Education and Work Experience for Jamie Barber

Education
University of West Georgia
Master of Business Administration-Finance
August 2009
West Georgia College
Bachelor of Business Administration—Accounting
August 1991

NARUC, Staff Subcommittee on Rate Design, Chair 11/17 To Present
NARUC Rate School Faculty 5/2020 To Present

Experience
Georgia Public Service Commission
Director, Energy Efficiency and Renewable Energy Unit 6/20 To Present

- Responsible for the oversight of the EERE Unit.
- Provide oversight and policy recommendations for issues related to Energy Efficiency and Renewable Energy.
- Provide Commission Oversight for the implementation of Georgia Power Company's Customer Renewable Supply Procurement (CRSP) Program.
- Facilitator of the Demand Side Management Working Group.
- Responsible for maintaining awareness of Marginal Rate Offerings of Georgia Power Company.
- Review of Proxy Qualifying Facilities Contracts with Georgia Power.
- Review of Renewable Requests for Proposals and Pro Forma Power Purchase Agreements.
- Responsible for maintaining awareness of the status of Georgia Power providing online customer access to usage data.
- Responds to inquiries relating to net metering, distributed generation, energy efficiency programs, and other related matters.
- Review of Georgia Power Company's Prepay Tariff and implementation of program.

Manager Energy Efficiency and Renewable Energy Group 10/13 To 6/20

ARRA Manager-Internal Consultants, Utilities Division 1/10 To 9/13

- Responsible for the oversight of the group within the Internal Consultants Section.
- Project Leader for issues related to Energy Efficiency and Renewable Energy.
- Project Leader for the implementation of Georgia Power Company's Large-Scale Solar Offering, Advanced Solar Initiative and Advanced Solar Initiative Prime Programs.
- Project Leader for the Certification of 250 megawatts of wind resources.
- Facilitator of the Demand Side Management Working Group.
- Responsible for maintaining awareness of Marginal Rate Offerings of Georgia Power Company.
- Review of Proxy Qualifying Facilities Contracts with Georgia Power.
- Review of Renewable Requests for Proposals and Pro Forma Power Purchase Agreements.
- Responsible for the Commission oversight of the Automated Meter Infrastructure (AMI) Implementation for Georgia Power and addressing customer inquiries related to the safety of AMI meters.
- Responsible for maintaining awareness of Georgia Power's smart grid upgrades to its distribution and transmission system.
- Responsible for maintaining awareness of the status of Georgia Power providing online customer access to usage data.
- Responds to inquiries relating to net metering, distributed generation, AMI, energy efficiency programs, smart grid, and other related matters.
- Review of Georgia Power Company's Prepay Tariff and implementation of program.

Georgia Public Service Commission 10/98 To 1/2010

Utilities Analyst-Natural Gas Section, Utilities Division

- Responsible for maintaining awareness of Base Rates and Rules and Regulations for Atlanta Gas Light Company and Atmos Energy Corporation.
- Review of Negotiated Contracts of Atmos Energy Corporation.
- Maintains Commission contact of assigned certificated marketers.
- Responds to inquiries about Natural Gas Deregulation and other Atlanta Gas Light Billing issues.
- Review the Dedicated Design Day Capacity allocation and Recalculation used by Atlanta Gas Light Company.
- Review of Performance-Based Regulation program of Atmos Energy Corporation.
- Filed and presented testimony regarding Atlanta Gas Light Company's Purchased Gas Costs and Revenues.
- Responsible for the auditing of Purchased Gas Costs of Atlanta Gas Light Company.
- Filed and presented testimony on rate design in Atlanta Gas Light Company Earning's case.
- Project Leader for the auditing of the Pipeline Replacement Program for Atmos Energy for compliance with Commission Order.
- Project Leader for the auditing of Sequent Energy Management.
- Responsible for tracking compliance with the Marketer Service Quality Standards.
- Project leader for Atmos Energy Gas Supply Plan.

Georgia Public Service Commission 10/97 To 10/98

Utilities Analyst Trainee-Gas Section, Utilities Division

- Performed detailed rate analysis that was used in determining base rates for Atlanta Gas Light Company.
- Filed and presented testimony in the United Cities Gas Company's 1998-99 Gas Supply Plan.
- Reviewed marketer applications for certification for financial competence.
- Reviewed proposed changes to rate schedules and terms of service of Atlanta Gas Light Company and United Cities Gas Company.
- Reviewed monthly filings of United Cities Gas Company's Performance-Based Ratemaking Plan.

Georgia Public Service Commission 11/96 To 10/97

Utilities Analyst Trainee-Electric Section, Utilities Division

- Project Manager for a series of Electric Restructuring Workshops.
- Reviewed and prepared sections of the Staff Report related to the Electric Restructuring Workshops.
- Reviewed filed proposed changes to rate schedules and terms of service of Georgia Power Company (GPC) and Savannah Electric Company (SEPCO).

Georgia Public Service Commission 11/94 To 11/96

Accountant-Electric Section, Utilities Division

- Tracked fuel recovery position of Georgia Power Company.
- Reviewed Special Contracts of Georgia Power Company.
- Tracked coal and other fuel prices.
- Participated in IRP review and hearings of GPC and SEPCO.
- Monitored the construction status of combustion turbines for additional capacity needs of GPC and SEPCO.

Georgia Public Service Commission 11/93 To 11/94

Accounting Technician-Administrative Division

- Responsible for proper classification of Commission expenses.
- Responsible for accounts payable.
- Reviewed Staff Travel Expense Reports.
- Maintained Commission Computer and Vehicle Inventory.

Nicholas Cooper

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ncooper@psc.ga.gov
1603 Clifton Terrace
Atlanta, GA 30307

Employment Experience:

Georgia Public Service Commission
Utilities Engineer, May 2014 – Present

- Verify and research Georgia Power Company reports relating to energy efficiency including EM&V, True-Up, Program Planning, and Quarterly Reports
- Prepared testimony and testified in the GPC 2016, 2019, 2022 IRP proceedings
- Administered the Demand Side Management Working Group
- Research and prepared PSC response to EPA Clean Power Plan
- Assist with Renewable Energy issues and policy
- Work with other team members to create reports and verify data

Atlanta Regional Commission
Intern, Natural Resources Department, May 2013 – December 2013

- Researched city level sustainability policy
- Researched policies related to various water issues for Georgia including the Tri-State water wars and Proctor Creek rehabilitation project
- Assisted in research for toilet rebate program to identify best practices and efficiency improvements

Phase 3 Marketing and Communications
Production Manager, April 2005 – August 2010

- Managed 3-7 employees across multi shifts and departments
- Trained new employees in my department, as well as cross-training companywide
- Promoted after one year to manage small format production department
- Used Adobe Creative Suite 5 to pre-flight files for print
- Developed work-flow schedules for meeting intense deadlines
- Maintained and ordered inventory and supplies
- Multi-task managing while operating printing presses

Phase 3 Marketing and Communications
Press Operator, March 2004 – April 2005

- Promotion after eight months of work
- Operated several digital printers in high intensity, deadline oriented environment
- Self-taught Adobe Creative Suite as training for promotion

Phase 3 Marketing and Communications
Finishing Specialist, August 2003 – March 2004

- Entry level position with promotion possibilities if willingness and competency shown

Education:

Georgia Institute of Technology, 2012-2014
MS Public Policy

- Researched Energy Efficiency and Demand Side Management Policy as part of Climate and Energy Policy Lab
- Employed each semester as a Teacher's Assistant for various classes including Energy Policy

- Working paper on Sustainability policy and best practices for cities across the U.S.
- Focus on Energy and Sustainability policy through course work and research

Georgia Institute of Technology, 2010-2012
MS Environmental Engineering

- Focus on environmental sustainability and policy
- Independent research using Life Cycle Assessment to evaluate advanced thorium nuclear options
- Evaluated combined processes for solar/nuclear/coal power generation and storage

Emory University, 1999-2003
BA Music with a minor in Philosophy

- 4 years of work study in Music Department assisting conductor and library organization
- Classical training in percussion and timpani
- Played in multiple bands across several genres, recorded and mastered two albums

Expertise:

Sustainable engineering

- Independent research project on sustainable power generation
- Focused coursework on sustainable practices
- Used Life Cycle Assessment tools such as SimaPro

Management

- 5 years of management experience
- Trained new employees
- Inventory management and ordering

Musician/Media

- Trained classical percussionist
- Recorded, mixed, mastered personal music
- Trained WREK radio host

Richard F. Spellman, CMVP

Executive Consultant

EDUCATION & PROFESSIONAL CERTIFICATIONS

Certified Measurement and Verification Professional (CMVP)

Management II Program, University of Michigan, Graduate School of Business, 1987

M.S. in Business Science, Thomas College, 1980

Amos Tuck Graduate School of Business, 1974-75

B.A., Math/Economics, Dartmouth College, 1974 (graduated with distinction)

PROFESSIONAL MEMBERSHIPS

Association of Energy Service Professionals (AESP), Board of Directors of AESP – 2005 to 2010

Chair of AESP Policy Committee – 1997 & 1998, Vice Chair AESP Policy Committee – 1995 & 1996

Association of Energy Services Professionals (AESP) Member, 1993 to present

Association of Energy Engineers member, 2013 to present

PROFESSIONAL EXPERIENCE

Mr. Spellman is currently an Executive Consultant at GDS Associates and has over 48 years of energy industry experience. During his career at GDS he served as Vice President, Senior Vice President and then President from 2007 to 2018. He has managed electric and natural gas energy efficiency, demand response, integrated resource planning and renewable energy consulting projects in such states as Alabama, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Indiana, Kentucky, Louisiana, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Vermont, Virginia and Wisconsin for GDS clients as well as in Canadian provinces (Nova Scotia, Ontario, British Columbia). He obtained AEE's Certified Measurement and Verification Professional (CMVP) designation in 2012. Mr. Spellman has expertise in the following EM&V technical skills:

1. Project management of state-wide EM&V Teams (Georgia, Pennsylvania)
2. Development of EM&V scopes of work for contracts with clients
3. Development of plans for impact, process and market effects evaluations
4. Development of sampling plans
5. Development of survey instruments (phone, internet, mail and in-person surveys)
6. Remote data collection and data analytics
7. On-site data collection and data analytics
8. Completion of impact, process and market effects evaluations
9. Benefit/cost analysis
10. Forecasting participation in energy efficiency programs
11. Preparation, proofreading and editing of draft and final reports
12. Use and analysis of normalized meter energy consumption

Mr. Spellman has completed impact, process and market effects evaluations for utilities, public benefits organizations and government clients. From 2009 to 2017 he served as the overall Project Manager for the Statewide Evaluator team for the Commonwealth of Pennsylvania for the Pennsylvania Public Utilities Commission (PUC). He has also served in project management positions for energy efficiency and demand response implementation projects for electric utility clients, Wisconsin Focus on Energy and Efficiency Maine.

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From 1999 to December 2002, Mr. Spellman served as the Program Manager for the Wisconsin Focus on Energy Commercial and Industrial pilot energy efficiency programs (Systems Benefit Charge funded) implemented in a 23-county area in Northeast Wisconsin, and he served as the Deputy Project Director for the $60 million Wisconsin Focus on Energy Business Program from March of 2001 until June of 2003. He has also served as a Senior Technical Advisor for the Efficiency Maine Business Energy Efficiency Program from 2003 through 2019. He has served as the Chair of the Policy Topic Committee of the Association of Energy Services Professionals (AESP) and he served as a member of the Board of Directors of AESP from 2005 to 2010.

Prior to joining GDS in 1993, he was employed at Central Maine Power Company (CMP) for sixteen years. He managed CMP's $26 million portfolio of energy efficiency programs. He also worked on CMP's market transformation program efforts with appliance and building standards, energy efficient lighting and motors, new construction and renewable energy programs. He worked on national market transformation programs such as the Super-Efficient Refrigerator Program (SERP) and the EPA's Green Lights and Energy Star Programs.

Finally, he has a solid track record testifying for clients before state regulatory Commissions and legislative committees on energy efficiency program planning, implementation and evaluation. He was also the chairperson of the New England Power Pool DSM Planning Committee for several years and worked on a wide range of regional DSM and renewable energy projects in New England during his sixteen years at CMP.

His education includes a BA degree with distinction in Math/Economics from Dartmouth College (graduated cum laude) and a Master's in Business from the Thomas College Graduate School of Business. He is a graduate of the University of Michigan Graduate School of Business Administration Management II Program (1987), and the Electric Council of New England Skills of Utility Management Program (1986). In 1974 Mr. Spellman was awarded a research grant by the Richard King Mellon Foundation to study how colleges and universities in the Northeast were responding to the 1973-1974 U.S. energy crisis.

Specific Experience Includes:

GDS Associates, Inc., ***Vice President, Senior Vice President, President, Executive Consultant***, 1993 to Present
At GDS Associates, Mr. Spellman has directed and completed numerous management consulting, IRP, renewable energy, DSM planning, implementation and evaluation, market research, load research and market planning assignments for the firm's clients, which include electric and natural gas utilities, municipal utilities, electric cooperatives, government agencies, and large commercial and industrial organizations.

Listed below are examples (not an exhaustive list) of specific DSM planning, research and EM&V projects completed by Mr. Spellman at GDS (1993 to present).

