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UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Artie Powell, Manager
Brenda Salter, Utility Technical Consultant Supervisor
Shauna Benvegnu-Springer, Utility Technical Consultant

Date: November 30, 2022

Re: **Docket No. 22-057-18**, Dominion Energy Utah's Application for Approval of the 2023 Year Budget for the Energy Efficiency Program and the Market Transformation Initiative.

Recommendation (Approval)

The Division of Public Utilities (Division) has reviewed the Application and recommends that the Public Service Commission of Utah (Commission or PSC) approve Dominion Energy Utah's 2023 Energy Efficiency Programs and Market Transformation Initiative Budget. The Division has also reviewed the tariff sheets filed with the application and recommends that the Commission approve the tariff sheets as filed.

Issue

On October 31, 2022, Dominion Energy Utah (Company or Dominion) applied with the Commission to approve its EE Programs and Market Transformation Initiative Budget for 2023. On October 31, 2022, the Commission issued an Action Request to the Division to review the application and make recommendations on the Company's filing by November 30, 2022. On November 1, 2022, the Commission issued a Notice of Filing and Comment Period detailing that any interested party may submit comments to the Commission by November

Division of Public Utilities

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30, 2022, with reply comments by December 15, 2022. This memorandum is the Division’s response to the Commission’s Action Request.

Background

DSM/EE PILOT PROGRAM AND BUDGET HISTORY

The original Demand Side Management (DSM) programs and Market Transformation Initiative were the products of a collaborative effort of interested parties working with Dominion (formerly Questar Gas Company). The purpose was to provide input and design programs to benefit Dominion’s general schedule (GS) rate class by reducing its natural gas usage. The programs were designed to improve the efficiency of natural gas consumption by those GS rate customers. The DSM program and Dominion’s Conservation Enabling Tariff (CET) application were submitted to the Commission on December 16, 2005, in Docket No. 05-057-T01. On January 16, 2007, the Commission approved the original application and established requirements. The Energy Efficiency Budget of \$28.1 million, as submitted in this docket, is the 17th budget proposed by the Company. Table 1 below shows a history of actual expenditures for 2017 through 2021, including the 2022 and 2023 EE Budgets. Totals in Table 1 have been rounded up or down, as appropriate.

Table 1: Annual EE Expenditures 2017-2021

DOMINION ENERGY UTAH DSM ENERGY EFFICIENCY REPORT YEARLY EXPENDITURES FOR ENERGY EFFICIENCY DOCKET NO. 22-057-18							
A	B	C	D	E	F	G	H
Energy Efficiency Programs	2017 Actual (000)	2018 Actual (000)	2019 Actual (000)	2020 Actual (000)	2021 Actual (000)	2022 Budget (000)	2023 Budget (000)
1 ThermWise Appliance	\$5,925	\$4,498	\$4,182	\$3,943	\$4,856	\$6,168	\$5,860
2 ThermWise Builder	\$5,644	\$6,540	\$6,120	\$9,076	\$7,792	\$9,503	\$8,250
3 ThermWise Business	\$3,980	\$1,952	\$2,674	\$3,000	\$3,436	\$3,379	\$3,203
4 ThermWise Custom Business	\$0	\$0	\$0	\$	\$	\$	\$
4 ThermWise Energy Plan	\$491	\$436	\$403	\$378	\$498	\$508	\$520
5 ThermWise Weatherization	\$4,044	\$7,550	\$8,184	\$9,966	\$7,813	\$8,040	\$7,692
6 Market Transformation	\$1,228	\$1,375	\$853	\$937	\$1,320	\$1,320	\$1,320
7 Energy Comparison Report	\$392	\$416	\$452	\$555	\$530	\$544	\$550
8 Low Income Weatherization	\$669	\$642	\$714	\$681	\$812	\$750	\$731
9 Less Accruals				-\$1,465			
# Total	\$22,374	\$23,408	\$23,581	\$27,071	\$27,058	\$30,213	\$28,125

The budgets have been flat from 2017 to 2019, with a \$4 to \$5 million increase since 2020 and after. Actual spending for 2017 through 2019 was below budget by \$1.1 to \$3.4 million.

