PROPOSED NEW 16 TAC § 7.480	§
RELATING TO ENERGY	§
CONSERVATION PLANS AND	§
PROPOSED AMENDMENTS TO 16 TAC	§
§ 7.460	§

BEFORE THE RAILROAD COMMISSION OF TEXAS

COMMENTS OF ATMOS ENERGY CORPORATION ON PROPOSED NEW 16 TAC § 7.480, RELATING TO ENERGY CONSERVATION PLANS AND AMENDMENTS TO 16 TAC § 7.460

Atmos Energy Corporation's ("Atmos Energy") Mid-Tex and West Texas Divisions submits these timely filed comments in response to proposed 16 Tex. Admin. Code ("TAC") § 7.480 ("Rule 7.480") relating to Energy Conservation Programs ("ECPs") and proposed amendments to 16 TAC § 7.460 ("Rule 7.460"), approved for publication by the Railroad Commission of Texas ("Commission") on September 19, 2023, and published in the October 6, 2023 issue of the *Texas Register*.

I. OVERVIEW

Atmos Energy is the country's largest natural gas-only distributor and safely delivers reliable, affordable, efficient, and abundant natural gas to more than 3 million distribution customers in over 1,400 communities across eight states, with over 2 million of those customers located in Texas. Recognizing our continued role as a vital component of the country's long-term sustainable energy future, Atmos Energy is continuing to execute its comprehensive environmental strategy focused on reducing Scope 1, 2, and 3 emissions (as defined by the Greenhouse Gas ("GHG") Protocol) and other environmental impacts from its operations, fleet, facilities, gas supply, and customer end-use. The largest source of GHG emissions associated with Atmos Energy's business is the end-use combustion of our natural gas product (Scope 3 emissions). Energy efficiency programs are the most impactful opportunity to reduce emissions, while maintaining customer choice, lowering energy bills, and reducing overall energy consumption.

Based on an American Gas Foundation study, GHG emissions from U.S. residential natural gas use could be reduced by as much as 40% from 2020 to 2050 through the use of energy efficient emerging natural gas technologies, at about 10% of the cost of electrification.

At Atmos Energy, we continue to work on reducing our Scope 3 GHG emissions through energy efficiency programs that help our customers conserve energy, save money, and reduce their environmental impact. Atmos Energy currently offers conservation and energy efficiency programs in its Louisiana, Mississippi, Colorado, and Texas Mid-Tex divisions, with Louisiana being the latest authority to approve the program in early 2022. These programs are marketed as SmartChoice Rebates and provide financial incentives to purchase high-efficiency natural gas equipment and smart thermostats, install home weatherization upgrades, in addition to providing free energy-saving devices. Atmos Energy appreciates the efforts of the 88th Texas Legislature to pass House Bill 2263 ("HB 2263"), which for the first time sets public policy in the State of Texas regarding the implementation of ECPs for local distribution companies ("LDCs") in the state and will standardize the requirements and oversight of such programs for the benefit of Texas natural gas customers.

Based on our experience with implementation of ECPs in other states, Atmos Energy offers the following comments on the Commission's proposed Rule 7.480 to comply with the directives of HB 2263 and to serve as guidance for LDCs as they develop ECPs for approval.

In addition, Atmos Energy offers comments on the proposed amendments to Rule 7.460 to incorporate penalty guidelines for potential violations of the second sentence in Texas Utilities Code § 104.258(c).

II. COMMENTS ON RULE 7.480

Atmos Energy has reviewed the Comments submitted by CenterPoint Energy Resources Corp. and supports the recommended changes to Rule 7.480 contained therein. Atmos Energy also provides the following additional information for consideration by the Commission.

In designing, developing, and implementing ECPs in other states, Atmos Energy has focused on beginning with a basic set of proven, high-impact programs that can be deployed quickly and help to build the infrastructure necessary for future, more comprehensive portfolios of programs. As the Southeast Energy Efficiency Alliance explains in its treatise "Energy Efficiency Quick Start Programs: A Guide to Best Practices":

The development of a portfolio of Quick Start programs provides a unique opportunity to develop a strategic approach that will both meet short-term objectives and set the stage for long-term growth and success. Thoughtful planning of the Quick Start programs and proactive thinking regarding the transition to Comprehensive Portfolio programs can lead to better performance towards goals, more satisfied customers and more efficient program delivery. ¹

In recognition of this fact, Texas Utilities Code § 104.403(g) requires that a proposed ECP portfolio "must be designed to overcome barriers to the adoption of energy-efficient equipment, technologies, and processes and be designed to change customer behavior as necessary." To meet this requirement, LDCs will need to incur costs for marketing and outreach activities, training of local trade allies to perform the offerings in the portfolio (such as home energy audits), quality control and quality assurance processes, partnership with retailers to provide customers with available rebates, as well as Evaluation, Measurement, and Verification requirements to verify savings. These costs as a proportion of the overall budget tend to be higher in the first few years of the program. Atmos Energy has found it to be most effective to use a third-party administrator ("TPA") who has extensive expertise in this area to develop, administer, and evaluate its ECPs. In

3

¹ https://www.seealliance.org/wp-content/uploads/Quick-Start-Best-Practices-041414-FINAL.pdf at p. 3.

the states where Atmos Energy has statewide programs available, we have found that our TPAs have been extremely successful in overcoming the barriers to adoption and encouraging participation so that all available incentives are claimed by our customers to their net benefit based on well-established principles of cost-effectiveness.

In Atmos Energy's Mid-Tex Division, we currently have a modest ECP that reaches a subset of our Mid-Tex customers, which has been constrained from growth due to the limitations in cost recovery associated with that program. In compliance with the provisions of Texas Utilities Code §§ 104.401 et seq. and Rule 7.480, the Mid-Tex Division plans to make a filing for a broader program with a budget that will allow broader participation across the state. The West Texas Division, which does not yet have any energy conservation offerings, will make a similar filing. Each proposal will include a budget that reflects all "costs prudently incurred to implement the energy conservation programs, including costs incurred to design, market, implement, administer, and deliver an energy conservation program" per § 104.403(b) and will include supporting information to show that these costs are reasonable and necessary. Based on past experience, the "administrative costs" as defined in Rule 7.480 may exceed 15% of the total budget. As a frame of reference, attached as Exhibit A is Atmos Energy's Louisiana Division first Annual Report for its Energy Efficiency Program Portfolio. The costs by category and the resulting savings are reflected on page 5 of this report. As discussed on pages 14-15, this portfolio of programs was demonstrated to be cost-effective, providing net benefits to customers in Louisiana, and the costs were found to be prudently incurred.

