

UTAH DEPARTMENT
OF COMMERCE
Division of Public Utilities

MARGARET W. BUSSE Executive Director

CHRIS PARKER Division Director

Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Brenda Salter, Assistant Director

Abdinasir Abdulle, Utility Technical Consultant Supervisor Shauna Benvegnu-Springer, Utility Technical Consultant

Date: December 1, 2023

Re: Docket No. 23-057-17, Dominion Energy Utah's Application for Approval of the

2024 Year Budget for the Energy Efficiency Program and the Market

Transformation Initiative.

Recommendation (Approve)

The Division of Public Utilities (Division) has reviewed the Application and recommends the Public Service Commission of Utah (Commission or PSC) approve Dominion Energy Utah's 2024 Energy Efficiency (EE) 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, 2023, Dominion Energy Utah (Company or Dominion) applied with the Commission for approval of its EE Programs and Market Transformation Initiative Budget 2024. On November 1, 2023, the Commission issued an Action Request to the Division to review the application and make recommendations on the Company's filing by November 30, 2023. On November 1, 2023, the Commission issued a Notice of Filing and Comment Period detailing that any interested party may submit the Division's response to the Commission by

November 30, 2023, with reply comments by December 15, 2023. This memorandum is the Division's comment on the Company's filing.

Background

DSM/EE PILOT PROGRAM AND BUDGET HISTORY

The original Demand Side Management (DSM) programs and Market Transformation Initiative resulted from 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. As submitted in this docket, the Energy Efficiency Budget of \$25.7 million is the 18th budget proposed by the Company.

Table 1 below shows a history of expenditures from 2018 through 2022, including the 2023 and 2024 EE Budgets. Totals in Table 1 have been rounded up or down, as appropriate.

		ON ENERGY										
	DSM ENERG		• · ·· • · · ·									
YEARLY EXPENDITURES FOR ENERGY EFFICIENCY												
DOCKET NO. 23-057-17												
	_		_	_	_							
A	В	C	D	E	F	G	Н					
	2018	2019	2020	2021	2022	2023	2024					
Energy Efficiency Programs	Actual	Actual	Actual	Actual	Actual	Budget	Budget					
	(000)	(000)	(000)	(000)	(000)	(000)	(000)					
1 ThermWise Appliance	\$4,498	\$4,182	\$3,943	\$4,856	\$3,918	\$5,860	\$4,93					
2 ThermWise Builder	\$6,540	\$6,120	\$9,076	\$7,792	\$8,984	\$8,250	\$8,15					
3 ThermWise Business	\$1,952	\$2,674	\$3,000	\$3,436	\$2,191	\$3,203	\$2,69					
4 ThermWise Custom Business	\$0	\$0	\$0	\$0	\$0	\$0	\$(
4 ThermWise Energy Plan	\$436	\$403	\$378	\$498	\$326	\$520	\$54					
5 ThermWise Weatherization	\$7,550	\$8,184	\$9,966	\$7,813	\$7,100	\$7,692	\$6,73					
6 Market Transformation	\$1,375	\$853	\$937	\$1,320	\$1,209	\$1,320	\$1,32					
7 Energy Comparison Report	\$416	\$452	\$555	\$530	\$478	\$550	\$52°					
8 Low Income Weatherization	\$642	\$714	\$681	\$812	\$690	\$731	\$760					
9 Less Accurals	\$0	\$0	-\$1,465	\$0	\$0	\$0	\$25,66					
# Total	\$23,408	\$23,581	\$27,071	\$27,058	\$24,895	\$28,125	\$25,66					

Discussion

The spending for the DSM programs from 2018 to 2019 was flat. The year 2020 increased spending by \$3.5 million, with 2021 resembling 2020. For 2024, 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.

2024 ENERGY EFFICIENCY PLAN SUMMARY

The EE proposed budget for 2024 is approximately \$25.7 million. This represents a decrease from the 2023 budget of approximately \$2.5 million. This is mainly due to lower participation in the various programs. The eight programs for 2024 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 2024 EE Program and Budget incorporate multiple incentive changes detailed in the Company's Application and Exhibits. The Division defers to the Application for incentive change details. Table 2 below summarizes Dominion's proposed 2024 DSM EE Budget of \$25.7 million for each program compared to the 2023 DSM EE Budget. This budget proposes a 9% decrease over the 2023 budget of \$28.1 million. Columns I and J compare the 2023 EE Budget Utility Cost Test ratios (UCT) to each program's 2024 EE Budget UCT.