The DSM expenditures for the 2020 budget year overspent by \$644,277. For 2023 Dominion anticipates less participation in the programs and less cost for the rebate components of several programs due to the slowing of the economy from inflation and rising interest rates.

2023 ENERGY EFFICIENCY PLAN SUMMARY

The EE proposed budget for 2023 is \$28.1 million. This represents a decrease from the 2022 budget of approximately \$2 million. This is mainly due to lower participation in the various programs. The eight programs for 2023 include the following:

- ThermWise Appliance Rebates
- ThermWise Builder Rebates
- ThermWise Business Rebates
- ThermWise Home Energy Plan
- ThermWise Weatherization Rebates
- Market Transformation Initiative
- Energy Comparison Report Program
- Low Income Efficiency Program (Utah Department of Workforce Services)

The 2023 EE Program and Budget incorporate multiple incentive changes detailing the Company’s Application and Exhibits. The Division defers to the Application for incentive change details. Table 2 below summarizes Dominion’s proposed 2023 Demand Side

Table 2: 2023 Budget Compared to 2022 Budget

DOMINION ENERGY UTAH DSM ENERGY EFFICIENCY REPORT 2023 Budget and 2022 Budget DOCKET NO. 22-057-18										
A	B	C	D	E	F	G	H	I	J	
Energy Efficiency Programs	2023 Budgeted Participants	2022 Budgeted Participants	2023 % Over/Under Budgeted	2023 Budget	2022 Budget	2023 % Over/Under 2022 Budget	2023 Dth Savings*	2022 Dth Savings*	2023 UCT Ratio	2022 UCT Ratio
1 ThermWise Appliance	13,413	19,339	-31%	\$5,859,850	\$6,168,350	-5%	180,064	220,849	1.66	1.80
2 ThermWise Builder	21,370	25,836	-17%	\$8,249,660	\$9,503,060	-13%	261,857	321,358	2.49	2.62
3 ThermWise Business	1,358	1,958	-31%	\$3,203,031	\$3,379,343	-5%	139,544	151,681	2.29	2.13
4 ThermWise Custom Busine	0	0	0%	\$0	\$0	0%	-	-		NA
5 ThermWise Energy Plan	2,240	2,240	0%	\$520,200	\$508,467	2%	36,166	36,166	2.11	1.76
6 ThermWise Weatherization	30,685	32,385	-5%	\$7,691,614	\$8,040,274	-4%	99,369	103,887	1.46	1.45
7 Market Transformation	N/A	N/A	N/A	\$1,320,000	\$1,320,000	N/A	N/A	N/A	NA	NA
8 Energy Comparison Report	280,000	228,000	23%	\$550,000	\$544,000	1%	358,400	291,840	4.62	1.71
9 Low Income Assistance	1,502	1,612	-7%	\$731,119	\$749,519	-2%	19,436	20,369	1.88	1.73
10 Total	350,568	311,370	13%	\$28,125,474	\$30,213,013	-7%	1,094,836	1,146,150	1.91	1.92
* Projected Dth savings for each program based on projected program participation and deemed savings estimates.										

Management (DSM) EE Budget of \$28.1 million for each program compared to the 2022 DSM EE Budget. This budget proposes a 7% decrease over the 2022 budget of \$30.2 million. Columns I and J compare the 2022 EE Budget Utility Cost Test ratios (UCT) to each program's 2023 EE Budget UCT.

Discussion

One of the goals of the EE programs is to educate consumers, thus fostering behavior change in the utility resource usage of participants. The 2023 budget expects 39,218 more participants and 53,314 less Dth savings than the 2022 budget. All the programs, except for the Energy Comparison Report and the Home Energy Plan, project a decrease in participation; the ThermWise Appliance Program by 31%, ThermWise Builder Program by 17%, ThermWise Business by 31%, ThermWise Weatherization Program by 5%, and Low-Income Assistance by 7% decrease. These decreases in participation drive a \$2 million reduction of the proposed budget. The ThermWise Home Energy Plan Program's participation and Dth savings will remain the same, with an increase of \$11,703 in the proposed budget. The overall EE budgeted Dth savings of 1,094,836 decreases from the 1,148,150 Dth saving level set for 2022. The 2022 Q3 Actual YTD report notes 571,541 Dth savings in nine months' performance, although the last quarter represents the beginning of the heating season.