Similarly, in its initial proposal and subsequent reporting, Atmos Energy will demonstrate in our Texas filings that the ECP proposed is cost-effective, providing net benefits to customers through energy savings and that costs associated with ECP implementation are prudently incurred

as required by the statute. In order to allow for the Commission to determine on a case-by-case basis the prudence of such proposed costs and in compliance with the provisions of § 104.403, Atmos Energy respectfully requests that Rule 7.480 be modified to remove the requirement in subsection (g) limiting administrative costs to 15% of the total costs of the portfolio.

III. COMMENTS ON RULE 7.460

Texas Utilities Code § 105.023(b-1) states that a civil penalty under that section may not be less than \$1,000 and not more than \$1,000,000 for *each violation of Section* 104.258(c). Section 105.023(e) goes on to direct the Commission by rule to establish a classification system to be used by a court for violations of 104.258(c).

Section 104.258(c) arguably has two possible violations, one of which is addressed by the proposed amendments to Rule 7.460. Specifically, § 104.258(c) says that:

A provider may not disconnect natural gas service to a residential customer during an extreme weather emergency. The provider shall defer collection of the full payment of bills that are due during an extreme weather emergency until after the emergency is over and shall work with customers to establish a pay schedule for deferred bills.

The proposed amendment at Rule 7.460(b)(1) addresses the first potential violation captured in the first sentence of § 104.258(c), and the subsequent table proposes a classification system to be used for violations of that first sentence. The second sentence in § 104.258(c) is incorporated in the language of current Rule 7.460(c) related to deferring collection of bills and offering payment plans. While it appears from the context and content of HB 2263 that the penalty range up to \$1 million was intended to refer to violation of the requirement not to disconnect during an extreme weather emergency, failure to comply with the requirements of the second sentence of this subsection regarding collection of bills and offering payment plans could also be viewed as a violation and thus requires the establishment of a classification system as well.

Accordingly, Atmos Energy recommends that the proposed changes to Rule 7.460 also include the following additions to subsection (c):

(c) Payment plans. Providers shall defer collection of the full payment of bills that are due during an extreme weather emergency until after the emergency is over and shall work with customers to establish a payment schedule for deferred bills as set forth in § 7.45 of this title (relating to Quality of Service). In accordance with Texas Utilities Code § 105.023, the Office of the Attorney General of Texas on its own initiative or at the request of the Commission may file suit to recover a civil penalty for a violation of this paragraph. The table in this paragraph contains a classification system to be used by a court when such a suit is filed. Figure 16 § 7.460(c).

Figure: 16 TAC § 7.460(c)

Classification System

Violation Factors	Factor Value (1-2)	Points Tally
Demand for collection of full		
payment of bills due is made during	1	
an extreme weather emergency		
Repeat violations based on	2	
provider's history of compliance	2	
Good faith effort to remedy	-1	
violation	-1	
		Total
	·	Penalty maximum per violation
1-3 points = Class D Violation		\$ 3,000

IV. CONCLUSION

Atmos Energy appreciates the opportunity to submit these comments and looks forward to working with the Commission, Staff, and other interested parties to developing the final version of this significant rulemaking.

Respectfully submitted,

/s/Daniel R. Renner

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ATTORNEY FOR:

ATMOS ENERGY CORPORATION



Louisiana Rate Division

Program Year 1

Louisiana Energy Efficiency Program Portfolio

Annual Report

Docket No. R-31106

Table of Contents

1.0 Executive Summary	3
2.0 Portfolio Impact	5
2.1 Program Costs	5
2.2 Program Savings	5
3.0 Portfolio Programs	5
3.1 Residential Solutions Program	5
3.1.1 Program Description	5
3.1.2 Program Highlights	6
3.1.3 Program Budgets, Savings & Participation	6
3.1.4 Program Events & Training	6
3.1.5 Planned or Proposed Changes to Program & Budget	8
3.2 Income Qualified Program	9
3.2.1 Program Description	9
3.2.2 Program Highlights	9
3.2.3 Program Budgets, Savings & Participation	9
3.2.4 Program Events & Training	9
3.2.5 Planned or Proposed Changes to Program & Budget	10
3.3 Commercial Solution Program	10
3.3.1 Program Description	11
3.3.2 Program Highlights	11
3.2.3 Program Budgets, Savings & Participation	11
3.2.4 Program Events & Training	11
3.2.5 Planned or Proposed Changes to Program & Budget	14
4.0 Evaluation, Measurement & Verification	14
4.1 Overview	14
Residential Solutions Program – EM&V Procedures	14
Income Qualified Solutions Program – EM&V Procedures	15
Commercial Solutions Program – EM&V Procedures	15
Custom Track?	Error! Bookmark not defined.
Prescriptive Track?	Error! Bookmark not defined.
4.2 Cost Benefit – Third Party Evaluator Results	15
5.0 Supplemental Requirements	15

5.1 Lost Revenue	15
5.2 Staffing	16
5.3 Information Provided to Consumers to Promote EE	16

1.0 Executive Summary

In accordance with the rules established by the Louisiana Public Service Commission ("LPSC"), Atmos Energy ("Atmos") is submitting this report as the review of the eighth year of the Quick Start Energy Efficiency Program and the first year of participation for Atmos Energy's service territory. Pursuant to LPSC Docket No. R-31106, this annual report is filed four months after the end of the eighth program year, for continuation of the Quick Start Energy Efficiency Program. To comply with providing information as required by the rule, the Arkansas Public Service Commission ("APSC") Standardized Annual Report Packet ("SARP") was utilized. This report includes the following sections:

- A narrative report containing program descriptions; activity; savings; participation and trainings;
 Evaluation, Measurement and Verification (EM&V) overview; staffing levels; and information provided to consumers to promote programs.
- A workbook detailing program budget, costs, savings and cost-benefit analysis.

