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January 12, 2023

VIA ELECTRONIC MAIL ONLY
Ms. Lora W. Johnson, CMC, LMMC
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Re: Filing of Entergy New Orleans, LLC's Reply Comments Regarding Energy Efficiency and Conservation, Demand Response, and Other Demand-Side Management Programs as well as Customer-Owned Distributed Energy Resources and Battery Storage (Resolution R-22-413; UD-22-04)

Dear Ms. Johnson,

On September 15, 2022, the Council of the City of New Orleans ("Council") adopted Resolution R-22-413 allowing stakeholders to provide comments regarding energy efficiency and conservation, demand response, and other demand-side management programs as well as customer-owned distributed energy resources and battery storage. The resolution allowed for comments to be filed by stakeholders through October 31, 2022, and for Reply Comments to be filed through January 12, 2023. Pursuant to Resolution R-22-413, Entergy New Orleans, LLC ("ENO") hereby respectfully submits its Reply Comments in response to stakeholder Initial Comments. As a result of the remote operations of the Council's office related to Covid-19, ENO submits this filing electronically and will submit the original and requisite number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding this filing, please contact my office at (504) 670-3680. Thank you for your assistance with this matter.

Sincerely,

Courtney R. Nicholson

Courtney R. Nicholson

Enclosures

cc: Official Service List UD-22-04 *(via electronic mail)*

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

RESOLUTION AND ORDER ESTABLISHING RULEMAKING TO CONSIDER SAVINGS TARGETS AND PROGRAM DESIGN FOR ENERGY EFFICIENCY, CONSERVATION, DEMAND RESPONSE AND OTHER DEMAND-SIDE MANAGEMENT PROGRAMS AS WELL AS CUSTOMER-OWNED DISTRIBUTED ENERGY RESOURCES AND BATTERY STORAGE PURSUANT TO COUNCIL RESOLUTION R-22-413	)	**DOCKET NO. UD-22-04**

ENTERGY NEW ORLEANS, LLC'S REPLY COMMENTS ON PROPOSED CHANGES TO THE COUNCIL'S ENERGY EFFICIENCY AND RELATED POLICIES

Entergy New Orleans, LLC ("ENO") respectfully submits these Reply Comments regarding the Energy Smart Program ("Program") and related matters in accordance with the procedural schedule provided in the Council of the City of New Orleans ("Council") Docket UD-22-04. These Reply Comments are in response to the Initial Comments provided on October 31, 2022, by the Alliance for Affordable Energy (the "AAE"), The Sierra Club ("Sierra Club"), and The National Audubon Society ("Audubon"). Initial Comments were filed by ENO and other Parties in response to Council resolution R-22-413 (the "Resolution") which allowed stakeholders to consider potential changes to the Council's energy efficiency, conservation, demand-side management, as well as energy storage policies.

I. Introduction

Initial Comments provided by stakeholders, pursuant to Council Resolution R-22-413, were filed on October 31, 2022. A virtual technical conference was held by the Council's

Advisors, ENO, and other stakeholders on December 8, 2022. While the AAE, Sierra Club and Audubon provided comments on a number of topics, there were common themes embedded in most of the submissions. Many of the comments from stakeholders centered around providing more targeted marketing and participation opportunities for income-qualified ("IQ") customers beyond the significant levels already being achieved by the Program. Such an approach involving increased investment in IQ-related measures would represent a shift in the focus of the Program. Throughout its first 12 years, the Program's main focus has been on delivering kWh savings in a **cost-effective** manner. In the past, the Council has chosen to waive the cost-effectiveness test requirement for the Income Qualified Weatherization Program ("IQW"; also previously "Low Income Program") as a policy decision. IQ projects tend to cost more than other residential program projects because the full cost of IQW projects is covered by the Program rather than the benefiting customer also bearing some portion of the cost. To be clear, ENO is not against promoting and supporting increased Energy Smart participation among IQ customers. However, it must be noted that shifting the Program's focus to support more IQ participation will require more funding and likely will impact some of the portfolio cost-effectiveness scores.