OVERALL ENERGY EFFICIENCY

Table 3 compares customer rebates, program costs, Dth savings, and participants as of September 30, 2022, the 2022 budget, and the 2023 proposed budget. The table shows a proposed 7% decrease in the 2023 proposed budget compared to the 2022 budget. The difference is attributed to declines in the various ThermWise program budgets. Table 3 shows a 4% reduction in total Dths saved and an expected increase of 13% in participants.

	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under) 2022	% over (under) 2022
Customer Rebates	\$15,869,120	\$23,862,546	\$ 21,781,273	(\$2,081,273)	-9%
Program Costs	\$3,576,883	\$6,350,467	\$6,344,201	(\$6,266)	-0.1%
Total Costs	\$19,446,003	\$30,213,013	\$28,125,474	(\$2,087,539)	-7%
Projected Dth Savings*	571,541	1,146,150	1,094,836	(51,314)	-4%
Participants**	40,656	311,370	350,568	39,198	13%
Total \$ / Dth Savings (\$0.00)	\$14	\$4	\$3	NA	N/A
Total Resource Cost Test B/C	1.10	1.50	1.55	NA	NA
Utility Cost Test B/C	1.30	1.90	1.91	NA	NA
* Projected Dth savings for each program based on projected program participation and deemed savings estimates.					

ThermWise Appliance Rebates Program

The ThermWise Appliance Rebates Program for 2023 is available to all GS single-family and multi-family residential customers. The program’s purpose is to encourage consumers to install high-efficiency home appliances.

This program has a 2023 proposed budget of \$5.9 million compared to a 2022 budget of \$6.2 million, a 5% decrease from the 2022 budget. Again, as with the previous year’s budgets, customer rebates will vary depending on customer participation. Table 4 compares the ThermWise Appliance Program by customer rebates and program administrative costs with actual results through September 30, 2022, to the projected 2022 and 2023 budgets. The table shows a forecasted 2023 decrease in the Utility Cost Test (UCT) and Total Resource Cost (TRC) test benefit ratios.

	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under) 2022	% over (under) 2022
Customer Rebates	\$ 2,485,700	\$ 5,253,350	\$ 4,948,850	\$ (304,500)	-6%
Program Costs	\$ 427,451	\$ 915,000	\$ 911,000	\$ (4,000)	-0.4%
Total Costs	\$ 2,913,151	\$ 6,168,350	\$ 5,859,850	\$ (308,500)	-6%
Projected Dth Savings *	81,477	220,849	180,064	(40,785)	-18%
Participants	8,291	19,339	13,413	(5,926)	-31%
Total \$ / Dth Savings (\$0.00)	\$ 36	\$ 28	\$ 33	NA	NA
Total Resource Cost Test B/C	1.86	1.85	1.58	NA	NA
Utility Cost Test B/C	1.74	1.80	1.66	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

Table 4 demonstrates a decrease of \$304,500 in customer rebate costs and a slight decrease of \$4,000 in program costs for the ThermWise Appliance Program budget for 2023. Dth savings and participants are projected to decrease by 18% and 31%, respectively, in the 2023 proposed budget. The Company believes the nation and Utah’s economies will slow as inflation and interest rates rise.

The Company’s Exhibit 1.1 reports 12,413 participants for the 2023 Budget vs. 13,413 participants reported in the Company’s Exhibit 1.10. The Division used the Company’s Exhibit 1.10 for analysis.

ThermWise Builder Rebates Program

The ThermWise Builder Rebate Program will continue in 2023 with several modifications.

