
Southwestern Public Service Company
Amended
2023 Energy Efficiency Plan and Report
Substantive Rules §§ 25.181, 25.182, and 25.183

May 1, 2023

Project No. 54470



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Introduction

Southwestern Public Service Company (“SPS”) presents this Amended Energy Efficiency Plan and Report (“EEPR”) to comply with 16 Tex. Admin. Code (“TAC”) §§ 25.181, 25.182, and 25.183 (collectively referred to herein as the “EE Rules”), which are the Public Utility Commission of Texas’s (“Commission”) rules implementing Public Utility Regulatory Act (“PURA”) § 39.905.¹ As mandated by this section of PURA, 16 TAC § 25.181(e)(1) requires that each investor-owned electric utility achieve the following minimum goal through market-based standard offer programs (“SOPs”), targeted market transformation programs (“MTPs”), or utility self-delivered programs:

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

¹ PURA is codified at Tex. Util. Code Ann. §§ 11.001–66.016.

Energy Efficiency Plan and Report Organization

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

- The Executive Summary highlights SPS’s reported achievements for 2022 and SPS’s plans for achieving its 2023 and 2024 projected energy efficiency savings goals.

Energy Efficiency Plan

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

Energy Efficiency Report

- Section V documents SPS’s actual weather-adjusted demand savings goals and energy targets for the previous five years (2018-2022).
- Section VI compares SPS’s projected energy and demand savings to its reported and verified savings by program for calendar years 2021 and 2022.
- Section VII documents SPS’s incentive and administration expenditures for the previous five years (2018-2022) broken out by program for each customer class.
- Section VIII compares SPS’s actual program expenditures for 2022 to its 2022 budget categorized by program for each customer class.
- Section IX describes the results from SPS’s MTPs.
- Section X details SPS’s current Energy Efficiency Cost Recovery Factor (“EECRF”) collection.
- Section XI reflects revenue SPS collected through the 2022 EECRF.

- Section XII breaks out the over/under-recovery of energy efficiency program costs.

Appendices

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

Executive Summary

SPS submits this EEPR to comply with the EE Rules for Program Years (“PY”) 2023 and 2024. The EEP portion of this EEPR details SPS’s efforts to achieve reductions in peak demand and energy use among its residential and commercial customers. For PYs 2023 and 2024, SPS has developed energy efficiency portfolios designed to meet goals prescribed by 16 TAC § 25.181.

EEP Summary

Table 1 shows SPS’s goal(s) calculations for PYs 2023 and 2024.² SPS’s PY 2023 Demand and Energy goals were approved in Commission Docket No. 53540.

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

Calendar Year	2023	2024
5-Year Average Peak Demand (MW)	(25.453)	(14.888)
Goal Metric: 0.4% Peak Demand (MW)	5.886	5.827
Demand Goal (MW)	6.027	6.027
Goal Metric: 0.4% Peak Energy (MWh)	10,313	10,209
Energy Goal (MWh)	10,559	10,559
Budget ³	\$4,523,959	\$4,545,219

In 2019, SPS met the demand goal trigger described in 16 TAC § 25.181(e)(1)(B). Because the trigger has been met, SPS calculated its demand reduction goal for PY 2024 using four-tenths of

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

³ Projected Budget amounts are set forth in Table 7.

1% of its summer weather-adjusted five-year average (2018-2022) peak demand for the combined residential and commercial customers. This calculation yields a goal metric of 5.827 MW, which is lower than SPS's PY 2023 goal of 6.027 MW. Therefore, in accordance with 16 TAC § 25.181(e)(1)(D), SPS is using its previous year's goal of 6.027 MW for PY 2024.

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

SPS will implement the following SOPs, MTPs, and Low-Income Weatherization programs in 2023:

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

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

EER Summary

The EER portion of this EEPR demonstrates that in 2022, SPS achieved 8,432 kW of reduction in demand and 18,882,525 kWh of energy savings, which equals 140% and 179%, respectively, of SPS’s demand goal of 6,027 kW and energy savings goal of 10,559,329 kWh.

The expenditures for these 2022 programs were \$3,765,299,⁴ which was 88% of SPS’s budget. The COVID-19 pandemic and subsequent restrictions placed on businesses and consumers limited SPS’s ability to install or complete high-contact energy efficient measures again during the program year. These restrictions, combined with current economic instability, has resulted in lower participation rates and expenditures within the programs. To meet the goal of a four-tenths of 1% reduction in the summer weather-adjusted peak demand through energy efficiency, SPS implemented: the Residential SOPs for single- and multi-family residences; the Large Commercial SOP; the Load Management SOP; the Hard-to-Reach SOP for low-income, single- and multi-family residences; the Low-Income Weatherization program; the Home Lighting MTP; the Retro-Commissioning MTP; Small Commercial MTP; Smart Thermostat Program MTP; and the Refrigerator Recycling MTP. Table 2 below compares the 2022 projected savings and budget to the reported savings as well as actual expended funds for 2022.