1. Evaluation and DSM planning technical support to the Staff of the Georgia Public Service Commission, 2007 to present
2. DSM program planning support for the Office of Regulatory Staff of the South Carolina Public Service Commission, 2025.
3. Evaluation of the State of Colorado Percentage of Income Payment Plan Program for the Colorado Energy Office, 2024.
4. Evaluation technical support to the Staff of the North Carolina Utilities Commission.
5. Program Manager, Pennsylvania Statewide Evaluation (SWE) Team for the Pennsylvania Public Utilities Commission, 2009 to 2017.
6. Project Manager, Maine Low-Income Household Energy Efficiency Baseline Study, completed in 2018 for the State of Maine Office of the Public Advocate
7. Energy Efficiency Subject Matter Expert for British Columbia Hydro, 2016
8. Evaluation Support for the Arkansas Office of the Attorney General (2014 to 2015)
9. Impact evaluation of Multi-Family Energy Efficiency Program for Austin Energy (Texas), 2013
10. Impact and Process Evaluation of Austin Energy Weatherization Assistance Program, 2013
11. Evaluation of Austin Energy Home Performance with Energy Star Program, 2013
12. Technical and regulatory support for evaluation, measurement and verification, setting energy efficiency savings goals – support for the Florida Public Service Commission, 2008 to 2009
13. Impact Evaluation of Efficiency Maine Residential Lighting Program, 2007

14. Evaluation of Bonneville Power Administration's Non Wires Solution Program, 2007
15. Impact evaluation of Massachusetts Energy Star Homes Program, 2005
16. Impact Analysis of KeySpan Energy Delivery Residential Energy Efficiency Program, 2003
17. Impact Analysis of KeySpan Energy Delivery Residential Low Income Energy Efficiency Program, 2004
18. Program evaluation support for the New York State Energy Research and Development Authority, 2001 to 2003

Listed below are examples of consulting projects completed by Mr. Spellman and colleagues at GDS relating to energy efficiency technical, economic and achievable potential studies:

1. **The City Council of the New Orleans, Louisiana (July 2021)** - This study provided an estimate of energy efficiency and demand response potential for the period 2021 to 2040 for the Entergy New Orleans (Entergy) service territory in New Orleans. This study was commissioned by the Council of the City as part of their retail regulatory oversite of electric utility services in Orleans Parish. For each level of energy efficiency potential examined (technical, economic, achievable, etc.), this detailed report presented the energy savings, peak demand savings, benefits and costs for the Entergy New Orleans service area for the period of 2021-2040.
2. **DTE Energy, Consumers Energy and the Lansing (Michigan) Board of Water & Light –** During 2017 and 2018 Mr. Spellman served as the overall Project Manager for the completion of energy efficiency and demand response potential studies for these Michigan electric and natural gas utilities. The main deliverables of this project were reports detailing the technical, economic and achievable potential for electric energy efficiency and demand response measures for the services areas of these three Michigan utilities as well as estimates of natural gas energy efficiency potential.
3. **Pennsylvania Public Utility Commission, Bureau of Conservation, Economics and Energy Planning** – In 2014 and 2015, GDS prepared a new, detailed report with findings on the technical, economic, achievable and program potential for electric energy efficiency measures and programs in the State of Pennsylvania. The final report was completed in February 2015. The final report presented updated technical, economic, and achievable potentials of Energy Efficiency measures for the Commonwealth of Pennsylvania for the period 2016-2025.
4. **Pennsylvania Public Utility Commission, Bureau of Conservation, Economics and Energy Planning** – In September 2011 GDS was retained by the Pennsylvania PUC to prepare a detailed report with findings on the technical, economic, achievable and program potential for electric energy efficiency measures and programs in the State of Pennsylvania. The final report was completed on May 10, 2012. The final report presented the technical, economic, and achievable potentials of Energy Efficiency measures for the Commonwealth of Pennsylvania for the period 2013-2022.
5. **Vermont Department of Public Service –** GDS was retained by the Vermont Department of Public Service to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency and conservation resources in the State of Vermont. GDS collected and analyzed extensive information on over 100 energy efficiency and conservation measures, developed supply curves to show the achievable potential and completed a final report in May 2011. The GDS Team also examined the amount of energy efficiency savings that could be achieved given different budget scenarios for Efficiency Vermont. The GDS Team also conducted an analysis of the electric rate and electric bill impacts from these various budget scenarios.
6. **PowerSouth –** GDS was retained by PowerSouth to conduct an assessment of the cost effective achievable potential for several electric energy efficiency and demand response measures in the PowerSouth service area. GDS collected and analyzed extensive information on selected energy efficiency measures and demand response measures, developed supply curves to show the achievable potential and completed a report by July 1, 2011.
7. **Maryland Natural Gas Potential Study** – In the spring of 2011, the Maryland Energy Administration (MEA) identified the need to determine the potential for natural gas energy efficiency savings in Maryland, and to identify the types of natural gas energy efficiency programs and measures that could save the most natural gas and be the most cost effective for the State of Maryland. The need for this analysis was initially created by the Maryland Energy Efficiency Act of 2008, which requires a study of the feasibility of setting energy savings targets in 2015 and 2020 for natural gas companies. MEA contracted with GDS in June of 2011 to conduct this natural gas energy efficiency potential study for the State of Maryland. As part of the project, GDS conducted analysis and prepared a technical-economic-achievable-program potential study documenting a base estimate of natural gas energy efficiency potential to determine the feasibility of setting energy savings targets in 2015 and 2020 for natural gas companies in Maryland. GDS presented alternative scenarios in low and high cases in terms of market potential and determined what likely can be achieved for market penetration in 2015 and

2020.This included information regarding required programs or market approaches addressing technologies, threshold incentive levels (by market or segment) pricing strategies, trade ally involvement and communications efforts. An implementation plan was also developed that recommended programs for 2015 and provided detailed recommendations on "best practice" strategies, program designs, requisite budgets, incentives and expected market penetration. GDS completed this study in November 2011.

8. **Consolidated Edison of New York –** Consolidated Edison Company of New York retained GDS to prepare an assessment of the natural gas energy efficiency potential in its service area and to develop a portfolio of natural gas energy efficiency programs. GDS developed this Gas Efficiency Plan for Con Ed, and the Plan was filed with the New York Public Service Commission in March 2009. The program plans included detailed benefit/cost calculations using the Total Resource Cost test. The plan also included a detailed plan for evaluation of each individual program, including details on the scope and method of measurement and verification activities pursuant to the Commission's rules and regulations.
9. **District of Columbia Energy Office** – In September 2007, GDS Associates and Ed Meyers Consulting completed a detailed assessment of energy use in the District of Columbia and developed findings and recommendations for cost effective electric and natural gas energy efficiency programs for the District. The report included detailed information on residential energy measures recommend for consideration in the upcoming Comprehensive Energy Plan IV for DC (CEP-IV) as well as energy efficiency programs and measures for DC Government facilities. The report found that the effectiveness of the District's programs can be increased working with the Metropolitan Washington Council of Governments (MWCOG) to leverage resources with federal agencies and coordinate policies and programs throughout the region to produce mutually targeted results. Such regional cooperation also reduces administrative costs per program unit delivered, as costs are amortized over more clients served. One particularly promising opportunity may involve regional government purchasing of energy efficiency products, where each governmental unit would gain from regional quantity discounts. The report determined the successful energy conservation programs can yield about 6,000 new jobs in the District of Columbia over a fifteen year period. DC's job creation totals in energy efficiency can be boosted for DC residents through First Source Employment Agreements and LSDBE requirements, when businesses receive tangible benefits from the DC government (for example, low-interest loans or down payment assistance).
10. **New Hampshire Public Utilities Commission** - In 2008, GDS in partnership with RLW Analytics, Research Into Action and RKM Research and Communications was retained by the New Hampshire Public Utilities Commission to conduct a thorough assessment of the potential for electric and natural gas energy efficiency in the state of New Hampshire. To support the energy efficient potential analysis, the GDS Team conducted residential and small commercial telephone surveys and large C&I site visits. The data collected will help determine key study inputs such as equipment saturations and baseline efficiency levels. The GDS Team has identified hundreds of electric and natural gas energy efficiency measures which are being analyzed to identify cost-effective measures. Estimates of the technical, economic and achievable electric and natural gas savings potential over the next ten years and the cost necessary to achieve these savings will then be developed.
11. **Hoosier Energy** - GDS was retained by Hoosier Energy to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency and demand response measures in service area of Hoosier Energy in southern Indiana. GDS collected and analyzed extensive information on over 200 energy efficiency measures and 25 demand response measures, developed supply curves to show the achievable potential and completed a report by December 2008.
12. **Brazos Electric Cooperative** - GDS was retained by Brazos Electric Cooperative to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency and demand response measures in the service area of this large electric cooperative in Eastern Texas. GDS collected and analyzed extensive information on over 200 energy efficiency measures and 25 demand response measures, developed supply curves to show the achievable potential and completed a draft report by September 2008.
13. **Arkansas Electric Cooperative Corporation** - GDS was retained by Arkansas Electric Cooperative Corporation to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency and demand response measures in the service area of this large electric cooperative in Arkansas. GDS collected and analyzed extensive information on over 200 energy efficiency measures and 25 demand response measures, developed supply curves to show the achievable potential and completed a draft report by September 2008.
14. **Central Maine Power Company (CMP)** - As a subcontractor to La Capra Associates, GDS was retained by CMP to conduct an assessment of the potential for cost-effective electric energy efficiency and demand response as an alternative to transmission system expansion in 5 sub-areas of the CMP service area. GDS collected and

analyzed extensive information on over 100 energy efficiency and conservation measures, developed supply curves to show the achievable potential and is in the process of developing a draft findings report.

15. **Bonneville Power Administration (BPA)** - GDS was retained by BPA to conduct an assessment of their Non-Wires Solutions initiative development process and the current state of the initiative. The BPA Non Wires Solutions Program assesses the feasibility of energy efficiency and demand response programs as an alternative to building new electric transmission lines in the BPA service area. GDS reviewed program materials and reports, designed an interview guide and conducted in-depth, interviews with key BPA staff. Our analysis identified program strengths, weaknesses and potential improvements in key program areas including design, implementation, planning, cost impact & allocation and resources. A final report was delivered on June 8, 2007.
16. **Reading Municipal Light Department (Reading, Massachusetts)** - GDS was retained by the RMLD to assess the technical, economic, and market potential for reducing (avoiding) electricity use and peak demand and reducing fossil-fueled electricity use and peak demand, in RMLD's service territory by implementing a wide range of end-use efficiency measures and renewable energy resource technologies. GDS collected and analyzed extensive information on over 100 energy efficiency, conservation and demand-response measures and renewable energy technologies, developed supply curves to show the achievable potential and is in the process of developing a draft report.
17. **Concord Municipal Light Department, Concord, Massachusetts –** GDS completed a detailed study for the potential for energy efficiency and renewable energy technologies for the Concord Municipal Light Department (CMLD). GDS's specific responsibilities for this project include identification and analysis of demand-side alternatives, including distributed generation and other demand response technologies (i.e., direct load control).
18. **North Carolina Electric Membership Corporation (NCEMC)** - GDS was retained by the NCEMC to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency and conservation resources in service area of the North Carolina Electric Membership Corporation (NCEMC). GDS collected and analyzed extensive information on over 200 energy efficiency and conservation measures, developed supply curves to show the achievable potential and completed a final report in 2007.
19. **Central Electric Power Cooperative Inc. (CEPCI)** - GDS was retained by the CEPCI to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency, conservation and demand response resources in the service area of CEPCI. GDS collected and analyzed extensive information on over 200 energy efficiency and conservation measures, developed supply curves to show the achievable potential and completed a final report in August 2007.
20. **Maine –** GDS recently completed a technical potential study for high efficiency residential lighting equipment for the Efficiency Maine Residential Lighting Program. GDS conducted this study for the Maine Public Utilities Commission.
21. **North Carolina Public Utilities Commission** -GDS was retained by the North Carolina PUC to conduct an assessment of the cost effective achievable potential for electric energy efficiency and conservation resources in the State of North Carolina. GDS collected and analyzed extensive information on over 100 energy efficiency and conservation measures, developed supply curves to show the achievable potential and completed a final report in December 2006.
22. **Vermont Department of Public Service -** GDS was retained by the Vermont Department of Public Service to conduct a thorough assessment of the cost effective achievable potential for electric energy efficiency and conservation resources in the State of Vermont. GDS collected and analyzed extensive information on over 100 energy efficiency and conservation measures, developed supply curves to show the achievable potential and completed a final report in January 2007. GDS also conducted market research with energy services providers in Vermont to collect information on baseline levels of energy efficiency in the State.
23. **Big Rivers Electric Corporation – 2005 Energy Efficiency Technical Potential Study - Kentucky -** During 2005, GDS completed a study of the technical and maximum achievable cost effective economic potential of energy efficiency measures and programs for the service area of the Big Rivers Electric Corporation, a large Generation and Transmission electric utility in Ohio. This technical and economic potential study was completed as part of the comprehensive analysis of supply-side and demand-side options for the latest BREC Integrated Resource Plan filing with the Kentucky Public Service Commission.
24. **Public Service of New Mexico** – GDS completed this natural gas DSM technical and achievable potential study in May 2005. This study presents estimates of the maximum achievable cost-effective potential for natural gas Demand-Side Management (DSM) opportunities in the service area of Public Service of New Mexico. The main output of this study is a concise, fully documented report on the opportunities for achievable, cost effective

natural gas energy efficiency programs in New Mexico.