This report addresses the performance of each energy efficiency program implemented under the Atmos Quick Start portfolio. During the Quick Start period (February 1, 2022 — Dec. 31, 2022), Atmos operated the energy programs as follows:

• Residential Programs

- Residential Solutions offering financial incentives and technical support to residential customers with the Atmos Energy Louisiana service area. Prescriptive rebates will be available to residential customers who replace their existing natural gas appliances with high-efficiency gas equipment.
- The Residential Solutions Program is also available to Louisiana Homebuilders who build new homes and choose to install energy efficient natural gas equipment.
- A network of qualified trade allies, vendors, and installation contractors was made available to help Residential customers navigate equipment installation.
- Direct install measures and energy savings kits were made available at no-cost to residential customers. These measures included low-flow showerheads, faucet aerators, and water heater pipe insulation.
- Downstream incentives were available to customers for the purchase of energy efficient natural gas clothes dryers, natural gas storage, condensing and tankless water heaters, and Wifi-enabled smart Thermostats through participating retailers.
- The availability of program incentives and services was advertised on the Atmos Energy website, periodic bill inserts, select media outlets, as well as through basic cooperative marketing materials developed and available to participating trade allies. All communication channels aimed to make Atmos Energy customers aware of the benefits of efficient equipment and the services available from Atmos Energy through the SmartChoice program.

Residential Income Qualified offering services to customers facing higher risks from
rising energy costs due to income level. This program offered Energy Efficiency kits from
local Community Action Agencies. These kits included low flow devices and well as
thermal pipe insulation to decrease natural gas and water usage.

• Commercial Programs

- The Commercial Solutions program is designed to support commercial customers by identifying energy-savings opportunities and overcoming the market barriers to implementing cost-effective, EE investments. The program promotes both prescriptive and custom measures. Incentives for eligible measures are paid on a \$/therm saved perproject basis. These projects may include direct installation, process improvements, other system-level custom projects and/or projects involving unique equipment not part of the prescriptive offerings.
- Program staff pre-inspects and pre-approves projects eligibility and provides M&V services or review as needed. The program is promoted to key trade allies (e.g., engineering firms, energy service providers, trade allies) so they can promote participation to their customers.
- Multiple commercial contractors, consultants, and engineers were used to help deliver the SmartChoice Program through multiple channels and projects.
- The Commercial Solutions Program completed over 130 facility assessments across the state which provided customer education on the value of energy efficiency and function of energy efficient products. During these assessments, the SmartChoice Program also offered the installation of no-cost energy savings measures such as: showerheads, faucet aerators, pre-rinse spray valves, exterior door weatherstripping, overhead door weatherstripping, steam traps, and Dryer Smart devices.

For Program Year 1("PY1"), Atmos achieved an energy savings of 554,386 therms through the implementation of the 3 programs offered to Louisiana customers. Total Resource Cost (TRC) test for all programs passes at 1.69.

Overall, the Commercial Solutions program saved the largest amount of therms inside the program and the depth and variety of measures proved this program to be very successful. The Residential Solutions program saw participation ramp up as the year went on and over 2,300 unique residential customers participated. The Income Qualified Program had 1,500 customers participate and receive no-cost energy savings kits.

While 50.56% of budget was utilized during the first year of the program, we anticipate greater utilization in future years as program awareness increases.

2.0 Portfolio Impact

2.1 Program Costs

Program	Marketing & Delivery	Incentives/Direct Install Costs	EM&V	Total
Residential Solutions	\$300,213	\$369,029	\$38,890	\$708,222
Income Qualified	\$44,600	\$36,195	\$7,540	\$88,335
Commercial Solutions	\$207,000	\$256,509	\$33,480	\$496,989
Total	\$551,813	\$661,733	\$80,000	\$1,293,546

2.2 Program Savings

Program	Rate Class	Annual Therms	Lifetime Therms
Residential Solutions	Residential	37,488	541,614
Income Qualified Solutions	Residential	12,074	130,375
Commercial Solutions	Non-Residential	504,824	4,511,108
Total		554,386	5,183,097

3.0 Portfolio Programs

3.1 Residential Solutions Program

3.1.1 Program Description

The Atmos Energy Residential Solutions Program provides residential customers with access to qualified vendors and installation contractors, and trade allies within the Atmos Energy Louisiana service area. Prescriptive rebates are available to residential customers who replace their existing equipment with high-efficiency gas equipment. Eligible measures, efficiency requirements and incentive amounts are detailed in the "eligible measures and incentives" section that follows. The program is also available to homebuilders who build a new home and install eligible equipment. Equipment installation is delivered directly through a trained network of local trade allies. In addition to the incentives available for eligible equipment, trade allies also install no-cost instant savings measures (direct install measures) at the time of the equipment installation. Available direct install measures include low-flow showerheads, faucet aerators, water heater pipe insulation and water heater wraps. On top of the trade ally incentive mechanism described above, downstream incentives are available to customers for the purchase of energy efficient dryers and gas storage, condensing and tankless water heaters through participating retailers.

The availability of program incentives and services are advertised on the Atmos Energy website, periodic bill inserts, select media outlets, as well as through basic cooperative marketing materials developed in partnership with the Atmos Energy SmartChoice Program and available to participating trade allies. Atmos Energy SmartChoice rebate information is also available at retail stores and distribution centers throughout the State. The program also utilizes a toll-free number

as an alternative intake channel for interested customers. All communication channels aim to make Atmos Energy customers aware of the benefits of efficient equipment and the services available from Atmos Energy through this and the SmartChoice program. Program staff and participating trade allies support customers in home.

3.1.2 Program Highlights

In PY1, the program proved to be a success in terms of customer participation, contractor participation and retail footpring:

- Energy savings were achieved with the successful installation of 9 unique eligible measures in 2,358 households.
- The program achieved 37,488 Therms in energy savings
- 28 different residential contractors participated in PY1. This includes 17 Louisiana plumbers and 11 Louisiana HVAC contractors. Program team met and presented the program to over 100 unique contractors throughout the state.
- 7 Louisiana Homebuilders enrolled and began installing energy efficient equipment in new homes
- Point of Purchase rebate and educational material installed in 54 retail stores and 32 supply houses throughout the state
- Customer satisfaction was very high among survey respondents
- 2,358 Participants installed 3,446 measures in PY1
- TRC − 0.31

3.1.3 Program Budgets, Savings & Participation

Program		Cost			Energy Savings			Measures		
Year	Budget	Actual	%	Plan	Evaluated	%	Plan	Actual	%	
PY1	\$1,011,042	\$708,222	70%	134,962	37,488	28%	5,794	3,446	59%	

