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Manager, Rates & Regulatory Service

VIA: E-FILING ONLY

March 28, 2024

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. Columbia Gas  
of Pennsylvania, Inc.  
Docket No. R-2022-3031211**

Dear Ms. Chiavetta:

On December 8, 2022, the Pennsylvania Public Utility Commission (“Commission”) approved Columbia Gas of Pennsylvania, Inc.’s (“Columbia”) Energy Efficiency and Conservation Program Plan at Docket No. R-2022-3031211. Consistent with the Commission’s Order to submit a report each April, three months after the close of the program year, enclosed is Columbia’s annual report for the period from January 1, 2023 through December 31, 2023.

Questions regarding this filing may be directed to me via email at rdanhires@nisource.com, or by telephone at 724-420-6377.

Respectfully Submitted,



Ribeka S. Danhires  
Manager, Rates & Regulatory Service

Enclosures

Cc: Office of Consumer Advocate (w/enc.)  
Bureau of Investigation and Enforcement (w/enc.)  
Office of Small Business Advocate (w/enc.)

# **Report to the Pennsylvania Public Utility Commission**

Columbia Gas of Pennsylvania  
Non-Low-Income Energy Efficiency  
Year Ended December 31, 2023

Prepared by Columbia Gas of Pennsylvania

Filing Date: 03/28/2024

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# 1 EXECUTIVE SUMMARY

This annual report is for the year ended December 31, 2023, the first year of Columbia Gas of Pennsylvania's (Columbia or the Company) Energy Efficiency and Conservation Portfolio of Programs Plan (Plan) which the Commission approved on December 8, 2022, in Columbia's 2022 Base Rate filing in Docket No. R-2022-3031211. This plan covers January 1, 2023 – December 31, 2025. Highlights of 2023 include:

- Total costs were \$619,804 or 53% of annual approved budget.
- Savings were: 7,461 Dth for the Online Energy Audit and Kit (OAK) Program and 6,861 Dth for the Residential Prescriptive (RP) Program.
- These programs provided \$1,802,532 in present value of net benefits to customers with a benefits-to-cost ratio (BCR) of 3.34 as calculated under the Total Resource Cost (TRC) Test.
- The OAK program spent 99% of 2023 budget, provided 3,794 kits which is approximately 55% of the total 3-year kit projection and achieved 280% of annual savings for 2023.
- The RP program rebated 697 EE measures, spent 44% of the 2023 budget and achieved 47% of annual savings for 2023.

## 2 PORTFOLIO OVERVIEW

### 2.1 Background

In December of 2022, the Commission approved Columbia's \$4 million 3-year plan to offer an energy efficiency and conservation portfolio to educate and assist customers with saving energy. The plan outlined a target launch date of July 2023 with the official launch being August 1, 2023.

Furthermore, the plan provided for two new energy efficiency programs -- Online Audit and Kit Program (OAK) and the Residential Prescriptive Program (RP). The OAK program's goal is to help educate customers regarding energy efficiency by showing that taking small steps to conserve energy can make a difference. The RP program offers customers incentives to upgrade to higher efficiency ENERGY STAR® certified equipment in order to realize greater energy savings. These programs followed the design and goals established as part of the 2022 Rider EE filing. Both programs are voluntary and available to residential customers within Columbia's service territory.

Columbia's approved plan includes a commitment to submit a report each April, three months after the close of the program year. The Company respectfully submits this report documenting the 2023 results of the initial launch year of this 3-year program.

## 2.2 Summary of Activity

The total portfolio spend was \$619,804 or 53% of budget, while annual savings of 14,322 (Dth) were 83% of 2023 projections. The savings were primarily driven by the OAK program exceeding its estimated 2023 kit goal of by 280%. In addition, the RP Program contributed to the savings goal by providing 697 customers with energy efficiency rebates. Both EE Programs provided a combined \$1,802,532 in present value net benefits with a BCR 3.34.

