$ 54.39	\$ 9.73	\$ 7.67	\$ 3.74	\$ 98.19	\$ 0.54	0.6%			
1,752	7.5	6	40%	\$ 20.00	\$ 2.67		\$ 108.78	\$ 19.45	\$ 15.33	\$ 5.63	\$ 171.86	\$ 20.00	\$ 2.67		\$ 108.78	\$ 19.45	\$ 15.33	\$ 6.58	\$ 172.82	\$ 0.96	0.6%			
2,628	7.5	6	60%	\$ 20.00	\$ 2.67		\$ 163.18	\$ 29.18	\$ 23.00	\$ 8.06	\$ 246.08	\$ 20.00	\$ 2.67		\$ 163.18	\$ 29.18	\$ 23.00	\$ 9.42	\$ 247.44	\$ 1.36	0.6%			
2,409	40	33	10%	\$ 20.00	\$ 2.67		\$ 149.58	\$ 26.74	\$ 21.08	\$ 7.45	\$ 227.52	\$ 20.00	\$ 2.67		\$ 149.58	\$ 26.74	\$ 21.08	\$ 8.71	\$ 228.79	\$ 1.27	0.6%			
4,282	40	33	18%	\$ 20.00	\$ 2.67		\$ 265.88	\$ 47.54	\$ 37.48	\$ 12.64	\$ 386.20	\$ 20.00	\$ 2.67		\$ 265.88	\$ 47.54	\$ 37.48	\$ 14.78	\$ 388.34	\$ 2.14	0.6%			
9,636	40	33	40%	\$ 20.00	\$ 2.67		\$ 598.31	\$ 106.98	\$ 84.33	\$ 27.49	\$ 839.79	\$ 20.00	\$ 2.67		\$ 598.31	\$ 106.98	\$ 84.33	\$ 32.15	\$ 844.44	\$ 4.65	0.6%			
14,454	40	33	60%	\$ 20.00	\$ 2.67		\$ 897.47	\$ 160.47	\$ 126.50	\$ 40.85	\$ 1,247.96	\$ 20.00	\$ 2.67		\$ 897.47	\$ 160.47	\$ 126.50	\$ 47.77	\$ 1,254.88	\$ 6.92	0.6%			
15,111	250	207	10%	\$ 20.00	\$ 2.67		\$ 938.26	\$ 167.76	\$ 132.25	\$ 42.68	\$ 1,303.62	\$ 20.00	\$ 2.67		\$ 938.26	\$ 167.76	\$ 132.25	\$ 49.90	\$ 1,310.85	\$ 7.23	0.6%			
30,222	250	207	20%	\$ 20.00	\$ 2.67		\$ 1,876.52	\$ 335.52	\$ 264.50	\$ 84.58	\$ 2,583.81	\$ 20.00	\$ 2.67		\$ 1,876.52	\$ 335.52	\$ 264.50	\$ 98.91	\$ 2,598.13	\$ 14.32	0.6%			
60,444	250	207	40%	\$ 20.00	\$ 2.67		\$ 3,753.05	\$ 671.05	\$ 529.01	\$ 168.40	\$ 5,144.17	\$ 20.00	\$ 2.67		\$ 3,753.05	\$ 671.05	\$ 529.01	\$ 196.93	\$ 5,172.70	\$ 28.53	0.6%			
90,666	250	207	60%	\$ 20.00	\$ 2.67		\$ 5,629.57	\$ 1,006.57	\$ 793.51	\$ 252.22	\$ 7,704.54	\$ 20.00	\$ 2.67		\$ 5,629.57	\$ 1,006.57	\$ 793.51	\$ 294.94	\$ 7,747.26	\$ 42.72	0.6%			
RATE 05 - IRRIGATION SERVICE RATE (Secondary, Current Summer: May - Oct, Proposed Summer: Jun - Sep)																								
Horse		Equiv.		Load Factor	Current								Proposed								Total Bill			
kWh	Power	kW			Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)		
438	7.5	6	10%	\$ 20.00	\$ 2.67		\$ 33.98	\$ 4.86	\$ 3.83	\$ 2.21	\$ 67.55	\$ 20.00	\$ 2.67		\$ 33.98	\$ 4.86	\$ 3.83	\$ 2.59	\$ 67.93	\$ 0.38	0.6%			
876	7.5	6	20%	\$ 20.00	\$ 2.67		\$ 67.95	\$ 9.73	\$ 7.67	\$ 3.66	\$ 111.67	\$ 20.00	\$ 2.67		\$ 67.95	\$ 9.73	\$ 7.67	\$ 4.27	\$ 112.29	\$ 0.62	0.6%			
1,752	7.5	6	40%	\$ 20.00	\$ 2.67		\$ 135.90	\$ 19.45	\$ 15.33	\$ 6.54	\$ 199.90	\$ 20.00	\$ 2.67		\$ 135.90	\$ 19.45	\$ 15.33	\$ 7.65	\$ 201.01	\$ 1.11	0.6%			
2,628	7.5	6	60%	\$ 20.00	\$ 2.67		\$ 203.86	\$ 29.18	\$ 23.00	\$ 9.43	\$ 288.14	\$ 20.00	\$ 2.67		\$ 203.86	\$ 29.18	\$ 23.00	\$ 11.03	\$ 289.73	\$ 1.59	0.6%			
2,409	40	33	10%	\$ 20.00	\$ 2.67		\$ 186.87	\$ 26.74	\$ 21.08	\$ 8.71	\$ 266.08	\$ 20.00	\$ 2.67		\$ 186.87	\$ 26.74	\$ 21.08	\$ 10.19	\$ 267.55	\$ 1.47	0.6%			
4,282	40	33	18%	\$ 20.00	\$ 2.67		\$ 332.16	\$ 47.54	\$ 37.48	\$ 14.89	\$ 454.73	\$ 20.00	\$ 2.67		\$ 332.16	\$ 47.54	\$ 37.48	\$ 17.41	\$ 457.25	\$ 2.52	0.6%			
9,636	40	33	40%	\$ 20.00	\$ 2.67		\$ 747.48	\$ 106.98	\$ 84.33	\$ 32.54	\$ 994.00	\$ 20.00	\$ 2.67		\$ 747.48	\$ 106.98	\$ 84.33	\$ 38.05	\$ 999.51	\$ 5.51	0.6%			
14,454	40	33	60%	\$ 20.00	\$ 2.67		\$ 1,121.22	\$ 160.47	\$ 126.50	\$ 48.43	\$ 1,479.28	\$ 20.00	\$ 2.67		\$ 1,121.22	\$ 160.47	\$ 126.50	\$ 56.63	\$ 1,487.48	\$ 8.20	0.6%			
15,111	250	207	10%	\$ 20.00	\$ 2.67		\$ 1,172.18	\$ 167.76	\$ 132.25	\$ 50.59	\$ 1,545.46	\$ 20.00	\$ 2.67		\$ 1,172.18	\$ 167.76	\$ 132.25	\$ 59.16	\$ 1,554.03	\$ 8.57	0.6%			
30,222	250	207	20%	\$ 20.00	\$ 2.67		\$ 2,344.36	\$ 335.52	\$ 264.50	\$ 100.42	\$ 3,067.48	\$ 20.00	\$ 2.67		\$ 2,344.36	\$ 335.52	\$ 264.50	\$ 117.43	\$ 3,084.49	\$ 17.01	0.6%			
60,444	250	207	40%	\$ 20.00	\$ 2.67		\$ 4,688.72	\$ 671.05	\$ 529.01	\$ 200.07	\$ 6,111.51	\$ 20.00	\$ 2.67		\$ 4,688.72	\$ 671.05	\$ 529.01	\$ 233.96	\$ 6,145.40	\$ 33.89	0.6%			
90,666	250	207	60%	\$ 20.00	\$ 2.67		\$ 7,033.08	\$ 1,006.57	\$ 793.51	\$ 299.72	\$ 9,155.55	\$ 20.00	\$ 2.67		\$ 7,033.08	\$ 1,006.57	\$ 793.51	\$ 350.49	\$ 9,206.32	\$ 50.77	0.6%			
RATE 05 - IRRIGATION SERVICE RATE (Secondary, Current Winter: Nov - Apr, Proposed Non-Summer: Oct - May)																								
Horse		Equiv.		Load Factor	Current								Proposed								Total Bill			
kWh	Power	kW			Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)		
438	7.5	6	10%	\$ 20.00	\$ 2.67		\$ 23.81	\$ 4.86	\$ 3.83	\$ 1.87	\$ 57.04	\$ 20.00	\$ 2.67		\$ 23.81	\$ 4.86	\$ 3.83	\$ 2.18	\$ 57.36	\$ 0.32	0.6%			
876	7.5	6	20%	\$ 20.00	\$ 2.67		\$ 47.61	\$ 9.73	\$ 7.67	\$ 2.97	\$ 90.64	\$ 20.00	\$ 2.67		\$ 47.61	\$ 9.73	\$ 7.67	\$ 3.47	\$ 91.14	\$ 0.50	0.6%			
1,752	7.5	6	40%	\$ 20.00	\$ 2.67		\$ 95.22	\$ 19.45	\$ 15.33	\$ 5.17	\$ 157.84	\$ 20.00	\$ 2.67		\$ 95.22	\$ 19.45	\$ 15.33	\$ 6.04	\$ 158.72	\$ 0.88	0.6%			
2,628	7.5	6	60%	\$ 20.00	\$ 2.67		\$ 142.84	\$ 29.18	\$ 23.00	\$ 7.37	\$ 225.05	\$ 20.00	\$ 2.67		\$ 142.84	\$ 29.18	\$ 23.00	\$ 8.62	\$ 226.30	\$ 1.25	0.6%			
2,409	40	33	10%	\$ 20.00	\$ 2.67		\$ 130.93	\$ 26.74	\$ 21.08	\$ 6.82	\$ 208.25	\$ 20.00	\$ 2.67		\$ 130.93	\$ 26.74	\$ 21.08	\$ 7.97	\$ 209.40	\$ 1.15	0.6%			
4,282	40	33	18%	\$ 20.00	\$ 2.67		\$ 232.73	\$ 47.54	\$ 37.48	\$ 11.52	\$ 351.94	\$ 20.00	\$ 2.67		\$ 232.73	\$ 47.54	\$ 37.48	\$ 13.47	\$ 353.89	\$ 1.95	0.6%			
9,636	40	33	40%	\$ 20.00	\$ 2.67		\$ 523.73	\$ 106.98	\$ 84.33	\$ 24.97	\$ 762.68	\$ 20.00	\$ 2.67		\$ 523.73	\$ 106.98	\$ 84.33	\$ 29.20	\$ 766.91	\$ 4.23	0.6%			
14,454	40	33	60%	\$ 20.00	\$ 2.67		\$ 785.59	\$ 160.47	\$ 126.50	\$ 37.07	\$ 1,132.30	\$ 20.00	\$ 2.67		\$ 785.59	\$ 160.47	\$ 126.50	\$ 43.35	\$ 1,138.58	\$ 6.28	0.6%			
15,111	250	207	10%	\$ 20.00	\$ 2.67		\$ 821.30	\$ 167.76	\$ 132.25	\$ 38.72	\$ 1,182.70	\$ 20.00	\$ 2.67		\$ 821.30	\$ 167.76	\$ 132.25	\$ 45.28	\$ 1,189.26	\$ 6.56	0.6%			
30,222	250	207	20%	\$ 20.00	\$ 2.67		\$ 1,642.61	\$ 335.52	\$ 264.50	\$ 76.67	\$ 2,341.97	\$ 20.00	\$ 2.67		\$ 1,642.61	\$ 335.52	\$ 264.50	\$ 89.65	\$ 2,354.96	\$ 12.99	0.6%			
60,444	250	207	40%	\$ 20.00	\$ 2.67		\$ 3,285.21	\$ 671.05	\$ 529.01	\$ 152.57	\$ 4,660.50	\$ 20.00	\$ 2.67		\$ 3,285.21	\$ 671.05	\$ 529.01	\$ 178.41	\$ 4,686.35	\$ 25.85	0.6%			
90,666	250	207	60%	\$ 20.00	\$ 2.67		\$ 4,927.82	\$ 1,006.57	\$ 793.51	\$ 228.47	\$ 6,979.04	\$ 20.00	\$ 2.67		\$ 4,927.82	\$ 1,006.57	\$ 793.51	\$ 267.17	\$ 7,017.74	\$ 38.70	0.6%			