ThermWise Builder Program					
	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under)	% over (under)
				2022	2022
1 Customer Rebates	\$ 7,192,063	\$ 8,983,060	\$ 7,739,660	\$ (1,243,400)	-14%
2 Program Costs	\$ 301,903	\$ 520,000	\$ 510,000	\$ (10,000)	-2%
3 Total Costs	\$ 7,493,966	\$ 9,503,060	\$ 8,249,660	\$ (1,253,400)	-16%
4 Projected Dth Savings *	124,781	321,358	261,857	(59,501)	-19%
5 Participants	13,919	25,836	21,370	(4,466)	-17%
6 Total \$ / Dth Savings (\$0.00)	\$ 60	\$ 30	\$ 32	NA	NA
7 Total Resource Cost Test B/	1.56	1.81	1.87	NA	NA
8 Utility Cost Test B/C	1.77	2.62	2.49	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

Table 5 shows that the 2023 budget for the ThermWise Builder Program is \$8.3 million, a \$1.3 million decrease from the 2022 budget of \$9.5 million. Expected participation and Dth saved were higher in the 2022 budget, resulting in lower forecasted dollars per Dth saved than expected in the 2023 budget. The 2023 Builder Program is projected to have a TRC ratio of 1.87 and a UCT ratio of 2.49.

ThermWise Business Rebates Program

This program is available to the GS rate class commercial customers. It offers various prescriptive measures, all designed to leverage the marketing access and existing delivery channels of local businesses, wholesalers, and retailers to provide cost-effective natural gas

savings opportunities. The program is adding several new measurements launching on January 1, 2023. They include high-performance new construction, dual-fuel heating systems, commercial benchmarking, and custom rebates. Table 6 summarizes the ThermWise Business Program by customer rebates and program costs with actual results through September 30, 2022, and the 2022 and 2023 budgets.

	2022	2022	2023	\$ over (under)	% over (under)
	Q3 Actual YTD	Budget	Budget	2022	2022
1 Customer Rebates	\$ 757,041	\$ 2,145,343	\$ 1,959,031	\$ (186,312)	-9%
2 Program Costs	\$ 887,082	\$ 1,234,000	\$ 1,244,000	\$ 10,000	1%
3 Total Costs	\$ 1,644,123	\$ 3,379,343	\$ 3,203,031	\$ (176,312)	-8%
4 Projected Dth Savings *	58,121	151,681	139,544	(12,137)	-8%
5 Participants	411	1,958	1,358	(600)	-31%
6 Total \$ / Dth Savings (\$0.00)	\$ 28	\$ 22	\$ 23	NA	NA
7 Total Resource Cost Test B/C	1.22	1.30	1.38	NA	NA
8 Utility Cost Test B/C	2.04	2.13	2.29	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

The ThermWise Business Program budget is proposed to decrease by \$176,312 in 2023. The 2023 budget is \$3.2 million, which is 5% below the 2022 budget, as shown in Table 6.

The Company's Exhibit 1.3 reports 140,304 Dth savings for the 2023 Budget vs. 139,544 Dth savings reported in the Company's Exhibit 1.10. The Division used the Company's Exhibit 1.10 for analysis.

THERMWISE HOME ENERGY PLAN REBATES PROGRAM

The Company administers the ThermWise Home Energy Plan. The Company proposes to use in-home or virtual home energy assessments. The program will continue with no significant changes in 2023. The 2023 budget is \$520,200, an increase of \$11,703 or 2%. Table 7 compares the 2023 EE budget to the 2022 EE budget and the September 30, 2022, YTD results.

	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under) 2022	% over (under) 2022
1 Customer Rebates	\$ 23,794	\$ 38,467	\$ 40,200	\$ 1,733	0%
2 Program Costs	\$ 209,257	\$ 470,000	\$ 480,000	\$ 10,000	2%
3 Total Costs	\$ 233,051	\$ 508,467	\$ 520,200	\$ 11,733	2%
4 Projected Dth Savings *	21,109	36,166	36,166	-	0%
5 Participants	1,574	2,240	2,240	-	0%
6 Total \$ / Dth Savings (\$0.00)	\$11	\$14	\$14	NA	NA
7 Total Resource Cost Test B/	1.76	1.79	2.14	NA	NA
8 Utility Cost Test B/C	1.73	1.76	2.11	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