3.1.4 Program Events & Training

Hosted in-person Contractor training and outreach meetings throughout the state to educate Plumbing contractors, HVAC contractors, and homebuilders on the value of energy efficient equipment as well as the incentives available through the SmartChoice Program. Local Atmos Energy offices or other meeting spaces were utilized to conduct these training sessions and contractors were continued to be engaged throughout 2022. During these initial program kick-off meetings, contractors were given marketing material to present to customers. These events and trainings occurred in:

- Monroe
- West Monroe
- Lafayette
- Kenner
- Prairieville

- Baton Rouge
- Kenner
- Metairie
- Mandeville
- Covington
- Houma
- Slidell
- Hammond
- LaPlace
- Harvey
- Broussard
- Livingston
- Ponchatoula
- Reserve
- Attended and presented to contractors at Diggers' Night Out (Contractor Meeting in Slidell)
- Multiple Plumbing-Heating-Cooling Contractors of Louisiana (PHCCLA) events throughout the state
- TPA staff held sales and customer service training for personnel at 54 retail stores
 throughout Louisiana. These stores include Lowe's, Home Depot, Stine, and other
 building supply and hardware stores. During these training sessions, TPA staff would
 educate store personnel on the benefits of the energy efficient equipment (Energy Star
 clothes dryers, water heaters, smart thermostats) and the rebates for customers. Point
 of purchase material for the program was placed in the stores and updated monthly at
 all 54 stores.
- TPA staff held sales training at 32 supply houses throughout the state (Southern Pipe and Supply, Ferguson's, LCR Plumbing Warehouse, Butcher Distributing, etc). During these sales trainings, TPA staff would help promote energy efficient water heaters, furnaces, and smart thermostats to contractors.
- Acadian Home Builder's Association Events
- Northshore Home Builders Association Events
- Southeast Louisiana Home Builders Association Events
- Home Builders Association of Northeast Louisiana

- Earth Day Awareness events at multiple retail locations to promote energy efficiency and sustainability.
- Events throughout October (Energy Awareness Month) to help educate residential customers on tips and strategies to reduce energy consumption.
- Over 30 Contractor appreciation events at Supply Houses and Distributors to promote SmartChoice Program to contractors.

3.1.5 Planned or Proposed Changes to Program & Budget

Atmos Energy SmartChoice Program plans to add weatherization measures such as duct sealing in accordance with Arkansas TRM 7.0 to achieve residential savings. This measure will be implemented by local Louisiana Contractors to address leaking return and supply ducts in residential homes to improve airflow and reduce HVAC runtime. Duct Sealing can be implemented in all weather zones of Louisiana and will provide increased therm savings and participation for residential customers.

Third Party Administrator has added additional local staff devoted solely to the Residential Solutions program. This Residential Solutions Specialist will work with Contractors and Homebuilders in Louisiana to market and drive more program participation. This will ensure TPA staff will have even more robust communication with trade allies, homeowners, and homebuilders.

SmartChoice Program is installing more direct install measures in homes and apartment complexes and not relying on direct install kit distribution as heavily in 2023. This will ensure the realization rate of the direct install measures is much higher. TPA Staff is working with Housing Authorities, apartment communities and residential customers to install these items directly into dwellings. The goal was set to install these measures in 5,000 homes and as of April 1, 2023 the TPA has installed these low flow devices in over 2,200 homes.

In PY1 the marketing and education program sent over 56,000 direct install kits emails and over 22,000 smart thermostat emails to Atmos Energy Customers. In order to drive more participation, the Marketing and education team will slightly increase the direct install kit email outreach to over 66,000 residential customers in Program Year 2. The Smart Thermostat eblast outreach will be increased to over 45,000 and cooperative advertising with Distributors will help drive more participation.

Added more specific and restrictive language regarding the necessity of gas water heaters for customers who receive direct install kits. This will mitigate the instances of customers receiving the kits that do not have natural gas water heating.

Added square footage information on rebate paperwork for smart thermostats to ensure more accurate calculation of savings for these measures.

Program Staff is looking into the viability of using Smart Thermostats as a no-cost direct install measure for the residential and income qualified program.

Atmos Energy SmartChoice Program is exploring potential co-op campaigns with Electric utilities (CLECO and Entergy) who also offer smart thermostat rebate programs. The utility programs could advertise these energy efficient measures together for customers who have dual-fuel HVAC systems.

Third Party Administrator will improve program tracking data and methods of sharing this information with Evaluator.

3.2 Income Qualified Program

3.2.1 Program Description

The Atmos Energy Income Qualified Program targets income qualified customers in Louisiana who need access to energy efficient technologies. The objective of the Income Qualified Program is to generate savings for this community, while improving homeowner awareness of energy use.

The program offers the installation of low flow shower heads, aerators, pipe wrap, and water heater wraps (if needed) at no cost to the homeowner. The program also offers the installation of energy efficient gas water heating equipment at no cost to the homeowner. The program will work with Community Action Agencies in Louisiana to confirm.

3.2.2 Program Highlights

In PY1, the program proved to be a success in terms of customer participation and Community Action Agency participation.

- Energy savings were achieved with the successful installation of 3 eligible measures in 1,500 households.
- The program achieved 12,074 (Therms) in energy savings
- 6 different Community Action Agencies participated in PY1 (Quad Area, St. Tammany, SMILE, Lafourche, Quachita, East Carrol)
- Customer satisfaction among participants was high
- Reached 46% of goal, achieved 12,074 (kWh/Therms) in PY1
- 1,500 Participants in PY1
- TRC .60

3.2.3 Program Budgets, Savings & Participation

Program	Program Cost			Energy Savings			Measures		
Year	Budget	Actual	%	Plan	Evaluated	%	Plan	Actual	%
PY1	\$192,140	\$88,335	46%	26,075	12,074	46%	1,455	1,500	103%

3.2.4 Program Events & Training

Multiple Contractor meetings throughout the state

Held Training sessions with the following Community Action Agencies (CAA). These training sessions included provided income qualified customers with access and education to energy

efficiency technology and information on how to reduce energy usage. While these training sessions were taking place, customers received a no-cost energy savings kit with instructions on how to install them in their homes.