Table 2: 2024 Budget Compared to 2023 Budget

DOMINION ENERGY UTAH DSM ENERGY EFFICIENCY REPORT 2024 Budget and 2023 Budget DOCKET NO. 23-057-17												
A	В	С		D	E	F	G	н	1	J		
	2024	2023	2024	2024	2023	2024	2024	2023	2024	2023		
Energy Efficiency Programs	Budgeted	Budgeted	% Over/Under	Budget	Budget	% Over/Under	Dth	Dth	UCT	UCT		
Participants Participants Budgeted 2022 Budget Savings* Savings* Ratio Ratio												
ThermWise Appliance	12,103	13,413	-10%	\$4,931,950	\$5,859,850	-16%	144,858	180,064	1.64	1.66		
ThermWise Builder	21,233	21,370	-1%	\$8,153,010	\$8,249,660	-1%	251,289	261,857	2.38	2.49		
ThermWise Business	883	1,358	-35%	\$2,690,181	\$3,203,031	-16%	92,686	139,544	1.78	2.29		
ThermWise Custom Busine	0	0	0%	\$0	\$0	0%	0	0	0.00	NA		
ThermWise Energy Plan	2,240	2,240	0%	\$546,720	\$520,200	5%	36,166	36,166	2.02	2.11		
ThermWise Weatherization	26,195	30,685	-15%	\$6,738,804	\$7,691,614	-12%	85,628	99,369	1.37	1.46		
Market Transformation	0	N/A	N/A	\$1,320,000	\$1,320,000	N/A	0	N/A	0.00	NA		
Energy Comparison Report	220,000	280,000	-21%	\$520,800	\$550,000	-5%	281,600	358,400	2.04	4.62		
Low Income Assistance	1,602	1,502	7%	\$759,689	\$731,119	4%	19,658	19,436	1.85	1.88		
Total	284,256	350,568	-19%	\$25,661,154	\$28,125,474	-9%	911,885	1,094,836	1.76	1.91		

One of the goals of the EE programs is to educate consumers, thus fostering behavior change in the utility resource usage of participants. The 2024 budget expects a 19% decrease in participants and a 17% decrease in Dth savings to the 2023 budget. All the programs, except for the Low-Income Assistance Program, project a reduction in participation: the ThermWise Appliance Program by 10%, ThermWise Builder Program by 1%, ThermWise Business by 35%, ThermWise Weatherization Program by 15%, and Energy Comparison Report by 21%. These decreases in participation drive a 9% reduction to the proposed budget. The ThermWise Home Energy Plan Program's involvement will remain the same, and Dth savings will increase by 5%, with an increase of \$26,520 in the proposed budget. The overall EE budgeted Dth savings of 911,885, a decrease from the 1,094,836 Dth saving level projected for 2023. The 2023 Q3 Actual YTD report notes 633,331 Dth savings in nine months' performance, although the last quarter represents the beginning of the heating season.

OVERALL ENERGY EFFICIENCY

Table 3 compares actual customer rebates, program costs, Dth savings, and participants as of September 30, 2023, to the 2023 and 2024 proposed budget. The table shows a proposed 9% decrease in the 2024 proposed budget compared to the 2023 budget. The difference is attributed to declines in the various ThermWise program budgets. Table 3 shows a 17% reduction in total Dths saved and an expected decrease of 19% in participants.

Changes to the programs included eliminating the HVAC monitoring and diagnostic systems from the Appliance, Builder, Business, and Low-Income programs. The industry has stated that most smart thermostats perform monitoring and diagnostic functions. Therefore, a rebate is no longer beneficial. The dual-fuel heating system specifications are proposed to move from the Company's Natural Gas Tariff No. 600 to the ThermWise.com website, effective January 1, 2024. This would allow the Company to update the specifications mid-year when technology changes without Commission approval. The Company proposed to add a rebate for variable refrigerant flow (VRF) that includes a natural gas dedicated outdoor air system (DOAS) at \$150 per ton in 2024. The boiler tune-up measures are being proposed to change from every other year to annually. All additional tariff and program changes are for clarification and accuracy.