Another recommendation that has been discussed is the ability to "opt all customers into" the Energy Smart program. For clarity, ENO understands this to mean adding all customers into the program(s) automatically until they "opt out" by either asking to be removed or deny the installation of the project/service at their home or business. There are some programs that are structured in a way to lend themselves more easily to an opt-out approach however higher costs should be expected with increased participation. Appendix A illustrates the potential for the individual Energy Smart programs to automatically opt in all eligible customers. Many of the current Energy Smart programs do not fit well with this approach, however, because customer

authorization is required to perform projects in their homes. For example, in the Home Performance with Energy Star ("HPwES") and IQW programs, authorization from the customer is required in order to perform an assessment, or any other project within the home.[1] All eligible customers have the opportunity to participate and only need to call or go online to schedule an appointment providing authorization for the Energy Smart team to perform an assessment. ENO is open to more discussion with the Council's Advisors and other stakeholders about opting all eligible customers into Energy Smart programs where such an approach is feasible.

ENO's replies to specific comments and recommendations from stakeholders follow.

II. AAE Comments and Recommendations

a. Require 15% of Savings to Benefit Income-Qualified Customers

The AAE asserts that "IQ households are paying for a greater share of the residential program budgets than is expended on programs intended to serve them."[2] Further, AAE claims that "less than 10% of the annual residential portfolio savings are expected to benefit IQ customers…"[3] The AAE's analysis is flawed and misleading.

The AAE's analysis does not recognize that other programs such as Retail Solutions and Multifamily Solutions contain savings associated with IQ participants, although the tables in the Implementation Plan do not show those savings separately. For several reasons, determining whether participants in other non-IQ-specific programs are in fact IQ customers is not feasible at the time of their participation. For example, when a customer goes into a retail location or the online marketplace and purchases a product that has been marked down using Energy Smart

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1 If customer authorization is still required then under the current structure of the HPwES and IQW programs, all customers are essentially opted into those programs as they are offered today.

2 Comments of the Alliance For Affordable Energy in UD-22-04 at p.7

3 *Id.*

incentives, the savings are counted in the Retail Solutions program even though that customer might otherwise qualify as an IQ customer. Based upon the AAE's assertion that "roughly 35% of ENO's residential customers have incomes that are low enough for them to qualify and participate in the IQ program…"[4], one can reasonably assume that a significant number of customers who participate in Energy Smart by purchasing products in retail stores or the online marketplace are, in fact, IQ customers. Similarly, energy efficiency projects are completed in multifamily residences that might be residences of IQ customers, but those savings are recognized in the Multifamily Solutions program. It is highly likely that a large percentage of the participants in the Behavioral program would qualify as IQ customers. The savings associated with these Behavioral program participants are recognized in the Behavioral program. When a student takes home an Energy Smart school kit, he/she is not identified as living in an IQ household though it is likely that many of the participants do. The A/C Solutions program is yet another example that contains, but does not isolate, savings associated with IQ customers. While there is no way to get an accurate count of the exact amount of IQ savings that is registered under other programs, it is clear that the actual amount of savings associated with IQ participants is much closer to, if not already above, the 15% of residential savings that the AAE proposes to target in future years.

The AAE also claims that "during the PY13-PY15 Plan period, the proposed annual investments in the IQW program decrease by 8% while the investments in the Large C&I program increase by roughly one-third." While this is an accurate statement regarding the PY13-15 implementation plan, the reason for this shift is related to the effort to keep the overall Energy Smart program cost-effective while attempting to meet the Council's aggressively increasing kWh savings target. As ENO mentioned in its Initial Comments on October 31, 2022, the enforcement

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4 *Id.*

of the Energy Independence and Security Act ("EISA") beginning in 2024 will severely restrict the inclusion of measures that achieve low-cost residential lighting savings. The Energy Smart program design team needed to find ways to not only make up for these lost savings opportunities, but also to plan to cover the required annual 0.2% increase (versus total kWh sales) in kWh savings targets. In order to keep the portfolio design cost-effective, it was necessary to reduce the reliance on programs that are less cost-effective such as the IQW, and increase reliance on other programs that could potentially produce a large amount of cost-effective savings. To increase the amount of IQW projects and also achieve the desired kWh savings target, program costs will necessarily increase, and overall portfolio cost-effectiveness will be reduced, likely below the 1.0 Cost/Benefit threshold required by the Council's rules.