25. **Utah Energy Office and Questar Gas Company** – GDS completed this natural gas DSM technical and achievable potential study in June 2004. This study presents estimates of the maximum achievable cost-effective potential for natural gas Demand-Side Management (DSM) opportunities in the State of Utah. The main output of this study is a concise, fully documented report on the opportunities for achievable, cost effective natural gas energy efficiency programs in Utah. This study assessed the impacts that gas DSM measures and programs can have on natural gas use, assesses the economic costs and benefits of DSM programs, and assesses the revenue impacts to Questar Gas Company. The final report also includes an assessment of the environmental impacts of the achievable DSM options identified in this study.
26. **Energy Efficiency Potential in Georgia – Study for the Alliance to Save Energy** – GDS completed this study for the Alliance to Save Energy in July 2004. This study provides estimates of the maximum achievable cost effective potential in the State of Georgia for several "top-ranked" energy efficiency programs. In addition, GDS presented expert witness testimony on behalf of the ASE before the Georgia Public Service Commission that covered the following issues:
    - The potential net present value dollar savings to ratepayers in Georgia due to the implementation of cost effective energy efficiency programs.
    - The cost effectiveness of these energy efficiency programs.
    - Energy efficiency tariffs that could be implemented in Georgia to save energy.
    - Up-to-date information on energy efficiency and DSM success stories and energy savings in other regions of North America and the technical potential for DSM in Georgia.
    - Improvements that could be made in the DSM measure screening process in Georgia.
    - Recommendations for DSM cost recovery and shareholder incentive mechanisms.
27. **Energy Efficiency Potential in Florida – Study for the Alliance to Save Energy and the Southern Alliance for Clean Energy** – GDS completed this study for the Alliance to Save Energy in July 2004. This study provides estimates of the maximum achievable cost effective potential in the State of Florida for several "top-ranked" energy efficiency programs
28. **Connecticut Energy Conservation Management Board** – In March 2003**,** GDS was retained by the Connecticut Energy Conservation Management Board to conduct a thorough assessment of the cost effective maximum achievable technical potential for energy efficiency and conservation resources in the State of Connecticut and two sub-regions of the State. GDS collected and analyzed extensive information on over 250 energy efficiency and conservation and developed supply curves to show the maximum achievable potential. GDS completed the final report in June 2004.
29. **Alliant Energy Corporate Services** - As an update to an assessment of potential customer-sited/distributed generation technology applications in all categories (residential, small/large commercial, industrial, and agricultural) conducted by GDS in 2001, Alliant requested that modeling assumptions be reviewed and revised, as necessary. In addition, the Distributed/Onsite Generation Screening (DOGS) tool was reviewed by MN Department of Commerce as part of a filing in 2001 and they requested expansion of applicable technologies and fuels, including: bio-diesel and methane from landfills and digesters to fuel reciprocating engines; methanol, ethanol, gasoline, and methane for electricity production from fuel cells. The revised model results will be used to estimate the market potential for distributed/onsite generation within Alliant's Minnesota service territories.
30. **Massachusetts GasNetworks –** In January of 2004, GDS was hired by GasNetworks (a network of several natural gas utilities in Massachusetts) to develop benefit/cost analyses and energy savings potential estimates for GasNetworks' regional market transformation and demand-side management programs. Benefit/cost ratios and energy savings potential estimates were developed for several regional gas energy efficiency programs using a spreadsheet model, and similar data were developed for each program for each service area for each natural gas utility participating in this study.
31. **Northern Utilities (Gas Company) –** In 2002 GDS was hired by Northern Utilities to prepare benefit/cost analyses and energy savings potential estimates of a portfolio of energy efficiency programs proposed for implementation in their New Hampshire service area. This project was completed during September 2002 and a final report was filed with the New Hampshire PUC. A workshop was conducted at the NH Public Utilities Commission early in 2003 to review cost-effectiveness methodologies and key model input/output requirements.
32. **KeySpan Energy Delivery (Gas Company)** – In 2002 GDS was hired by KeySpan Energy Delivery – New Hampshire to prepare benefit/cost analyses and energy savings potential estimates of ten energy natural gas

energy efficiency programs proposed for implementation in the KeySpan New Hampshire service area. This project was completed during September 2002 and a final report was filed with the New Hampshire PUC that month.

33. **Big Rivers Electric Corporation – 2002 Energy Efficiency Technical Potential Study - Kentucky -** During 2002, GDS completed a study of the technical and economic potential of energy efficiency and load management measures and programs for the service area of the Big Rivers Electric Corporation, a large Generation and Transmission electric utility in Ohio. This technical and economic potential study was completed as part of the comprehensive analysis of supply-side and demand-side options for the latest BREC Integrated Resource Plan filing with the Kentucky Public Service Commission.
34. **City of Grand Island, Nebraska – Municipal Utility – Energy Efficiency Technical Potential Study -** GDS completed a study of the technical and economic potential for energy efficiency and load management measures and programs for the service area of this large municipal electric utility in Nebraska. This technical and economic potential study was completed as part of the comprehensive analysis of supply-side and demand-side options for an Integrated Resource Plan for this utility.
35. **City of Lafayette, Louisiana – Municipal Utility – Energy Efficiency Technical Potential Study -** GDS completed a study of the technical and economic potential for energy efficiency and load management measures and programs for the service area of this large municipal electric utility in Louisiana. This technical and economic potential study was completed as part of the comprehensive analysis of supply-side and demand-side options for an Integrated Resource Plan for this utility.
36. **New York State Energy Research and Development Authority (NYSERDA) - Energy $mart^{SM} Program Evaluation Services:** In the fall of 1999**,** GDS was retained by NYSERDA to be the prime evaluation contractor for the New York Energy $mart^{SM} program. During the years 2000, 2001, 2002, and 2003, GDS has been responsible for providing energy efficiency program and measure data collection, analysis, and report writing services to NYSERDA in support of their overall evaluation and market assessment efforts, and to determine actual savings of the programs. To date, GDS team evaluation activities have included development of a Gap Analysis for the purpose of setting priorities and allocating evaluation resources to the various New York Energy $mart^{SM} project areas; and numerous evaluation activities leading to development of a draft and final Program Evaluation Status report which provided the New York Public Service Commission with sufficient information to determine the future of SBC-funded public benefits programs beyond its initial three-year transition period which ended July, 2001.
37. **Distributed Generation Technical Potential Assessment for Minnesota and Iowa:** During the fall of 2001, GDS assessed the technical potential of customer-sited distributed generation technology applications for Alliant, a major investor owned utility located in the MidWest. The analysis covered the residential, small/large commercial, industrial, and agricultural sectors. GDS developed a Distributed/Onsite Generation Screening spreadsheet model to determine the cost-effectiveness of various distributed generation options; used the model to assess the potential for various customer groups and then scaled results using customer profiles. Model results were also used to estimate the technical potential for distributed/onsite generation within Alliant's Minnesota and Iowa service territories.
38. **Renewable Electric Energy and Peak Demand Savings Methodology Reviews - Wind Power and Photovoltaics Programs:** GDS performed detailed reviews of NYSERDA's methodologies for estimating electric energy savings and peak demand reduction benefits associated with NYSERDA's Wind Power Research & Development Program and two Photovoltaic (PV) programs. These Savings Methodology reviews entailed three-components: 1) a review of the current method used by NYSERDA for estimating savings (including algorithms and inherent assumptions), 2) a review of the methods and assumptions used by other utilities and program administrators for estimating savings from similar programs being implemented elsewhere in the country, and 3) a presentation of key findings and recommendations.
39. **Evaluation Services for Commercial/Industrial Program Areas and Technical Assistance Reviewing Engineering Analyses- Efficiency Vermont:** GDS Associates is the lead contractor in a team that has been hired to assist the VT DPS in evaluating a statewide portfolio of energy efficiency programs targeted to the Commercial and Industrial market sectors. The GDS team is also providing technical engineering and review assistance, on an "on-call" basis, to the administrator of Vermont's energy efficiency programs.
40. **Development and Implementation of Five-Year Energy Efficiency Plan – Boston Edison:** GDS Associates was retained by Boston Edison to assist BECo staff with the development of program designs, evaluation plans, technical potential estimates and budgets for the Company's Five Year Energy Efficiency Plan. For this project GDS performed energy efficiency technology screenings to identify potentially viable measures for utility

funding/support and developed the program designs for a number of new initiatives, including over a dozen new market transformation programs. GDS also conducted cost effectiveness screening for all of the new DSM initiatives included in the plan.

41. **Energy Efficiency Technical and Market Potential Analysis:** This report presented the results of a technical and market potential study for energy efficiency options for the East Texas Electric Cooperative, Inc. (ETEC). The purpose of this report was to review energy efficiency options that comply with the Public Utility Commission of Texas (PUCT) orders issued in Northeast Texas Electric Cooperative (NTEC), Sam Rayburn Electric Cooperative (SRG&T) and Tex-La Electric Cooperative of Texas (Tex-La) rate cases. This study presented cost effectiveness findings and recommendations on energy efficiency options and programs for ETEC and its member generation and transmission electric cooperatives (NTEC, SRG&T, and Tex-La). In this study, GDS evaluated the cost effectiveness of over 90 energy efficiency options and found many of them to be cost effective according to the Total Resource Cost Test.
42. **Technical and Market Potential Analysis for Load Management and Energy Efficiency Options:** GDS was retained to update energy efficiency and load management technical and market potential analyses completed in the mid 1990's time period, and to develop recommendations relating to cost effective DSM programs for electric cooperatives in East Texas. This study identified energy efficiency and load management (DSM) options that were viable based on economic tests presented in the California Standard Practice Manual for Economic Analysis of Demand-Side Management Programs. DSM options that had a Total Resource Cost test benefit/cost ratio greater than 1.3 and a positive net present value for the participant were ones that were recommended by GDS for further program development.

Central Maine Power Company - Manager of Marketing Services/Marketing and Product Development, August 1990 to May 1993

From 8/90 to 8/92 - Responsible for managing the design and implementation of CMP's residential, commercial, and industrial demand-side management programs. Also responsible for corporate market research, five-year DSM implementation plans, testifying on DSM topics before regulatory agencies, and for participating in integrated resource planning activities. Accountable for managing a $26 million DSM budget and a staff of 50 persons. Served on three person lead team from 1989 to 1992 to develop CMP's first integrated resource plan. During 1991 traveled to Czechoslovakia and Poland to provide consulting to foreign electric utilities on DSM issues.

From 8/92 to 5/93, responsible for identifying and developing marketing strategies for products and services which would improve the competitiveness of CMP's customers, increase the efficiency of energy use, increase CMP's profitability, and which would reduce the rate of growth of electricity prices for all customers. Directly responsible for the design of renewable energy and demand-side management programs, integrated resource planning, research on new technologies, and managing marketing and product development staff. Also provided consulting services to utilities in New Zealand, Australia, and Bulgaria relating to DSM program design and implementation.

Central Maine Power Company - Director of Market Research and Forecasting, June 1986 to August 1990

Responsible for managing twenty-five professional employees. Duties included supervising DSM program impact and process evaluation activities, short and long range load forecast development, local area energy and peak load forecasts, market and load research, economic forecasting, and developing and updating DSM assumptions for use in the Company's long range planning models. Also participated in the development of the first Power Partners RFP, and in the evaluation and selection of proposals submitted in response to this RFP.

Central Maine Power Company - Corporate Economist, May 1985 to May 1986

Responsible for monitoring and forecasting energy and economic trends in the CMP service area and in the New England Region. Duties included development of corporate short-term kWh sales and revenue forecasts, market research studies, and CMP's energy management strategy. Instrumental in promoting the use of state-of-the art PC-based computer models for integrated resource planning (UPLAN). Authored a second report on CMP's DSM strategy in April 1986. Also responsible for supervising several analysts.

Central Maine Power Company - Staff Economist, May 1977 to May 1985

(5/77 to 5/78) Joined CMP in May 1977 and worked in the Customer Services Department. Responsibilities included short-term forecasting, annual appliance saturation surveys, preparation of the 1977 and 1978 long-range energy and peak load forecasts, and impact evaluation of demand response programs (including Kilowatt-Savings Time demand response program).

(5/78 to 12/80) In May of 1978, selected to join a new group, the Corporate Financial Model Staff, to develop a new corporate financial model for CMP. Had major responsibility for development of a revenue forecasting model and assisted with development of models to produce income statement, balance sheet, and sources and uses of funds forecasts. In addition to corporate model development, responsibilities included short-term forecasting and market research.

(12/80 to 5/85) In December of 1980, moved to CMP's Research Department for five years. Responsible for all corporate market research, short-term kWh sales and revenue forecasts, economic analyses and forecasts, and forecasts of key corporate planning assumptions. Prepared and published CMP's first DSM strategy study in March 1985.

OTHER SELECTED PROFESSIONAL ACTIVITIES •

- Member of Technical Advisory Group (TAG) for the U.S. Department of Energy Uniform Methods Project (UMP), 2011 to 2020.
- Board of Directors, Association of Energy Services Professionals (AESP), 2005 to 2010
- Member of the Association of Energy Service Professionals (1993 to Present), Vice Chairman of the Policy Committee (1995-1996), Chair of Policy Committee (1997 and 1998)
- Panel Leader, 1992 American Council for an Energy Efficient Economy (ACEEE) Summer Study on Building Energy Efficiency.
- Chairman of the NEPOOL Demand-Side Management Planning Committee, September 1989 to September 1990, August 1991-July 1992.
- Vice Chairman of the NEPOOL Demand-Side Management Committee - January to August 1989, July 1990 - July 1991.
- Member of the NEPOOL Demand-Side Management Task Force (1986-1988).
- Member of the Load Research Committee of the Association of Edison Illuminating Companies (1988-1991).
- Alternate to the NEPOOL Governor's Liaison Committee (1986-1988).
- State Forecast Analyst for the NEPOOL Load Forecasting Model (1979-1986).
- Maine Model Manager of the New England Economic Project economic forecasting model, 1983-1986.
- Member of the Statistical Research Committee of the Electric Council of New England (Chairperson 1982-1983, member 1977-1986).
- Member of the Edison Electric Institute Economics Committee (1986-1991).
- Past member of the International Association of Energy Economists.