Table 7 shows increases of \$ 10,000 in program costs, and \$1,733 in rebates/incentives, with no change in Dth savings and participants. The benefit-cost ratio for 2023 with the TRC is projected to be 2.14, and the UCT is 2.11

THERMWISE WEATHERIZATION REBATES PROGRAM

This program offers both GS single-family and multi-family residential customer rebates for installing qualifying weatherization measures. The 2023 budget is \$7.7 million, a decrease of 7% from the 2022 budget. Table 8 compares the ThermWise Weatherization Program by customer rebates and program costs with actual results through September 30, 2022, along with the 2022 and 2023 budgets.

	2022	2022	2023	\$ over (under)	% over (under)
	Q3 Actual YTD	Budget	Budget	2022	2022
1 Customer Rebates	\$ 4,768,535	\$ 7,255,274	\$ 6,926,614	\$ (328,660)	-5%
2 Program Costs	\$ 440,369	\$ 785,000	\$ 765,000	\$ (20,000)	-3%
3 Total Costs	\$ 5,208,904	\$ 8,040,274	\$ 7,691,614	\$ (348,660)	-7%
4 Projected Dth Savings *	63,874	103,887	99,369	(4,518)	-4%
5 Participants	15,767	32,385	30,685	(1,700)	-5%
6 Total \$ / Dth Savings (\$0.00)	\$ 82	\$ 77	\$ 77	NA	NA
7 Total Resource Cost Test B/	1.26	1.23	1.24	NA	NA
8 Utility Cost Test B/C	1.48	1.45	1.46	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

The table shows the benefit-cost ratios increasing from the 2022 budget with a TRC of 1.24 and a UCT of 1.46 for 2023.

LOW-INCOME WEATHERIZATION PROGRAM

The agreement reached in Docket 05-057-T01 contained a provision for the Company to provide funding of \$250,000 for the state’s Low Income Weatherization Program. In 2009, the funding for this program was increased by another \$250,000 for a total contribution of \$500,000. This is meant to address natural gas issues for qualified low-income assistance recipients. This tariff includes a paragraph allowing approved non-profit or governmental agencies to apply for rebates under the ThermWise Programs. This enables qualified agencies to utilize rebates for work they have performed to do additional weatherization measures. The Utah Department of Workforce Services, Housing and Community Development Division (HCD) currently qualify under this provision. This allows HCD to report its activity quarterly and include the saved Dth through its efforts as part of the quarterly reports filed by the Company on the EE program results.

Low Income Efficiency Program					
	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under) 2022	% over (under) 2022
1 Customer Rebates	\$ 641,987	\$ 225,519	\$ 207,119	\$ (18,400)	-8%
2 Program Costs	\$ 8,269	\$ 524,000	\$ 524,000	\$ -	0%
3 Total Costs	\$ 650,256	\$ 749,519	\$ 731,119	\$ (18,400)	-2%
4 Projected Dth Savings *	3,300	20,369	19,436	(933)	-5%
5 Participants	694	1,612	1,502	(110)	-7%
6 Total \$ / Dth Savings (\$0.00)	\$197	\$37	\$38	NA	NA
7 Total Resource Cost Test B/C	1.70	1.68	1.83	NA	NA
8 Utility Cost Test B/C	1.72	1.73	1.88	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

Table 9 reflects the budget for the Low-Income Weatherization Program. The proposed 2023 budget shows a decrease of \$18,400 or 2%. This is the third year a reduction has been submitted for the program budget. The TRC ratio increased to 1.83, and UCT increased to 1.88 for 2023. Both participants and Dth savings are estimated to decrease by 7% and 5%, respectively.

THERMWISE ENERGY COMPARISON REPORT

Initially launched in November of 2011 with 8,000 customers receiving the report, the Company has introduced the report to over 480,000 customers, with a control group of approximately 110,000 customers who do not receive the report. The Company proposes to

deliver the Energy Comparison Report (ECR) to 280,000 customers in 2023, an increase of 52,000 customers. The Company plans to continue to target the comparison report to consumers with higher usage relative to their square footage in 2022. The 2023 proposed budget for the Energy Comparison Program is \$550,000, an increase of \$6,000 or 1.0%.