- Quad Area CAA
- St Tammany CAA
- SMILE CAA
- Lafourche CAA
- Quachita Parish CAA
- East Carroll CAA

3.2.5 Planned or Proposed Changes to Program & Budget

Atmos Energy SmartChoice Program plans to add weatherization measures such as duct sealing in accordance with Arkansas TRM 7.0 to achieve residential savings. This measure will be implemented by local Louisiana Contractors to address leaking return and supply ducts in residential homes to improve airflow and reduce HVAC runtime. Duct Sealing can be implemented in all weather zones of Louisiana and will provide increased therm savings and participation for residential customers.

Third Party Administrator has added additional staff devoted solely to the Residential Solutions program. This Residential Solutions Specialist will work with Contractors and Homebuilders in Louisiana to market and drive more program participation. This will ensure TPA staff will have even more robust communication with trade allies and homebuilders.

Program Staff is looking into the viability of using Smart Thermostats as a no-cost direct install measure for the residential and income qualified program.

Atmos Energy and TPA staff are conducting Energy Awareness days at Community Action Agencies throughout the state that will help customers to reduce bill payments, as well as educate them on the SmartChoice Program. During this time, they will be enrolled for potential weatherization measures at their homes. This will drive therm savings to the program.

In addition to the six CAAs listed above, in PY2 the SmartChoice Program will work with the following Income Qualified assistance groups:

- Jefferson Community CAA
- CENLA CAA
- Delta Community CAA
- St. John the Baptist CAA

Working closely with Habitat for Humanity, Creating New Horizons, and other non-profit organizations who build and renovate residential homes for the income qualified customer base. The SmartChoice Program will provide enhanced equipment rebates and weatherization measures installed during the construction of the home to drive savings and participation.

Third Party Administrator will improve program tracking data and methods of sharing this information with Evaluator.

3.3 Commercial Solution Program

3.3.1 Program Description

The Atmos Energy SmartChoice implemented a Commercial Program that offers incentives for direct install and prescriptive measures, and in some cases custom projects, which result in a verifiable energy usage reduction, focusing on simple, direct install measures for which deemed savings are available.

This program offers technical assistance provided with other commercial programs that have been effective in removing market barriers for small commercial customers. This includes providing facility assessments and customer education on the value of energy efficiency and function of energy efficient products. Incentives for the program are paid on a \$/therm saved basis using program caps as warranted to ensure that program dollars are allocated across a large number of participants. The program offers technical support and also develops and maintains a contractor network to provide additional outreach and customer participation.

3.3.2 Program Highlights

In PY1, the program proved to be a success in terms of customer participation, contractor participation and savings goals:

- Energy savings were achieved with the successful installation of eligible measures for 80 projects.
- The program achieved 504,824 (Therms) in energy savings
- Over 12 different commercial contractors participated in PY1 (Associated Foods, Gaudin Equipment, MSS, Louisiana Steam, Bernhard, etc)
- Customer satisfaction for this program was also very high
- Reached 97% of goal, achieved 495,919 (kWh/Therms) in PY1 (additional 20,000 therms will be added to PY2 as customer did not get information in time for PY1)
- 48 Unique Participants in PY1
- TRC 2.69

3.2.3 Program Budgets, Savings & Participation

Program	Program Cost			Energy Savings			Measures		
Year	Budget	Actual	%	Plan	Evaluated	%	Plan	Actual	%
PY1	\$920,480	\$496,989	54%	521,713	504,825	97%	10,052	3,433	34%

3.2.4 Program Events & Training

Hosted Contractor training and outreach meetings throughout the state to educate Plumbing contractors, HVAC contractors, and homebuilders on the value of energy efficient equipment as well as the incentives available through the SmartChoice Program. Local Atmos Energy offices or other meeting spaces were utilized to conduct these training sessions and contractors were continued to be engaged throughout 2022. These events and trainings occurred in:

Monroe

- West Monroe
- Lafayette
- Kenner
- Prairieville
- Baton Rouge
- Kenner
- Metairie
- Mandeville
- Covington
- Houma
- Slidell
- Hammond
- LaPlace
- Harvey
- Broussard
- Livingston
- Ponchatoula
- Reserve
- Presented the SmartChoice Program to hundreds of restaurant owners and suppliers at Louisiana Restaurant Showcase Event
- Presented the SmartChoice Program to Child Nutrition Directors and Facility Directors at Louisiana School Nutrition Association Events. Multiple Schools have decided to purchase Energy Star rated cooking equipment in school cafeterias due to the SmartChoice Program.
- Presented the SmartChoice Program for facility directors at Louisiana Hospital Association Events. Multiple hospitals have utilized the custom incentive program in order to complete energy saving projects such as boiler upgrades and replacements, steam system improvements, and condensate return projects.
- Earth Day Awareness events at multiple retail locations
- Completed 130 facility assessments throughout the state for a diverse cross section of customers (Hospitals, Schools, Restaurants, Hotels, Auto repair, Non-Profits, etc). These facility assessments provided education and project recommendations for customers to utilize the custom or prescriptive rebate program. During these site assessments, TPA staff also completed no-cost direct install measures to offer immediate natural gas reduction.
- TPA Staff focused on locally owned dry cleaners to deliver no-cost facility assessment and steam trap replacements. These sites included:

- D & D Cleaners Monroe, LA The SmartChoice Program identified 12 failed steam traps resulting in an estimated 9,547 Therms saved annually. This project represents an estimated 22% of their annual gas usage.
- Oil Center Cleaners Lafayette, LA The SmartChoice Program identified 11 failed steam traps resulting in an estimated 10,409 Therms saved annually. This project represents an estimated 25% of their annual gas usage.
- Scott Oak Cleaners Scott, LA The SmartChoice Program identified 10 failed steam traps resulting in an estimated 6,211 Therms saved annually. This project represents an estimated 14% of their annual gas usage.
- Thurmanize Cleaners Monroe, LA The SmartChoice Program identified 19 failed steam traps resulting in an estimated 12,672 Therms saved annually. This project represents an estimated 23% of their annual gas usage.
- Congress Cleaners Lafayette, LA The SmartChoice Program identified 10 failed steam traps resulting in an estimated 6,953 Therms saved annually. This project represents an estimated 11% of their annual gas usage.
- Golden Cleaners Lafayette ,LA The SmartChoice Program identified 8 failed steam traps resulting in an estimated 5,159 Therms saved annually. This project represents an estimated 8 % of their annual gas usage.
- Kenner Cleaners Kenner, LA The SmartChoice Program identified 7 failed steam traps resulting in an estimated 6,492 Therms saved annually. This project represents an estimated 26 % of their annual gas usage.
- Hardy Cleaners Lafayette, LA The SmartChoice Program identified 6 failed steam traps resulting in an estimated 12,150 Therms saved annually. This project represents an estimated 10% of their annual gas usage.
- Northside Cleaners Lafayette, LA The SmartChoice Program identified 11 failed steam traps resulting in an estimated 8,183 Therms saved annually. This project represents an estimated 9% of their annual gas usage.
- Rosers Cleaners- Kenner, LA The SmartChoice Program identified 5 failed steam traps resulting in an estimated 4,742 Therms saved annually. This project represents an estimated 10% of their annual gas usage.