Table 2: Summary of 2022 Projected Savings and Budget, Reported Savings, and Expended Funds

Calendar Year	2022
Demand Goal (MW)	6.027
Energy Goal (MWh)	10,559
Projected MW Savings	11.45
Projected MWh Savings	22,929
Reported/Verified MW Savings	8.43
Reported/Verified MWh Savings	18,883
Total Funds Budgeted	\$4,263,542
Total Funds Expended	\$3,765,299

⁴ This number includes costs associated with all 2021 Evaluation, Measurement, and Verification (“EM&V”) activities and SPS’s 2022 EECRF expenses.

Energy Efficiency Plan

I. 2023 and 2024 Programs

A. Program Portfolios

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

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

Table 3 below summarizes SPS’s PY 2023 programs and targeted customer classes. SPS is proposing one new program in PY 2024, which is detailed below in Section D.

Table 3: 2023 Proposed Energy Efficiency Program Portfolio

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

Residential HVAC MTP	Residential	Retrofit
Hard-to-Reach Food Banks MTP	Residential Hard-to-Reach	Retrofit

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

B. Administrative and Research Costs for 2023 and 2024

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

Research and Development (“R&D”) costs include those costs for conducting studies and analyses to identify new programs or measures that enhance the energy efficiency or load management offerings and meet future energy and demand goals. For 2024, SPS is planning to continue research and test product strategies for a Commercial Codes & Standards program offering for potential inclusion into the portfolio. SPS will also continue to allocate funding to research a School Education Kits program that targets fifth grade students in the SPS service territory. SPS will also start to research the opportunity of adding a demand management option to its existing Residential Smart Thermostat Program.

C. Existing Programs for 2024

SPS will continue to offer the following pre-existing programs in 2024.

Large Commercial Standard Offer Program

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

Small Commercial Market Transformation Program

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

Load Management Standard Offer Program

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

Retro-Commissioning Market Transformation Program

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

Residential Standard Offer Program

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

Smart Thermostat Market Transformation Program

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

Refrigerator Recycling Market Transformation Program

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

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

Home Lighting Market Transformation Program

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

Hard-to-Reach Standard Offer Program

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

Low-Income Weatherization Market Transformation Program

SPS's Low-Income Weatherization program is designed to cost-effectively reduce the energy consumption and energy costs of SPS's low-income customers. Under this program, one or more program implementers contract with not-for-profit community organizations and government agencies to provide weatherization services to SPS residential customers who meet the current Department of Energy income-eligibility guidelines. Implementation of SPS's Low-Income Weatherization program provides eligible residential customers appropriate

weatherization measures and basic on-site energy education and satisfies the requirements of 16 TAC § 25.181(p).

Residential HVAC Market Transformation Program

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

Hard-to-Reach Food Bank Market Transformation Program

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

D. New and Modified Programs for 2024

Residential Codes Market Transformation Program

The Residential Codes Market Transformation Program will pro-actively encourage and support jurisdictions to ensure compliance with the latest state-wide building codes for the residential market. Support will be designed to meet each jurisdiction where they are in the code adoption and implementation cycle, and work to build relationships with Architects, Builders, and City Officials. Communities will be given tools and resources to help them realize the economic and energy performance benefits of energy efficient buildings. Resources and training will be provided to assist with barriers such as limited code staff time, how to ensure compliance,

misinformation about the costs and benefits and homebuilder awareness and knowledge about how to meet the new codes efficiently and cost effectively.

General Implementation Plan

Program Implementation

SPS will implement its energy efficiency programs in a non-discriminatory and cost-effective manner. For PYs 2023 and 2024, SPS intends to conduct programs using the following activity schedule:

- On December 15, 2022, SPS conducted kick-off meetings for each program, and allowed sponsors to submit applications by December 29th for the 2023 PY, which were reviewed and accepted in the order of receipt.
- Throughout 2023, SPS has and will offer approved EESPs contracts to implement projects. After contract execution, the EESP may begin implementation and reporting of measures. All projects must be completed, and results reported to SPS before November 15, 2023. SPS will continue to inform the EESP community of pertinent news and updates by posting program notices on its energy efficiency website, offering local and Internet-based workshops (if necessary), and sending email notices to various energy service company associations.
- No later than January 1, 2024, SPS will announce its 2024 energy efficiency programs and open its website application pages to assist EESPs in preparing project applications for PY 2024. The application process gives sponsors feedback on whether projects are eligible and the level of incentives for which they may qualify.
- Throughout 2024, SPS will offer contracts to approved EESPs to implement energy efficiency projects. After contract execution, the EESP may begin implementation and reporting of measures. All projects must be completed, and results reported to SPS before November 15, 2024. SPS will continue to inform the EESP community of pertinent news and updates by posting program notices on its energy efficiency website, offering local and Internet-based workshops (if necessary), and sending email notices to various energy service company associations.
- During 2023 and 2024, the Small Commercial MTP, Load Management SOP, Retro-Commissioning MTP, Refrigerator Recycling MTP, Home Lighting MTP, Hard-to-Reach SOP, Low Income Weatherization, Residential HVAC MTP, and Residential

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

Program Tracking

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

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

Measurement and Verification

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

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

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

Outreach and Research Activities

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

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

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

SPS uses a mix of large C&I customer account management staff and third-party implementation staff to educate customers about the Large Commercial SOP, Load Management SOP, and Retro-Commissioning MTP. In 2023, the account management team and third-party implementation staff will continue their efforts to hold customer meetings and use marketing materials to explain the program and the requirements for participation.

II. Customer Classes

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

classes. The annual budgets are allocated to customer classes by examining historical program results, evaluating economic trends, and taking into account 16 TAC § 25.181(e)(3)(F), which states that no less than 5% of the utility’s total demand goal should be achieved through programs for Hard-to-Reach customers. SPS has relied on historical achievements to determine the budget allocations for PYs 2023 and 2024. Although these guidelines have been set, the actual distribution of the budget must remain flexible based upon the response of the marketplace and the potential interest that a customer class may have in a specific program.

Table 4: Summary of Customer Classes

Customer Class	Qualifications	Number of Customers⁵
Commercial	< 69 kV service voltage	53,860
Residential	All Residential	219,827
Hard-to-Reach⁶	Hard-To-Reach Income Requirement Residential subset	69,026

III. Projected Energy Efficiency Savings and Goals

As prescribed by 16 TAC § 25.181(e)(3), SPS’s 2023 demand reduction goal is calculated by applying four-tenths of 1% (0.004) to the five-year average (2018-2022) peak demand, for residential and commercial customers combined, at the meter. Table 5 provides the peak load data used to calculate the demand reduction projection for the demand goal for PY 2024, as required by the EE Rules. To calculate this goal, SPS applied an average line loss factor of 9.70%⁷ to the weather-normalized peak demand value for residential and commercial customers. SPS then removed the peak demand of opt-out customers from the residential and commercial peak demand values. SPS calculated the average peak demand for the combined residential and commercial customers for the previous five years (2018-2022). As shown in Table 5, during the previous five-year period, SPS has experienced an average summer weather-adjusted peak

⁵ Commercial and Residential number of customers reflect actual SPS customer counts as of December 2021. Hard-to-Reach customers were estimated based on the most recently available U.S. Census data. In 2020, 31.4% of Texans were below the 200% poverty threshold.
<https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-46.html>

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

demand for the combined residential and commercial customers at the meter of 1,457 MW. SPS applied four-tenths of 1% (0.004) to the five-year average (2018-2022) peak demand resulting in a goal of 5.827 MW. Because this goal is lower than PY 2023's goal of 6.027 MW, SPS is using the previously approved goal for PY 2023 of 6.027 MW for PY 2024 in accordance with 16 TAC § 25.181(e)(1)(D).

⁷ SPS's most recently approved line loss study can be found in Docket No. 47527. For purposes of the EEPR, SPS used a simple average of line losses for all levels from the source to the meter.