b. Establish a Demand Reduction Target That Aligns with the Achievable Potential Identified in ENO's Potential Study

The AAE recommends setting a long-term peak reduction target of 7% with reduction targets at intervals along the way, including 6% by 2030. The AAE bases its recommendation on the 2021 Guidehouse Potential Study ("Guidehouse Study") that was developed for the 2021 Integrated Resource Plan ("IRP"). The AAE points out that the Guidehouse Study "outlines achievable cost effective Demand Response ("DR") programs that reach 70MW by 2040, or just over 7% of summer peak demand."[5] It should be noted that 7% of ENO's 2021 actual summer peak of 1155MW is approximately 81MW. The Guidehouse Study does not forecast ENO's achievable cost-effective DR programs to reach 81MW within the 2040 timeframe. While the Guidehouse Study provides a good framework for the IRP, it should be remembered that the IRP is a long-term planning tool. In determining a demand reduction target, the long-term view should

[5] *Id.* at 18 (citing 2021 IRP DSM Study at 70)

be analyzed alongside present circumstances and recent historical results to develop a reasonable goal. ENO's demand response ("DR") programs are still in the developmental stage. The Direct Load Control A/C Switch Program ("DLC Switch Program"), which was ENO's first residential DR program was discontinued in 2022 due to a lack of participation. The Bring Your Own Thermostat ("BYOT") Program has hit participation targets in its first couple of years, but the program is still relatively new. The Large Commercial Automated Demand Response ("ADR") program got off to a slow start during the height of the Covid-19 shutdowns but has since begun to gather momentum in participation. The Council has approved three new pilot DR programs, the Electric Vehicle Charging Pilot, the Battery Storage Demand Response Pilot, and the Peak Time Rebate Pilot for PY13-PY15. The fact that the Program is still developing its DR offerings should be considered when setting an overall demand reduction goal. The relative cost-effectiveness of DR programs should also be considered before the Council sets a long-term target that will likely require a large amount of incremental funding to reach.

c. Establish a Demand-Side Management ("DSM") Working Group

The AAE recommends the establishment of a DSM Working Group that will meet four times annually to address program success, development, or changes that can better serve New Orleanians. ENO supports the creation of a DSM Working Group to the extent that the Group's efforts do not inhibit or in any way become a hindrance to implementation of the Program. In the last two years, the Energy Smart team has participated in many projects including the development of DSM potential studies and the Integrated Resource Plan, the issuance and completion of a Request for Proposals for Third Party Administrators, the development of the PY13-PY15 Implementation Plan and the procedural schedule of Council Docket UD-22-04. With the advent

of new programs being implemented in 2023, the Energy Smart team hopes to increase its focus on implementing the new programs and achieving the increasing savings goals as much as possible. Therefore, ENO recommends that a DSM Working Group, if one were to be initiated by the Council through this proceeding, initially meet semi-annually rather than quarterly. A semi-annual meeting cadence would be consistent with program reporting and the potential need for more frequent meetings could be revisited in the future.

d. Utilize Energy Burden and Heat Island Data

The AAE also recommends the Council direct ENO to obtain geographic data pertaining to energy burden, urban heat index, and race, and to further correlate it with utility data on arrearages and disconnections. As a part of its PY13-PY15 Implementation Plan, the Energy Smart team proposed various ideas for continuation, enhancements to, and expansion of the Income-Qualified Weatherization offering. Included in those proposed enhancements was utilizing "GIS mapping with census tract data to identify areas of Orleans Parish with the highest energy burden to target program outreach." Appendix B provides examples of GIS mapping that the Program is intending to employ. The Energy Smart team anticipates working with stakeholders on ideas for marketing to these areas once identified.