**The following tables provides a high-level overview of the non-low-income EE portfolio's spending and savings for 2023.**

*Please note: In-order to tie savings and costs together as effectively as possible, results will be reported based on commitments made. Any measures that have been verified as installed within a program year along with any costs committed to these measures, including administration costs, will be counted for that year.*

**Table 1: EE Portfolio Summary**

<i>Portfolio Summary</i>	<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
<b>Component</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>
<b>Portfolio Spending (Nominal \$)</b>						
Residential Prescriptive Program	\$286,079	\$650,000	44%	\$286,079	\$2,417,000	12%
Online Energy Audit & Kit Program	\$213,385	\$216,630	99%	\$213,385	\$771,000	28%
Portfolio Wide	\$120,339	\$300,000	40%	\$120,339	\$812,000	15%
<b>Total</b>	<b>\$619,804</b>	<b>\$1,166,630</b>	<b>53%</b>	<b>\$619,804</b>	<b>\$4,000,000</b>	<b>15%</b>
<b>Natural Gas Savings</b>						
Annual (Dth)	14,322	17,184	83%	14,322	73,552	19%
Lifetime (Dth)	214,104	300,039	71%	214,104	1,264,342	17%

### 2.2.1 Summary of Program Costs

**Table 2: EE Portfolio Costs and Participation by Program 2023**

<i>Portfolio Costs and Participation By Program - CY 2023</i>				
<b>Program</b>	<b>Total</b>	<b>Incentive</b>	<b>Non-Incentive</b>	<b>Rebates/Kits</b>
Residential Prescriptive Program	\$286,079	\$210,584	\$75,495	697
Online Energy Audit & Kit Program	\$213,385	\$115,051	\$98,334	3,794
<b>Total</b>	<b>\$499,464</b>	<b>\$325,635</b>	<b>\$173,830</b>	<b>4,491</b>

## 2.2.2 Summary of Program Savings

**Table 3: EE Portfolio Savings by Program – 2023**

### *Portfolio Savings by Program - CY 2023*

Program	Natural Gas (Dth)		Electric Energy (MWh)		Water (Million Gal)	
	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime
Residential Prescriptive Program	6,861	126,049	23.4	257.1	0.0	0.0
Online Energy Audit & Kit Program	7,461	88,054	0.0	0.0	7.9	74.2
<b>Total</b>	<b>14,322</b>	<b>214,104</b>	<b>23.4</b>	<b>257.1</b>	<b>7.9</b>	<b>74.2</b>

## 2.2.3 Summary of Program Cost Effectiveness

**Table 4: EE Portfolio Cost-Effectiveness by Program – 2023**

### *Portfolio Cost-Effectiveness by Program - Phase to Date (2022\$)*

Program	TRC PV Benefits	TRC PV Costs	TRC PV Net	TRC BCR
Residential Prescriptive Program	\$1,031,309	\$446,251	\$585,058	2.31
Online Energy Audit & Kit Program	\$1,541,038	\$203,224	\$1,337,814	7.58
Portfolio Wide Cost	\$0	\$120,339	(\$120,339)	0.00
<b>Total</b>	<b>\$2,572,346</b>	<b>\$769,814</b>	<b>\$1,802,532</b>	<b>3.34</b>

## 2.3 Progress in Support of Plan Commitments

- Over the three years of the Plan, Columbia plans to spend \$4.0 million on the administration and delivery of the two programs. In 2023, total spend was \$619,804 or approximately 15% of the total budget three-year program budget.
- The programs are projected to save 1.3 million Dth of natural gas over the lifetime of the measures. Current progress to goal in 2023 is 214,104 Dth of lifetime savings or 17% of the three-year goal.
- The portfolio's present value of benefits is \$10.9 million, with \$5.1 million in present value of costs, leading to a present value of net benefits of \$5.7 million and a TRC BCR of 2.12. In 2023 we realized 2,572,346 of present value of benefits, \$769,814 of present value of costs, leading to a present value of net benefits of \$1,802,532 with a TRC BCR of 3.34.
- The Plan is also expected to save 3,041 MWh of electricity and save 84 million gallons of water. In 2023, the Plan realized a lifetime savings of electricity was 257 MWh and a lifetime savings of 74 million gallons of water.
- The Plan filing discussed exploring specific marketing tactics to share information about Columbia's new programs.