- Ochsner Main Campus Jefferson, LA The SmartChoice Program identified boiler, insulation, condensate return, and steam trap measures totaling 72,005 Therms saved annually.
- **St. Francis Hospital Monroe, LA** The SmartChoice Program identified steam trap and pipe insulation measures totaling 144,957 therms saved annually.
- **LSU Hospital Monroe, LA** -The SmartChoice Program identified boiler and steam trap measures totaling 14,651 therms saved annually.
- Morehouse Parish School Board Bastrop, LA The SmartChoice Program identified Energy Star Commercial Cooking measures totaling 19,532 therms saved annually.
- The Boulevard Bistro Restaurant Covington, LA The SmartChoice Program identified Energy Star Commercial Cooking measures totaling 4,020 therms saved annually.
- Interstate Hyundai West Monroe, LA The SmartChoice Program identified direct install measures totaling 18,635 therms saved annually.

3.2.5 Planned or Proposed Changes to Program & Budget

Third Party Administrator will improve program tracking data and methods of sharing this information with Evaluator.

Build a more robust trade ally network across different delivery channels to further diversify the measure mix of the commercial solutions program.

4.0 Evaluation, Measurement & Verification

4.1 Overview

ADM Associates ADM Associates (ADM), the TPE for PY1, evaluated the portfolio in PY1. Two standards were used to evaluate these savings. For prescriptive measures, verify that savings are being calculated according to the AR TRM V3.0 and AR TRM V7.0, both adapted for Louisiana weather. For custom measures, this effort comprises the calculation of savings according to accepted protocols (e.g., IPMVP). This is to ensure that custom measures are cost-effective and provide reliable savings.

Residential Solutions Program – EM&V Procedures

EM&V of the Residential Solutions Program consist of a measurement of the existing baseline conditions of a sample of homes, the nature of the energy efficiency improvements installed, usage characteristics of the homes pre and post retrofit and assessing whether the homeowners would have undertaken the efficient actions in the absence of the program. Data gathering to expedite EM&V was coordinated with the Implementation Contactor and the EM&V implementer in the final implementation design.

In most cases, TPE applied the AR TRM V7.0 to verify claimed savings. In the case where a measure is not included in either version of the AR TRM, an alternative TRM was used. For example, natural gas dryers were not included in the AR TRM V7.0, therefore the Evaluators used deem savings calculations from the AR TRM V9.0. Additionally, other measures, such as the tankless water heaters and smart thermostats did not include weather adjusted water temperatures for water heating in the applicable weather zones, therefore ADM developed weather adjusted savings.

Income Qualified Solutions Program – EM&V Procedures

EM&V of the Residential Solutions Program consist of a measurement of the existing baseline conditions of a sample of homes, the nature of the energy efficiency improvements installed, usage characteristics of the homes pre and post retrofit and assessing whether or not the homeowners would have undertaken the efficient actions in the absence of the program. Data gathering to expedite EM&V was coordinated with the Implementation Contactor and the EM&V implementer in the final implementation design.

Commercial Solutions Program – EM&V Procedures

EM&V approach for this program reflects the types of projects completed. To ensure that projects provide the expected savings, the evaluation approach employs on and off-site verification assessments to confirm the measures are installed and used under conditions specified by the TRM, or any other agreed upon methodology. Evaluation activities also assess assumed baseline conditions through contractor site assessments, when it is appropriate.

4.2 Cost Benefit – Third Party Evaluator Results

Program	Realized Annual Energy Savings (Therms)	Number of Measures/ Projects	Total Program Expenditures	Total Resource Cost Test (TRC)	Utility Cost Test (UCT)
Residential Solutions	37,488	3,446	\$708,222	0.3	0.31
Income Qualified Solutions	12,074	1,500	\$88,335	0.61	0.61
Commercial Solutions	504,824	3,433	\$496,989	2.69	3.86
Total	554,386	8,379	\$1,293,547	1.43	1.69

5.0 Supplemental Requirements

5.1 Lost Revenue

Since PY1 was the first year that Atmos participated in the Energy Efficiency program, LCFC was neither projected nor collected. Atmos Energy reserves the right to do so in the future.

The level of proposed LCFC for each class will be determined by multiplying the class LCFC factor by the projected annual level of energy savings achieved through each program for each class. The class LCFC factor will be calculated by dividing the most recent twelve months of EECR revenue, including formula rate plan increases or decreases, by the class therm sales from the same period.

5.2 Staffing

Atmos does not directly allocate time spent managing its Energy Efficiency program but absorbs the direct labor costs.

5.3 Information Provided to Consumers to Promote EE

The programs utilized a direct marketing approach via in-house and third-party program staff as well as participating contractors. Marketing materials were developed for use within the programs.

Third Party Staff conducted a robust energy education campaign that was focused on targeted internet search to help customers discover the energy efficiency program. This was done through paid search result advertising, Meta (Facebook and Instagram), television and streaming platforms, and email marketing education efforts.

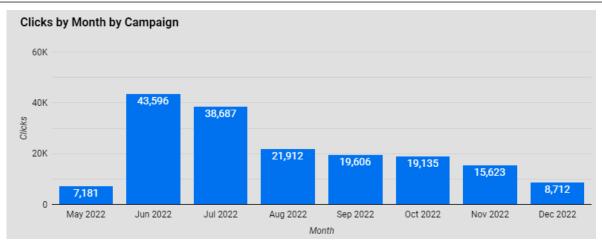
The Energy Education Campaign ran from May-December in order to raise awareness of the Atmos Energy Smart Choice Program.