PUBLICATIONS •

1. Spellman, Richard F., *Modeling of Energy Management Strategies with the Utility Systems Analysis Mode*l, paper presented at the International Load Management Conference, November 1984, Chicago, Illinois
2. Spellman, Richard F., *Use of Computer Models and Load Research Data for Developing Energy Management Strategies*, paper presented at the Fifth Annual Northeast Load Research Conference, September 10-12, 1986, Farmington, Connecticut
3. Spellman, Richard F., *Potential Market Penetration of DSM Programs at Central Maine Power*, paper presented at Third National Conference on Utility DSM Programs, June 16-18, 1987, Houston, Texas
4. Spellman, Richard F., *Demand-Side Management Market Penetration: Modeling and Resource Planning Perspectives from Central Maine Power Company*, paper presented at the Fourth National Conference on Utility DSM Programs, May 2-4, 1989, Cincinnati, Ohio
5. Spellman, Richard F., *Using Program Evaluation Data for Long-Range Resource Planning at Central Maine Power Company*, paper presented at the Canadian Electrical Association's Conference on Enhancing Electricity's Value to Society, October 22-24, 1990, Toronto, Canada
6. Spellman, Richard F., *Demand-Side Management from a North American Perspective*, Keynote Address to the International Energy Agency Conference on Advanced Technologies for Electric Demand-Side Management,

written for Joe C. Collier, Jr., President and Chief Executive Officer of Central Maine Power Company, paper presented in Sorrento, Italy on April 3, 1991

7. Leamon, Ann K., and Spellman, Richard F., *From the Bottom Up: T&D and DSM*, paper presented at the 5th National Demand-Side Management conference, July 30 - August 1, 1991, Boston, Massachusetts
8. Haeri, M. Hossein, and Spellman, Richard F., *Integration of Evaluation Results into the Resource Planning Process*, paper presented at the 5th National Demand-Side Management Conference, July 30 - August 1, 1991, Boston, Massachusetts
9. Spellman, Richard F., *Does Fuel Switching Make Sense for an Electric Utility?*, paper presented at the 1992 International Energy Efficiency and DSM Conference, October 22, 1992, Toronto, Ontario
10. Spellman, Richard F., and Brunette, Marguerite, *Market Research for the Design, Implementation, and Evaluation of a Compact Fluorescent Lighting Program*, paper presented at the EPRI/EUMRC Market Research Symposium, November 17-20, 1992, Dallas, Texas
11. Spellman, Richard F., Forum For Applied Research and Public Policy/Fall 1992, *Energy Management: A View from Maine* (Journal Article)
12. Spellman, Richard F., *DSM Incentives Plus Electric Rate Adjustment Mechanisms Equal Bottom Line Impact*, paper presented at the 6th National Demand-Side Management Conference, March 24-26, 1993, Miami Beach, Florida
13. Spellman, Richard F., Van Wie, David A., Peaco, Daniel E., Lawrence, and Dennis R., *Optimizing Demand-Side and Supply Resources Using Linear Programming*
14. Spellman, Richard F., Utility Experience With Load Management in Texas, EPRI/Houston Lighting and Power Co. Load Management Conference, May 3, 1994, Houston, Texas.
15. Spellman, Richard, F., The Role of DSM in the Privatized Electricity Sector in England and Wales, and New Zealand, Paper Presented at the Association of Demand-Side Management Professionals Annual Meeting, Orlando, Florida, December 1994.
16. Spellman, Richard, F., Energy Services in A Global Environment, Paper Presented at the Association of Energy Services Professionals Annual Meeting, Phoenix, Arizona, December 1995.
17. Spellman, Richard, F., Value Added Services as Profit Centers in Texas, Paper Presented at the Association of Energy Services Professionals Annual Meeting, Beverly Hills, California, December 1996.
18. Spellman, Richard, F., "Preparing for Competition by Updating Corporate Marketing Strategies", Paper Presented at the Association of Energy Services Professionals Annual Meeting, Boca Raton, Florida, December 1997.
19. Megdal, Lori, Spellman, Richard, F., Johnson, Bruce "Methods and Measurement Issues for a DSM Evaluation versus a Market Transformation Market Assessment and Baseline Study", Paper Presented at the 1999 Energy Program Evaluation Conference, Denver, Colorado, August 1999.
20. Spellman, Richard F., Shel Feldman, Bruce Johnson, Lori Megdal, "Measuring Market Transformation Progress & the Binomial Test: Recent Experience at Boston Gas Company", Paper presented at the ACEEE Summer Study on Building Energy Efficiency, August 2000.
21. Spellman, Richard F., Giffin, Thomas M., Sheil, Jolene A., Nicol, John, "Experience and Lessons from the Wisconsin Industrial Focus on Energy Program: Transformation in Industrial Energy Efficiency Markets", presented at American Council for and Energy Efficient Economy Summer Study on Energy Efficiency in Buildings, Tarrytown, New York. July 25-27, 2001
22. Spellman, Richard F., Shel Feldman, Bruce Johnson, Lori Megdal, "Transition Strategies for Market Transformation Programs: Recent Experience at KeySpan Energy Delivery", Paper presented at the December 2001 12th National Energy Services Conference.
23. Rooney, Thomas; Spellman, Richard; Rufo, Michael; Schlegel, Jeff; "Estimating the Potential for Cost Effective Electric Energy and Peak Demand Savings in Connecticut", Paper presented at the 2004 American Council for an Energy Efficient Economy Summer Study in Pacific Grove, California, August 2004.
24. Spellman, Richard F., Goldfarb, Lynn K., Barnes, Harley, "Using Market Research to Improve Program Design and Delivery of Residential Lighting Programs in the US Northeast Region", Paper presented at the 15th National Energy Services Conference, December 7, 2004, Clearwater Beach, Florida.

25. Spellman, Richard F.; Goldfarb, Lynn K.; Huber, Jeffrey; "IS THERE A POTENTIAL NATIONAL MARKET FOR TRADING ENVIRONMENTAL CREDITS BASED ON THE ENVIRONMENTAL SAVINGS ACHIEVED THROUGH ENERGY EFFICIENCY SAVINGS?", Paper presented at the 16th National Energy Services Conference, December 2005.
26. Spellman, Richard F.; Rooney, Thomas; Burks, Jeffrey; Bean, Stephen; "Potential for Natural Gas Savings in the Southwest", Paper presented at the 2006 ACEEE Summer Study on Building Energy Efficiency, held at Pacific Grove, California.

DIRECT TESTIMONY OF RICHARD F. SPELLMAN •

1. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket Nos. 85-48, 85-82, 85-83, filed July 7, 1986. Subject Matter: Economics of Commercial and Industrial Conservation Programs in the CMP Service Area
2. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket Nos. 88-111 and 87-261, filed November 6, 1987. Subject Matter: DSM Assumptions for Central Maine Power Company in Long Term Avoided Cost Filing.
3. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket Nos. 88-111 and 87-261, filed June 22, 1988. Subject Matter: DSM Potential and Cost Effectiveness in the CMP Service Area.
4. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket No. 89-68, filed May 19, 1989. Subject Matter: Review and explain the basis for the updated short-term kWh sales forecast on which CMP's revised Attrition Study is based.
5. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket No. 89-68, filed October 24, 1989. Subject Matter: Review and explain the basis for the short-term kWh sales forecast on which CMP's Attrition Study is based.
6. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket No. 91-213, filed November 15, 1991. Subject Matter: Present CMP's conclusions regarding the advisability of inaugurating a residential space heat conversion program in the Company's service territory.
7. On Behalf of Central Maine Power Company, Before the State of Maine Public Utilities Commission, Docket No. 91-213, filed July 31, 1992. Subject Matter: Present updated information regarding the advisability of inaugurating a residential space heat conversion program in the Company's service territory.
8. On Behalf of Tex-La Electric Cooperative of Texas, Inc. Before the Public Utilities Commission of Texas, Docket No. 12289, filed July 1993. Subject Matter: Tex-La's DSM activities and updating of TEX-LA Energy Efficiency Plan.
9. On Behalf of Tex-La Electric Cooperative of Texas, Inc. Before the Public Utilities Commission of Texas, Docket No. 12289, filed July 1993. Subject Matter: Rebuttal testimony relating to TEX-LA's DSM activities.
10. On Behalf of H.E. Butt Grocery Company, Before the Public Utilities Commission of Texas, Docket No. 12820, Filed October 17, 1994. Subject Matter: Proposed modifications to Central Power and Light DSM Programs.
11. On Behalf of The Coalition of Cities and The City of Houston, Before the Public Utilities Commission of Texas, Docket No. 12065, filed November 15, 1994. Subject Matter: Proposed changes to Houston Lighting and Power Company's DSM programs.
12. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket NO. 5602-U, filed May 8, 1995. Subject Matter: Proposed modifications to DSM programs proposed by Georgia Power Company in Integrated Resource Plan filed by the Company in January 1995.
13. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket NO. 5601-U, filed May 8, 1995. Subject Matter: Proposed modifications to DSM programs proposed by Savannah Electric and Power Company in Integrated Resource Plan filed by the Company in January 1995.
14. On Behalf of the Sam Rayburn G&T Electric Cooperative, Inc., Before the Public Utilities Commission of Texas, Docket No. 14893, filed September 1995. Subject Matter: Description of SRG&T Compliance with prior Commission orders relating to SRG&Ts DSM activities.
15. On Behalf of the Sam Rayburn G&T Electric Cooperative, Inc., Before the Public Utilities Commission of Texas,

Docket No. 14893, filed January 1996. Subject Matter: Rebuttal testimony relating to SRG&Ts DSM activities.

16. On Behalf of the Sam Rayburn G&T Electric Cooperative, Inc., Before the Public Utilities Commission of Texas, Docket No. 14893, filed March 1996. Subject Matter: Surrebuttal testimony relating to SRG&Ts DSM activities.
17. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket Nos. 6315-U and 6325-U, filed April 5, 1996. Subject Matter: Evaluation of Benefits and Costs of Residential Load Management Program Proposed by Georgia Power Company.
18. On Behalf of Green Mountain Power Company, Before the Vermont Public Service Board, Docket No. 5983, filed December 8, 1997. Subject Matter: Rebuttal Testimony relating to the effectiveness of the Company's historical DSM activities.
19. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket NO. 8708-U, filed May 29, 1998. Subject Matter: DSM programs proposed by Georgia Power Company in Integrated Resource Plan filed by the Company in 1998.
20. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket NO. 8709-U, filed May 29, 1998. Subject Matter: Proposed modifications to DSM programs proposed by Savannah Electric and Power Company in Integrated Resource Plan filed by the Company in January 1995.
21. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket No. 8709-U, filed May 29, 1998. Subject Matter: Proposed modifications to DSM programs proposed by Savannah Electric and Power Company in Integrated Resource Plan filed by the Company in January 1998.
22. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket No. 13305-U, filed May 11, 2001. Subject Matter: DSM programs proposed by Georgia Power Company in Integrated Resource Plan filed by the Company in January 2001.
23. On Behalf of the Georgia Public Service Commission Staff IRP Adversary Team, Before the Georgia Public Service Commission, Docket No. 13306-U, filed May 11, 2001. Subject Matter: Proposed modifications to DSM programs proposed by Savannah Electric and Power Company in Integrated Resource Plan filed by the Company in January 2001.
24. On Behalf of the Alliance to Save Energy, Before the Georgia Public Service Commission, Docket Nos. 17687 & 17688-U, filed May 14, 2004. Subject Matter: Proposal for new energy efficiency programs to be paid for and implemented by Savannah Electric and Power Company and Georgia Power Company (this was intervener testimony filed in the Integrated Resource Plan dockets heard before the Georgia Commission during 2004).
25. On Behalf of the Southern Alliance for Clean Energy, Before the Georgia Public Service Commission, Docket Nos. 4822-U & 19279-U, filed November 12, 2004. Subject Matter: Provided comments on the rules of the Georgia Commission relating to the methodology for the calculation of electric energy and capacity avoided costs that would apply to renewable energy producers in the State of Georgia.
26. On behalf of the Public Staff of the North Carolina Utilities Commission, Before the North Carolina Public Service Commission, Docket No. E-7, Sub 831, June 26, 2008, Subject Matter: The purposes of this testimony were the following: (1) to determine whether the SAVE-A-WATT (SAW) approach was in the public interest of the ratepayers of Duke Energy Carolinas, LLC (Duke or the Company); (2) to determine whether the SAW program administrator costs per lifetime kWh saved were reasonable and whether projected utility margins for energy efficiency and demand response resources under the proposed SAVE-A-WATT approach were reasonably based; (3) to determine whether the SAW approach would achieve the maximum achievable cost-effective potential for kilowatt-hour (kWh) and kilowatt (kW) savings in the Company's service area in North Carolina.; (4) to determine whether any additional cost-effective energy efficiency and demand response programs should be included in the Company's Energy Efficiency Plan; (5) to determine whether an alternative to SAW exists that provides superior electricity and dollar savings to the Company's ratepayers at a much lower cost to them.
27. On behalf of Communities Against Regional Interconnect, Before the State of New York Public Service Commission, Case No. 06-T-0650, Filed January 9, 2009, Subject Matter: The purposes of this testimony were the following: to present the achievable, cost effective non-route alternatives to construction of the New York Regional Interconnect (NYRI) project and to demonstrate that with the implementation of the proposed non-route alternatives there is no real need for the NYRI project.