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

Calendar Year	Peak Demand (MW) @ Source						Energy Consumption (MWh) @ Meter				Energy Efficiency Goal Calculation		
	Total System		Residential & Commercial				Total System		Residential & Commercial		Peak Demand @ Meter (9.7% Line Losses)	5-Year Average Peak Demand @ Meter	Goal Metric: 0.4% Peak Demand at Meter
	Actual	Actual Weather Adjusted	Actual	Actual Weather Adjusted	Opt-Out	Peak Demand @ Source Net Opt-Outs	Actual	Actual Weather Adjusted	Actual	Actual Weather Adjusted			
2014	2,506	2,497	1,711	1,702	55	1,647	14,061,579	14,038,723	7,712,573	7,689,717	1,487	1,525	6.10
2015	2,405	2,478	1,618	1,691	52	1,639	14,032,058	14,004,866	7,621,821	7,594,628	1,480	1,499	6.00
2016	2,499	2,449	1,727	1,677	43	1,634	13,958,248	13,905,333	7,498,352	7,445,437	1,475	1,497	5.99
2017	2,464	2,434	1,675	1,645	47	1,597	13,844,659	13,912,071	7,358,371	7,425,783	1,442	1,491	5.96
2018	2,583	2,567	1,848	1,832	51	1,781	14,297,147	14,100,463	7,723,000	7,526,316	1,608	1,478	5.91
2019	2,483	2,510	1,702	1,729	37	1,692	14,037,836	13,944,983	7,465,519	7,372,666	1,528	1,457	5.83
2020	2,371	2,329	1,677	1,634	49	1,585	13,360,219	13,247,232	7,260,442	7,147,455	1,431	1,499	5.99
2021	2,271	2,196	1,580	1,504	10	1,494	14,145,895	14,127,188	7,632,057	7,013,178	1,349	1,507	6.03
2022	2,341	2,269	1,418	1,525	9	1,516	14,749,444	14,524,533	8,063,727	7,220,870	1,369	1,497	5.99
2023	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1,472	5.89
2024	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1,457	5.83

⁸ Line loss factors for 2019 were approved for SPS in Docket No. 47527.

For PYs 2023 and 2024, SPS developed budgets to meet the energy and demand goals in a cost-effective manner, as prescribed by 16 TAC § 25.181. Details of these budgets, including the allocation of funds to specific programs, are given in Section IV.

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

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

2023	Projected Savings	
	MW	MWh
Commercial	7.73	10,884
Commercial SOP	1.02	3,826
Retro-Commissioning MTP	0.90	3,969
Load Management SOP	5.00	20
Small Commercial MTP	0.22	1,000
Home Lighting MTP	0.59	2,069
Residential	2.69	9,255
Residential SOP	0.4	900
Home Lighting MTP	2.00	7,000
Smart Thermostat MTP	-	600
Refrigerator Recycling MTP	.05	395
Residential HVAC MTP	0.24	360
Hard-to-Reach	1.65	5,875
Hard-to-Reach SOP	0.50	1,310
Hard-to-Reach Food Bank	0.9	3,800
Low-Income Weatherization	0.25	765
Total Annual Projected	12.07	26,014
2024	Projected Savings	
	MW	MWh
Commercial	7.28	9,328
Commercial SOP	1.02	3,826
Retro-Commissioning MTP	0.90	3,969
Load Management SOP	5.00	20
Small Commercial MTP	0.22	1,000
Home Lighting MTP	0.14	513
Residential	1.12	4,079
Residential SOP	0.36	810
Home Lighting MTP	0.47	1,718
Smart Thermostat MTP	-	600
Refrigerator Recycling MTP	0.05	395
Residential HVAC MTP	0.24	360
Residential Codes MTP	-	196
Hard-to-Reach	1.04	3,271
Hard-to-Reach SOP	0.45	1,180
Hard-to-Reach Food Bank	0.34	1,326
Low-Income Weatherization	0.25	765
Total Annual Projected	9.44	16,678