Rate 7 - CITY AND COUNTY SERVICE (Annual Average, Secondary)																							
Load		Current										Proposed										Total Bill	
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)			
1,460	10	20%	\$ 17.50	\$ 2.50	\$ 115.03	\$ 38.71	\$ 16.21	\$ 12.78	\$ 6.86	\$ 209.59	\$ 17.50	\$ 2.50	\$ 115.03	\$ 38.71	\$ 16.21	\$ 12.78	\$ 8.02	\$ 210.75	\$ 1.16	0.6%			
2,920	10	40%	\$ 17.50	\$ 2.50	\$ 115.03	\$ 77.42	\$ 32.42	\$ 25.56	\$ 9.15	\$ 279.58	\$ 17.50	\$ 2.50	\$ 115.03	\$ 77.42	\$ 32.42	\$ 25.56	\$ 10.70	\$ 281.13	\$ 1.55	0.6%			
4,380	10	60%	\$ 17.50	\$ 2.50	\$ 115.03	\$ 116.13	\$ 48.63	\$ 38.33	\$ 11.44	\$ 349.57	\$ 17.50	\$ 2.50	\$ 115.03	\$ 116.13	\$ 48.63	\$ 38.33	\$ 13.38	\$ 351.51	\$ 1.94	0.6%			
5,840	10	80%	\$ 17.50	\$ 2.50	\$ 115.03	\$ 154.84	\$ 64.84	\$ 51.11	\$ 13.73	\$ 419.56	\$ 17.50	\$ 2.50	\$ 115.03	\$ 154.84	\$ 64.84	\$ 51.11	\$ 16.06	\$ 421.88	\$ 2.32	0.6%			
3,796	26	20%	\$ 17.50	\$ 2.50	\$ 299.09	\$ 100.65	\$ 42.14	\$ 33.22	\$ 16.76	\$ 511.86	\$ 17.50	\$ 2.50	\$ 299.09	\$ 100.65	\$ 42.14	\$ 33.22	\$ 19.59	\$ 514.69	\$ 2.83	0.6%			
6,475	26	34%	\$ 17.50	\$ 2.50	\$ 299.09	\$ 171.88	\$ 71.89	\$ 56.67	\$ 20.98	\$ 640.28	\$ 17.50	\$ 2.50	\$ 299.09	\$ 171.88	\$ 71.89	\$ 56.67	\$ 24.53	\$ 643.83	\$ 3.55	0.6%			
11,388	26	60%	\$ 17.50	\$ 2.50	\$ 299.09	\$ 301.94	\$ 126.43	\$ 97.59	\$ 28.67	\$ 875.80	\$ 17.50	\$ 2.50	\$ 299.09	\$ 301.94	\$ 126.43	\$ 99.67	\$ 33.53	\$ 880.65	\$ 4.85	0.6%			
15,184	26	80%	\$ 17.50	\$ 2.50	\$ 299.09	\$ 402.59	\$ 168.57	\$ 132.89	\$ 34.63	\$ 1,057.77	\$ 17.50	\$ 2.50	\$ 299.09	\$ 402.59	\$ 168.57	\$ 132.89	\$ 40.49	\$ 1,063.63	\$ 5.86	0.6%			
14,600	100	20%	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 387.10	\$ 162.09	\$ 127.78	\$ 62.52	\$ 1,909.83	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 387.10	\$ 162.09	\$ 127.78	\$ 73.11	\$ 1,920.42	\$ 10.59	0.6%			
29,200	100	40%	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 774.21	\$ 324.18	\$ 255.56	\$ 85.43	\$ 2,609.71	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 774.21	\$ 324.18	\$ 255.56	\$ 99.90	\$ 2,624.18	\$ 14.47	0.6%			
43,800	100	60%	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 1,161.31	\$ 486.27	\$ 383.34	\$ 108.34	\$ 3,309.60	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 1,161.31	\$ 486.27	\$ 383.34	\$ 126.70	\$ 3,327.95	\$ 18.35	0.6%			
58,400	100	80%	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 1,548.42	\$ 648.36	\$ 511.12	\$ 131.25	\$ 4,009.48	\$ 17.50	\$ 2.50	\$ 1,150.33	\$ 1,548.42	\$ 648.36	\$ 511.12	\$ 153.49	\$ 4,031.71	\$ 22.23	0.6%			
Rate 7 - CITY AND COUNTY SERVICE (Current Summer: May - Oct, Proposed Summer: Jun - Sep)																							
Load		Current										Proposed										Total Bill	
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)			
1,460	10	20%	\$ 17.50	\$ 2.50	\$ 146.90	\$ 53.15	\$ 16.21	\$ 12.78	\$ 8.43	\$ 257.46	\$ 17.50	\$ 2.50	\$ 146.90	\$ 53.15	\$ 16.21	\$ 12.78	\$ 9.86	\$ 258.89	\$ 1.43	0.6%			
2,920	10	40%	\$ 17.50	\$ 2.50	\$ 146.90	\$ 106.29	\$ 32.42	\$ 25.56	\$ 11.21	\$ 342.37	\$ 17.50	\$ 2.50	\$ 146.90	\$ 106.29	\$ 32.42	\$ 25.56	\$ 13.11	\$ 344.27	\$ 1.90	0.6%			
4,380	10	60%	\$ 17.50	\$ 2.50	\$ 146.90	\$ 159.44	\$ 48.63	\$ 38.33	\$ 13.99	\$ 427.28	\$ 17.50	\$ 2.50	\$ 146.90	\$ 159.44	\$ 48.63	\$ 38.33	\$ 16.36	\$ 429.65	\$ 2.37	0.6%			
5,840	10	80%	\$ 17.50	\$ 2.50	\$ 146.90	\$ 212.58	\$ 64.84	\$ 51.11	\$ 16.77	\$ 512.19	\$ 17.50	\$ 2.50	\$ 146.90	\$ 212.58	\$ 64.84	\$ 51.11	\$ 19.61	\$ 515.03	\$ 2.84	0.6%			
3,796	26	20%	\$ 17.50	\$ 2.50	\$ 381.94	\$ 138.18	\$ 42.14	\$ 33.22	\$ 20.83	\$ 636.31	\$ 17.50	\$ 2.50	\$ 381.94	\$ 138.18	\$ 42.14	\$ 33.22	\$ 24.36	\$ 639.84	\$ 3.53	0.6%			
6,475	26	34%	\$ 17.50	\$ 2.50	\$ 381.94	\$ 235.69	\$ 71.89	\$ 56.67	\$ 25.93	\$ 792.12	\$ 17.50	\$ 2.50	\$ 381.94	\$ 235.69	\$ 71.89	\$ 56.67	\$ 30.32	\$ 796.51	\$ 4.39	0.6%			
11,388	26	60%	\$ 17.50	\$ 2.50	\$ 381.94	\$ 414.53	\$ 126.43	\$ 99.67	\$ 35.28	\$ 1,077.85	\$ 17.50	\$ 2.50	\$ 381.94	\$ 414.53	\$ 126.43	\$ 99.67	\$ 41.26	\$ 1,083.83	\$ 5.98	0.6%			
15,184	26	80%	\$ 17.50	\$ 2.50	\$ 381.94	\$ 552.71	\$ 168.57	\$ 132.89	\$ 42.51	\$ 1,298.62	\$ 17.50	\$ 2.50	\$ 381.94	\$ 552.71	\$ 168.57	\$ 132.89	\$ 49.71	\$ 1,305.82	\$ 7.20	0.6%			
14,600	100	20%	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 531.45	\$ 162.09	\$ 127.78	\$ 78.19	\$ 2,388.51	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 531.45	\$ 162.09	\$ 127.78	\$ 91.44	\$ 2,401.75	\$ 13.24	0.6%			
29,200	100	40%	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 1,062.90	\$ 324.18	\$ 255.56	\$ 105.99	\$ 3,237.62	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 1,062.90	\$ 324.18	\$ 255.56	\$ 123.94	\$ 3,255.58	\$ 17.96	0.6%			
43,800	100	60%	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 1,594.35	\$ 486.27	\$ 383.34	\$ 133.78	\$ 4,086.74	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 1,594.35	\$ 486.27	\$ 383.34	\$ 156.45	\$ 4,109.40	\$ 22.66	0.6%			
58,400	100	80%	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 2,125.80	\$ 648.36	\$ 511.12	\$ 161.58	\$ 4,935.85	\$ 17.50	\$ 2.50	\$ 1,469.00	\$ 2,125.80	\$ 648.36	\$ 511.12	\$ 188.95	\$ 4,963.23	\$ 27.38	0.6%			
Rate 7 - CITY AND COUNTY SERVICE (Current Winter: Nov - Apr, Proposed Non-Summer: Oct - May)																							
Load		Current										Proposed										Total Bill	
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)			
1,460	10	20%	\$ 17.50	\$ 2.50	\$ 99.10	\$ 31.49	\$ 16.21	\$ 12.78	\$ 6.08	\$ 185.66	\$ 17.50	\$ 2.50	\$ 99.10	\$ 31.49	\$ 16.21	\$ 12.78	\$ 7.11	\$ 186.69	\$ 1.03	0.6%			
2,920	10	40%	\$ 17.50	\$ 2.50	\$ 99.10	\$ 62.99	\$ 32.42	\$ 25.56	\$ 8.12	\$ 248.18	\$ 17.50	\$ 2.50	\$ 99.10	\$ 62.99	\$ 32.42	\$ 25.56	\$ 9.50	\$ 249.56	\$ 1.38	0.6%			
4,380	10	60%	\$ 17.50	\$ 2.50	\$ 99.10	\$ 94.48	\$ 48.63	\$ 38.33	\$ 10.17	\$ 310.71	\$ 17.50	\$ 2.50	\$ 99.10	\$ 94.48	\$ 48.63	\$ 38.33	\$ 11.89	\$ 312.43	\$ 1.72	0.6%			
5,840	10	80%	\$ 17.50	\$ 2.50	\$ 99.10	\$ 125.97	\$ 64.84	\$ 51.11	\$ 12.22	\$ 373.24	\$ 17.50	\$ 2.50	\$ 99.10	\$ 125.97	\$ 64.84	\$ 51.11	\$ 14.29	\$ 375.31	\$ 2.07	0.6%			
3,796	26	20%	\$ 17.50	\$ 2.50	\$ 257.66	\$ 81.88	\$ 42.14	\$ 33.22	\$ 14.72	\$ 449.63	\$ 17.50	\$ 2.50	\$ 257.66	\$ 81.88	\$ 42.14	\$ 33.22	\$ 17.21	\$ 452.12	\$ 2.49	0.6%			
6,475	26	34%	\$ 17.50	\$ 2.50	\$ 257.66	\$ 139.67	\$ 71.89	\$ 56.67	\$ 18.47	\$ 564.36	\$ 17.50	\$ 2.50	\$ 257.66	\$ 139.67	\$ 71.89	\$ 56.67	\$ 21.60	\$ 567.49	\$ 3.13	0.6%			
11,388	26	60%	\$ 17.50	\$ 2.50	\$ 257.66	\$ 245.65	\$ 126.43	\$ 99.67	\$ 25.36	\$ 774.77	\$ 17.50	\$ 2.50	\$ 257.66	\$ 245.65	\$ 126.43	\$ 99.67	\$ 29.66	\$ 779.06	\$ 4.29	0.6%			
15,184	26	80%	\$ 17.50	\$ 2.50	\$ 257.66	\$ 327.53	\$ 168.57	\$ 132.89	\$ 30.68	\$ 937.34	\$ 17.50	\$ 2.50	\$ 257.66	\$ 327.53	\$ 168.57	\$ 132.89	\$ 35.88	\$ 942.54	\$ 5.20	0.6%			
14,600	100	20%	\$ 17.50	\$ 2.50	\$ 991.00	\$ 314.93	\$ 162.09	\$ 127.78	\$ 54.69	\$ 1,670.49	\$ 17.50	\$ 2.50	\$ 991.00	\$ 314.93	\$ 162.09	\$ 127.78	\$ 63.95	\$ 1,679.75	\$ 9.26	0.6%			
29,200	100	40%	\$ 17.50	\$ 2.50	\$ 991.00	\$ 629.86	\$ 324.18	\$ 255.56	\$ 75.15	\$ 2,295.76	\$ 17.50	\$ 2.50	\$ 991.00	\$ 629.86	\$ 324.18	\$ 255.56	\$ 87.88	\$ 2,308.49	\$ 12.73	0.6%			
43,800	100	60%	\$ 17.50	\$ 2.50	\$ 991.00	\$ 944.80	\$ 486.27	\$ 383.34	\$ 95.62	\$ 2,921.02	\$ 17.50	\$ 2.50	\$ 991.00	\$ 944.80	\$ 486.27	\$ 383.34	\$ 111.82	\$ 2,937.22	\$ 16.20	0.6%			
58,400	100	80%	\$ 17.50	\$ 2.50	\$ 991.00	\$ 1,259.73	\$ 648.36	\$ 511.12	\$ 116.09	\$ 3,546.29	\$ 17.50	\$ 2.50	\$ 991.00	\$ 1,259.73	\$ 648.36	\$ 511.12	\$ 135.76	\$ 3,565.96	\$ 19.67	0.6%			

RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Secondary, Annual Average)																			
kWh	Current								Proposed								Total Bill		
	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,000	\$ 20.00	\$ 3.34		\$ 49.30	\$ 11.10	\$ 8.75	\$ 3.13	\$ 95.63	\$ 20.00	\$ 3.34		\$ 49.30	\$ 11.10	\$ 8.75	\$ 3.66	\$ 96.16	\$ 0.53	0.6%	
10,000	\$ 20.00	\$ 3.34		\$ 493.04	\$ 111.02	\$ 87.52	\$ 24.20	\$ 739.11	\$ 20.00	\$ 3.34		\$ 493.04	\$ 111.02	\$ 87.52	\$ 28.29	\$ 743.21	\$ 4.10	0.6%	
14,751	\$ 20.00	\$ 3.34		\$ 727.28	\$ 163.77	\$ 129.10	\$ 35.32	\$ 1,078.80	\$ 20.00	\$ 3.34		\$ 727.28	\$ 163.77	\$ 129.10	\$ 41.30	\$ 1,084.78	\$ 5.98	0.6%	
25,000	\$ 20.00	\$ 3.34		\$ 1,232.59	\$ 277.55	\$ 218.80	\$ 59.30	\$ 1,811.59	\$ 20.00	\$ 3.34		\$ 1,232.59	\$ 277.55	\$ 218.80	\$ 69.35	\$ 1,821.63	\$ 10.04	0.6%	
50,000	\$ 20.00	\$ 3.34		\$ 2,465.18	\$ 555.10	\$ 437.60	\$ 117.82	\$ 3,599.04	\$ 20.00	\$ 3.34		\$ 2,465.18	\$ 555.10	\$ 437.60	\$ 137.78	\$ 3,619.00	\$ 19.96	0.6%	
100,000	\$ 20.00	\$ 3.34		\$ 4,930.36	\$ 1,110.20	\$ 875.20	\$ 234.85	\$ 7,173.95	\$ 20.00	\$ 3.34		\$ 4,930.36	\$ 1,110.20	\$ 875.20	\$ 274.63	\$ 7,213.73	\$ 39.78	0.6%	
RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Secondary, Summer: Jun - Sep)																			
kWh	Current								Proposed								Total Bill		
	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,000	\$ 20.00	\$ 3.34		\$ 59.83	\$ 11.10	\$ 8.75	\$ 3.49	\$ 106.51	\$ 20.00	\$ 3.34		\$ 59.83	\$ 11.10	\$ 8.75	\$ 4.08	\$ 107.10	\$ 0.59	0.6%	
10,000	\$ 20.00	\$ 3.34		\$ 598.30	\$ 111.02	\$ 87.52	\$ 27.76	\$ 847.94	\$ 20.00	\$ 3.34		\$ 598.30	\$ 111.02	\$ 87.52	\$ 32.46	\$ 852.64	\$ 4.70	0.6%	
14,751	\$ 20.00	\$ 3.34		\$ 882.56	\$ 163.77	\$ 129.10	\$ 40.57	\$ 1,246.21	\$ 20.00	\$ 3.34		\$ 882.56	\$ 163.77	\$ 129.10	\$ 47.44	\$ 1,246.21	\$ 6.88	0.6%	
25,000	\$ 20.00	\$ 3.34		\$ 1,495.76	\$ 277.55	\$ 218.80	\$ 68.21	\$ 2,083.66	\$ 20.00	\$ 3.34		\$ 1,495.76	\$ 277.55	\$ 218.80	\$ 79.77	\$ 2,095.21	\$ 11.55	0.6%	
50,000	\$ 20.00	\$ 3.34		\$ 2,991.52	\$ 555.10	\$ 437.60	\$ 135.63	\$ 4,143.19	\$ 20.00	\$ 3.34		\$ 2,991.52	\$ 555.10	\$ 437.60	\$ 158.61	\$ 4,166.16	\$ 22.97	0.6%	
100,000	\$ 20.00	\$ 3.34		\$ 5,983.03	\$ 1,110.20	\$ 875.20	\$ 270.47	\$ 8,262.24	\$ 20.00	\$ 3.34		\$ 5,983.03	\$ 1,110.20	\$ 875.20	\$ 316.29	\$ 8,308.06	\$ 45.82	0.6%	
RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Secondary, Non-Summer: Oct - May)																			
kWh	Current								Proposed								Total Bill		
	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,000	\$ 20.00	\$ 3.34		\$ 44.04	\$ 11.10	\$ 8.75	\$ 2.95	\$ 90.19	\$ 20.00	\$ 3.34		\$ 44.04	\$ 11.10	\$ 8.75	\$ 3.45	\$ 90.69	\$ 0.50	0.6%	
10,000	\$ 20.00	\$ 3.34		\$ 440.40	\$ 111.02	\$ 87.52	\$ 22.41	\$ 684.70	\$ 20.00	\$ 3.34		\$ 440.40	\$ 111.02	\$ 87.52	\$ 26.21	\$ 688.49	\$ 3.79	0.6%	
14,751	\$ 20.00	\$ 3.34		\$ 649.64	\$ 163.77	\$ 129.10	\$ 32.69	\$ 998.53	\$ 20.00	\$ 3.34		\$ 649.64	\$ 163.77	\$ 129.10	\$ 38.23	\$ 1,004.07	\$ 5.54	0.6%	
25,000	\$ 20.00	\$ 3.34		\$ 1,101.01	\$ 277.55	\$ 218.80	\$ 54.85	\$ 1,675.55	\$ 20.00	\$ 3.34		\$ 1,101.01	\$ 277.55	\$ 218.80	\$ 64.14	\$ 1,684.94	\$ 9.29	0.6%	
50,000	\$ 20.00	\$ 3.34		\$ 2,202.02	\$ 555.10	\$ 437.60	\$ 108.91	\$ 3,326.97	\$ 20.00	\$ 3.34		\$ 2,202.02	\$ 555.10	\$ 437.60	\$ 127.36	\$ 3,345.42	\$ 18.45	0.6%	
100,000	\$ 20.00	\$ 3.34		\$ 4,404.03	\$ 1,110.20	\$ 875.20	\$ 217.03	\$ 6,629.80	\$ 20.00	\$ 3.34		\$ 4,404.03	\$ 1,110.20	\$ 875.20	\$ 253.80	\$ 6,666.57	\$ 36.77	0.6%	

RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Primary, Annual Average)																			
kWh	Current								Proposed								Total Bill		
	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,000	\$ 20.00	\$ 3.34		\$ 45.85	\$ 10.82	\$ 8.75	\$ 3.00	\$ 91.76	\$ 20.00	\$ 3.34		\$ 45.85	\$ 10.82	\$ 8.75	\$ 3.51	\$ 92.27	\$ 0.51	0.6%	
10,000	\$ 20.00	\$ 3.34		\$ 458.47	\$ 108.22	\$ 87.52	\$ 22.93	\$ 700.48	\$ 20.00	\$ 3.34		\$ 458.47	\$ 108.22	\$ 87.52	\$ 26.82	\$ 704.36	\$ 3.88	0.6%	
50,000	\$ 20.00	\$ 3.34		\$ 2,292.34	\$ 541.10	\$ 437.60	\$ 111.50	\$ 3,405.88	\$ 20.00	\$ 3.34		\$ 2,292.34	\$ 541.10	\$ 437.60	\$ 130.38	\$ 3,424.76	\$ 18.88	0.6%	
164,275	\$ 20.00	\$ 3.34		\$ 7,531.49	\$ 1,777.78	\$ 1,437.73	\$ 364.51	\$ 11,134.86	\$ 20.00	\$ 3.34		\$ 7,531.49	\$ 1,777.78	\$ 1,437.73	\$ 426.26	\$ 11,196.60	\$ 61.74	0.6%	
250,000	\$ 20.00	\$ 3.34		\$ 11,461.70	\$ 2,705.50	\$ 2,188.00	\$ 554.32	\$ 16,932.86	\$ 20.00	\$ 3.34		\$ 11,461.70	\$ 2,705.50	\$ 2,188.00	\$ 648.21	\$ 17,026.76	\$ 93.90	0.6%	
500,000	\$ 20.00	\$ 3.34		\$ 22,923.41	\$ 5,411.00	\$ 4,376.00	\$ 1,107.84	\$ 33,841.59	\$ 20.00	\$ 3.34		\$ 22,923.41	\$ 5,411.00	\$ 4,376.00	\$ 1,295.50	\$ 34,029.29	\$ 187.66	0.6%	
RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Primary, Summer: Jun - Sep)																			
kWh	Current								Proposed								Total Bill		
	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,000	\$ 20.00	\$ 3.34		\$ 57.49	\$ 10.82	\$ 8.75	\$ 3.40	\$ 103.81	\$ 20.00	\$ 3.34		\$ 57.49	\$ 10.82	\$ 8.75	\$ 3.97	\$ 104.38	\$ 0.57	0.5%	
10,000	\$ 20.00	\$ 3.34		\$ 574.93	\$ 108.22	\$ 87.52	\$ 26.87	\$ 820.89	\$ 20.00	\$ 3.34		\$ 574.93	\$ 108.22	\$ 87.52	\$ 31.42	\$ 825.44	\$ 4.55	0.6%	
50,000	\$ 20.00	\$ 3.34		\$ 2,874.67	\$ 541.10	\$ 437.60	\$ 131.20	\$ 4,007.92	\$ 20.00	\$ 3.34		\$ 2,874.67	\$ 541.10	\$ 437.60	\$ 153.43	\$ 4,030.14	\$ 22.22	0.6%	
164,275	\$ 20.00	\$ 3.34		\$ 9,444.74	\$ 1,777.78	\$ 1,437.73	\$ 429.26	\$ 13,112.86	\$ 20.00	\$ 3.34		\$ 9,444.74	\$ 1,777.78	\$ 1,437.73	\$ 501.98	\$ 13,185.58	\$ 72.72	0.6%	
250,000	\$ 20.00	\$ 3.34		\$ 14,373.37	\$ 2,705.50	\$ 2,188.00	\$ 652.86	\$ 19,943.07	\$ 20.00	\$ 3.34		\$ 14,373.37	\$ 2,705.50	\$ 2,188.00	\$ 763.45	\$ 20,053.66	\$ 110.59	0.6%	
500,000	\$ 20.00	\$ 3.34		\$ 28,746.74	\$ 5,411.00	\$ 4,376.00	\$ 1,304.93	\$ 39,862.01	\$ 20.00	\$ 3.34		\$ 28,746.74	\$ 5,411.00	\$ 4,376.00	\$ 1,525.97	\$ 40,083.06	\$ 221.05	0.6%	
RATE 8 - WATER, SEWAGE, AND STORM SEWAGE PUMPING (Primary, Non-Summer: Oct - May)																			
kWh	Current								Proposed								Total Bill		
	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,000	\$ 20.00	\$ 3.34		\$ 40.02	\$ 10.82	\$ 8.75	\$ 2.81	\$ 85.74	\$ 20.00	\$ 3.34		\$ 40.02	\$ 10.82	\$ 8.75	\$ 3.28	\$ 86.22	\$ 0.48	0.6%	
10,000	\$ 20.00	\$ 3.34		\$ 400.23	\$ 108.22	\$ 87.52	\$ 20.96	\$ 640.27	\$ 20.00	\$ 3.34		\$ 400.23	\$ 108.22	\$ 87.52	\$ 24.51	\$ 643.83	\$ 3.56	0.6%	
50,000	\$ 20.00	\$ 3.34		\$ 2,001.17	\$ 541.10	\$ 437.60	\$ 101.64	\$ 3,104.86	\$ 20.00	\$ 3.34		\$ 2,001.17	\$ 541.10	\$ 437.60	\$ 118.86	\$ 3,122.07	\$ 17.21	0.6%	
164,275	\$ 20.00	\$ 3.34		\$ 6,574.86	\$ 1,777.78	\$ 1,437.73	\$ 332.14	\$ 10,145.85	\$ 20.00	\$ 3.34		\$ 6,574.86	\$ 1,777.78	\$ 1,437.73	\$ 388.40	\$ 10,202.11	\$ 56.26	0.6%	
250,000	\$ 20.00	\$ 3.34		\$ 10,005.87	\$ 2,705.50	\$ 2,188.00	\$ 505.04	\$ 15,427.76	\$ 20.00	\$ 3.34		\$ 10,005.87	\$ 2,705.50	\$ 2,188.00	\$ 590.60	\$ 15,513.31	\$ 85.55	0.6%	
500,000	\$ 20.00	\$ 3.34		\$ 20,011.74	\$ 5,411.00	\$ 4,376.00	\$ 1,009.30	\$ 30,831.38	\$ 20.00	\$ 3.34		\$ 20,011.74	\$ 5,411.00	\$ 4,376.00	\$ 1,180.27	\$ 31,002.35	\$ 170.97	0.6%	

RATE 9 - LARGE POWER SERVICE (Annual Averages, Secondary, above 800 kW)																										
Current													Proposed													
Total	13.32% On-Peak-S	86.68% Off-Peak-S	100.00% Off-Peak NS	Total	Load	Current					Proposed					Total Bill										
kWh	kWh	kWh	kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)			
116,800	15,560	101,240	116,800	800	20%	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 1,475.56	\$ 1,296.71	\$ 1,022.23	\$ 547.13	\$ 16,713.24	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 1,475.56	\$ 1,296.71	\$ 1,022.23	\$ 639.81	\$ 16,805.92	\$ 92.68	0.6%			
233,600	31,121	202,479	233,600	800	40%	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 2,951.17	\$ 2,593.43	\$ 2,044.47	\$ 675.55	\$ 20,636.22	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 2,951.17	\$ 2,593.43	\$ 2,044.47	\$ 789.98	\$ 20,750.66	\$ 114.44	0.6%			
350,400	46,681	303,719	350,400	800	60%	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 4,426.73	\$ 3,890.14	\$ 3,066.70	\$ 803.97	\$ 24,559.15	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 4,426.73	\$ 3,890.14	\$ 3,066.70	\$ 940.16	\$ 24,695.34	\$ 136.19	0.6%			
467,200	62,242	404,958	467,200	800	80%	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 5,902.34	\$ 5,186.85	\$ 4,088.93	\$ 932.39	\$ 28,482.13	\$ 127.00	\$ 4.64	\$ 12,239.97	\$ 5,902.34	\$ 5,186.85	\$ 4,088.93	\$ 1,090.34	\$ 28,640.07	\$ 157.94	0.6%			
157,972	21,046	136,926	157,972	1082	20%	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 1,995.75	\$ 1,753.81	\$ 1,382.57	\$ 738.42	\$ 22,556.74	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 1,995.75	\$ 1,753.81	\$ 1,382.57	\$ 863.50	\$ 22,681.83	\$ 125.09	0.6%			
315,944	42,091	273,853	315,944	1082	40%	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 3,991.45	\$ 3,507.61	\$ 2,765.14	\$ 912.11	\$ 27,862.51	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 3,991.45	\$ 3,507.61	\$ 2,765.14	\$ 1,066.62	\$ 28,017.02	\$ 154.51	0.6%			
479,924	63,937	415,987	479,924	1082	61%	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 6,063.08	\$ 5,328.12	\$ 4,200.29	\$ 1,092.41	\$ 33,370.09	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 6,063.08	\$ 5,328.12	\$ 4,200.29	\$ 1,277.45	\$ 33,555.14	\$ 185.05	0.6%			
631,888	84,182	547,706	631,888	1082	80%	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 7,982.90	\$ 7,015.22	\$ 5,530.28	\$ 1,259.49	\$ 38,474.09	\$ 127.00	\$ 4.64	\$ 16,554.56	\$ 7,982.90	\$ 7,015.22	\$ 5,530.28	\$ 1,472.84	\$ 38,687.44	\$ 213.35	0.6%			
438,000	58,352	379,648	438,000	3000	20%	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 5,533.45	\$ 4,862.68	\$ 3,833.38	\$ 2,039.47	\$ 62,300.50	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 5,533.45	\$ 4,862.68	\$ 3,833.38	\$ 2,384.95	\$ 62,645.98	\$ 345.48	0.6%			
876,000	116,703	759,297	876,000	3000	40%	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 11,066.85	\$ 9,725.35	\$ 7,666.75	\$ 2,521.06	\$ 77,011.53	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 11,066.85	\$ 9,725.35	\$ 7,666.75	\$ 2,948.11	\$ 77,438.59	\$ 427.06	0.6%			
1,314,000	175,055	1,138,945	1,314,000	3000	60%	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 16,600.29	\$ 14,588.03	\$ 11,500.13	\$ 3,002.84	\$ 91,722.61	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 16,600.29	\$ 14,588.03	\$ 11,500.13	\$ 3,511.27	\$ 92,231.25	\$ 508.64	0.6%			
1,752,000	233,407	1,518,593	1,752,000	3000	80%	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 22,133.74	\$ 19,450.70	\$ 15,333.50	\$ 3,484.22	\$ 106,433.70	\$ 127.00	\$ 4.64	\$ 45,899.89	\$ 22,133.74	\$ 19,450.70	\$ 15,333.50	\$ 4,074.43	\$ 107,023.91	\$ 590.21	0.6%			
RATE 9 - LARGE POWER SERVICE (Summer: Jun - Sep, Secondary, above 800 kW)																										
Current													Proposed													
Current Proposed	16.39% On-Peak-S	83.61% Off-Peak-S	100.00% Off-Peak NS	Total	Load	Current					Proposed					Total Bill										
kWh	kWh	kWh	kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)			
116,800	15,560	101,240	116,800	800	20%	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 2,973.99	\$ 1,296.71	\$ 1,022.23	\$ 814.32	\$ 24,875.34	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 2,973.99	\$ 1,296.71	\$ 1,022.23	\$ 952.26	\$ 25,013.28	\$ 137.94	0.6%			
233,600	31,121	202,479	233,600	800	40%	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 5,948.12	\$ 2,593.43	\$ 2,044.47	\$ 993.46	\$ 30,347.56	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 5,948.12	\$ 2,593.43	\$ 2,044.47	\$ 1,161.75	\$ 30,515.84	\$ 168.28	0.6%			
350,400	46,681	303,719	350,400	800	60%	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 8,922.11	\$ 3,890.14	\$ 3,066.70	\$ 1,172.59	\$ 35,819.63	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 8,922.11	\$ 3,890.14	\$ 3,066.70	\$ 1,371.23	\$ 36,018.26	\$ 198.63	0.6%			
467,200	62,242	404,958	467,200	800	80%	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 11,896.24	\$ 5,186.85	\$ 4,088.93	\$ 1,351.73	\$ 41,291.85	\$ 127.00	\$ 4.64	\$ 18,636.44	\$ 11,896.24	\$ 5,186.85	\$ 4,088.93	\$ 1,580.71	\$ 41,520.82	\$ 228.97	0.6%			
157,972	21,046	136,926	157,972	1082	20%	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 4,022.48	\$ 1,753.81	\$ 1,382.57	\$ 1,099.80	\$ 33,596.09	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 4,022.48	\$ 1,753.81	\$ 1,382.57	\$ 1,286.11	\$ 33,782.39	\$ 186.30	0.6%			
315,944	42,091	273,853	315,944	1082	40%	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 8,044.81	\$ 3,507.61	\$ 2,765.14	\$ 1,342.08	\$ 40,997.07	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 8,044.81	\$ 3,507.61	\$ 2,765.14	\$ 1,569.43	\$ 41,224.42	\$ 227.35	0.6%			
479,924	63,937	415,987	479,924	1082	61%	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 12,220.21	\$ 5,328.12	\$ 4,200.29	\$ 1,593.58	\$ 48,679.63	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 12,220.21	\$ 5,328.12	\$ 4,200.29	\$ 1,863.52	\$ 48,949.57	\$ 269.94	0.6%			
631,888	84,182	547,706	631,888	1082	80%	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 16,089.62	\$ 7,015.22	\$ 5,530.28	\$ 1,826.65	\$ 55,799.20	\$ 127.00	\$ 4.64	\$ 25,205.79	\$ 16,089.62	\$ 7,015.22	\$ 5,530.28	\$ 2,136.07	\$ 56,108.63	\$ 309.43	0.6%			
438,000	58,352	379,648	438,000	3000	20%	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 11,152.74	\$ 4,862.68	\$ 3,833.38	\$ 3,041.46	\$ 92,908.56	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 11,152.74	\$ 4,862.68	\$ 3,833.38	\$ 3,556.67	\$ 93,423.76	\$ 515.20	0.6%			
876,000	116,703	759,297	876,000	3000	40%	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 22,305.34	\$ 9,725.35	\$ 7,666.75	\$ 3,713.22	\$ 113,428.97	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 22,305.34	\$ 9,725.35	\$ 7,666.75	\$ 4,342.22	\$ 114,057.97	\$ 629.00	0.6%			
1,314,000	175,055	1,138,945	1,314,000	3000	60%	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 33,458.09	\$ 14,588.03	\$ 11,500.13	\$ 4,384.98	\$ 133,949.52	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 33,458.09	\$ 14,588.03	\$ 11,500.13	\$ 5,127.78	\$ 134,692.32	\$ 742.80	0.6%			
1,752,000	233,407	1,518,593	1,752,000	3000	80%	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 44,610.83	\$ 19,450.70	\$ 15,333.50	\$ 5,056.75	\$ 154,470.08	\$ 127.00	\$ 4.64	\$ 69,886.66	\$ 44,610.83	\$ 19,450.70	\$ 15,333.50	\$ 5,913.33	\$ 155,326.67	\$ 856.59	0.6%			
RATE 9 - LARGE POWER SERVICE Non-Summer: Nov - May, Secondary, above 800 kW)																										
Current													Proposed													
Total	13.32% On-Peak-S	86.68% Off-Peak-S	100.00% Off-Peak NS	Total	Load	Current					Proposed					Total Bill										
kWh	kWh	kWh	kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)			
116,800	15,560	101,240	116,800	800	20%	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 726.35	\$ 1,296.71	\$ 1,022.23	\$ 413.53	\$ 12,632.20	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 726.35	\$ 1,296.71	\$ 1,022.23	\$ 483.58	\$ 12,702.25	\$ 70.05	0.6%			
233,600	31,121	202,479	233,600	800	40%	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 1,452.69	\$ 2,593.43	\$ 2,044.47	\$ 516.59	\$ 15,780.55	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 1,452.69	\$ 2,593.43	\$ 2,044.47	\$ 604.10	\$ 15,868.06	\$ 87.51	0.6%			
350,400	46,681	303,719	350,400	800	60%	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 2,179.04	\$ 3,890.14	\$ 3,066.70	\$ 619.66	\$ 18,928.91	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 2,179.04	\$ 3,890.14	\$ 3,066.70	\$ 724.63	\$ 19,033.88	\$ 104.97	0.6%			
467,200	62,242	404,958	467,200	800	80%	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 2,905.38	\$ 5,186.85	\$ 4,088.93	\$ 722.72	\$ 22,077.27	\$ 127.00	\$ 4.64	\$ 9,041.73	\$ 2,905.38	\$ 5,186.85	\$ 4,088.93	\$ 845.15	\$ 22,199.70	\$ 122.43	0.6%			
157,972	21,046	136,926	157,972	1082	20%	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 982.38	\$ 1,753.81	\$ 1,382.57	\$ 557.73	\$ 17,037.07	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 982.38	\$ 1,753.81	\$ 1,382.57	\$ 652.20	\$ 17,131.55	\$ 94.48	0.6%			
315,944	42,091	273,853	315,944	1082	40%	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 1,964.77	\$ 3,507.61	\$ 2,765.14	\$ 697.12	\$ 21,295.23	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 1,964.77	\$ 3,507.61	\$ 2,765.14	\$ 815.21	\$ 21,413.31	\$ 118.08	0.6%			
479,924	63,937	415,987	479,924	1082	61%	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 2,964.51	\$ 5,328.12	\$ 4,200.29	\$ 841.82	\$ 25,153.33	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 2,964.51	\$ 5,328.12	\$ 4,200.29	\$ 984.42	\$ 25,857.93	\$ 142.80	0.6%			
631,888	84,182	547,706	631,888	1082	80%	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 3,929.53	\$ 7,015.22	\$ 5,530.28	\$ 975.91	\$ 29,814.54	\$ 127.00	\$ 4.64	\$ 12,228.95	\$ 3,929.53	\$ 7,015.22	\$ 5,530.28	\$ 1,141.23	\$ 29,970.85	\$ 165.31	0.6%			
438,000	58,352	379,648	438,000	3000	20%	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 2,723.80	\$ 4,862.68	\$ 3,833.38	\$ 1,538.48	\$ 46,996.47	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 2,723.80	\$ 4,862.68	\$ 3,833.38	\$ 1,799.09	\$ 47,257.08	\$ 260.61	0.6%			
876,000	116,703	759,297	876,000	3000	40%	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 5,447.60	\$ 9,725.35	\$ 7,666.75	\$ 1,924.97	\$ 58,802.82	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 5,447.60	\$ 9,725.35	\$ 7,666.75	\$ 2,251.05	\$ 59,128.90	\$ 326.08	0.6%			
1,314,000	175,055	1,138,945	1,314,000	3000	60%	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 8,171.39	\$ 14,588.03	\$ 11,500.13	\$ 2,311.47	\$ 70,609.16	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 8,171.39	\$ 14,588.03	\$ 11,500.13	\$ 2,703.02	\$ 71,000.71	\$ 391.55	0.6%			
1,752,000	233,407	1,518,593	1,752,000	3000	80%	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 10,695.19	\$ 19,450.70	\$ 15,333.50	\$ 2,697.96	\$ 82,415.50	\$ 127.00	\$ 4.64	\$ 33,906.50	\$ 10,695.19	\$ 19,450.70	\$ 15,333.50	\$ 3,154.98	\$ 82,872.52	\$ 457.02	0.6%			