ŀ	Table 3						
		ThermWise Energ	y Efficiency Pro	gra	m		
L							
						2024	2024
		2023	2023		2024	\$ over (under)	% over (under)
		Q3 Actual YTD	Budget		Budget	2023	2023
1	Customer Rebates	\$13,486,798	\$ 21,821,474	\$	18,986,054	(\$2,835,420)	-13%
2	Program Costs	\$4,131,803	\$6,304,000	\$	6,675,100	\$371,100	5.9%
3	Total Costs	\$17,618,601	\$ 28,125,474	\$	25,661,154	(\$2,464,320)	-9%
4	Projected Dth Savings*	633,331	1,094,835		911,884	(182,951)	-17%
5	Participants**	246,568	350,588		284,256	(66,332)	-19%
6	Fotal \$ / Dth Savings (\$0.00)	\$3	\$3		\$3	NA	N/A
7	Total Resource Cost Test B/	1.42	1.50		1.48	NA	NA
8	Utility Cost Test B/C	1.79	1.90		1.76	NA	NA
9	Projected Dth savings for e	ach program base	ed on projected	pro	gram participa	tion and deemed sav	ings estimates.
	** Participants include Partic	cipants from the I	nergy Comparis	son	Report, which	DEU doesn't include	

PROGRAM AND ADMINISTRATIVE COSTS

Table 3 on page 5 shows that the 2024 total program administrative costs are \$6.7 million, including a \$371,100 increase from the 2023 budget program costs. Program cost represents about 26% of the entire 2024 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 21% of the total 2024 EE Budget of \$25.7 million. The increase in program costs resulted from increased processing costs of the customer rebates.

The Division continues to urge the Company to look for ways to implement reduction steps to improve overall program efficiencies and program costs. 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.

THERMWISE APPLIANCE REBATES PROGRAM

The ThermWise Appliance Rebates Program for 2024 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 2024 proposed budget of \$4.9 million compared to a 2023 budget of \$5.9 million, an 8% decrease. Again, as with the previous year's budgets, customer rebates 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, 2023, to the projected 2024 and 2023 budgets. The table shows a forecasted 2024 decrease in the Utility Cost Test (UCT) and an increase in Total Resource Cost (TRC) test benefit ratios.

Table 4													
		ThermWise	Αp	pliance Prog	ram								
	2024 202												
								2024	2024				
		2023		2023		2024		\$ over (under)	% over (under)				
	Q3	Actual YTD		Budget		Budget		2023	2023				
1 Customer Rebates	\$	3,186,975	\$	4,948,850	\$	3,899,150	\$	(1,049,700)	-21%				
2 Program Costs	\$	583,960	\$	911,000	\$	1,032,800	\$	121,800	13.4%				
3 Total Costs	\$	3,770,935	\$	5,859,850	\$	4,931,950	\$	(927,900)	-8%				
4 Projected Dth Savings *		89,456		180,064		144,858		(35,206)	-20%				
5 Participants		8,275		13,413		12,103		(1,310)	-10%				
6 Total \$ / Dth Savings (\$0.00)	\$	42	\$	33	\$	34		NA	NA				
7 Total Resource Cost Test B		1.74		1.58		1.69		NA	NA				
8 Utility Cost Test B/C		1.63		1.66		1.64		NA	NA				

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

Table 4 demonstrates a decrease of \$1,049,700 in customer rebate costs and an increase of \$121,800 in program costs for the 2024 ThermWise Appliance Program budget. The Dth savings and participants are projected to decrease by 20% and 10%, respectively, in the 2024 proposed budget. The Company believes the nation and Utah's economies will slow as inflation and interest rates rise.

THERMWISE BUILDER REBATES PROGRAM

The ThermWise Builder Rebate Program will continue in 2024 with minor tariff sheet modifications.

Table 5											
			Th	ermWise Bu	ilde	r Program					
								2024	2024		
		2023		2023		2024	\$	over (under)	% over (under)		
	Q3	Actual YTD		Budget		Budget		2023	2023		
Customer Rebates	\$	4,552,147	\$	7,739,660	\$	7,577,010	\$	(162,650)		-2%	
Program Costs	\$	315,478	\$	510,000	\$	576,000	\$	66,000		13%	
Total Costs	\$	4,867,625	\$	8,249,660	\$	8,153,010	\$	(96,650)		11%	
Projected Dth Savings *		115,394		261,857		251,289		(10,568)		-4%	
Participants		9,858		21,370		21,233		(137)		-1%	
Total \$ / Dth Savings (\$0.00)	\$	42	\$	32	\$	32		NA	NA		
Total Resource Cost Test B/		2.52		1.87		1.83		NA	NA		
Utility Cost Test B/C		2.32		2.49		2.38		NA	NA		
* Projected Dth savings for e	* Projected Dth savings for each program based on projected program participation and deemed savings estimates.										