IV. Program Budgets

Table 7: Proposed Annual Budget Broken Out by Program for Each Cost Class

2023	Incentives	Admin	R&D	EM&V	Total Budget
Commercial	\$ 1,858,345	\$ 87,730	\$ -	\$ -	\$ 1,946,075
Commercial SOP	390,200	46,072	-	-	436,272
Retro-Commissioning MTP	800,000	-	-	-	800,000
Load Management SOP	250,500	35,278	-	-	285,778
Small Commercial MTP	400,000	5,624	-	-	405,624
Home Lighting MTP	17,645	757	-	-	18,402
Residential	1,012,651	63,747	-	-	1,076,398
Residential SOP	272,400	26,297	-	-	298,697
Home Lighting MTP	335,251	14,388	-	-	349,639
Smart Thermostat MTP	30,000	3,785	-	-	33,785
Refrigerator Recycling MTP	175,000	8,976	-	-	183,976
Residential HVAC MTP	200,000	10,300	-	-	210,300
Hard-to-Reach	1,050,275	27,710	-	-	1,077,985
Hard-to-Reach SOP	385,275	19,470	-	-	404,745
Hard-to-Reach Food Bank	200,000	8,240	-	-	208,240
Low-Income Weatherization	465,000	-	-	-	465,000
Research & Development	-	-	160,000	-	160,000
General Administration	-	211,253	-	-	211,253
Evaluation, Measurement, & Verification	-	-	-	52,248	52,248
Rider Expenses	-	-	-	-	-
Grand Total	\$ 3,921,271	\$ 390,440	\$ 160,000	\$52,248	\$ 4,523,959
2024	Incentives	Admin	R&D	EM&V	Total Budget
Commercial	\$1,855,064	90,362	\$ -	\$ -	1,945,426
Commercial SOP	390,200	47,454	-	-	437,654
Retro-Commissioning MTP	800,000	-	-	-	800,000
Load Management SOP	250,500	36,336	-	-	286,836
Small Commercial MTP	400,000	5,793	-	-	405,793
Home Lighting MTP	14,364	780	-	-	15,144
Residential	1,020,311	70,659	-	-	1,090,970
Residential SOP	272,400	27,086	-	-	299,486
Home Lighting MTP	272,911	14,820	-	-	287,731
Smart Thermostat MTP	30,000	3,899	-	-	33,899
Refrigerator Recycling MTP	175,000	9,246	-	-	184,246
Residential HVAC MTP	200,000	10,609	-	-	210,609
Residential Codes MTP	70,000	5,000	-	-	75,000
Hard-to-Reach	1,050,275	28,541	-	-	1,078,816
Hard-to-Reach SOP	385,275	20,054	-	-	405,329
Hard-to-Reach Food Bank	200,000	8,487	-	-	208,487
Low-Income Weatherization	465,000	-	-	-	465,000
Research & Development	-	-	160,000	-	160,000
General Administration	-	217,591	-	-	217,591
Evaluation, Measurement, & Verification	-	-	-	52,415	52,415
Rider Expenses	-	-	-	-	-
Grand Total	\$ 3,925,650	\$ 407,154	\$ 160,000	\$52,415	\$4,545,219

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

Table 8 documents SPS’s demand and energy reduction goals for the previous five years (2018-2022) calculated in accordance with 16 TAC § 25.181 and actual demand reduction and energy savings achieved.

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

Calendar Year	Adjusted Demand Goal (MW)	Adjusted Energy Goal (MWh)	Actual Demand Reduction (MW)	Actual Energy Savings (MWh)
2022	6.03	10,559	8.43	18,883
2021	6.03	10,559	10.06	25,411
2020	5.99	10,502	11.67	25,663
2019	5.49	9,627	9.57	23,328
2018	5.49	9,627	9.57	18,906

VI. Projected Versus Reported and Verified Demand and Energy Savings

This section documents SPS’s projected savings and its reported and verified savings for PYs 2021 and 2022. Table 9 shows the savings for SOPs, MTPs, and the Low-Income Weatherization program. SPS’s 2021 programs produced 10,06 kW demand savings or 167% of the statutory goal of 6,027 kW. In 2022, SPS’s programs produced 8.43 kW of demand savings at the meter or 140% of the statutory goal of 6,027 kW. Taking into account line losses approved in Docket No. 47527, SPS’s 2022 programs produced 9.34 MW of demand savings at the source.

Table 9: Projected versus Reported/Verified Savings for 2021 and 2022 (at Meter)

2021	Projected Savings		Reported/Verified Savings	
	kW	kWh		kW
Commercial	6,422	11,758,660	6,237	12,490,989
Commercial SOP	1,015	3,825,600	910	4,129,671
Retro-Commissioning MTP	1,100	4,850,400	925	5,188,299
Load Management SOP	3,500	14,000	3,772	15,089
Small Commercial MTP	220	1,000,000	230	1,115,918
Home Lighting MTP	587	2,068,660	400	2,042,013
Residential	2,915	10,458,516	2,343	8,351,923
Residential SOP	900	2,300,000	324	855,191
Home Lighting MTP	1,965	6,925,516	2,008	6,789,241
Smart Thermostat MTP	-	838,200	-	616,077
Refrigerator Recycling MTP	50	394,800	12	91,414
Hard-to-Reach	900	2,465,000	1,477	4,567,735
Hard-to-Reach SOP	650	1,700,000	1,198	3,779,061
Low-Income Weatherization	250	765,000	279	788,674
Total Annual Savings Goals	10,237	24,682,176	10,057	25,410,647
2022	Projected Savings		Reported/Verified Savings	
	kW	kWh	kW	kWh
Commercial	7,972	10,884,491	4,568	6,298,054
Commercial SOP	1,015	3,825,600	309	1,447,635
Retro-Commissioning MTP	900	3,969,231	483	2,411,458
Load Management SOP	5,250	21,000	3,282	3,282
Small Commercial MTP	220	1,000,000	124	551,973
Home Lighting MTP	587	2,068,660	370	1,883,644
Residential	2,724	9,969,536	2,305	7,783,824
Residential SOP	709	1,811,020	436	1,175,830
Home Lighting MTP	1,965	6,925,516	1,858	6,281,114
Smart Thermostat MTP	-	838,200	-	240,284
Refrigerator Recycling MTP	50	394,800	11	86,596
Hard-to-Reach	750	2,074,850	1,559	4,800,647
Hard-to-Reach SOP	500	1,309,850	1,211	3,757,797
Low-Income Weatherization	250	765,000	348	1,042,850
Total Annual Savings Goals	11,446	22,928,877	8,432	18,882,525