Rate 11 - Municipal Street Lighting																							
Average		Current Base										Proposed										Total Bill	
#lamps	kWh	Fixed Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Fixed Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel Bill	RPS	EUERF	Total Bill	Differ	Differ(%)				
7,000 L - MV 195 Watts	1 69	\$ 14.62	\$3.17			\$ 0.77	\$ 0.61	\$ 0.65	\$ 19.82	\$ 14.62	\$3.17			\$ 0.77	\$ 0.61	\$ 0.76	\$ 19.93	\$ 0.11	0.6%				
11,000 L - MV 275 Watts	1 98	\$ 18.14	\$3.17			\$ 1.09	\$ 0.86	\$ 0.79	\$ 24.04	\$ 18.14	\$3.17			\$ 1.09	\$ 0.86	\$ 0.79	\$ 24.04	\$ -	0.0%				
20,000 L - MV 450 Watts	1 160	\$ 25.77	\$3.17			\$ 1.78	\$ 1.40	\$ 1.09	\$ 33.21	\$ 25.77	\$3.17			\$ 1.78	\$ 1.40	\$ 1.09	\$ 33.21	\$ -	0.0%				
14,400 L - SV 193 Watts	1 69	\$ 14.69	\$3.17			\$ 0.76	\$ 0.60	\$ 0.65	\$ 19.88	\$ 14.69	\$3.17			\$ 0.76	\$ 0.60	\$ 0.65	\$ 19.88	\$ -	0.0%				
23,200 L - SV 313 Watts	1 111	\$ 20.21	\$3.17			\$ 1.24	\$ 0.98	\$ 0.87	\$ 26.46	\$ 20.21	\$3.17			\$ 1.24	\$ 0.98	\$ 0.87	\$ 26.46	\$ -	0.0%				
45,000 L - SV 485 Watts	1 173	\$ 27.82	\$3.17			\$ 1.92	\$ 1.51	\$ 1.16	\$ 35.58	\$ 27.82	\$3.17			\$ 1.92	\$ 1.51	\$ 1.16	\$ 35.58	\$ -	0.0%				
31W - 50W LED (Equi. to 150W HPS)																							
51W - 100W LED (Equi. to 250W HPS)																							
14,000 L - HPS 193 Watts	1 69	\$ 18.17	\$3.17			\$ 0.76	\$ 0.60	\$ 0.77	\$ 23.47	\$ 18.17	\$3.17			\$ 0.76	\$ 0.60	\$ 0.77	\$ 23.47	\$ -	0.0%				
23,200 L - HPS 313 Watts	1 111	\$ 23.69	\$3.17			\$ 1.24	\$ 0.98	\$ 0.98	\$ 30.06	\$ 23.69	\$3.17			\$ 1.24	\$ 0.98	\$ 0.98	\$ 30.06	\$ -	0.0%				
45,000 L - SV 485 Watts	1 173	\$ 33.79	\$3.17			\$ 1.92	\$ 1.51	\$ 1.37	\$ 41.76	\$ 33.79	\$3.17			\$ 1.92	\$ 1.51	\$ 1.37	\$ 41.76	\$ -	0.0%				
31W - 50W LED (Equi. to 150W HPS)																							
51W - 100W LED (Equi. to 250W HPS)																							
14,400 L - HPS 193 Watts	1 69	\$ 21.92	\$3.17			\$ 0.76	\$ 0.60	\$ 0.90	\$ 27.35	\$ 21.92	\$3.17			\$ 0.76	\$ 0.60	\$ 0.90	\$ 27.35	\$ -	0.0%				
23,200 L - MV 313 Watts	1 69	\$ 27.57	\$3.17			\$ 0.76	\$ 0.60	\$ 1.09	\$ 33.19	\$ 27.57	\$3.17			\$ 0.76	\$ 0.60	\$ 1.09	\$ 33.19	\$ -	0.0%				
45,000 L - HPS 485 Watts	1 173	\$ 35.34	\$3.17			\$ 1.92	\$ 1.51	\$ 1.42	\$ 43.36	\$ 35.34	\$3.17			\$ 1.92	\$ 1.51	\$ 1.42	\$ 43.36	\$ -	0.0%				
31W - 50W LED (Equi. to 150W HPS)																							
51W - 100W LED (Equi. to 250W HPS)																							
14,400 L - SV 193 Watts	1 111	\$ 16.60	\$3.17			\$ 1.24	\$ 0.98	\$ 0.74	\$ 22.73	\$ 16.60	\$3.17			\$ 1.24	\$ 0.98	\$ 0.74	\$ 22.73	\$ -	0.0%				
23,200 L - HPS 313 Watts	1 111	\$ 22.04	\$3.17			\$ 1.24	\$ 0.98	\$ 0.93	\$ 28.35	\$ 22.04	\$3.17			\$ 1.24	\$ 0.98	\$ 0.93	\$ 28.35	\$ -	0.0%				
45,000 L - HPS 485 Watts	1 173	\$ 29.63	\$3.17			\$ 1.92	\$ 1.51	\$ 1.23	\$ 37.46	\$ 29.63	\$3.17			\$ 1.92	\$ 1.51	\$ 1.23	\$ 37.46	\$ -	0.0%				
31W - 50W LED (Equi. to 150W HPS)																							
51W - 100W LED (Equi. to 250W HPS)																							
7,000 L - MV 195 Watts	1 69	\$ 3.76	\$3.17			\$ 0.77	\$ 0.61	\$ 0.28	\$ 8.59	\$ 3.76	\$3.17			\$ 0.77	\$ 0.61	\$ 0.28	\$ 8.59	\$ -	0.0%				
20,000 L - MV 450 Watts	1 160	\$ 8.70	\$3.17			\$ 1.78	\$ 1.40	\$ 0.51	\$ 15.56	\$ 8.70	\$3.17			\$ 1.78	\$ 1.40	\$ 0.51	\$ 15.56	\$ -	0.0%				
14,400 L - SV 175 Watts	1 62	\$ 3.38	\$3.17			\$ 0.69	\$ 0.55	\$ 0.26	\$ 8.05	\$ 3.38	\$3.17			\$ 0.69	\$ 0.55	\$ 0.26	\$ 8.05	\$ -	0.0%				
19,800 L - SV 250 Watts	1 89	\$ 4.82	\$3.17			\$ 0.99	\$ 0.78	\$ 0.33	\$ 10.09	\$ 4.82	\$3.17			\$ 0.99	\$ 0.78	\$ 0.33	\$ 10.09	\$ -	0.0%				
23,200 L - SV 313 Watts	1 111	\$ 6.03	\$3.17			\$ 1.24	\$ 0.98	\$ 0.39	\$ 11.80	\$ 6.03	\$3.17			\$ 1.24	\$ 0.98	\$ 0.39	\$ 11.80	\$ -	0.0%				
33,000 L - SV 365 Watts	1 130	\$ 7.03	\$3.17			\$ 1.44	\$ 1.14	\$ 0.43	\$ 13.21	\$ 7.03	\$3.17			\$ 1.44	\$ 1.14	\$ 0.43	\$ 13.21	\$ -	0.0%				
45,000 L - SV 485 Watts	1 173	\$ 9.34	\$3.17			\$ 1.92	\$ 1.51	\$ 0.54	\$ 16.48	\$ 9.34	\$3.17			\$ 1.92	\$ 1.51	\$ 0.54	\$ 16.48	\$ -	0.0%				
L - 21W-30W LED																							
L - 31W-40W LED																							
L - 41W-50W LED	1 12	\$ 0.68	\$3.17			\$ 0.14	\$ 0.11	\$ 0.14	\$ 4.24	\$ 0.68	\$3.17			\$ 0.14	\$ 0.11	\$ 0.14	\$ 4.24	\$ -	0.0%				
L - 51W-60W LED	1 16	\$ 0.88	\$3.17			\$ 0.18	\$ 0.14	\$ 0.15	\$ 4.51	\$ 0.88	\$3.17			\$ 0.18	\$ 0.14	\$ 0.15	\$ 4.51	\$ -	0.0%				
L - 61W-70W LED	1 19	\$ 1.07	\$3.17			\$ 0.22	\$ 0.17	\$ 0.16	\$ 4.78	\$ 1.07	\$3.17			\$ 0.22	\$ 0.17	\$ 0.16	\$ 4.78	\$ -	0.0%				
L - 71W-80W LED	1 23	\$ 1.25	\$3.17			\$ 0.26	\$ 0.20	\$ 0.17	\$ 5.05	\$ 1.25	\$3.17			\$ 0.26	\$ 0.20	\$ 0.17	\$ 5.05	\$ -	0.0%				
L - 81W-90W LED	1 27	\$ 1.44	\$3.17			\$ 0.30	\$ 0.23	\$ 0.17	\$ 5.31	\$ 1.44	\$3.17			\$ 0.30	\$ 0.23	\$ 0.17	\$ 5.31	\$ -	0.0%				
L - 91W-100W LED	1 30	\$ 1.63	\$3.17			\$ 0.34	\$ 0.26	\$ 0.18	\$ 5.58	\$ 1.63	\$3.17			\$ 0.34	\$ 0.26	\$ 0.18	\$ 5.58	\$ -	0.0%				
L - 101W-110W LED	1 34	\$ 1.82	\$3.17			\$ 0.38	\$ 0.30	\$ 0.19	\$ 5.86	\$ 1.82	\$3.17			\$ 0.38	\$ 0.30	\$ 0.19	\$ 5.86	\$ -	0.0%				
L - 110W-130W LED	1 37	\$ 2.01	\$3.17			\$ 0.42	\$ 0.33	\$ 0.20	\$ 6.12	\$ 2.01	\$3.17			\$ 0.42	\$ 0.33	\$ 0.20	\$ 6.12	\$ -	0.0%				
L - 111W-130W LED	1 43	\$ 2.30	\$3.17			\$ 0.47	\$ 0.37	\$ 0.21	\$ 6.53	\$ 2.30	\$3.17			\$ 0.47	\$ 0.37	\$ 0.21	\$ 6.53	\$ -	0.0%				
L - 131W-150W LED	1 50	\$ 2.68	\$3.17			\$ 0.55	\$ 0.44	\$ 0.23	\$ 7.07	\$ 2.68	\$3.17			\$ 0.55	\$ 0.44	\$ 0.23	\$ 7.07	\$ -	0.0%				
L - 151W-170W LED	1 57	\$ 3.06	\$3.17			\$ 0.63	\$ 0.50	\$ 0.25	\$ 7.61	\$ 3.06	\$3.17			\$ 0.63	\$ 0.50	\$ 0.25	\$ 7.61	\$ -	0.0%				
L - 171W-190W LED	1 64	\$ 3.44	\$3.17			\$ 0.71	\$ 0.56	\$ 0.27	\$ 8.15	\$ 3.44	\$3.17			\$ 0.71	\$ 0.56	\$ 0.27	\$ 8.15	\$ -	0.0%				
L - 191W-210W LED	1 71	\$ 3.81	\$3.17			\$ 0.79	\$ 0.62	\$ 0.28	\$ 8.68	\$ 3.81	\$3.17			\$ 0.79	\$ 0.62	\$ 0.28	\$ 8.68	\$ -	0.0%				
L - 211W-230W LED	1 78	\$ 4.19	\$3.17			\$ 0.87	\$ 0.69	\$ 0.30	\$ 9.22	\$ 4.19	\$3.17			\$ 0.87	\$ 0.69	\$ 0.30	\$ 9.22	\$ -	0.0%				
L - 231W-250W LED	1 85	\$ 4.57	\$3.17			\$ 0.95	\$ 0.75	\$ 0.32	\$ 9.75	\$ 4.57	\$3.17			\$ 0.95	\$ 0.75	\$ 0.32	\$ 9.75	\$ -	0.0%				
L - 251W-270W LED	1																N/A						

