

**EEBC IS ASKING MEMBERS TO RESPOND BY AUGUST 31<sup>st</sup>**  
**XCEL ENERGY 2021-2022 ENERGY EFFICIENCY DSM PLAN**

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**THIS IS YOUR WINDOW OF OPPORTUNITY TO INFLUENCE**  
**THE OUTCOMES OF XCEL ENERGY'S INCENTIVE MEASURES/REBATES!**

## EEBC REQUEST | CALL TO ACTION

### TIMELINE OVERVIEW

1. **JULY 1** | Xcel Energy (PSCo) filed their 2021-2022 DSM Plan. Assign to Administrative Law Judge (ALJ)
2. **AUGUST 2** | Dietze & Davis (EEBC's legal Counsel) filed motion to intervene and began our advocacy at the Commission
3. **AUGUST-SEPTEMBER** | EEBC works with EEBC members to provide Dietze and Davis with clear direction on our industry needs for strategic updates to the DSM Plan to help us to keep *growing Energy Efficiency and the Clean Energy Economy of Colorado*. EEBC waiting for ALJ's schedule of legal procedures to be agreed upon
4. **August 31** | The filing will give members time to gather comments, data, and input to support your issues – potential initiatives [see below]. The following are instructions to review the DSM Plan and submit your comments by August 31<sup>st</sup> for the next *Policy Action Committee (PAC) meeting*. Date TBD

## EEBC REQUEST | CALL TO ACTION

**NEXT STEPS** | The following are instructions on *'how to submit your suggestions'* to intervene in the DSM Plan

1. **Review your industry area** to see how the DSM Plan may affect your company  
- and offer suggestions for change.
2. **For guidance** and/or your level of interest in intervening, contact  
Carmen@recurve.com | 608-332-7992 or [Patricia@eebco.org](mailto:Patricia@eebco.org) | 303-319-5623
3. **Bring your** positions, modifications, or other comments (and new programs) that you would like EEBC to intervene on to the PAC meetings.
4. **Submit your positions**, modifications, or other comments for changes and level of interest in below initiatives/rebates in which to intervene, contact  
Carmen@recurve.com | 608-332-7992 or [Patricia@eebco.org](mailto:Patricia@eebco.org) | 303-319-5623

## REVIEWING THE DSM PLAN

**NEXT STEPS** | Guidance and tools for reviewing your industry's sections in the DSM Plan

**1<sup>st</sup> HOW TO REVIEW XCEL ENERGY'S DSM PLAN [PPT]** | Carmen Best, *Recurve*

DSM Plan Highlights: how to find your industry section, and new products that may affect your industry

**2<sup>nd</sup> '101 Tutorial'** | Clayton Reed, *CLEAResult*

Tips on what to review concerning your industry rebate/measure sections

- Review the Executive Summary, Tables, Budgets, and Measures/Rebate Program sections
  - Look carefully over the Descriptions and Budgets
  - Narratives that might be different from the 2019-2020 DSM Plan
    - Example: HVAC Nate Certification was omitted in update versus prior Plan
  - Look at core assumptions that are causing changes
    - Major contextual Items

- How much is allocated spending on your incentives, programs, and products in the 2021-2022 Plan – *Compared to the 2019-2020 Plan*
- Review changes that may add ‘New Technology’ to your Program
- Make sure that language is *not* different than in the last DSM Plan
- If new measures are being added, look at the ‘Technical Section ‘ – *Technical “TRM” calculations are overwhelming!*
- Electric and Gas budgets saving will be split – *check out both budgets*
- Understand how Xcel Energy is *crunching numbers*. – *How does Xcel Energy create calculations for calculating deemed saving?*

**DSM PLAN DOCUMENTS**

- [Xcel Energy DSM Plan | 2021-2022](#)
- [Xcel Energy DSM Plan | 2019-2020](#)
- [Xcel Energy DSM Plan | 2019-2020 Status Report](#)

**POLICY ACTION COMMITTEE | DOCUMENTS**

- [JULY 16, 2020 MEETING MINUTES](#)
- [JULY 30, 2020 MEETING AGENDA](#)
- [JULY 30, 2020 MEETING MINUTES](#)

**Policy Action Committee (PAC) | CALL TO ACTION**

**| UPDATE FOR AUGUST 31<sup>st</sup> COMMENT DEADLINE FOR OUR SUBMISSION TO THE PUC**

**NEXT STEPS** | At the July 30, 2020, Policy Action Committee meeting, the following product/industry areas were identified as concerns to EEBC members. **Deadline is coming up. Please send your rebate questions and comments for the ‘discovery phase’ of the DSM process by August 31, Monday.**