- *Explore a micro-website for program advertising to lead back to.* Rather than spending additional money to create a separate micro-site, the programs utilize Columbia Gas' website ([www.columbiagaspa.com](http://www.columbiagaspa.com)) to share important information with customers. The information is found under the "Ways to Save" tab. The programs further utilize web-links in all advertising efforts to direct customers back to the website where they can learn more about Columbia's EE programs. Some examples include:
  - [Columbiagaspa.com/WarmWise](http://Columbiagaspa.com/WarmWise)
  - [Columbiagaspa.com/rebates](http://Columbiagaspa.com/rebates)
  - [Columbiagaspa.com/kits](http://Columbiagaspa.com/kits)
- *Partner with local businesses and trade allies to generate awareness of programs.* In 2023 on two separate occasions, Columbia shared information about the availability of the programs with Columbia's trade ally network to generate awareness of the programs.
- *Target equipment manufacturers to ensure they offer higher efficiency equipment and to make Columbia's customers aware of our programs.* In 2023, through the program results, Columbia found it was not necessary to reach out to manufacturers as a strong relationship was developed with the trade allies who participated in the RP program. These trade allies in turn partner directly with manufacturers.
- *Partner with community-based organizations to share information about the new programs.* The WarmWise Community Liaison continues to share the new EE programs with customers throughout Columbia's territory. In addition, on several occasions, Columbia met with the low-income service providers to share details regarding the programs to expand outreach. Finally, program information was shared with the Universal Services Advisory Council to share more details about the new programs.
- *Work with ACT 129 electric administrators to see if there are partnership opportunities available.* In 2023, Columbia did not reach out to electric administrators regarding partnership opportunities. However, in 2024 Columbia believes opportunities may exist to connect with electric administrators to discuss how to leverage the IRA and IIJA funds within Columbia's service territory.

2.3.1 Portfolio Costs

**Table 5: EE Portfolio Costs by Category**

<i>Portfolio Costs by Category</i>				<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
<b>Component (Nominal \$)</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>
<b>Direct Utility Costs</b>	<b>\$619,804</b>	<b>\$1,166,630</b>	<b>53%</b>	<b>\$619,804</b>	<b>\$4,000,000</b>	<b>15%</b>			
Customer Incentives	\$325,635	\$487,630	67%	\$325,635	\$2,024,000	16%			
Administration	\$290,526	\$504,000	58%	\$290,526	\$1,438,000	20%			
Marketing	\$1,043	\$132,000	1%	\$1,043	\$295,000	0%			
Inspections	\$2,600	\$23,000	11%	\$2,600	\$93,000	3%			
Evaluations	\$0	\$20,000	0%	\$0	\$150,000	0%			
<b>Direct Participant Cost</b>	<b>\$182,484</b>	<b>\$393,070</b>	<b>46%</b>	<b>\$182,484</b>	<b>\$1,679,688</b>	<b>11%</b>			

**Table 6: Portfolio Wide Costs**

<i>Portfolio Wide Costs</i>				<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
<b>Component (Nominal \$)</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>
<b>Direct Utility Costs</b>	<b>\$120,339</b>	<b>\$300,000</b>	<b>40%</b>	<b>\$120,339</b>	<b>\$812,000</b>	<b>15%</b>			
Customer Incentives	\$0	\$0	-	\$0	\$0	-			
Administration	\$120,339	\$300,000	40%	\$120,339	\$812,000	15%			
Marketing	\$0	\$0	-	\$0	\$0	-			
Inspections	\$0	\$0	-	\$0	\$0	-			
Evaluations	\$0	\$0	-	\$0	\$0	-			
<b>Participant Cost</b>	<b>\$0</b>	<b>\$0</b>	<b>-</b>	<b>\$0</b>	<b>\$0</b>	<b>-</b>			