RATE 19 - SEASONAL AGRICULTURAL PROCESSING SERVICE (Annual Average)																					
		Load	Current								Proposed								Total Bill		
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,460	10	20%	\$ 20.00	\$ 4.04	\$ -	\$ 140.27	\$ 16.21	\$ 12.78	\$ 6.54	\$ 199.84	\$ 20.00	\$ 4.04	\$ -	\$ 140.27	\$ 16.21	\$ 12.78	\$ 7.65	\$ 200.95	\$ 1.11	0.6%	
2,920	10	40%	\$ 20.00	\$ 4.04	\$ -	\$ 280.55	\$ 32.42	\$ 25.56	\$ 12.27	\$ 374.83	\$ 20.00	\$ 4.04	\$ -	\$ 280.55	\$ 32.42	\$ 25.56	\$ 14.35	\$ 376.91	\$ 2.08	0.6%	
4,380	10	60%	\$ 20.00	\$ 4.04	\$ -	\$ 420.82	\$ 48.63	\$ 38.33	\$ 18.00	\$ 549.82	\$ 20.00	\$ 4.04	\$ -	\$ 420.82	\$ 48.63	\$ 38.33	\$ 21.05	\$ 552.87	\$ 3.05	0.6%	
5,840	10	80%	\$ 20.00	\$ 4.04	\$ -	\$ 561.10	\$ 64.84	\$ 51.11	\$ 23.73	\$ 724.81	\$ 20.00	\$ 4.04	\$ -	\$ 561.10	\$ 64.84	\$ 51.11	\$ 27.75	\$ 728.83	\$ 4.02	0.6%	
7,300	50	20%	\$ 20.00	\$ 4.04	\$ -	\$ 701.37	\$ 81.04	\$ 63.89	\$ 29.46	\$ 899.80	\$ 20.00	\$ 4.04	\$ -	\$ 701.37	\$ 81.04	\$ 63.89	\$ 34.45	\$ 904.79	\$ 4.99	0.6%	
14,422	50	40%	\$ 20.00	\$ 4.04	\$ -	\$ 1,385.65	\$ 160.11	\$ 126.22	\$ 57.40	\$ 1,753.42	\$ 20.00	\$ 4.04	\$ -	\$ 1,385.65	\$ 160.11	\$ 126.22	\$ 67.12	\$ 1,763.14	\$ 9.72	0.6%	
21,900	50	60%	\$ 20.00	\$ 4.04	\$ -	\$ 2,104.13	\$ 243.13	\$ 191.67	\$ 86.74	\$ 2,649.71	\$ 20.00	\$ 4.04	\$ -	\$ 2,104.13	\$ 243.13	\$ 191.67	\$ 101.43	\$ 2,664.40	\$ 14.69	0.6%	
29,200	50	80%	\$ 20.00	\$ 4.04	\$ -	\$ 2,805.50	\$ 324.18	\$ 255.56	\$ 115.38	\$ 3,524.66	\$ 20.00	\$ 4.04	\$ -	\$ 2,805.50	\$ 324.18	\$ 255.56	\$ 134.93	\$ 3,544.20	\$ 19.54	0.6%	
29,200	200	20%	\$ 20.00	\$ 4.04	\$ -	\$ 2,805.50	\$ 324.18	\$ 255.56	\$ 115.38	\$ 3,524.66	\$ 20.00	\$ 4.04	\$ -	\$ 2,805.50	\$ 324.18	\$ 255.56	\$ 134.93	\$ 3,544.20	\$ 19.54	0.6%	
58,400	200	40%	\$ 20.00	\$ 4.04	\$ -	\$ 5,611.00	\$ 648.36	\$ 511.12	\$ 229.95	\$ 7,024.46	\$ 20.00	\$ 4.04	\$ -	\$ 5,611.00	\$ 648.36	\$ 511.12	\$ 268.91	\$ 7,063.42	\$ 38.96	0.6%	
87,600	200	60%	\$ 20.00	\$ 4.04	\$ -	\$ 8,416.49	\$ 972.54	\$ 766.68	\$ 344.52	\$ 10,524.07	\$ 20.00	\$ 4.04	\$ -	\$ 8,416.49	\$ 972.54	\$ 766.68	\$ 402.88	\$ 10,582.63	\$ 58.36	0.6%	
116,800	200	80%	\$ 20.00	\$ 4.04	\$ -	\$ 11,221.99	\$ 1,296.71	\$ 1,022.23	\$ 459.09	\$ 14,024.07	\$ 20.00	\$ 4.04	\$ -	\$ 11,221.99	\$ 1,296.71	\$ 1,022.23	\$ 536.86	\$ 14,101.84	\$ 77.77	0.6%	
RATE 19 - SEASONAL AGRICULTURAL PROCESSING SERVICE (Summer, Jun - Sep)																					
		Load	Current								Proposed								Total Bill		
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,460	10	20%	\$ 20.00	\$ 4.04		\$ 177.39	\$ 16.21	\$ 12.78	\$ 7.80	\$ 238.21	\$ 20.00	\$ 4.04		\$ 177.39	\$ 16.21	\$ 12.78	\$ 9.12	\$ 239.53	\$ 1.32	0.6%	
2,920	10	40%	\$ 20.00	\$ 4.04		\$ 354.78	\$ 32.42	\$ 25.56	\$ 14.78	\$ 451.57	\$ 20.00	\$ 4.04		\$ 354.78	\$ 32.42	\$ 25.56	\$ 17.29	\$ 454.08	\$ 2.51	0.6%	
4,380	10	60%	\$ 20.00	\$ 4.04		\$ 532.16	\$ 48.63	\$ 38.33	\$ 21.77	\$ 664.93	\$ 20.00	\$ 4.04		\$ 532.16	\$ 48.63	\$ 38.33	\$ 25.45	\$ 668.62	\$ 3.69	0.6%	
5,840	10	80%	\$ 20.00	\$ 4.04		\$ 709.55	\$ 64.84	\$ 51.11	\$ 28.75	\$ 878.29	\$ 20.00	\$ 4.04		\$ 709.55	\$ 64.84	\$ 51.11	\$ 33.62	\$ 883.16	\$ 4.87	0.6%	
7,300	50	20%	\$ 20.00	\$ 4.04		\$ 886.94	\$ 81.04	\$ 63.89	\$ 35.74	\$ 1,091.65	\$ 20.00	\$ 4.04		\$ 886.94	\$ 81.04	\$ 63.89	\$ 41.79	\$ 1,097.70	\$ 6.05	0.6%	
14,422	50	40%	\$ 20.00	\$ 4.04		\$ 1,752.25	\$ 160.11	\$ 126.22	\$ 69.81	\$ 2,132.44	\$ 20.00	\$ 4.04		\$ 1,752.25	\$ 160.11	\$ 126.22	\$ 81.63	\$ 2,144.26	\$ 11.82	0.6%	
21,900	50	60%	\$ 20.00	\$ 4.04		\$ 2,660.82	\$ 243.13	\$ 191.67	\$ 105.58	\$ 3,225.25	\$ 20.00	\$ 4.04		\$ 2,660.82	\$ 243.13	\$ 191.67	\$ 123.47	\$ 3,243.13	\$ 17.88	0.6%	
29,200	50	80%	\$ 20.00	\$ 4.04		\$ 3,547.76	\$ 324.18	\$ 255.56	\$ 140.50	\$ 4,292.04	\$ 20.00	\$ 4.04		\$ 3,547.76	\$ 324.18	\$ 255.56	\$ 164.31	\$ 4,315.84	\$ 23.80	0.6%	
29,200	200	20%	\$ 20.00	\$ 4.04		\$ 3,547.76	\$ 324.18	\$ 255.56	\$ 140.50	\$ 4,292.04	\$ 20.00	\$ 4.04		\$ 3,547.76	\$ 324.18	\$ 255.56	\$ 164.31	\$ 4,315.84	\$ 23.80	0.6%	
58,400	200	40%	\$ 20.00	\$ 4.04		\$ 7,095.52	\$ 648.36	\$ 511.12	\$ 280.20	\$ 8,559.23	\$ 20.00	\$ 4.04		\$ 7,095.52	\$ 648.36	\$ 511.12	\$ 327.66	\$ 8,606.70	\$ 47.47	0.6%	
87,600	200	60%	\$ 20.00	\$ 4.04		\$ 10,643.29	\$ 972.54	\$ 766.68	\$ 419.89	\$ 12,826.42	\$ 20.00	\$ 4.04		\$ 10,643.29	\$ 972.54	\$ 766.68	\$ 491.01	\$ 12,897.55	\$ 71.13	0.6%	
116,800	200	80%	\$ 20.00	\$ 4.04		\$ 14,191.05	\$ 1,296.71	\$ 1,022.23	\$ 559.58	\$ 17,093.61	\$ 20.00	\$ 4.04		\$ 14,191.05	\$ 1,296.71	\$ 1,022.23	\$ 654.37	\$ 17,188.40	\$ 94.79	0.6%	
RATE 19 - SEASONAL AGRICULTURAL PROCESSING SERVICE (Non-Summer, Oct - May)																					
		Load	Current								Proposed								Total Bill		
kWh	kW	Factor	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)	
1,460	10	20%	\$ 20.00	\$ 4.04		\$ 121.72	\$ 16.21	\$ 12.78	\$ 5.91	\$ 180.66	\$ 20.00	\$ 4.04		\$ 121.72	\$ 16.21	\$ 12.78	\$ 6.92	\$ 181.66	\$ 1.00	0.6%	
2,920	10	40%	\$ 20.00	\$ 4.04		\$ 243.44	\$ 32.42	\$ 25.56	\$ 11.01	\$ 336.46	\$ 20.00	\$ 4.04		\$ 243.44	\$ 32.42	\$ 25.56	\$ 12.88	\$ 338.33	\$ 1.87	0.6%	
4,380	10	60%	\$ 20.00	\$ 4.04		\$ 365.15	\$ 48.63	\$ 38.33	\$ 16.12	\$ 492.27	\$ 20.00	\$ 4.04		\$ 365.15	\$ 48.63	\$ 38.33	\$ 18.84	\$ 495.00	\$ 2.73	0.6%	
5,840	10	80%	\$ 20.00	\$ 4.04		\$ 486.87	\$ 64.84	\$ 51.11	\$ 21.22	\$ 648.08	\$ 20.00	\$ 4.04		\$ 486.87	\$ 64.84	\$ 51.11	\$ 24.81	\$ 651.67	\$ 3.59	0.6%	
7,300	50	20%	\$ 20.00	\$ 4.04		\$ 608.59	\$ 81.04	\$ 63.89	\$ 26.32	\$ 803.88	\$ 20.00	\$ 4.04		\$ 608.59	\$ 81.04	\$ 63.89	\$ 30.77	\$ 808.34	\$ 4.46	0.6%	
14,422	50	40%	\$ 20.00	\$ 4.04		\$ 1,202.34	\$ 160.11	\$ 126.22	\$ 51.20	\$ 1,563.91	\$ 20.00	\$ 4.04		\$ 1,202.34	\$ 160.11	\$ 126.22	\$ 59.87	\$ 1,572.59	\$ 8.68	0.6%	
21,900	50	60%	\$ 20.00	\$ 4.04		\$ 1,825.77	\$ 243.13	\$ 191.67	\$ 77.32	\$ 2,361.94	\$ 20.00	\$ 4.04		\$ 1,825.77	\$ 243.13	\$ 191.67	\$ 90.42	\$ 2,375.04	\$ 13.10	0.6%	
29,200	50	80%	\$ 20.00	\$ 4.04		\$ 2,434.37	\$ 324.18	\$ 255.56	\$ 102.82	\$ 3,140.97	\$ 20.00	\$ 4.04		\$ 2,434.37	\$ 324.18	\$ 255.56	\$ 120.24	\$ 3,158.38	\$ 17.41	0.6%	
29,200	200	20%	\$ 20.00	\$ 4.04		\$ 2,434.37	\$ 324.18	\$ 255.56	\$ 102.82	\$ 3,140.97	\$ 20.00	\$ 4.04		\$ 2,434.37	\$ 324.18	\$ 255.56	\$ 120.24	\$ 3,158.38	\$ 17.41	0.6%	
58,400	200	40%	\$ 20.00	\$ 4.04		\$ 4,868.73	\$ 648.36	\$ 511.12	\$ 204.83	\$ 6,257.08	\$ 20.00	\$ 4.04		\$ 4,868.73	\$ 648.36	\$ 511.12	\$ 239.53	\$ 6,291.77	\$ 34.69	0.6%	
87,600	200	60%	\$ 20.00	\$ 4.04		\$ 7,303.10	\$ 972.54	\$ 766.68	\$ 306.84	\$ 9,373.19	\$ 20.00	\$ 4.04		\$ 7,303.10	\$ 972.54	\$ 766.68	\$ 358.82	\$ 9,425.17	\$ 51.98	0.6%	
116,800	200	80%	\$ 20.00	\$ 4.04		\$ 9,737.46	\$ 1,296.71	\$ 1,022.23	\$ 408.85	\$ 12,489.30	\$ 20.00	\$ 4.04		\$ 9,737.46	\$ 1,296.71	\$ 1,022.23	\$ 478.11	\$ 12,558.56	\$ 69.26	0.6%	