28. On behalf of Connecticut Natural Gas Corporation, Before the State of Connecticut Department of Public Utility Control, Docket No. 08-12-06, Filed January 16, 2009, Subject Matter: The purposes of this testimony were the following: (1) describe how the new Connecticut Natural Gas (CNG) energy efficiency programs will strengthen the partnership with customers through expanded communication and outreach, consistent with the state's policy encouraging energy efficiency; (2) present an overview of existing CNG energy efficiency programs; (3) present information on best practice natural gas energy efficiency programs in other States; (4) describe CNG's proposal to expand energy efficiency program offerings; (5) provide a summary of proposed budgets, energy savings and cost effectiveness of proposed program offerings; (6) describe staffing needs to support the proposed programs; (7) present information on the impact of proposed programs on natural gas use per customer; (8) describe the regulatory mechanism for recovery of program costs.

29. On behalf of the Southern Connecticut Gas Company, Before the State of Connecticut Department of Public Utility Control, Docket No. 08-08-17, Filed January 20, 2009, Subject Matter: The purposes of this testimony were the following: (1) describe how the new Southern Connecticut Gas Company (SCG) energy efficiency programs will strengthen the partnership with customers through expanded communication and outreach, consistent with the state's policy encouraging energy efficiency; (2) present an overview of existing SCG energy efficiency programs; (3) present information on best practice natural gas energy efficiency programs in other States; (4) describe SCG's proposal to expand energy efficiency program offerings; (5) provide a summary of proposed budgets, energy savings and cost effectiveness of proposed program offerings; (6) describe staffing needs to support the proposed programs; (7) present information on the impact of proposed programs on natural gas use per customer; (8) describe the regulatory mechanism for recovery of program costs.

30. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket Nos. 31081 & 31082, filed May 2010. Subject Matter: Reviewed energy efficiency and demand response programs included in the 2010 Georgia Power Company Integrated Resource Plan and made recommendations for an enhanced portfolio of such programs. Also made recommendations relating to DSM cost recovery and financial incentives for the Company's shareholders.

31. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket Nos. 36498 & 336499, filed May 2013. Subject Matter: Reviewed energy efficiency and demand response programs included in the 2013 Georgia Power Company Integrated Resource Plan and made recommendations relating to the Company's proposed portfolio of DSM programs. Also made recommendations relating to DSM cost recovery and financial incentives for the Company's shareholders.

32. On Behalf of Steel Dynamics, Inc., Before the Indiana Utility Regulatory Commission, Docket No 44310, filed June 2013. Subject Matter: The purpose of this testimony was to address why the Commission should approve a structured self-direct demand side management program for large customers served by jurisdictional electric utilities and such a program should be structured.

33. On Behalf of the Arkansas Attorney General, Before the Arkansas Public Service Commission, Docket Nos. 07-075-TF, 07-076-TF, 07-077-TF, 07-078-TF, 07-081-TF, 07-0082-TF, 07-085-TF. Subject Matter: IN THE MATTER OF THE REQUEST FOR APPROVAL OF ITS QUICK START ENERGY EFFICIENCY PROGRAMS AND THE TARIFF RELATED TO THE PROGRAMS OF UTILITIES IN ARKANSAS, filed on May 2, 2014. The purpose of this testimony was to provide detailed recommendations on how seven electric and natural gas utilities in Arkansas could address flaws in the evaluation, measurement and verification procedures used to determine accurate program kWh and kW savings, the need for these utilities to follow-up and implement detailed recommendations made in program evaluations and to discuss necessary steps to address non cost effective programs. t.

34. On Behalf of the Arkansas Attorney General, Before the Arkansas Public Service Commission, Docket Nos. 07-075-TF, 07-076-TF, 07-077-TF, 07-078-TF, 07-081-TF, 07-0082-TF, 07-085-TF. Subject Matter: IN THE MATTER OF THE REQUEST FOR APPROVAL OF ITS QUICK START ENERGY EFFICIENCY PROGRAMS AND THE TARIFF RELATED TO THE PROGRAMS OF UTILITIES IN ARKANSAS, filed on May 8, 2015. The purpose of this testimony was to provide detailed recommendations on how seven electric and natural gas utilities in Arkansas could improve the efficiency and cost effectiveness of proposed DSM programs based on EM&V results achieved to date and based on recommendations made by the independent third party evaluations and the Independent Evaluation Monitor (IEM).

35. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket No. 40161, filed May 6, 2016. Subject Matter: Reviewed the Company's IRP testimony and exhibits, IRP plan and data responses filed in this IRP proceeding. Then developed, submitted and presented testimony with

recommendations relating to the Company's treatment of DSM resources in the IRP process, the proposed portfolio of DSM programs included in the IRP and presented the Commission's current policy on treating DSM resources as a priority resource in the IRP process of a utility.

36. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket No. 40162, filed May 6, 2016. Subject Matter: Reviewed the Company's testimony, DSM plan and data responses filed in this DSM proceeding. Then filed and presented testimony with recommendations relating to DSM cost recovery and financial incentives for the Company's shareholders for successful implementation of energy efficiency programs.

37. On Behalf of the Ohio Consumers' Counsel, filed Direct Testimony with the Public Utilities Commission of Ohio In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company For Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019, Case No. 16-0743-EL-POR 36, September 13, 2016.

38. On Behalf of the Ohio Consumers' Counsel, filed Supplemental Testimony with the Public Utilities Commission of Ohio In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company For Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019, Case No. 16-0743-EL-POR 36, January 10, 2017.

39. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket No. 42310, filed April 25, 2019. Subject Matter: Reviewed the Company's 2022 IRP report, pre-filed testimony and exhibits, and data responses filed in this IRP proceeding. Then developed, submitted and presented testimony with recommendations relating to the Company's treatment of DSM resources in the IRP process, the proposed portfolio of DSM programs included in the IRP and presented the Commission's current policy on treating DSM resources as a priority resource in the IRP process of a utility.

40. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket No. 42311, filed April 25, 2019. Subject Matter: Reviewed the Company's testimony, DSM plan and data responses filed in this DSM proceeding. Then filed and presented testimony with recommendations relating to DSM cost recovery and financial incentives for the Company's shareholders for successful implementation of energy efficiency programs.

41. On Behalf of the People's Counsel, District of Columbia, **Formal Case No. 1160,** In the Matter of the Development of Metrics for Electric Company and Gas Company Energy Efficiency and Demand Response Programs Pursuant to Section 201(b) of the Clean Energy DC Omnibus Amendment Act of 2018. Filed on November 23, 2021.

42. On Behalf of the Public Interest Advocacy Staff of the Georgia Public Service Commission, Docket Nos. 44160 and 44161, filed May 6, 2022. Subject Matter: Reviewed the Company's 2022 IRP report, pre-filed testimony and exhibits, and data responses filed in this IRP proceeding. Then developed, submitted and presented testimony with recommendations relating to the Company's treatment of DSM resources in the IRP process, the proposed portfolio of DSM programs included in the IRP and presented the Commission's current policy on treating DSM resources as a priority resource in the IRP process of a utility.

Staff's Recommended DSM Program Planning Approach

1. Georgia Power, using an RFP process, will select a third-party consultant to assist in the Technical Resource Manual update, research active programs nationally, and assist in developing proposed programs.

2. Georgia Power will utilize a technical and economic potential study for Georgia Power's service territory to assist in targeting DSM programs in the areas where the highest market potential exists.

3. Georgia Power, along with its consultant, will update the DSM Measures in the Technical Resource Manual for the purpose of producing the energy efficiency potential study. The starting point will be the 2025 IRP Technology Catalog. Additional technologies will be added once Georgia Power's consultant is chosen and begins its work. The Company will then use the results of the potential study to identify a list of DSM measures that pass the TRC test to be used in program plans. This list of measures will then be presented to the DSMWG. The Company will work closely with members of the DSMWG through this process, and DSMWG members may also propose new measures to be added at any point in the measure evaluation process.

   For each DSM measure that passes the TRC test included in the Technology Catalog, the utility shall provide all members of the DSM Working Group with the following information:

   a. A brief description of the measure;
   b. Measure costs and the exact source for these costs;
   c. Measure kW and kWh load impacts and the exact source for such load impacts;
   d. The forecast of electric and other avoided costs used to value measure or program savings;
   e. Measure useful life and the exact source for measure life data;
   f. Measure levelized cost per lifetime kWh saved (for energy efficiency measures only);
   g. Size of the eligible market;
   h. Forecast of achievable market penetration;
   i. Current saturation of the energy efficiency or demand response measure and the source of this data;
   j. Assumptions on participant benefits, if any, other than electricity savings; and
   k. Any other supporting data deemed pertinent by the utility.

The update of the Technical Resource Manual will be completed by January 1, 2027.

4. Once the Technical Resource Manual is updated, Georgia Power will propose the bundling of measures into programs. Georgia Power, along with its consultant, will prepare a proposed program presentation for review by the DSMWG. Any other member of the DSMWG may propose programs as well. The DSMWG will meet to facilitate sufficient discussions on the programs to be evaluated. An electronic version of this presentation will be provided to the DSMWG at least two weeks prior to the in-person meeting where this information will be presented.

5. As part of the program design development, the Company intends to collect and share customer data/feedback with the DSMWG. In the event that the Company reasonably determines that certain data/feedback cannot be shared with the DSMWG, the DSMWG will be made aware of that withholding and the reasons for that withholding. This could include information obtained from surveys, customer focus groups, impact and process evaluations, Georgia Power Account Representatives, etc.

6. Once the Company determines which programs are to be analyzed, it will perform an economic screening of the programs in greater detail using the EnerSim and PRICEM models. For each program proposed by a member of the DSMWG that Georgia Power decides not to analyze, Georgia Power shall provide to the DSMWG justification for its decision. The economic screening will include ratepayer impact measure ("RIM"), participants cost test ("PCT"), total resource cost tests ("TRC"), and the Program Administrator Test for use in program design development. The results of the economic screening will be shared with the DSMWG for discussion.

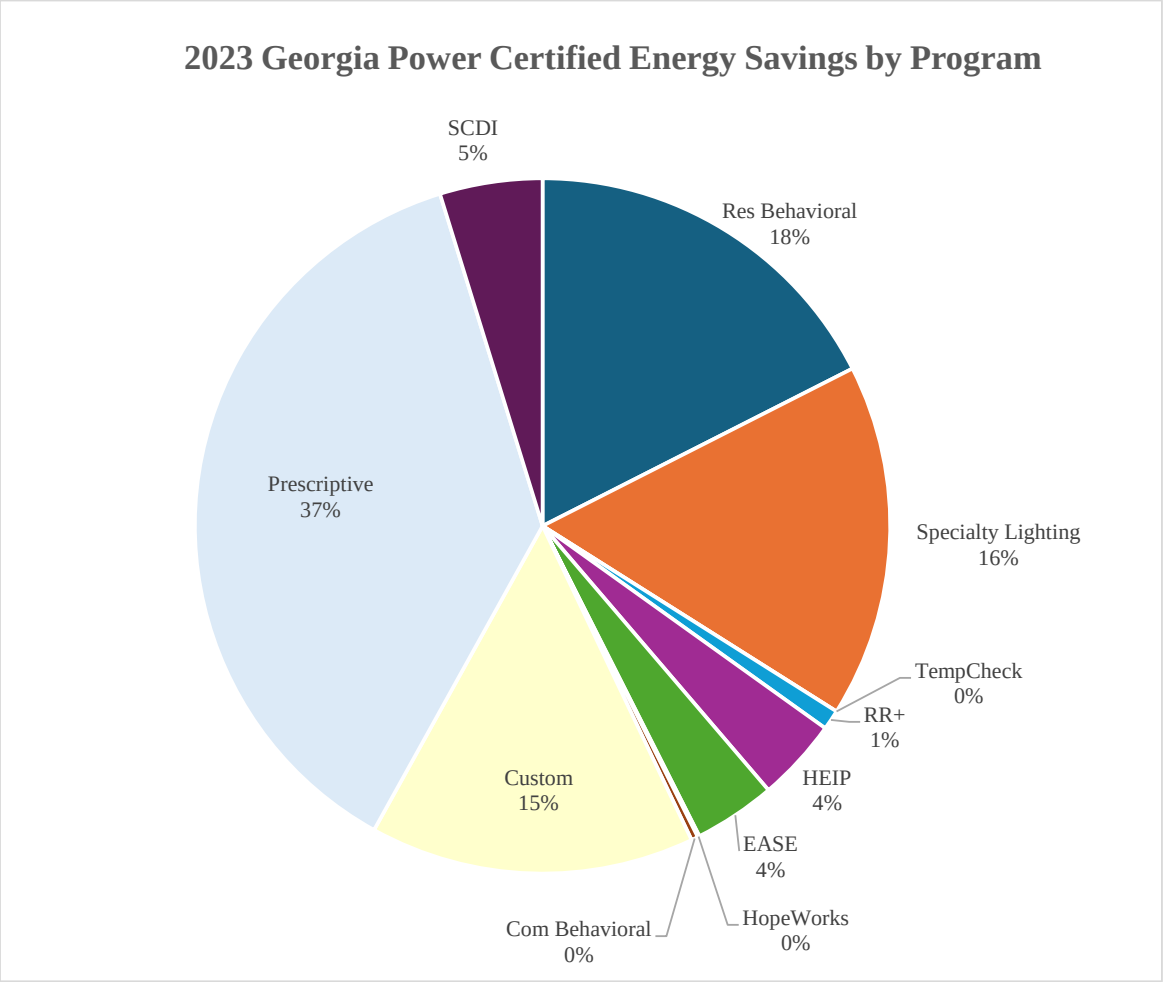
7. Attempts to reach consensus and finalize all programs to be proposed for implementation in the 2028 IRP must be completed by third quarter of 2027 in order to allow the Company's Resource Planning group adequate time for inclusion in their process.