### 2.3.2 Portfolio Savings

**Table 7: EE Portfolio Savings**

<i>Portfolio Savings</i>	<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
	<b>Actual</b>	<b>Projected</b>	<b>%</b>	<b>Actual</b>	<b>Projected</b>	<b>%</b>
Natural Gas (Dth)						
Annual	14,322	17,184	83%	14,322	73,552	19%
Lifetime	214,104	300,039	71%	214,104	1,264,342	17%
Electric Energy (MWh)						
Annual	23	65	36%	23	276	8%
Lifetime	257	720	36%	257	3,041	8%
Electric Demand (kW)	4.2	11.7	36%	4.2	49.3	8%
Water (Millions Gallons)						
Annual	7.9	1.5	522%	7.9	8.4	93%
Lifetime	74.2	15.1	492%	74.2	84.4	88%

## 3 PROGRAM RESULTS

### 3.1 Online Audit and Kit Program

(Rate Class: All residential)

#### 3.1.1 Program Description

The OAK Program is designed to provide residential customers with information on how to improve the energy efficiency of their homes along with free, targeted energy savings kits. The program also provides a way for customers to engage with Columbia Gas and learn about the WarmWise Low Income Programs as well as the RP Program.

#### 3.1.2 Program Highlights

Columbia has contracted with Silver Blaze to provide the online audit and AM Conservation as the fulfillment vendor for the energy efficiency kits. The program spent \$213,385 in 2023 of which \$115,051 was for customer incentives (kits). Below is a chart of 2023 program participation. The program provided first year annual gas savings of 7,461 Dth with 88,054 Dth in lifetime savings. Under the TRC Test, the OAK Program provided \$1,337,814 in present value of net benefits with a BCR of 7.58.

**Table 8: OAK Program Participation**

<i>OAK Program Participation</i>				<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
<b>Equipment</b>	<b>Actual Kits</b>	<b>Projected Kits</b>	<b>%</b>	<b>Actual Kits</b>	<b>Projected Kits</b>	<b>%</b>			
Water Savings Kit	2,455	470	522%	2,455	2,630	93%			
Space Heat Savings Kit	1,339	780	172%	1,339	4,290	31%			
<b>Total</b>	<b>3,794</b>	<b>1,250</b>	<b>304%</b>	<b>3,794</b>	<b>6,920</b>	<b>55%</b>			

**3.1.3 Marketing Activity**

For the five-month period in 2023, Columbia’s primary method of introducing the programs to residential customers was through customer newsletters, bill inserts and emails to Columbia’s residential customer base. Columbia also utilized the following outreach methods for the new program:

- Met with Columbia’s low-income service providers to educate them about the new program so they can encourage customers to take the online energy audit and receive energy efficiency measures to help save additional energy and money.
- Columbia utilized Google® paid search which uses key energy saving terms to drive customers to the OAK program.
- In August of 2023, Columbia sent a targeted email to customers who previously expressed interest in learning more about the Columbia’s energy efficiency plans to share news about the availability of the new programs.

Through these efforts, 6,277 customers completed the online survey to receive an energy saving kit. Due to supply chain issues and internal expense allocation coding adjustments, Columbia was only able to recognize 3,794 kits for 2023. The remaining 2,480 kits have been carried over as 2024 program allocations.

In addition, the total 2023 spend for the OAK program marketing activities was \$17,192. However, due to internal expense allocation adjustments with the new program, the OAK program can only reflect a marketing spend of \$558 for 2023. The remaining \$16,634 has been carried over as 2024 marketing expenses.

**3.1.4 Inspection and Evaluation Activity**

No inspections occurred in the 5-month period of 2023; however, plans are in place to survey program participants in mid-2024 as part of the planned program evaluation.