VII. Historical Program Expenditures

This section documents SPS’s incentive and administrative expenditures for the previous five years (2018-2022) broken out by program for each customer class. Table 10 shows expenditures for SOPs, MTPs, and the Low-Income Weatherization Program.

Table 10: Historical Program Incentive and Administrative Expenditures for 2018 through 2022⁹

Program	2022		2021		2020		2019		2018	
	Incent. (000s)	Admin (000s)	Incent. (000s)	Admin (000s)	Incent. (000s)	Admin (000s)	Incent. (000s)	Admin (000s)	Incent. (000s)	Admin (000s)
Commercial	\$ 1,332	\$ 61	\$ 1,795	\$ 49	\$ 1,627	\$ 61	\$ 1,684	\$ 43	\$ 1,784	\$ 43
Large Commercial SOP	258	34	387	36	218	35	231	27	264	30
Small Commercial SOP	-	-	-	-	-	-	-	-	-	-
Retro-Commissioning MTP	670	-	922	-	947	-	869	-	882	-
Load Management SOP	204	26	199	12	246	21	171	13	227	13
Small Commercial MTP	182	-	270	-	198	-	400	-	400	-
Home Lighting MTP	18	1	16	1	17	5	13	2	12	0
Residential	788	72	639	70	947	134	875	78	805	35
Residential SOP	415	34	297	46	597	35	568	27	584	30
Home Lighting MTP	338	26	298	14	329	91	251	39	221	5
Smart Thermostat MTP	10	2	23	7	9	-	1	-	-	-
Refrigerator Recycling MTP	24	10	21	4	13	7	55	11	-	-
Hard-to-Reach	1,205	10	1,137	38	952	35	918	27	905	30
Hard-to-Reach SOP	758	10	685	38	491	35	497	27	496	30
Low-Income Weatherization	447	-	452	-	461	-	421	-	410	-
Research & Development	-	98	-	20	-	24	-	16	-	25
General Administration	-	148	-	142	-	136	-	148	-	167
Evaluation, Measurement, & Verification	-	34	-	33	-	31	-	34	-	34
Rider Expenses	-	17	-	17	-	23	-	27	-	47
Total Expenditures	\$ 3,325	\$ 440	\$ 3,570	\$ 369	\$ 3,526	\$ 444	\$ 3,477	\$ 374	\$ 3,495	\$ 379

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

VIII. Program Funding for Calendar Year 2022

As shown in Table 11, SPS spent a total of \$3,765,299¹⁰ on its energy efficiency programs in 2022, which is \$498,243 less than SPS's 2022 approved budget of \$4,263,542.

Table 11: Program Funding for Calendar Year 2022

Customer Segment and Program	Total Projected Budget	Participants	Actual Funds Expended (Incentives)	Actual Funds Expended (Admin)	Total Funds Expended	Budget and Expenditure Variance
Commercial & Industrial	\$ 1,943,520	12,489	\$ 1,332,292	\$ 60,902	\$1,393,193	72%
Large Commercial SOP	434,930	32	258,053	33,566	291,619	67%
Retro-Commissioning MTP	800,000	16	670,150	-	670,150	84%
Load Management SOP	284,750	7	204,123	25,985	230,108	81%
Small Commercial MTP	405,460	35	182,151	-	182,151	45%
Home Lighting MTP	18,380	12,399	17,814	1,351	19,165	104%
Residential	1,066,581	237,581	787,795	71,591	859,386	81%
Residential SOP	499,971	729	415,368	33,566	448,934	90%
Home Lighting MTP	349,220	236,592	338,459	25,677	364,136	104%
Smart Thermostat MTP	33,675	144	9,500	1,912	11,412	34%
Refrigerator Recycling MTP	183,715	116	24,468	10,436	34,904	19%
Hard-to-Reach	854,178	1,868	1,205,406	9,931	1,215,337	142%
Hard-to-Reach SOP	404,178	1,665	758,301	9,931	768,232	190%
Low-Income Weatherization	450,000	203	447,105	-	447,105	99%
Research & Development	160,000		-	97,959	97,959	61%
General Administration	205,100		-	148,200	148,200	72%
Evaluation, Measurement, & Verification	34,163		-	34,163	34,163	NA
EECRF Rider Expenses	-		-	17,062	17,062	NA
Total	\$ 4,263,542	251,938	\$ 3,325,493	\$ 439,807	\$3,765,299	88%