Rate 25 - Outdoor Recreational Lighting Service																							
kWh		Current										Proposed										Total Bill	
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)				
0		\$ 18.00	\$ 2.89		\$ -	\$ -	\$ -	\$ 0.71	\$ 21.60			\$ 18.00	\$ 2.89		\$ -	\$ -	\$ 0.83	\$ 21.72		\$ 0.12	0.6%		
100		\$ 18.00	\$ 2.89		\$ 7.90	\$ 1.11	\$ 0.88	\$ 1.04	\$ 31.82			\$ 18.00	\$ 2.89		\$ 7.90	\$ 1.11	\$ 0.88	\$ 1.22	\$ 31.99		\$ 0.17	0.5%	
500		\$ 18.00	\$ 2.89		\$ 39.50	\$ 5.55	\$ 4.38	\$ 2.38	\$ 72.69			\$ 18.00	\$ 2.89		\$ 39.50	\$ 5.55	\$ 4.38	\$ 2.78	\$ 73.10		\$ 0.41	0.6%	
1,000		\$ 18.00	\$ 2.89		\$ 78.99	\$ 11.10	\$ 8.75	\$ 4.05	\$ 123.79			\$ 18.00	\$ 2.89		\$ 78.99	\$ 11.10	\$ 8.75	\$ 4.74	\$ 124.47		\$ 0.68	0.5%	
2,508		\$ 18.00	\$ 2.89		\$ 198.11	\$ 27.84	\$ 21.95	\$ 9.10	\$ 277.89			\$ 18.00	\$ 2.89		\$ 198.11	\$ 27.84	\$ 21.95	\$ 10.64	\$ 279.43		\$ 1.54	0.6%	
5,000		\$ 18.00	\$ 2.89		\$ 394.95	\$ 55.51	\$ 43.76	\$ 17.43	\$ 532.55			\$ 18.00	\$ 2.89		\$ 394.95	\$ 55.51	\$ 43.76	\$ 20.39	\$ 535.50		\$ 2.95	0.6%	
10,000		\$ 18.00	\$ 2.89		\$ 789.91	\$ 111.02	\$ 87.52	\$ 34.16	\$ 1,043.50			\$ 18.00	\$ 2.89		\$ 789.91	\$ 111.02	\$ 87.52	\$ 39.95	\$ 1,049.28		\$ 5.78	0.6%	
RATE 26 - STATE UNIVERSITY TIME OF DAY SERVICE (6,000 kW or greater, Annual Averages)																							
kWh		Current										Proposed										Total Bill	
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)				
876,000	96,019	779,981	876,000	6000	20%	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 7,928.89	\$ 9,480.07	\$ 7,666.75	\$ 2,975.21	\$ 90,884.83	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 7,928.89	\$ 9,480.07	\$ 7,666.75	\$ 3,479.20	\$ 91,388.82	\$ 503.99	0.6%
1,752,000	192,038	1,559,962	1,752,000	6000	40%	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 15,857.78	\$ 18,960.14	\$ 15,333.50	\$ 3,823.88	\$ 116,809.21	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 15,857.78	\$ 18,960.14	\$ 15,333.50	\$ 4,471.62	\$ 117,456.95	\$ 647.74	0.6%
2,628,000	288,057	2,339,943	2,628,000	6000	60%	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 23,786.67	\$ 28,440.22	\$ 23,000.26	\$ 4,672.54	\$ 142,733.58	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 23,786.67	\$ 28,440.22	\$ 23,000.26	\$ 5,464.04	\$ 143,525.09	\$ 791.51	0.6%
3,504,000	384,076	3,119,924	3,504,000	6000	80%	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 31,715.55	\$ 37,920.29	\$ 30,667.01	\$ 5,521.20	\$ 168,657.96	\$ 135.00	\$ 5.03	\$ 62,693.88	\$ 31,715.55	\$ 37,920.29	\$ 30,667.01	\$ 6,250.00	\$ 169,386.76	\$ 728.80	0.4%
1,118,944	122,648	996,296	1,118,944	7664	20%	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 10,127.82	\$ 12,109.21	\$ 9,793.00	\$ 3,799.02	\$ 116,050.07	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 10,127.82	\$ 12,109.21	\$ 9,793.00	\$ 4,442.56	\$ 116,693.60	\$ 643.53	0.6%
2,479,721	271,804	2,207,917	2,479,721	7664	44%	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 22,444.56	\$ 26,835.54	\$ 21,702.52	\$ 5,117.34	\$ 156,320.96	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 22,444.56	\$ 26,835.54	\$ 21,702.52	\$ 5,984.19	\$ 157,187.81	\$ 866.85	0.6%
3,356,832	367,945	2,988,887	3,356,832	7664	60%	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 30,383.51	\$ 36,327.64	\$ 29,378.99	\$ 5,967.07	\$ 182,278.22	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 30,383.51	\$ 36,327.64	\$ 29,378.99	\$ 6,250.00	\$ 182,561.15	\$ 282.93	0.2%
4,475,776	490,593	3,985,183	4,475,776	7664	80%	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 40,511.33	\$ 48,436.85	\$ 39,171.99	\$ 6,250.00	\$ 214,591.18	\$ 135.00	\$ 5.03	\$ 80,080.98	\$ 40,511.33	\$ 48,436.85	\$ 39,171.99	\$ 6,250.00	\$ 214,591.18	\$ -	0.0%
2,190,000	240,047	1,949,953	2,190,000	15000	20%	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 19,822.20	\$ 23,700.18	\$ 19,166.88	\$ 6,250.00	\$ 225,813.99	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 19,822.20	\$ 23,700.18	\$ 19,166.88	\$ 6,250.00	\$ 225,813.99	\$ -	0.0%
4,380,000	480,095	3,899,905	4,380,000	15000	40%	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 39,644.44	\$ 47,400.36	\$ 38,333.76	\$ 6,250.00	\$ 288,503.29	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 39,644.44	\$ 47,400.36	\$ 38,333.76	\$ 6,250.00	\$ 288,503.29	\$ -	0.0%
6,570,000	720,142	5,849,858	6,570,000	15000	60%	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 59,466.64	\$ 71,100.54	\$ 57,500.64	\$ 6,250.00	\$ 351,192.55	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 59,466.64	\$ 71,100.54	\$ 57,500.64	\$ 6,250.00	\$ 351,192.55	\$ -	0.0%
8,760,000	960,189	7,799,811	8,760,000	15000	80%	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 79,288.85	\$ 94,800.72	\$ 76,667.52	\$ 6,250.00	\$ 413,881.81	\$ 135.00	\$ 5.03	\$ 156,734.70	\$ 79,288.85	\$ 94,800.72	\$ 76,667.52	\$ 6,250.00	\$ 413,881.81	\$ -	0.0%
RATE 26 - STATE UNIVERSITY TIME OF DAY SERVICE (6,000 kW or greater, Summer: Jun - Sep)																							
kWh		Current										Proposed										Total Bill	
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)				
876,000	96,019	779,981	876,000	6000	20%	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 15,755.08	\$ 9,480.07	\$ 7,666.75	\$ 4,506.72	\$ 137,668.36	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 15,755.08	\$ 9,480.07	\$ 7,666.75	\$ 5,270.14	\$ 138,431.78	\$ 763.42	0.6%
1,752,000	192,038	1,559,962	1,752,000	6000	40%	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 31,510.15	\$ 18,960.14	\$ 15,333.50	\$ 6,250.25	\$ 171,683.80	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 31,510.15	\$ 18,960.14	\$ 15,333.50	\$ 6,250.00	\$ 172,313.54	\$ 629.74	0.4%
2,628,000	288,057	2,339,943	2,628,000	6000	60%	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 47,265.23	\$ 28,440.22	\$ 23,000.26	\$ 6,250.00	\$ 205,215.44	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 47,265.23	\$ 28,440.22	\$ 23,000.26	\$ 6,250.00	\$ 205,215.44	\$ -	0.0%
3,504,000	384,076	3,119,924	3,504,000	6000	80%	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 63,020.31	\$ 37,920.29	\$ 30,667.01	\$ 6,250.00	\$ 238,117.35	\$ 135.00	\$ 5.03	\$ 100,119.71	\$ 63,020.31	\$ 37,920.29	\$ 30,667.01	\$ 6,250.00	\$ 238,117.35	\$ -	0.0%
1,118,944	122,648	996,296	1,118,944	7664	20%	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 20,124.45	\$ 12,109.21	\$ 9,793.00	\$ 5,755.27	\$ 175,808.21	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 20,124.45	\$ 12,109.21	\$ 9,793.00	\$ 6,250.00	\$ 176,302.94	\$ 494.73	0.3%
2,479,721	271,804	2,207,917	2,479,721	7664	44%	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 44,598.39	\$ 26,835.54	\$ 21,702.52	\$ 6,250.00	\$ 227,412.73	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 44,598.39	\$ 26,835.54	\$ 21,702.52	\$ 6,250.00	\$ 227,412.73	\$ -	0.0%
3,356,832	367,945	2,988,887	3,356,832	7664	60%	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 60,373.48	\$ 36,327.64	\$ 29,378.99	\$ 6,250.00	\$ 260,356.38	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 60,373.48	\$ 36,327.64	\$ 29,378.99	\$ 6,250.00	\$ 260,356.38	\$ -	0.0%
4,475,776	490,593	3,985,183	4,475,776	7664	80%	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 80,497.93	\$ 48,436.85	\$ 39,171.99	\$ 6,250.00	\$ 302,383.04	\$ 135.00	\$ 5.03	\$ 127,886.24	\$ 80,497.93	\$ 48,436.85	\$ 39,171.99	\$ 6,250.00	\$ 302,383.04	\$ -	0.0%
2,190,000	240,047	1,949,953	2,190,000	15000	20%	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 39,387.63	\$ 23,700.18	\$ 19,166.88	\$ 6,250.00	\$ 338,944.00	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 39,387.63	\$ 23,700.18	\$ 19,166.88	\$ 6,250.00	\$ 338,944.00	\$ -	0.0%
4,380,000	480,095	3,899,905	4,380,000	15000	40%	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 78,775.39	\$ 47,400.36	\$ 38,333.76	\$ 6,250.00	\$ 421,198.81	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 78,775.39	\$ 47,400.36	\$ 38,333.76	\$ 6,250.00	\$ 421,198.81	\$ -	0.0%
6,570,000	720,142	5,849,858	6,570,000	15000	60%	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 118,163.02	\$ 71,100.54	\$ 57,500.64	\$ 6,250.00	\$ 503,453.50	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 118,163.02	\$ 71,100.54	\$ 57,500.64	\$ 6,250.00	\$ 503,453.50	\$ -	0.0%
8,760,000	960,189	7,799,811	8,760,000	15000	80%	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 157,550.65	\$ 94,800.72	\$ 76,667.52	\$ 6,250.00	\$ 585,708.20	\$ 135.00	\$ 5.03	\$ 250,299.28	\$ 157,550.65	\$ 94,800.72	\$ 76,667.52	\$ 6,250.00	\$ 585,708.20	\$ -	0.0%
RATE 26 - STATE UNIVERSITY TIME OF DAY SERVICE (6,000 kW or greater, Non-Summer: Oct - May)																							
kWh		Current										Proposed										Total Bill	
		Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Customer Charge	AMS Rider	Demand Charge	Energy Use Charge	Fuel	RPS	EUERF	Total Bill	Differ	Differ(%)				
876,000	96,019	779,981	876,000	6000	20%	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 4,015.79	\$ 9,480.07	\$ 7,666.75	\$ 2,209.46	\$ 67,493.07	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 4,015.79	\$ 9,480.07	\$ 7,666.75	\$ 2,583.73	\$ 67,867.34	\$ 374.27	0.6%
1,752,000	192,038	1,559,962	1,752,000	6000	40%	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 8,031.59	\$ 18,960.14	\$ 15,333.50	\$ 2,925.69	\$ 89,371.92	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 8,031.59	\$ 18,960.14	\$ 15,333.50	\$ 3,421.28	\$ 89,867.51	\$ 495.59	0.6%
2,628,000	288,057	2,339,943	2,628,000	6000	60%	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 12,047.38	\$ 28,440.22	\$ 23,000.26	\$ 3,641.91	\$ 111,250.76	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 12,047.38	\$ 28,440.22	\$ 23,000.26	\$ 4,258.84	\$ 111,867.68	\$ 616.92	0.6%
3,504,000	384,076	3,119,924	3,504,000	6000	80%	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 16,063.18	\$ 37,920.29	\$ 30,667.01	\$ 4,358.14	\$ 133,129.61	\$ 135.00	\$ 5.03	\$ 43,980.96	\$ 16,063.18	\$ 37,920.29	\$ 30,667.01	\$ 5,096.39	\$ 133,867.85	\$ 738.24	0.6%
1,118,944	122,648	996,296	1,118,944	7664	20%	\$ 135.00	\$ 5.03	\$ 56,178.35	\$ 5,129.51	\$ 12,109.21	\$ 9,793.00	\$ 2,820.90	\$ 86,171.00	\$ 135.00	\$ 5.03	\$ 56,178.35	\$ 5,129.51	\$ 12,109.21	\$ 9,793.00	\$ 3,298.75	\$ 86,648.84	\$ 477.84	0.6%
2,479,721	271,804	2,207,917	2,479,721	7664	44%	\$ 135.00	\$ 5.03	\$ 56,178.35	\$ 11,367.64	\$ 26,835.54	\$ 21,702.52	\$ 3,933.49	\$ 120,157.56	\$ 135.00	\$ 5.03	\$ 56,178.35	\$ 11,367.64	\$ 26,835.54	\$ 21,702.52	\$ 4,599.80	\$ 120,823.87	\$ 666.31	0.6%
3,356,832	367,945	2,988,887	3,356,832	7664	60%	\$ 135.00	\$ 5.03	\$ 56,178.35	\$ 15,388.52	\$ 36,327.64	\$ 29,378.99	\$ 4,650.62	\$										