### 3.1.5 Program Results

**Table 9: OAK Program Costs**

<i>OAK Program Costs</i>				<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
<b>Component (Nominal \$)</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>			
<b>Direct Utility Costs</b>	<b>\$213,385</b>	<b>\$216,630</b>	<b>99%</b>	<b>\$213,385</b>	<b>\$771,000</b>	<b>28%</b>			
Customer Incentives	\$115,051	\$25,630	449%	\$115,051	\$142,000	81%			
Administration	\$97,776	\$113,000	87%	\$97,776	\$384,000	25%			
Marketing	\$558	\$58,000	1%	\$558	\$155,000	0%			
Inspections	\$0	\$0	-	\$0	\$0	-			
Evaluations	\$0	\$20,000	0%	\$0	\$90,000	0%			
<b>Participant Cost</b>	<b>\$0</b>	<b>\$0</b>	<b>-</b>	<b>\$0</b>	<b>\$0</b>	<b>-</b>			

**Table 10: OAK Program Savings**

<i>OAK Program Savings</i>				<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
<b>Type</b>	<b>Actual</b>	<b>Projected</b>	<b>%</b>	<b>Actual</b>	<b>Projected</b>	<b>%</b>			
<b>Natural Gas (Dth)</b>									
Annual	7,461	2,666	280%	7,461	14,743	51%			
Lifetime	88,054	35,903	245%	88,054	198,248	44%			
<b>Electric Energy (MWh)</b>									
Annual	0	0	-	0	0	-			
Lifetime	0	0	-	0	0	-			
<b>Electric Demand (kW)</b>	0	0	-	0	0	-			
<b>Water (Millions Gallons)</b>									
Annual	7.9	1.5	522%	7.9	8.4	93%			
Lifetime	74.2	15.1	492%	74.2	84.4	88%			

**Table 11: OAK Program Cost-Effectiveness**

<b>OAK Program TRC Test Results</b>		<b>CY 2023</b>	<b>CY 2023 - CY 2025</b>
<b>Benefit/Cost Component</b>	<b>Value (2022\$)</b>	<b>Value (2022\$)</b>	<b>Value (2022\$)</b>
TRC PV Benefits	\$1,541,038	\$1,541,038	\$1,541,038
TRC PV Costs	\$203,224	\$203,224	\$203,224
TRC PV Net Benefits	\$1,337,814	\$1,337,814	\$1,337,814
TRC Benefit/Cost Ratio	7.58	7.58	7.58

### 3.2 Residential Prescriptive Program

(Rate Class: RS/RTC not available to CAP customers)

#### 3.2.1 Program Description

The RP program is designed to overcome market barriers to energy efficient space and water heating equipment in the residential sector through rebates and customer awareness. The objective of the program is to avoid lost opportunities by encouraging consumers to install the most efficient gas heating technologies available when replacing older, less efficient equipment. The program also aims to strengthen Columbia Gas’ relationship with HVAC contractors, suppliers, and other trade allies.

#### 3.2.2 Program Highlights

Columbia contracted with Resource Innovations to process rebate applications for the RP Program. The program spent \$286,079 in 2023 of which \$210,584 was customer incentives. Below is the chart of the number of rebate applications fulfilled in 2023. The program provided first year annual gas savings of 6,861 Dth with 126,049 in lifetime savings. Under the TRC Test, the RP Program provided \$585,058 in present value of net benefits with a BCR of 2.31.