Digital Campaign

Google Responsive Display

- Impressions 14,030,401
- Clicks 174,452
- CTR − 1.24%
- Avg CPC \$0.06

Campaign	Impressions	Clicks →	CTR	Avg. CPC
2022_ATMOS-LA_Display_ResReb_PRJ102646	14,030,401	174,452	1.24%	\$0.06

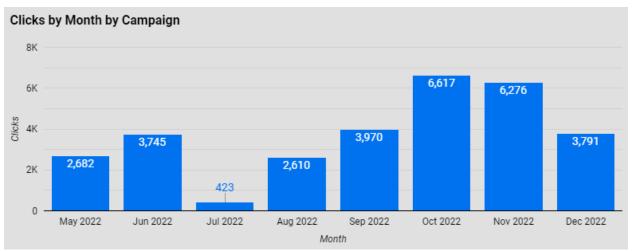


	Campaign →	Ad group	Impressions	Clicks	Avg. CPC
1.	2022_ATMOS-LA_Display_ResReb_PRJ102646	Brand	6,110,946	87,401	\$0.06
2.	2022_ATMOS-LA_Display_ResReb_PRJ102646	Rebates	7,919,455	87,051	\$0.07

Google Responsive Paid Search

- Impressions 160,531
- Clicks 30,114
- CTR 18.75%
- Avg CPC \$0.58

Campaign	Impressions	Clicks +	CTR	Avg. CPC
2022_ATMOS-LA_Search_ResReb_PRJ102646	160,531	30,114	18.76%	\$0.58



Ad group	Campaign	Clicks +	Impressions	Cost	CTR
Brand Awareness	2022_ATMOS-LA_Search_ResReb_PRJ102646	28,542	132,544	\$12,088.28	21.53%
Appliance Rebates	2022_ATMOS-LA_Search_ResReb_PRJ102646	944	20,223	\$3,120.32	4.67%
Home Energy Audit	2022_ATMOS-LA_Search_ResReb_PRJ102646	628	7,764	\$2,187.27	8.09%

Top Keywords				
Search keyword	Campaign	Impressions	Clicks •	CTR
atmos energy	2022_ATMOS-LA_Search_ResR	64,869	17,065	26.31%
atmos gas	2022_ATMOS-LA_Search_ResR	63,134	10,302	16.32%
atmos natural gas	2022_ATMOS-LA_Search_ResR	2,617	665	25.41%
energy rebate	2022_ATMOS-LA_Search_ResR	9,470	349	3.69%
atmos energy services	2022_ATMOS-LA_Search_ResR	1,061	296	27.9%
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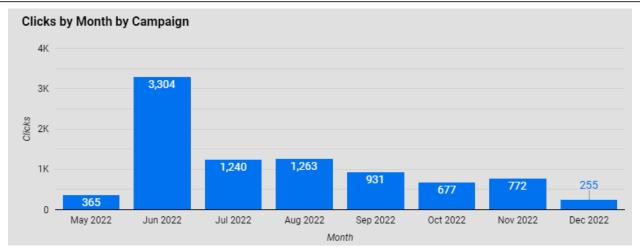
Top Cities by Clicks		
City	Impressions	Clicks →
Metairie	13,663	3,075
Monroe	15,757	2,788
Lafayette	10,421	1,776
Kenner	8,567	1,554
New Orleans	6,312	974
		1 - 100 / 104 < >

Google Discovery

- Impressions 693,516
- Clicks 8,807
- CTR 1.27%

• Avg CPC - \$1.00

Campaign	Impressions	Clicks +	CTR	Avg. CPC
2022_ATMOS-LA_Discovery_ResReb_PRJ102646	693,516	8,807	1.27%	\$1

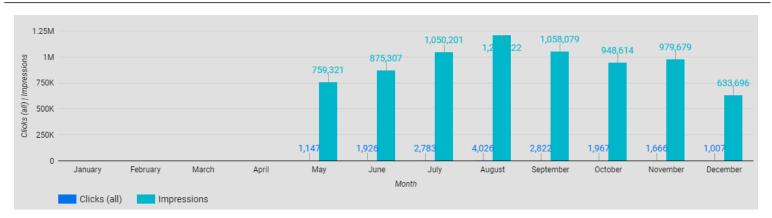


	Campaign +	Ad group	Impressions	Clicks	Avg. CPC
1.	2022_ATMOS-LA_Discovery_ResReb_PRJ102646	Brand	407,180	5,830	\$0.96
2.	2022_ATMOS-LA_Discovery_ResReb_PRJ102646	Rebates	286,336	2,977	\$1.07

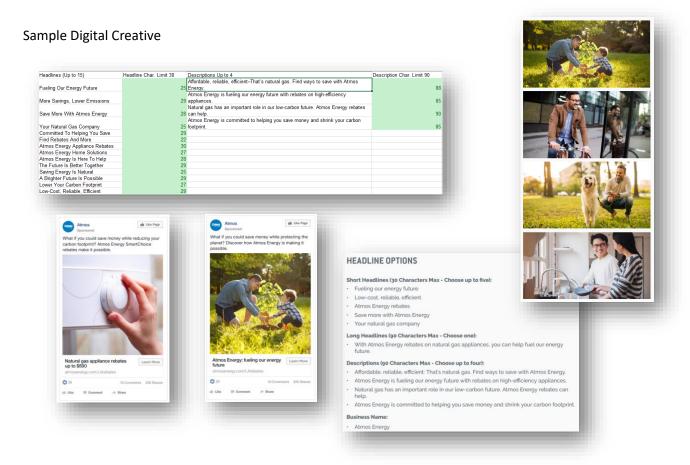
Meta Ads

- Impressions 7,520,319
- Reach 767,265
- Clicks 10,159
- CTR 0.14%
- CPC \$2.48

Campaign name	Campaign start date	Campaign end date	Impressions •	Reach	Link clicks	CTR	CPC
2022_ATMOS-LA_ResReb_PRJ102646	May 11, 2022	Dec 19, 2022	7,520,319	767,265	10,159	0.14%	\$2.48



Campaign name	Ad set name	Impressions •	Reach	Link clicks	CTR	CPC
2022_ATMOS-LA_ResReb_PRJ102646	Appliance Rebates	5,302,324	638,797	7,941	0.15%	\$2.2
2022_ATMOS-LA_ResReb_PRJ102646	Brand Awareness	2,217,381	435,100	2,217	0.1%	\$3.51
2022_ATMOS-LA_ResReb_PRJ102646	Home Energy Audits	614	577	1	0.16%	\$1.8