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF EL PASO ELECTRIC)
COMPANY'S APPLICATION FOR)
APPROVAL OF ITS 2025-2027 ENERGY)
EFFICIENCY AND LOAD MANAGEMENT)
PLAN, UTILITY INCENTIVE AND REVISED)
RATE NO. 17- EFFICIENT USE OF ENERGY)
RECOVERY FACTOR)

Case No. 24-00154-UT

EL PASO ELECTRIC COMPANY,)
Applicant.)
_____)

DECLARATION OF ADRIAN HERNANDEZ IN SUPPORT OF
THE FOREGOING DIRECT TESTIMONY IN EL PASO
ELECTRIC'S APPLICATION FOR APPROVAL OF ITS 2025-2027
ENERGY EFFICIENCY AND LOAD MANAGEMENT PLAN, UTILITY
INCENTIVE AND REVISED RATE NO. 17-EFFICIENT USE OF
ENERGY RECOVERY FACTOR

I *Adrian Hernandez*, pursuant to Rule 1-011 NMRA, state as follows:

1. I affirm in writing under penalty of perjury under the laws of the State of New Mexico that the following statements are true and correct.

2. I am over 18 years of age and have personal knowledge of the facts stated herein. I am employed by El Paso Electric Company as the *Principal Rate Analyst*.

3. The foregoing Direct Testimony of Adrian Hernandez, together with all exhibits sponsored therein and attached thereto, is true and accurate based on my knowledge and belief.

4. I submit this Declaration, based upon my personal knowledge and upon information and belief, in support of EPE's *Application for Approval of Its 2025-2027 Energy Efficiency and Load Management Plan, Utility Incentive and Revised Rate No. 17-Efficient Use of Energy Recovery Factor*.

FURTHER, DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 29, 2024.

/s/ *Adrian Hernandez*

ADRIAN HERNANDEZ

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF EL PASO ELECTRIC
COMPANY'S APPLICATION FOR
APPROVAL OF ITS 2025-2027 ENERGY
EFFICIENCY AND LOAD MANAGEMENT
PLAN, UTILITY INCENTIVE AND REVISED
RATE NO. 17- EFFICIENT USE OF ENERGY
RECOVERY FACTOR**

Case No. 24-00154-UT

**EL PASO ELECTRIC COMPANY,
Applicant.**

CERTIFICATE OF SERVICE

**I HEREBY CERTIFY that on July 29, 2024 El Paso Electric Company's Application
for Approval of 2025-2027 Plan, 2025-2027 Utility Incentive and Revised Rate No. 17-**

EUERF was emailed to each of the following:

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DATED July 29, 2024

/s/ Kari E. Olson

Kari E. Olson