**Table 12: RP Program Participation**

<b>RP Program Participation</b>	<b>CY 2023</b>			<b>CY 2023 - CY 2025</b>		
<b>Equipment</b>	<b>Actual Rebates</b>	<b>Projected Rebates</b>	<b>%</b>	<b>Actual Rebates</b>	<b>Projected Rebates</b>	<b>%</b>
Energy Star® certified Smart Thermostat	345	900	38%	345	3,800	9%
Residential Furnace	237	520	46%	237	2,020	12%
Residential Boiler	19	20	95%	19	90	21%
Residential Combi Boiler	33	80	41%	33	340	10%
Tankless Water Heater	63	120	53%	63	490	13%
<b>Total</b>	<b>697</b>	<b>1,640</b>	<b>43%</b>	<b>697</b>	<b>6,740</b>	<b>10%</b>

### 3.2.3 Marketing Activity

For the 5-month period in 2023, Columbia's primary method of introducing the program to residential customers was through customer newsletters, bill inserts and emails to Columbia's residential customer base. Columbia also utilized in the following outreach methods for this new program:

- Included the new program information in our quarterly newsletter to approximately 64 trade allies.
- Columbia utilized Google® paid search which uses key energy saving terms to drive customers to our website.
- Met with approximately 48 low-income contractors to educate them about the new program.
- In August of 2023, Columbia sent a targeted email to customers who previously expressed interest in learning more about the Columbia's energy efficiency plans.

Total 2023 spend for the RP program's marketing activities was \$18,845. However, due to internal expense allocation adjustments with the new program, the RP program can only reflect a marketing spend of \$485 for 2023. The remaining \$18,360 has been carried over as 2024 marketing expenses.

### 3.2.4 Inspection and Evaluation

Resource Innovations provides a BPI certified inspector to conduct inspections for the RP program. As the program was only active for five months in 2023, 13 inspections occurred with the team ramping up to Columbia's full inspection plan of reviewing a minimum of 10% of all approved applications in 2024.

### 3.2.5 Program Results

**Table 13: RP Program Costs**

<i>RP Program Costs</i>	<i>CY 2023</i>			<i>CY 2023 - CY 2025</i>		
	<b>Component (Nominal \$)</b>	<b>Actual</b>	<b>Budget</b>	<b>%</b>	<b>Actual</b>	<b>Budget</b>
<b>Direct Utility Costs</b>	<b>\$286,079</b>	<b>\$650,000</b>	<b>44%</b>	<b>\$286,079</b>	<b>\$2,417,000</b>	<b>12%</b>
Customer Incentives	\$210,584	\$462,000	46%	\$210,584	\$1,882,000	11%
Administration	\$72,410	\$91,000	80%	\$72,410	\$242,000	30%
Marketing	\$485	\$74,000	1%	\$485	\$140,000	0%
Inspections	\$2,600	\$23,000	11%	\$2,600	\$93,000	3%
Evaluations	\$0	\$0	-	\$0	\$60,000	0%
<b>Participant Cost</b>	<b>\$182,484</b>	<b>\$393,070</b>	<b>46%</b>	<b>\$182,484</b>	<b>\$1,679,688</b>	<b>11%</b>

**Table 14: RP Program Savings**

<i>RP Program Savings</i> <i>CY 2023</i>				<i>CY 2023 - CY 2025</i>		
Type	Actual	Projected	%	Actual	Projected	%
Natural Gas (Dth)						
Annual	6,861	14,518	47%	6,861	58,809	12%
Lifetime	126,049	264,136	48%	126,049	1,066,094	12%
Electric Energy (MWh)						
Annual	23.4	65.5	36%	23.4	276.5	8%
Lifetime	257.1	720.3	36%	257.1	3041.4	8%
Electric Demand (kW)						
	4.2	11.7	36%	4.2	49.3	8%
Water (Millions Gallons)						
Annual	0	0	-	0	0	-
Lifetime	0	0	-	0	0	-

**Table 15: RP Program Cost-Effectiveness**

<i>RP Program TRC Test Results</i> <i>CY 2023</i>		<i>CY 2023 - CY 2025</i>
Benefit/Cost Component	Value (2022\$)	Value (2022\$)
TRC PV Benefits	\$1,031,309	\$1,031,309
TRC PV Costs	\$446,251	\$446,251
TRC PV Net Benefits	\$585,058	\$585,058
TRC Benefit/Cost Ratio	2.31	2.31