Key Takeaways for Digital Campaign

- Google Paid Search was the highest performer
 - o Incredible Avg. Click-Through-Rate of 18.75%!
- Healthy CTR on Google Display, with a very low Cost-Per-Click
- Utilize video more often on Meta to increase CTR/user engagement
- Setting up conversion tracking would be beneficial in 2023

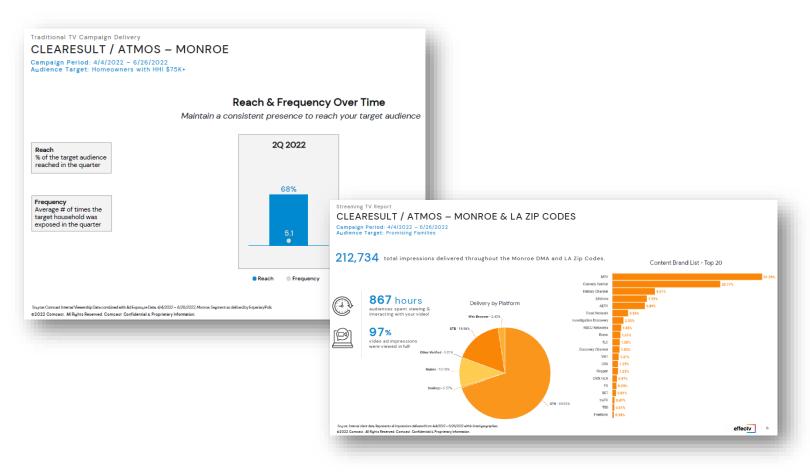
TV Ads

CLEAResult / ATMOS

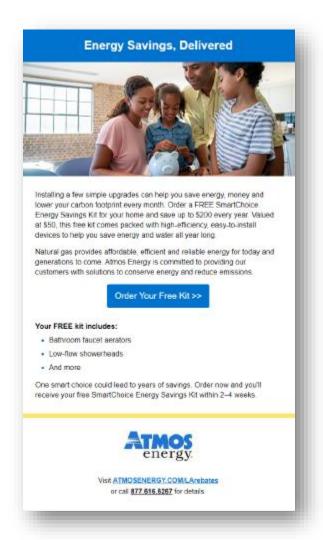
CAMPAIGN STRATEGY

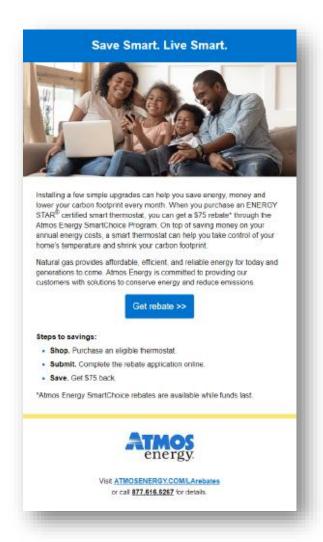


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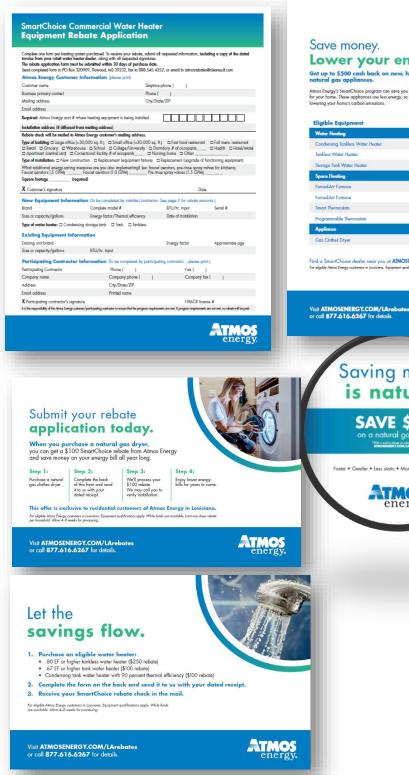


Emails





DI Kit Email Total Send – 56,767 Smart Thermostat Email Total Send – 22,974







Smart thermostats. Brilliant rebates.

select smart thermostats.

Get a \$75 SmartChoice rebate on

Saving money is natural.

SAVE \$100

ATMOS energy.

Lower Your Energy Costs. Increase Your Profits.

Improving your bottom line is easier than you think with rebates on high-efficiency natural gas equipment from Atmos Energy's Smart/hoice program. These appliances use less energy, so you save money on your monthly utility bill, in addition to lowering your business' carbon emissions.



À	Eligible Equipment	Efficiency Requirement	Rebate
	Water Heating		
	Tankless/Storage Tank (for Kitchers)	.93 EF or higher	\$450
	Tankless Water Heater	.80 EF or higher	\$250
3	Condensing Tank Water Heater	.90 TE or higher	\$100
	Storage Tank Water Heater	.67 EF or higher	\$100
A RESERVE	Space Heating		
	Gas Furnace	95% AFUE or higher	\$500
	Gas Furnace	90%-94.9% AFUE	\$400
_	Smart Thermostats	Wi-R enabled	\$75
AND DES	Commercial Cooking Equipmen	r	
	Combination Oven	ENERGY STAR* rated*	\$1,000
	Conveyor Oven	ENERGY STAR roted*	\$750
-	Convection Oven (Full Stze)	ENERGY STAR rated*	\$750
	Rotating Rack Oven	ENERGY STAR roted*	\$250
	High-Efficiency Fryer	ENERGY STAR roted*	\$250
	Steamer	ENERGY STAR roted*	\$1,000
	Griddle	ENERGY STAR roted*	\$200-\$700
	Salamander Brotler	ENERGY STAR roted*	\$150
	Upright Brotler	ENERGY STAR rated*	\$600
	Rottsserie Oven	ENERGY STAR roted*	\$500
	Charbrotler	ENERGY STAR rated*	\$700
	Commercial Dishwasher	ENERGY STAR roted*	\$250-\$500
-	Commercial & Industrial Heatin	g Equipment	
	Botler Tune-up Bemer		\$100/system
-	Replacement Boiler		\$1,000 per MBTU/Hr input up to \$3,500**
	Reset Controls		\$150/control system**
	Botler Vent Domper		\$250/vent damper**
	Botler Cutout Control		\$150 cut-out control

ATMOS energy.