   Preliminary cost-effectiveness tests using PRICEM for revenue and avoided costs inputs will be developed for each program. These programs will be divided into programs that are passive (energy efficiency programs whose response is not controlled) versus active (demand response

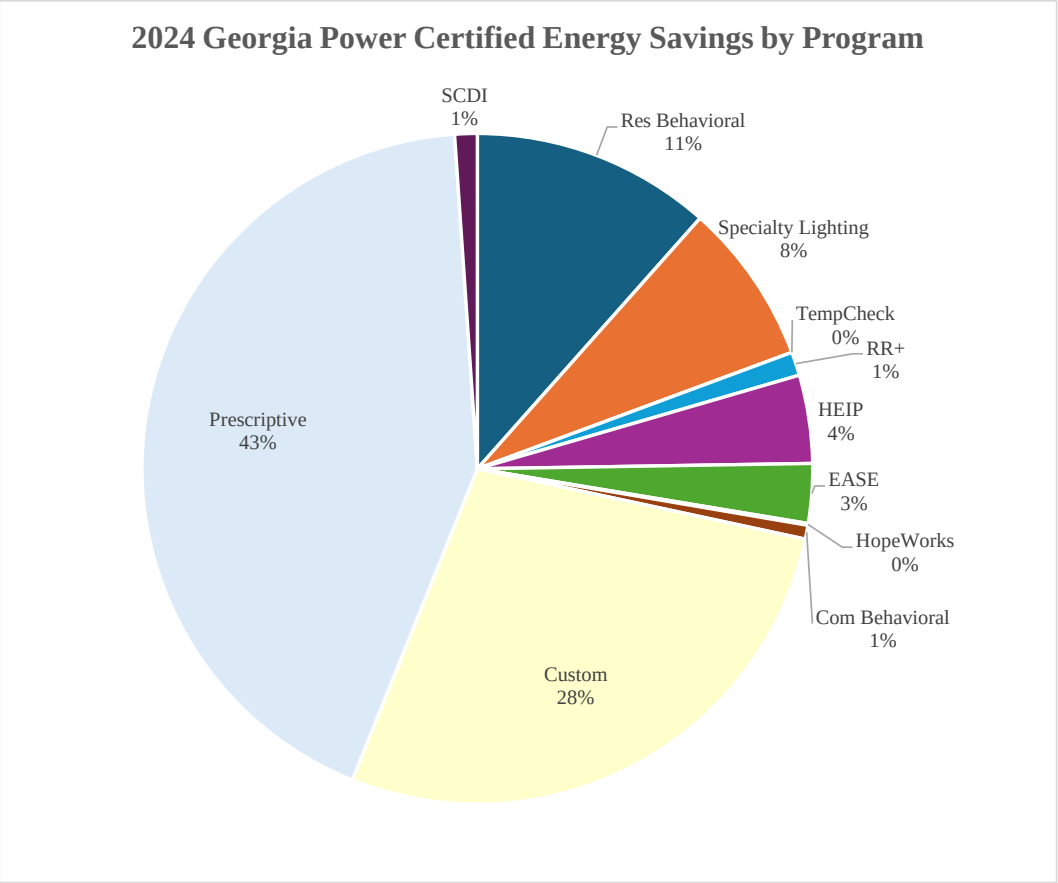
programs that are generally under dispatch control of the utility). Load reductions associated with passive programs will be used to adjust the load and energy forecast. Capacity associated with active programs will be modeled as resources. This information will be evaluated as two different system configurations with a base case without any new DSM (the base case would include the effects of continuation of existing DSM programs) and a Company DSM change case with both passive and active new DSM.

8. As part of the sensitivity analysis, the Company will also analyze at least one aggressive DSM change case developed with the assistance of the DSMWG. The aggressive DSM change case(s) could include technically viable and economically efficient DSM programs and resources that were not included in the Company DSM change case. The aggressive DSM change case(s) could also include higher penetrations of the DSM programs proposed in the Company DSM change case. The Company will also produce an additional sensitivity in its 2028 IRP development and resource optimization process, where DSM is allowed to compete head-to-head with supply-side options in the Company's IRP model as a selectable resource. This case should be called the Integrated Modeling Case.

9. The Company will use the difference in costs between the base case and the Proposed DSM change case configuration to determine the avoided generation cost impact of the DSM measures in the Proposed DSM change case. As the final step, the cost effectiveness tests mentioned in item 6 (above) will be calculated based on the inputs and adjustments from the system tools. Revenue impacts will be based on current rates and escalations based on the Company's financial projections adjusted for the DSM cost impacts. The avoided generation costs from the system tools and the avoided Transmission and Distribution ("T&D") revenue requirements as estimated by PRICEM will be used to calculate the benefits of the RIM, TRC and Program Administrator test for each DSM change case. The projected deadline for including new programs in the system planning process is October 1, 2027.



Source: Georgia Power 2023 Q4 Report filed under Docket No. 44161



Source: Georgia Power 2024 Q4 Report filed under Docket No. 44161

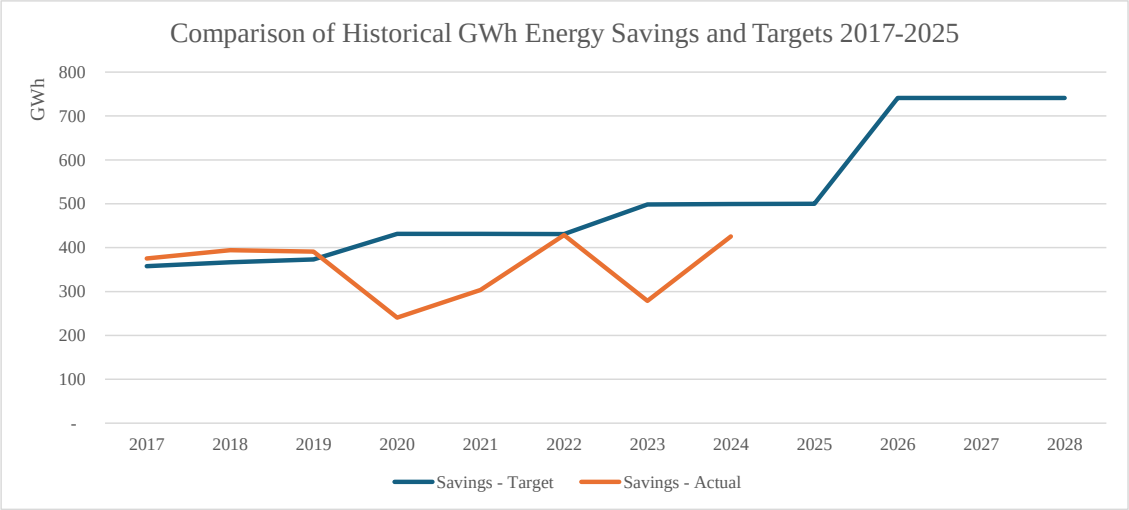
Historical Energy Targets and Actual Energy Savings in MWh for 2017-2025

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Energy Savings - Target*	357,758	366,611	373,219	431,524	431,400	430,825	498,219	499,456	500,077	741,097	741,097	741,097
Savings - Actual**	375,375	394,209	391,092	240,512	303,724	428,659	278,502	425,662				

*Target data is from IRP Filings in 2016, 2019, 2022, and 2025

**Actual data is from Georgia Power Quarterly Reports Dockets No. 40161, 42311 and 44161

Average Projected Energy Savings 2026-2028 in MWh	741,097
Average percent kWh energy savings achieved 2017-2024	83.7%



Comparison of Actual and Proposed Program Spending for 2017-2024 to Company's Proposed Program Spending for 2026-2028

	Actual Spending	
2017	$	53,216,842
2018	$	60,189,894
2019	$	56,546,022
2017-2019 Average	**$**	**56,703,368**
2020	$	50,202,501
2021	$	55,241,459
2022	$	62,837,638
2020-2022 Average	**$**	**56,093,866**
2023	$	70,475,922
2024	$	81,959,719
2023-2024 Average	**$**	**76,217,821**

	Proposed Spending	
2017	$	69,500,100
2018	$	73,551,223
2019	$	74,404,390
2017-2019 Average	**$**	**72,485,238**
2020	$	69,885,467
2021	$	71,372,072
2022	$	72,167,608
2020-2022 Average	**$**	**71,141,716**
2023	$	92,009,533
2024	$	93,392,830
2025	$	88,555,894
2023-2025 Average	**$**	**91,319,419**
2026	$	571,740,022
2027	$	578,832,073
2028	$	583,570,822
2026-2028 Average	**$**	**578,047,639**

Average Budget Excess 2017-2024	$	15,701,653
Percent Average Spending of Total Budget		79.6%

Note: All figures cited do not include Additional Sum

Sources:

2026-2028 data is from DSM Certification Filing in Docket No. 56003

2017-2024 data is from Georgia Power Quarterly Reports filed in Dockets Nos. 40162, 42311 and 44161

Staff's Recommended Case MWh and MW Savings

	Staff's Recommended Case			
	MWh Saved			
	2026	2027	2028	Average
HEIP	28,620	28,620	28,620	28,620
Demand Response	-	-	-	-
Res Behavioral	50,222	50,222	50,222	50,222
EASE	21,994	21,994	21,994	21,994
HopeWorks	370	370	370	370
Residential Subtotal	*101,206*	*101,206*	*101,206*	*101,206*
Custom	77,298	77,298	77,298	77,298
Prescriptive	299,297	299,297	299,297	299,297
SCDI	25,333	25,333	25,333	25,333
Commercial Subtotal	*401,928*	*401,928*	*401,928*	*401,928*
Total	**503,133**	**503,133**	**503,133**	**503,133**

	Staff's Recommended Case			
	MW Saved			
	2026	2027	2028	Average
HEIP	8.0	8.0	8.0	8.0
Demand Response	97.7	97.7	97.7	97.7
Res Behavioral	9.5	9.3	9.2	9.3
EASE	7.0	7.0	7.0	7.0
HopeWorks	0.1	0.1	0.1	0.1
Residential Subtotal	*122.2*	*122.1*	*121.9*	*122.1*
Custom	11.2	11.2	11.2	11.2
Prescriptive	44.7	44.7	44.7	44.7
SCDI	6.8	6.8	6.8	6.8
Commercial Subtotal	*62.7*	*62.7*	*62.7*	*62.7*
Total	**184.9**	**184.8**	**184.6**	**184.8**

Staff's Recommended Case Budget

	Staff's Recommended Case			
	Total Program Budget			
	2026	2027	2028	Total
HEIP	$ 18,072,994	$ 18,072,994	$ 18,072,994	$ 54,218,982
Demand Response	$ 10,483,699	$ 8,640,574	$ 8,730,510	$ 27,854,783
Res Behavioral	$ 1,368,959	$ 1,368,959	$ 1,368,959	$ 4,106,877
EASE	$ 30,856,129	$ 30,856,129	$ 30,856,129	$ 92,568,387
HopeWorks	$ 1,156,068	$ 1,156,354	$ 1,156,659	$ 3,469,081
Residential Subtotal	*$ 61,937,850*	*$ 60,095,011*	*$ 60,185,252*	*$ 182,218,113*
Custom	$ 12,449,787	$ 12,449,787	$ 12,449,787	$ 37,349,361
Prescriptive	$ 55,330,738	$ 55,330,738	$ 55,330,738	$ 165,992,214
SCDI	$ 11,338,828	$ 11,338,828	$ 11,338,828	$ 34,016,484
Commercial Subtotal	*$ 79,119,353*	*$ 79,119,353*	*$ 79,119,353*	*$ 237,358,059*
Cross Cutting $	$ 3,550,000	$ 3,454,000	$ 2,959,100	$ 9,963,100
EM&V $	$ 1,800,000	$ 2,400,600	$ 175,600	$ 4,376,200
Total Program Budget	**$ 146,407,203**	**$ 145,068,964**	**$ 142,439,305**	**$ 433,915,472**

	Summary of Other DSM Costs			
	2026	2027	2028	Total
Residential Pilot Budget $	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 4,500,000
Commercial Pilot Budget $	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 4,500,000
Residential Consumer Awareness $	$ 4,500,000	$ 4,500,000	$ 4,500,000	$ 13,500,000
Commercial Consumer Awareness $	$ 1,100,000	$ 1,100,000	$ 1,100,000	$ 3,300,000
Education Initiative - Learning Power	$ 4,000,000	$ 4,000,000	$ 4,000,000	$ 12,000,000
Residential Audit Tool	$ -	$ -	$ -	$ -
Residential Auditors	$ -	$ -	$ -	$ -
Total Other DSM Costs	**$ 12,600,000**	**$ 12,600,000**	**$ 12,600,000**	**$ 37,800,000**