Table 5 shows that the 2024 budget for the ThermWise Builder Program is \$8.2 million, a \$96,650 decrease from the 2023 budget of \$8.3 million. Expected participation and Dth saved were higher in the 2023 budget, resulting in lower forecasted dollars per Dth saved than expected for the 2024 budget. The 2024 Builder Program is projected to have a TRC ratio of 1.83 and a UCT ratio of 2.38.

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.

Table 6 summarizes the ThermWise Business Program by customer rebates and program costs with actual results through September 30, 2023, and budgets for 2023 and 2024. The ThermWise Business Program budget is proposed to decrease by \$512,850 in 2024.

	Table 6													
		The	rmWise Busin	ess	s Program									
			2023		2023		2024		\$ over (under)	% over (under)				
		Q3	Actual YTD		Budget		Budget		2023	2023				
1	Customer Rebates	\$	1,007,652	\$	1,959,031	\$	1,403,181	\$	(555,850)	-28%				
2	Program Costs	\$	388,000	\$	1,244,000	\$	1,287,000	\$	43,000	3%				
3	Total Costs	\$	1,395,652	\$	3,203,031	\$	2,690,181	\$	(512,850)	-25%				
4	Projected Dth Savings *		71,502		139,544		92,686		(46,858)	-34%				
5	Participants		595		1,358		883		(475)	-35%				
6	Total \$ / Dth Savings (\$0.00)	\$	20	\$	23	\$	29		NA	NA				
7	Total Resource Cost Test B/		0.82		1.38		1.17		NA	NA				
8	Utility Cost Test B/C		3.08		2.29		1.78		NA	NA				

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

The 2024 budget is \$2.7 million, 25% below the 2023 budget, as shown in Table 6.

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 2024. The 2024 budget is \$546,720, an increase of \$26,520 or 4%.

	Table 7								
		ThermWise Home	En	ergy Plan P	rogı	ram			
							2024	2024	
		2023		2023		2024	\$ over (under)	% over (under)	
		Q3 Actual YTD		Budget		Budget	2023	2023	
1	Customer Rebates	\$ 25,263	\$	40,200	\$	48,720	\$ 8,520		0%
2	Program Costs	\$ 284,867	\$	480,000	\$	498,000	\$ 18,000		4%
3	Total Costs	\$ 310,130	\$	520,200	\$	546,720	\$ 26,520		4%
4	Projected Dth Savings *	23,286		36,166		36,166	-		0%
5	Participants	1,637		2,240		2,240	•		0%
6	Total \$ / Dth Savings (\$0.00)	\$13		\$14		\$15	NA	NA	
7	Total Resource Cost Test B/	2.90		2.14		2.06	NA	NA	
8	Utility Cost Test B/C	2.85		2.11		2.02	NA	NA	

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

Table 7 compares the 2024 EE budget to the 2023 EE budget and the September 30, 2023, YTD results. Table 7 shows increases of \$18,000 in program costs and \$8,520 in rebates/incentives, with no change in Dth savings and participants. The benefit-cost ratio for 2024 with the TRC is projected to be 2.06, and the UCT is 2.02

THERMWISE WEATHERIZATION REBATES PROGRAM

This program offers both GS single-family and multi-family residential customer rebates for installing qualifying weatherization measures. The 2024 budget is \$6.7 million, a decrease of 12% from the 2023 budget. Table 8 compares the ThermWise Weatherization Program by customer rebates and program costs with actual results through September 30, 2023, along with the 2023 and 2024 budgets.