	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under)	% over (under)
				2022	2022
1 Customer Rebates	\$ -	\$ -	\$ -	\$ -	0%
2 Program Costs	\$ 402,679	\$ 544,000	\$ 550,000	\$ 6,000	1%
3 Total Costs	\$ 402,679	\$ 544,000	\$ 550,000	\$ 6,000	1%
4 Projected Dth Savings *	218,880	291,840	358,400	66,560	23%
5 Participants	171,000	228,000	280,000	52,000	23%
6 Total \$ / Dth Savings (\$0.00)	\$1	\$2	\$2	NA	NA
7 Total Resource Cost Test B/C	1.79	4.60	4.62	NA	NA
8 Utility Cost Test B/C	1.79	4.60	4.62	NA	NA

* Projected Dth savings for each program based on projected program participation and deemed savings estimates.

With participants increasing by 52,000, Dth savings are projected to increase by 23%. The TRC and UCT benefit ratios increased to 4.62.

THERMWISE MARKET TRANSFORMATION INITIATIVE

The ThermWise Market Transformation Initiative involves lasting changes to the natural gas market and conservation. “Therm” will continue to be the primary program spokesperson for ThermWise.

	2022	2022	2023	2023	2023
	Q3 Actual YTD	Budget	Budget	\$ over (under)	% over (under)
				2022	2022
1 Customer Rebates	\$0	\$0	0	\$0	0.0%
2 Program Costs	\$899,873	\$1,320,000	\$1,320,000	\$0	0.0%
3 Total Costs	\$899,873	\$1,320,000	\$1,320,000	\$0	0.0%
4 Projected Dth Savings *	N/A	N/A	N/A	N/A	N/A
5 Participants	N/A	N/A	N/A	N/A	N/A
6 Total \$ / Dth Savings (\$0.00)	N/A	N/A	N/A	N/A	N/A
7 Total Resource Cost Test B/C	0.0	0.0	0	N/A	N/A
8 Utility Cost Test B/C	0.0	0.0	0	N/A	N/A

The initiative includes \$900,000 for a market awareness campaign, sponsorship of building code training at \$80,000, supporting the ThermWise.com website, meetings of the Advisory Group, a customer annual survey, \$60,000 for program design work and management administration, and support of funding of \$280,000 for special marketing events. The ThermWise marketing budget has no changes; therefore, the 2023 budget is the same as the 2022 budget.

PROGRAM AND ADMINISTRATIVE COSTS

Table 3 on page 5 shows that the 2023 total program administrative costs are \$6.3 million, including a \$6,266 decrease from the 2022 budget program costs. Program cost represents about 22.5% of the entire 2023 budget. The Market Transformation Program (MTP) budget of \$1.3 million is included in the program's administrative costs. When the MTP is removed from the program costs, all other program costs represent 18% of the total 2023 EE Budget of \$28.1 million.

The Division continues to urge the Company to continue to look for ways to implement administrative cost reduction steps to improve overall program efficiencies. The Division appreciates the Company submitting quarterly reports within 45 calendar days after the quarter ends. The Division continues to monitor the comprehensive program and individual measures to ensure they serve the public interest.

Conclusion

The Division continues to find value in the overall program objectives. All programs have met their TRC and UCT ratios, demonstrating savings and benefits. Therefore, the Division supports the 2023 Energy Efficiency Budget and recommends that the Commission approve the application. The Division has also reviewed the tariff sheets filed with the application and suggests that the Commission endorse the tariff sheets as filed.

The Division commends Dominion and the Advisory Group for their active participation and commitment to continue to develop and promote vital energy efficiency programs, with the intent to promote the energy-saving measures to an even broader base of GS customers. The Division finds the proposed 2023 EE budget just, reasonable, and in the public interest.

cc: Kelly Mendenhall, Dominion Energy
Mike Orton, Dominion Energy
Travis Willey, Dominion Energy
Michele Beck, Office of Consumer Services