Total DSM Budget*	**$ 159,007,203**	**$ 157,668,964**	**$ 155,039,305**	**$ 471,715,472**

*Budget does not include Additional Sum

Additional Sum Comparisons 2017-2024 to 2026-2028

Actual Additional Sum Earned		
2017	$	11,652,603
2018	$	10,941,597
2019	$	12,462,395
2020	$	6,214,957
2021	$	7,803,514
2022	$	9,793,425
2023	$	5,132,101
2024*	$	12,304,332
Average	**$**	**8,249,666**

	Company's Proposed Methodology		Currently Approved Methodology**	
	Proposed Case		Proposed Case	Capacity and Affordability Case
2026	$ 29,643,868		$ 8,642,724	$ 8,160,602
2027	$ 29,643,862		$ 8,591,555	$ 8,714,419
2028	$ 29,643,856		$ 8,546,742	$ 9,363,043
Average	**$ 29,643,862**		**$ 8,593,674**	**$ 8,746,021**

	Average Increase for 2026-2028 from Historical Earned		
	Proposed Case	Proposed Case	Capacity and Affordability Case
Difference	$ 21,394,196	$ 344,008	$ 496,356

Notes and Sources:

*Proposed Additional Sum from 2024 True-Up Filing in Docket No. 44161

**Currently Approved Methodology was calculated by Staff

2026-2028 data is from DSM Certification Filing in Docket No. 56003

2017-2024 data is from Georgia Power Quarterly Reports filed in Dockets Nos. 40162, 42311 and 44161

Table 1: Performance Based Incentives - State Policy

State	Penalties	Incentives	Source	Source Website	Incentive Method Category
Alabama	None	Alabama Power is able to recover a "reasonable rate of return" on efficiency program spending through a rate rider.	AL Public Service Commission / ACEEE	http://www.edisonfoundation.net/iei/Documents/IEI_stateEEpolicyupdate_1214.pdf Docket 31045	Rate of return on program expenditures
Alaska	None	None	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Arizona	None	Calculated as percentage of net economic benefits from approved DSM programs based on a graduated scale and capped at a maximum $/kWh of first-year savings achieved, Performance Incentive will not exceed $0.0125/kWh saved. Less than 85% = 0, 85-95% = 6%, 96-105% = 7%, Over 105% = 8%.	AZ Corporation Commission	https://www.aps.com/-/media/APS/APSCOM-PDFs/Utility/Regulatory-and-Legal/Regulatory-Plan-Details-Tariffs/Business/Service-Schedules/DSMAC_PlanOfAdministration.pdf?sc_lang=en	Percent of net benefits if savings goal is achieved
Arkansas	None	Incentives are available if the company achieves 80-120% of energy savings goals. If 80 to 99% of energy savings goal is achieved, the Company receives 10% of the total portfolio net benefits. For savings above 100% of target, the 10% of net benefits is capped at 8% of program spending.	AR Public Service Commission	https://apps.apsc.arkansas.gov/rules/energy_conservation_rules_06-004-R.pdf https://apps.apsc.arkansas.gov/pdf/08/08-137-u_135_1.pdf	Percent of net benefits if savings goal is achieved
California	Penalties have been removed for the ESPI program currently in place	Complicated four part program including Lifecycle savings performance award (weighted 2/3 kWh savings and 1/3 demand savings, capped at 9% total resource program spending), Ex ante review and compliance (capped at 3% less admin expenses), Non-resource management fee (capped at 3% ono-resource spending less admin), Codes and standards management fee (capped at 12% of budget).	California Public Utilities Commission	http://www.cpuc.ca.gov/NR/rdonlyres/7F928E5C-D20C-46C3-BC3B-792EBBE1ADFD/0/2013ESPIPerformanceStatementReport_DISTRIBUTE.docx CA Decision 10-12-049 and ACEEE state policy database	Complicated multi-part incentive mechanism
Colorado	None	The Performance Incentive for the 2022 Plan year is 40 percent of net economic benefits14 for all savings above 280 GWh and up to 550 GWh, provided that the Company achieves at least 400 GWh in energy efficiency savings. Savings over 550 GWh are not eligible for incentive earnings. The performance incentive in combination with the disincentive offsets is subject to an $18 million incentive cap. That threshold was ordered in Decision No. C18-0743. Additionally, A Disincentive Offset of $1.5 million is awarded because the Company achieved over 80 percent of the annual energy savings goal of 500 GWh. That threshold was ordered in Decision No. C18-0417.	Colorado Public Utilities Commission	Proceeding Number 13A-0686EG, Decision Number C14-07331 https://www.dora.state.co.us/pls/efi/EFI_Search_UI.Show_Decision?p_dec=25569&p_session_id= https://www.xcelenergy.com/staticfiles/xe-responsive/Company/Rates%20&%20Regulations/2022%20Colorado%20DSM%20Annual%20Status%20Report.pdf	Percent of net benefits if savings goal is achieved. No incentive is achieved after a certain amount of savings achieved.
Connecticut	None	The incentive, referred to as a "management fee," can be from 2.5-7% of the program costs before taxes. The threshold for earning the minimum incentive (2.5%) is 75% of the goal. At 100% of the goal, the incentive would be 5%. At 135% of goals, it would be 7%.	ACEEE	https://database.aceee.org/state/utility-business-model	Percent of program costs if savings target is achieved
Delaware	None	None	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
District of Columbia	Penalties applied to Sustainable Energy Utility (SEU) if it fails to meet required performance benchmarks.	SEU implements energy efficiency programs in DC under the Clean and Affordable Energy Act. Financial incentives are given to SEU if it surpass performance benchmarks set in the contract.	ACEEE	https://database.aceee.org/state/utility-business-model	Lump sum incentive if savings target is met.
Florida	None	The commission is authorized to allow an investor-owned electric utility an additional return on equity of up to 50 basis points for exceeding 20 percent of their annual load-growth through energy efficiency and conservation measures. §366.82(9) of FEECA. No rewards or penalties have been granted at this time.	Florida Energy Efficiency and Conservation Act (FEECA)	http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0300-0399/0366/Sections/0366.82.html	Lump sum incentive if savings target is met.
Georgia	None	As agreed to under the 2022 Integrated Resource Plan stipulation resolution, Georgia Power will receive an Additional Sum of 9.5% of the NPV of the actual net benefits of verified net kWh savings as determined by the Program Administrator test from the certified DSM programs, with no cap, provided that following the annual determination of verified net kWh savings. If the annual incremental kWh savings is less than 50% of that initially projected, the Additional Sum shall be 0.5% for demand response measures and 3% for energy efficiency measures. If the Additional Sum exceeds program costs, the portion of Additional Sum that exceeds the program cost shall be calculated based on 4% of actual net benefits of verified net kWh savings as determined by the Program Administrator test from certified DSM programs. Georgia Power will update all data relating to actual program participation, as well as the actual energy savings and actual programs costs when calculating the Additional Sum for 2014 and future years.	GA Public Service Commission	Docket No. 44161	Percent of net benefits
Hawaii	None	Under the Public Benefits Administrator (PBFA) Contract, the PBFA has the ability to earn $700,000 by achieving 100% of performance indicator targets or a portion based on the percentage met. If PBFA exceeds its target, up to an additional $133,000 could be awarded.	Hawaii Public Utilities Commission	ORDER NO. 37119 TERMINATING HAWAIIAN ELECTRIC'S MANDATORY TRIENNIAL RATE CASE CYCLE; Public Utilities Commission; Docket No. 2008-0274	Lump sum incentive if savings target is met.
Idaho	None	None	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Illinois	$100,000 per day for not meeting goals. May be required to make contribution to LIHEAP, based on utility size. May have administration shifted to third party.	None	MEEA (Midwest Energy Efficiency Alliance)	http://mwalliance.org/policy/IL/rescomm https://www.ilga.gov/legislation/ilcs/fulltext.asp?DocName=022000050K8-103#:~:text=Sec.,measures%20to%20reduce%20delivery%20load.	No DSM Shareholder incentive
Indiana	If Southern Indiana Gas and Electric Company does not achieve its performance targets, they are met with 1% penalty	Southern Indiana Gas and Electric Company: Incentive level is capped at 12% of program costs for achieving 100-120% of goal. A negative incentive level of -4% is applied for achieving 49% or less of goal. Minimum threshold is 65-70% savings. Duke Energy: No cap on total earned. Nothing earned until achieving 75% of goal, with a graduated plan increasing from 6% to 12.13% over 110% of goal achieved. Vectren: 10% cap on incentive. I&M: Two-tier shared savings mechanism as the lower of 15% of 90% of each individual sector's net benefits under the utility cost test or 15% of sector program costs.	Indiana Utility Commission	Indiana Utility Regulatory Commission-Order No. 43427 pg 35 I&M Program - https://iurc.portal.in.gov/legal-case-details/?id=e323a5d1-d981-e611-8107-1458d04eabe0 Vectern - https://www.vectren.com/assets/cms/livesmart/pdfs/EEEP.pdf	Percent of program costs if savings target is achieved
Iowa	None	None - only cost recovery	MEEA (Midwest Energy Efficiency Alliance)	http://mwalliance.org/policy/IA/utility	No DSM Shareholder incentive
Kansas	None	66-117 (e) The commission may allow a return on such investment equal to an increment of from 0.5% to 2% plus an amount equal to the rate of return fixed for the utility's other investment in property found by the commission to be used or required to be used in its services to the public. The commission may also allow such higher rate of return on investments by a public utility in experimental projects, such as load management devices. No Utility has filed to receive an Additional Sum under this rule.	KS Legislation	https://www.ksrevisor.org/statutes/chapters/ch66/066_001_0017.html	Rate of return on program expenditures
Kentucky	None	Based on shared savings mechanism. AEP can earn an incentive of up to 10% of net savings after program costs while Duke and LGE can earn up to 15% of net resource savings. No cap. Determined on a case-by-case basis.	ACEEE	https://lge-ku.com/sites/default/files/documents/lge_ku_dsm_ee_app_011714.pdf https://database.aceee.org/state/utility-business-model	Percent of net benefits
Louisiana	None	No statewide policy. Entergy New Orleans earns 7% of program costs for achieving 100% of kWh goals with the incentive scaling within a band of 95% to 120% of savings goals with a maximum of 9%.	EntergyNO	https://cdn.entergy-neworleans.com/userfiles/content/energy_smart/Program_Year_10-12/Revised_Implementation_Plan_PY_10-12_1-22-20.pdf https://cdn.entergy-neworleans.com/userfiles/content/energy_smart/Program_Year_10/PY10_UPI_LCFC_Filing.pdf	Percent of program costs if savings target is achieved
Maine	None	Maine's efficiency programs are implemented by a government agency. There are statutory provisions allowing decoupling and incentives, but they are not currently used.	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Maryland	None	Allows utilities to rate base and capitalize their investments with a return on investment based on the weighted average cost of capital.	Maryland Public Service Commission	https://www.psc.state.md.us/wp-content/uploads/2024-EmPOWER-Maryland-Energy-Efficiency-Act-Standard-Report-Final.pdf	Rate of return on program expenditures or boost to rate of return on common equity
Massachusetts	If the utility company or aggregator does not meet its burden, the department may levy a fine of not more than the product of $0.05 per kilowatt-hour times the shortfall of kilowatt-hours saved, which shall be paid to the Massachusetts clean energy technology center within 60 days after the end of the year in which the department levies the fine. The fine shall not impact ratepayers.	Incentive is based on 3 components ($118.6 total for all electric utilities): Equity (85% of planned portfolio equity benefits - $21.4 million); Electrification (50% of planned benefits - $33.8 million); Standard (75% of planned benefits or weighted average portfolio threshold - $63.4 million), Value (75% of planned portfolio net benefits threshold). Electric incentives equal 4.7% of total plan budget. *Incentive = 5% x $ electricity savings x $ value component Incentive Pool: Equity = $21.4 million ; Electrification = $33.8 million ; Standard $63.4 million (Minimum threshold for % of savings target is 75%; maximum is 125%)		https://ma-eeac.org/wp-content/uploads/2022-2024-Term-Sheet-10.26.21-Final-with-Exhibits.pdf https://www.mass.gov/info-details/energy-efficiency-dockets-and-filings https://www.mass.gov/doc/2022-2024-three-year-energy-efficiency-plans-order/download	Complicated multi-part incentive mechanism