Pursuant to 16 TAC § 25.181(l)(2)(Q), SPS is required to provide an explanation of annual program spending variance from budgets if the variance exceeds a positive or negative 10%. In 2022, seven programs met this criterion: Retro-Commissioning MTP, Load Management SOP,

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

Large Commercial SOP, Small Commercial MTP, Smart Thermostat MTP, Refrigerator Recycling MTP, and the Hard-to-Reach program.

- Due to the continuing COVID-19 pandemic, inflation, and supply chain issues, the Retro-Commissioning MTP, Large Commercial SOP, and Small Commercial MTP Program, all of which are high-touch customer experiences, did not achieve their forecasted goals or spending in PY 2022. Projects were delayed due to materials/supply chain and will go into PY 2023. SPS expects that participation in these programs will increase as materials become available.
- The Refrigerator Recycling Program did not achieve its forecasted goals or spending in PY 2022. Most of the marketing efforts in PY 2022 were aimed at increasing program awareness to lay a better foundation for future marketing campaigns. With increased program awareness, future marketing efforts are expected to lead to higher levels of participation.
- Although SPS ran several marketing initiatives, including an email campaign to increase participation, the Smart Thermostat MTP program came up just short of meeting its PY 2022 forecast. SPS plans to continue marketing the program and hopes participation will increase as more customers become aware of the online marketplace.
- Load Management SOP was below budgeted spending primarily due to a reduction in participation as well as kW achievement coming in lower than originally forecasted. The lower spend and achievement was due in part to only one SOP event dispatched during 2022, along with a metering issue for one SOP participant that did not allow the Company to verify that customer's event performance during the SOP event. That participant represented approximately 20% of the SOP program's committed capacity for 2022.
- The Hard-to-Reach program budget included the Food Bank Program lighting program budget. Also, some sponsors needed extra funds to cover the cost of serving more customers. This is causing the budget to be higher than filed for 2022. The Food Bank Program is its own program for 2023. It was important for Xcel Energy to serve these customers with the extra budget.

IX. Market Transformation Program Results

SPS launched its Commercial Retro-Commissioning MTP in April 2013. In 2022, SPS completed 16 projects that resulted in a reduction of 483 kW and 2,411,458 kWh. SPS expects additional, similar projects to be completed in 2023.

SPS launched its Small Commercial MTP in January 2017. In 2022, SPS completed 65 projects that resulted in a reduction of 230 kW and 1,115,918 kWh. This new program has proven to be effective at increasing participation amongst small commercial customers which was the focus for this offering.

SPS launched its Home Lighting MTP in January 2017. In 2022, SPS had 236,591 bulbs sold in its upstream lighting program that resulted in a reduction of 2,227 kW and 8,164,758 kWh.

SPS launched its Smart Thermostat MTP on January 1, 2020. In the program's third year as a program, SPS sold 170 Thermostats on its online marketplace that resulted in a reduction of 83,498 kWh.

SPS launched its Refrigerator Recycling MTP on January 1, 2019. In the program's fourth year as a program, SPS recycled 116 old refrigerators within the service territory that resulted in a reduction of 11 kW and 86,596 kWh.

X. 2022 Energy Efficiency Cost Recovery Factor (EECRF)

On October 12, 2021, in Docket No. 52072, the Commission approved SPS's 2022 EECRF to recover a total of \$6,339,374 in expenses associated with its 2022 energy efficiency programs, effective January 1, 2022.

Table 13: 2022 EECRF Rates

Rate Schedule	\$/kWh
Residential Service	\$0.001329
Small General Service	\$0.000487
Secondary General Service	\$0.000553
Primary General Service	\$0.000840
Small Municipal and School Service	\$0.000193
Large Municipal Service	\$0.000486
Large School Service	\$0.002241

XI. Revenue Collected through EECRF (2022)

SPS collected \$6,571,315.47 through its 2022 EECRF, which became effective January 1, 2022.

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

SPS recovered \$747,246 more than actual PY 2022 expenses approved in Docket No. 52072, as shown in Table 14 below.