1. **Review your industry area** to see how the DSM Plan may affect your company
2. **Provide your level of concern and suggestions to the below concerns**
3. **Submit your positions, modifications, or suggestions, contact**  
Carmen@recurve.com | 608-332-7992 or [Patricia@eebco.org](mailto:Patricia@eebco.org) | 303-319-5623

**AREA OF CONCERNS**

**GSHP** | Terry Proffer, *Major Geothermal*

GSHP technology is substantially minimized on attention, facts, and benefits not only to consumers but to utilities. One thing to note based on experience from one GSHP residential home installation the ‘all’ electric house – air-conditioned by 100% GSHP installation – the Xcel Energy rate is at the highest cost per kWh (3rd tier). Why would someone be penalized for having a system that uses a fraction of the electrical power for cooling compared to a conventional air source heat pump (air conditioner) under the same climate conditions? And, has a proven 350% to 400% COP in heating versus a Natural Gas furnace that will struggle to meet 90% COP due to altitude – yet Xcel Energy offers rebates for so-called ‘high efficiency’ gas furnaces?

**Dietze & Davis Response | Mark Detsky**

– “If you are asking whether NG rebates should be discontinued, I think its fair game to ask whether these will be phased out. There is a heat pump water heater rebate and conversion from NG as a pilot for ‘beneficial electrification’ in the DSM Plan as well, did you see that?”

**Geo-Targeting** | Carmen Best, *Recurve*

Will geo-targeting pilot be extended as AMI is rolled out? (and aimed at areas that have AMI + have constraints? What is the plan for optimizing locational value in the cost effectiveness calculations? Is it aligned with the DSP proceeding? To potentially optimize distribution system planning with non wires alternatives.

**Third Party Programs** | Jim Crossman, *Financial Energy Management*

– Why are so many sole sources? Why not a more active open solicitation process?

**Demand Response | Carmen Best, Recurve**

Why is it such a closed process, it appears to be very close to the vest and limits value of bringing in new vendors and exposure to new ideas - why not open solicitations?

**Air Leakage Measures/Air Sealing | Jason Oliver, AeroSeal & Tarek Simmons, AeroBarrier**

— Where would they add incentives for air barriers, especially valuable to indoor air quality and health in COVID era?

**Insulation Incentives | Debbie Weingardt, Bestway Insulation**

— Add new incentive to the insulation rebates for “wall re-insulation process”

**Virtual Energy Audits | Kasey Provorse, Energy Smart Colorado**

— Kasey is looking at the plan to see how remote audits are addressed

**Heat Pump (HP) | Doug White, Trane & Joe Wheeler, Carrier**

— HP rebates, companies engaging their regulatory resources to review

**Heat Pump (HP) | Nathan Kahre, EnergyLogic**

— HP rebates for new homes

**HPWH | Ali Beglar, Daikin**

— Member asked about HPWH output covering 5 to1

**Streamlining Product Development | Piloting Process | Patricia Rothwell, EEBC**

— Further the update process to be inclusive of multiple products and beneficial electrification products, and/or services to apply in one form. The current form is limited in that accommodates one single product or one single program at a time.

**HIGHLIGHTS FROM | Xcel Energy 2021-2022 Energy Efficiency DSM Plan**

**Electric Goals and Budgets That Exceed its Commission Target as Follows**

- 539 GWh of electric energy savings and 103 MW of demand reduction in 2021
- 524 GWh of electric energy savings and 102 MW of demand reduction in 2022
- \$89.9 million in 2021 and \$90.1 million in 2022

**Xcel Energy's Gas DSM Goals and Budgets**

- 823,854 dekatherms in 2021 and 863,875 dekatherms in 2022
- The proposed Gas DSM budgets exceed the \$15 million budget cap established by Paragraph 13 of Attachment A to Decision No. C18-0417 and Rule 4753(k). Xcel Energy has contemporaneously filed a Petition for Variance on these budget requirements. The proposed budgets for Gas DSM \$17.8 million in 2021 and \$18.1 million in 2022

**Low-Income Budgets and Goals Increased**

There are also demand response goals of a cumulative level of demand response (total controllable load) of 489 MW and 503 MW for 2021 and 2022. These remain mostly Company-owned, rate-based proposals