	Note: This is a programmatic penalty not an energy saved penalty.		MA Public Utilities Commission		
Michigan	None	The incentive is calculated at the maximum 15% of investment or 25% of net benefits (whichever is lesser) when energy savings are equal to or greater than 115% of the statutory target and UCT score is equal to or greater than 1.25. Program costs can be capitalized and earn a normal rate of return.	MI Public Service Commission	http://efile.mpsc.state.mi.us/efile/docs/16736/0013.pdf	Percent of net benefits if savings goal is achieved
Minnesota	None	Electric utilities receive an incentive starting at least when they achieve energy savings equal to 0.4 percent of their retail sales and maximizes when reaching 1.7% of sales. Incentive is calculated based on up to 10% of net benefits depending on percentage of sales achieved with a cap of 30% of utility program spending. Incentives are based on gross savings.	MN Public Utilities Commission Docket E,G-999/CI-08-133	https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId=%7b7B916D08-09C1-4084-8C13-852C2F8CC8E9%7d&documentTitle=201212-82007-01	$ per kWh saved if savings target is met
Mississippi	None	Allowed and amount is determined on a case-by-case basis. "In addition, if the utility seeks Commission approval to earn a return on energy efficiency investments and the utility seeks to recover these costs though the EECR, then the utility all in corporate these costs into its filing. Any return on investment calculation shall be based on the reporting year. The EECR shall be adjusted to reflect reconciliation of any over-or under-recovery for the prior year and the approved budget for the current Program Year."	MS Public Service Commission	https://database.aceee.org/state/utility-business-model https://www.sos.ms.gov/ACProposed/00019234b.pdf	Rate of return on program expenditures or boost to rate of return on common equity
Missouri	None	Incentives are weighted to be 80% energy and 20% demand. After reaching 70% of goal, 4.59% of Net Benefits is awarded with a 2 year cap of $1.63 million. Incentives ramp up to 130% of goal with 11.47% of net benefit with a cap of $4.06 million. Utilities can only recover from 33.2% of net benefits supplied by the program. The calculation is quite complicated with several steps involved, and this process has not undergone a full accounting currently.	MO Public Service Commission	https://www.efis.psc.mo.gov/mpsc/commoncomponents/viewdocument.asp?DocId=935836333	Percent of net benefits if savings goal is achieved
Montana	None	Commission can add up to 2% added to the rate of return on common equity permitted on the utility's other investments. This incentive has not been approved for any utility.	MT Public Service Commission	MCA § 69-3-712	Rate of return on program expenditures or boost to rate of return on common equity
Nebraska	None	None	Nebraska Energy Office	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Nevada	None	Upon the request of the electric utility or intervening party or upon a motion of the Commission, the Commission may authorize an electric utility to include in the amount recovered (pursuant to subsection 1 of NRS 704.785) for an individual program for energy efficiency or conservation financial incentives to support the promotion of the participation of the customers of the electric utility in the program for energy efficiency or conservation.	NV Revised Statutes	https://www.leg.state.nv.us/register/2015Register/R046-15A.pdf	Custom incentive method (case by case)
New Hampshire	None	Must achieve 65% of planned savings with a maximum of 125% of planned savings applied to the Additional Sum. Complicated formula using several factors: Lifetime kWh Savings (35%), Annual kWh Savings (10%), Summer Peak Demand Savings (9%), Winter Peak Demand Savings (6%), Active Demand Savings (5%) Value - Net Benefits (35%). Formula is as follows: PI = [(1.925% x ACTUAL) x (kWhL-ACT/kWhL-PLN)] + [(0.55% x ACTUAL) x (kWhAACT/kWhA-PLN)] + [(0.495% x ACTUAL) x (kWSUM-ACT/kWSUM-PLN)] + [(0.33% x ACTUAL) x (kWWIN-ACT/kWWIN-PLN)] + [(0.275% x ACTUAL) x (kWADR-ACT/kWADR-PLN)] + [(1.925% x ACTUAL) x (NET-BENACT/NET-BENPLN)].	NH Public Utilities Commission	https://www.puc.nh.gov/VirtualFileRoom/ShowDocument.aspx?DocumentId=76b6732e-95d1-4412-8956-dadff1cba1d7	Complicated multi-part incentive mechanism
New Jersey	None	Performance incentives and penalties take the form of a return on equity (ROE) adjustment applied to EE and PDR program investment. An incentive is awarded if a utility achieves between 110% and 150% of its target. Achievement of between 90% and 110% of the target represents compliance. A penalty is assessed if performance of the target is between 50% and 90%, and a utility is deemed non-compliant if achieving 50% or less of its target.	NCSL	https://database.aceee.org/state/utility-business-model https://nj.pseg.com/aboutpseg/regulatorypage/-/media/e1246FFFDC554404A5D0E84310D8BE84.ashx	Rate of return on program expenditures or common equity if savings goal is achieved
New Mexico		New Mexico's Efficient Use of Energy Act and Rule allows an electric company to propose a profit incentive mechanism that is based on satisfactory program performance and does not exceed the product of the approved annual program costs and its weighted average cost of capital. PNM, EPE, and SPS all earn an incentive award. SWPSC: 2015 is capped at $600,000 with an adjustment for spending, goals, and low-income spending. Expected return in about $550,000 on a budget of $7,883,614 or 6.97%.	ACEEE	https://database.aceee.org/state/utility-business-model https://www.pnm.com/documents/28767612/39749933/2024+EE+%26+LM+Program+Plan.pdf/30a7150a-0b3e-6b0d-b220-986d75ed67c6?t=1681838113958	Percent of program costs if savings target is achieved
New York	None	For 2012 through 2015, there is a two tier incentive level. Utilities will be eligible for incentives for achievement of their targets and statewide goals. The incentive pool is $36 million for electric utilities with $24 million available to be earned through individual company performance and $12 million earned for statewide achievement.	ACEEE	https://database.aceee.org/state/utility-business-model	Custom incentive method (case by case)
North Carolina	None	For Duke Energy Progress: A range from 5-15% of avoided costs which are capped as a % of actual program costs can be earned. 8% applied to the net savings of DSM programs and 13% applied to the net savings of energy efficiency programs.	North Carolina Utilities Commission	Docket E-7, Sub 831/Docket E-7, Sub 979 https://database.aceee.org/state/utility-business-model	Percent of net benefits
North Dakota	None	None	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Ohio	If utilities fail to comply, the commission can assess: -An amount per day under/non-compliance relative to period of report equal to that prescribed, OR -An amount equal to the existing market value of one renewable energy credit per MWh	Duke Program ONLY: The EE-PDR Program Incentive (PI) amount shall be computed by multiplying the net resource savings expected from the approved programs which are to be installed during the upcoming twelve-month period times the allowed shared savings percentage. The allowed shared savings percentages are as follows: 0% for 100% or less, 7.5% for 100% - 110%, 10% for 110% - 115%, 15% for greater than 115%. Net resource savings are defined as program benefits less the cost of the program based on present value of Company's avoided costs over the expected life of the program.	Ohio Laws and Rules	http://codes.ohio.gov/orc/4928.66	Percent of net benefits if savings goal is achieved
Oklahoma	None	Beginning in 2015, utilities will only be allowed to collect an incentive if the portfolio achieves 80% of the individual utility's goal and the portfolio has a TRC score higher than 1.0. Utilities will still be able to earn an incentive on programs with a TRC result of less than 1.0, but only if the portfolio as a whole passes the test. If savings beyond 100% of the utility savings goal are achieved, 15% of net benefits will be paid. The rule is not explicit in a maximum threshold for the total incentive, only the minimum.	OK Corporation Commission	https://oklahoma.gov/content/dam/ok/en/occ/documents/ajls/jls-courts/rules/2024/chapter-35-electric%20utility-rules-copy-with-df-edits-effective-10-01-24.pdf	Percent of net benefits if savings goal is achieved
Oregon	None (The Energy Trust of Oregon, rather than a private utility company, implements Energy Efficiency programs in Oregon. The lost revenue recovery and shareholder incentives are not necessary.)	None	Oregon Public Utility	http://energytrust.org/	No DSM Shareholder incentive
Pennsylvania	If an EDC fails to meet the energy and peak load savings targets specified in Act 129, then the EDC shall be subject to a civil penalty not less than $1 million and not to exceed $20 million for failure to achieve the required reductions in consumption.	None	Pennsylvania Public Utility Commission	www.puc.state.pa.us/pcdocs/1182750.pdf	No DSM Shareholder incentive
Rhode Island	None	Shareholder incentive mechanism: 1.25% of spending budget for achieving 75% of savings target in a sector and increase linearly to 5% for achieving 100% , 6.25% for achieving 125% of the savings target. 30% of current incentives are set aside for achievement of summer annual MW demand saving goals. Overall target equal to 3.5% of eligible annual budget and 1.5% of annual spending.	RI Public Utilities Commission	http://www.ripuc.ri.gov/eventsactions/docket/4527-NGrid-2015-EEPP(10-31-14).pdf	Complicated multi-part incentive mechanism
South Carolina	None	Varies depending on the utility. Dominion Energy retains 9.9 percent of the savings its energy efficiency programs produce, while Duke Energy Carolinas and Duke Energy progress retain 11.5 percent and 11.75 percent, respectively, of the savings its EE programs generate.	SC Public Service Commission Edison Foundation	https://dms.psc.sc.gov/attachments/matter/31AF327C-9287-AE79-A9787EF9EA316BE1	Percent of net benefits
South Dakota	None	MidAmerican: Capped at 30% of approved annual spending, must achieve 100% of goal with a max return at 150% of goal.	South Dakota Public Utilities Commission	https://puc.sd.gov/commission/dockets/electric/2007/el07-015/022509e1.pdf	Percent of net benefits if savings goal is achieved
Tennessee	None	None	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Texas	None, must achieve 100% of goal to qualify for a bonus	Beginning with the 2012 program year, a utility that exceeds 100% of its demand and energy reduction goals shall receive a bonus equal to 1% of the net benefits for every 2% that the demand reduction goal has been exceeded, with a maximum of 10% of the utility's total net benefits. Capped at 20 of total program costs for each utility. Net benefits are based on avoided cost which was 4.6 cents in 2014 (10.4 in 2013)	Texas Administrative Code	http://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.181/25.181.pdf	Percent of net benefits if savings goal is achieved
Utah	None	None, however Utah Legislature passed HJR 9, a Joint Resolution on Cost-effective Energy Efficiency and Utility Demand Side Management. HJR 9 expresses support for regulatory mechanisms to help remove utility disincentives and create incentives to increase efficiency and conservation so long as these mechanisms are found to be in the public interest.	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive
Vermont	None	Efficiency Vermont works on a three year performance period. Efficiency Vermont works with the Vermont Public Service Department to develop Quantitative Performance Indicators (QPIs) to measure the programs' success, eight QPIs. These metrics must be met in order to earn the maximum performance award at the end of a three-year period. Allowed to earn 4.5% in 2024 and 5% in 2025-26 of program costs as compensation split between operations fee and performance award. There are 9 separate benchmarks that must be achieved with various penalties for non-performance. Compensation only available if utility reaches 75% of savings target. . 2015-2017 compensation increased to 4.1% to 6% with a 50-50 split between operations fee and performance incentives.	Order of Appointment for Vermont Energy Investment Corporation	https://epuc.vermont.gov/?q=node/64/171403/FV-BDIssued-PTL	Percent of program costs if savings target is achieved

Virginia	None	The legislation states that an electric utility may recover projected and actual costs of energy efficiency programs, including a margin recoverable on operating expenses, which is equal to the general rate of return on common equity. The SCC can only approve such recovery if it finds that the program is in the public interest.	Virginia Code	§56-585.1.A.5.c	Rate of return on program expenditures or common equity if savings goal is achieved
Washington	Utilities are penalized $50/megawatt for each megawatt the company falls below the target for utilities serving more than 25,000 customers.	No reward is in place or proposed by regulated electric utilities.	WA Utilities and Transportation Commission/ State Legislature	http://apps.leg.wa.gov/RCW/default.aspx?cite=19.285&full=true#19.285.040	No DSM Shareholder incentive
West Virginia	None	Request for recovery of lost revenues was denied in 2013 and 2014.	West Virginia Public Service Commission	http://www.psc.state.wv.us/scripts/WebDocket/ViewDocument.cfm?CaseActivityID=393663&NotType=%27WebDocket%27	No DSM Shareholder incentive
Wisconsin	None	Utilities get cost recovery for funding Focus on Energy. For utility proposed programs, utilities can earn a rate of return equivalent to new capital investments or propose other shared savings mechanisms, such as decoupling and lost revenue recovery. This has not been pursued by utilities at this time.	ACEEE / MEEA	https://database.aceee.org/state/utility-business-model http://www.mwalliance.org/policy/WI/utility#ratestructure	No DSM Shareholder incentive
Wyoming	None	None	ACEEE	https://database.aceee.org/state/utility-business-model	No DSM Shareholder incentive

2024 Evaluated NTG Ratios

	Freeridership	Spillover	NTG	Source
Residential - Overall			***89.2%***	
Lighting - Marketplace			8.0%	2024 EM&V
Lighting - Food Bank	N/A	N/A	100.0%	2024 EM&V
Thermostat DR	N/A	N/A	100.0%	2024 EM&V
HEIP - Individual	34.0%	5.0%	71.0%	2024 EM&V
HEIP - Whole Home	33.0%	2.0%	69.0%	2024 EM&V
HEIP Marketplace	29.0%	0.0%	71.0%	2024 EM&V
HEIP Manufactured Home	28.0%	0.0%	72.0%	2024 EM&V
EASE	N/A	N/A	100.0%	2024 EM&V
RR+	49.0%	0.0%	51.0%	2024 EM&V
Behavioral	N/A	N/A	100.0%	2024 EM&V
Commercial - Overall			***76.3%***	
Prescriptive	19.6%	0.1%	80.5%	2024 EM&V
Custom	23.4%	0.0%	65.4%	2024 EM&V
Small Commercial	4.1%	0.0%	95.9%	2024 EM&V
Behavioral	N/A	N/A	0.0%	2024 EM&V

Source: Georgia Power 2024 Evaluation, Measurement, and Verification Reports