	Table 8														
		The	rmWise Weat	her	ization Progr	am									
			2023		2023		2024		\$ over (under)	% over (under)					
		Q3	Actual YTD		Budget		Budget		2023	2023					
1	Customer Rebates	\$	4,597,848	\$	6,926,614	\$	5,825,804	\$	(1,100,810)	-16%					
2	Program Costs	\$	690,957	\$	765,000	\$	913,000	\$	148,000	19%					
3	Total Costs	\$	5,288,805	\$	7,691,614	\$	6,738,804	\$	(952,810)	-12%					
4	Projected Dth Savings *		61,837		99,369		85,628		(13,741)	-14%					
5	Participants		15,677		30,685		26,195		(4,490)	-15%					
6	Total \$ / Dth Savings (\$0.00)	\$	86	\$	77	\$	79		NA	NA					
7	Total Resource Cost Test B/		1.15		1.24		1.17		NA	NA					
8	Utility Cost Test B/C		1.42		1.46		1.37		NA	NA					

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

The table shows the benefit-cost ratios decreasing from the 2023 budget with a TRC of 1.17 and a UCT of 1.37 for 2024.

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 eligible 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) qualifies 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.

	Table 9									
			L	ow	Income Effi	cier	ncy Program			
								2024	2024	
			2023		2023		2024	\$ over (under)	% over (under)	
		Q3	Actual YTD		Budget		Budget	2023	2023	
1	Customer Rebates	\$	116,913	\$	207,119	\$	232,189	\$ 25,070		12%
2	Program Costs	\$	509,971	\$	524,000	\$	527,500	\$ 3,500		1%
3	Total Costs	\$	626,884	\$	731,119	\$	759,689	\$ 28,570		4%
4	Projected Dth Savings *		3,055		19,436		19,658	222		1%
5	Participants		526		1,522		1,602	80		5%
6	Total \$ / Dth Savings (\$0.00)		\$205		\$38		\$39	NA	NA	
7	Total Resource Cost Test B/		0.43		1.83		1.81	NA	NA	
8	Utility Cost Test B/C		0.46		1.88		1.85	NA	NA	

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

Table 9 reflects the spending and budgets for the Low-Income Weatherization Program. The proposed 2024 budget increases of \$28,570 or 4%. This is the first year in the last four years where growth is anticipated in the program budget. The TRC ratio decreased to 1.81, and the UCT ratio fell to 1.85 for 2024. Participants and Dths savings are estimated to increase by 1% 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 220,000 customers in 2024, a decrease of 60,000 customers. The Company plans to continue to target the comparison report to consumers with higher usage relative to their square footage in 2023.

	Table 10											
		Ther	mWise Energ	y C	omparison R	ерс	ort					
	2024 2024											
									2024	2024		
			2023		2023		2024		\$ over (under)	% over (under)		
		Q3 /	Actual YTD		Budget		Budget		2023	2023		
1	Customer Rebates	\$	-	\$	•			\$	•	0%		
2	Program Costs	\$	420,096	\$	550,000	\$	520,800	\$	(29,200)	-5%		
3	Total Costs	\$	420,096	\$	550,000	\$	520,800	\$	(29,200)	-5%		
4	Projected Dth Savings *		268,800		358,400		281,600		(76,800)	-21%		
5	Participants		210,000		280,000		220,000		(60,000)	-21%		
6	Total \$ / Dth Savings (\$0.00)		\$2		\$2		\$2		NA	NA		
7	Total Resource Cost Test B/		2.41		4.62		2.04		NA	NA		
8	Utility Cost Test B/C		2.41		4.62		2.04		NA	NA		

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

The 2024 proposed budget for the Energy Comparison Program is \$520,800, a decrease of \$29,200 or 5%. With participants decreasing by 21%, Dth savings are projected to reduce by 21%. The TRC and UCT benefit ratios decreased to 2.04.

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.

	Table 11					
		ThermWise Ma	rket Transform	ation Program		
	Column1 -	Column6 -				
					2024	2024
		2023	2023	2024	\$ over (under)	% over (under)
		Q3 Actual YTD	Budget	Budget	2023	2023
1	Customer Rebates	\$0	0		\$0	0.0%
2	Program Costs	\$938,474	\$1,320,000	\$1,320,000	\$0	0.0%
3	Total Costs	\$938,474	\$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/	0.0	0	0	N/A	N/A
8	Utility Cost Test B/C	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, support for 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 2024 budget is the same as the 2023 budget.

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 2024 Energy Efficiency and Market Transformation Initiative 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 approve the tariff sheets as filed.

The Division commends Dominion and the Advisory Group for their active participation and commitment to continue developing and promoting vital energy efficiency programs, intending to encourage energy-saving measures to an even broader base of GS customers. The Division finds the proposed 2024 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