Table 14: Over/Under Recovery (2022)

2022 Program Costs	\$	4,229,379
AIP Reduction		5,228
2021 EM&V Costs		34,163
2020 Net Over Recovery		(551,568)
2020 Rate Case Expenses (D. 50804)		22,980
2020 Performance Bonus		2,604,419
Total		5,818,841
EECRF Recovery		6,571,315
Net (Over)/Under Recovery	\$	(752,474)

Acronyms

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

APPENDIX A: REPORTED DEMAND AND ENERGY REDUCTION BY COUNTY 2022

Large Commercial SOP			
County	# of Premises	kW	kWh
Castro	1	30	87,438
Potter	10	244	1,199,241
Randall	3	35	160,956
Total	15	309	1,447,635

Recommissioning MTP			
County	# of Premises	kW	kWh
Dallam	1	11	47,815
Gray	1	4	16,243
Hale	4	85	335,876
Lubbock	1	40	92,296
Parmer	1	12	45,522
Potter	1	13	48,786
Randall	4	317	1,824,920
Total	13	483	2,411,458

Load Management			
County	# of Premises	kW	kWh
Hartley	3	183	183
Parmer	2	357	357
Potter	8	1,115	1,115
Randall	2	1,245	1,245
Yoakum	1	382	382
Total	19	3,282	3,282

Small Commercial MTP			
County	# of Premises	kW	kWh
Armstrong	1	8	35,993
Bailey	1	5	18,648
Gray	2	6	31,848
Hale	1	3	10,080
Parmer	2	8	37,957
Potter	3	18	93,630
Randall	6	76	323,877
Total	16	124	552,035

Home Lighting MTP			
County	# of Premises¹¹	kW	kWh
Deaf Smith	7,283	67.77	248,725
Garza	108	1	2,821
Gray	10,845	99	362,196
Hale	13,101	126	465,980
Hockley	8,595	82	301,393
Hutchinson	10,990	96	352,970
Lamb	1,438	12	42,431
Moore	10,282	95	347,919
Potter	172,574	1,518	5,560,191
Randall	10,078	96	350,528
Seminole	3,697	35	129,603
Total	248,991	2,227	8,164,758

Residential SOP			
County	# of Premises	kW	kWh
Bailey	5	11	38,452
Crosby	1	15	34,863
Deaf Smith	19	25	78,688
Gaines	97	175	422,990
Gray	35	65	231,985
Hale	6	7	16,232
Hockley	8	9	9,090
Lamb	11	18	60,715
Parmer	2	3	12,022
Potter	26	26	56,079
Randall	44	61	169,865
Yoakum	15	22	44,849
Total	269	436	1,175,830

¹¹ Sum of individual bulbs sold and not individual premises.

Hard-to-Reach SOP			
County	# of Premises	kW	kWh
Bailey	63	52	103,978
Deaf Smith	1	1	926
Gaines	92	81	148,456
Gray	110	177	517,379
Hale	10	109	381,988
Hockley	7	58	192,760
Hutchinson	1	1	826
Lamb	31	43	132,164
Lubbock	24	25	50,664
Ochiltree	1	50	182,805
Potter	69	487	1,668,675
Randall	66	121	363,450
Yoakum	5	5	13,726
Total	480	1,211	3,757,797

Low-Income Weatherization			
County	# of Premises	kW	kWh
Hutchinson	2	2	4,271
Potter	106	337	1,018,710
Randall	7	9	19,868
Total	115	348	1,042,850

Smart Thermostats			
County	# of Premises	kW	kWh
Armstrong	2	-	2,794
Bailey	2	-	2,794
Carson	2	-	2,794
Castro	1	-	2,794
Dallam	1	-	1,397
Deaf Smith	1	-	1,397
Gaines	7	-	9,779
Gray	6	-	13,970
Hale	4	-	5,588
Hemphill	2	-	2,794
Hockley	1	-	1,397
Hutchinson	2	-	2,794
Lamb	1	-	1,397
Lubbock	7	-	9,779
Lynn	1	-	1,397
Parmer	1	-	1,397
Potter	40	-	55,880
Randall	79	-	110,363
Swisher	1	-	1,397
Yoakum	3	-	4,191
Total	164	-	240,284

Refrigerator Recycling			
County	# of Premises	kW	kWh
Armstrong	2	0	1,839
Carson	1	0	1,317
Crosby	1	0	755
Deaf Smith	1	0	561
Gaines	1	0	755
Gray	8	1	5,937
Hale	4	0	2,337
Hockley	2	0	1,534
Hutchinson	3	0	2,625
Lamb	1	0	746
Moore	2	0	1,953
Ochiltree	1	0	957
Parmer	1	0	808
Potter	38	4	29,847
Randall	41	4	34,625
Total	107	11	86,596