III. Sierra Club Comments and Recommendations

a. Energy Smart Program Should Be Modified to Include Geographic Targeting Based on Energy Burden, Heat Islands, and Other Indicators

Please see ENO's Reply Comments to the AAE regarding utilizing Energy Burden and Heat Island Data.

b. ENO Should Prioritize Census Tracts Most Impacted by Severe Energy Burden and Heat Island Impacts, With Attention to Other Indicators Including Income, Race, Housing Burden, and Asthma

The Sierra Club recommended that ENO begin using census tract data to help target areas most in need of energy efficiency investment. The Sierra Club provided data for 10 census tracts that met certain qualifications related to energy burden and heat island impact. The tables below illustrate Energy Smart program participation in those census tracts for Program Years ("PYs") 7-9 and for Program Years 10-12 (through August 2022).

PY7-PY9:

Program	Count of Projects
A/C Solutions	40
Home Performance with ENERGY STAR	476
Income-Qualified Weatherization	79
Large Commercial & Industrial Solutions	15
Multifamily Solutions	88
Publicly Funded Institutions	2
Retail Lighting & Appliances	19
School Kits & Community Outreach	13
Small Commercial & Industrial Solutions	27
Grand Total	759

PY10-12 (through August 2022):

Program	Count of Projects
A/C Solutions	94
Appliance Recycling & Replacement Pilot	33
Commercial & Industrial Construction Solutions	2
DR - Large Commercial/Industrial	3
DR - Residential BYOT	62
DR - Residential DLC	53
DR - Small Commercial	6
Home Performance with ENERGY STAR	539
Income-Qualified Weatherization	106
Large Commercial & Industrial Solutions	18
Multifamily Solutions	192
Publicly Funded Institutions	5
Retail Lighting & Appliances	240
School Kits & Community Outreach	4
Small Commercial & Industrial Solutions	88
Grand Total	1445

As shown above, Energy Smart has already been active across the 10 census tracts identified by Sierra Club even without separate census tract analysis. However, the Energy Smart team plans to incorporate increased use of census tract data into its marketing efforts as is discussed further above in ENO's Reply Comments to the AAE regarding utilizing Energy Burden and Heat Island Data.

c. Best Practices for Implementation of a Geographic Targeting Program

The Sierra Club recommends a neighborhood-based approach to delivering energy efficiency programs to disadvantaged areas. ENO currently targets neighborhood associations throughout the City for outreach, but ENO looks forward to discussing the potential for a neighborhood-based offering in New Orleans.

d. The Energy Smart Program Must Ensure it is Reaching Low-Income Renters Effectively

The Sierra Club claims, "[W]hile the low-income weatherization and HPwES programs proposed by ENO include multi-family homes with four or fewer units, the plan does not distinguish a different approach for these buildings as opposed to single-family homes, nor does it offer any solutions for larger buildings."[6] The Energy Smart program currently treats multifamily homes with four or fewer units in the HPwES or IQW program like single-family homes because these residences tend to function like such, especially if the units have multiple owners. IQ residents who rent in multifamily homes with four or fewer units receive an assessment in which they receive direct install measures. From the assessment, follow-up measures are offered and performed at no charge to the participant. The Sierra Club's claim regarding solutions for larger buildings is not accurate. The Multifamily program is, in fact, designed for larger multifamily buildings. The table below, extracted from the PY11 Energy Smart EM&V Report, shows measures completed in seven (7) large apartment complexes in Program Year 11 alone. Many of these residential complexes house IQ renters.

6 Comments of Sierra Club at p. 21 (UD-22-04)

Records indicated a total of 775 projects were completed in seven large apartment complexes. Table 7-5 summarizes the total number of homes a measure was installed in and/or performed at, total measures installed/performed and the expected kWh and peak kW reductions by measure.

TABLE 7-5 PY11 MULTIFAMILY SUMMARY OF MEASURES AND EXPECTED SAVINGS

Measure	Sum of Measures	*Ex ante* Gross Energy Savings (kWh)	*Ex ante* Gross Demand Reductions (kW)	% of kWh
Duct Sealing	458	1,040,832	294.54	77.5%
Air Sealing	150	125,924	42.59	9.4%
Indoor LED Lamp (Specialty)	168	18,882	3.21	1.4%
Indoor LED Lamp (Standard)	304	63,046	10.70	4.7%
Outdoor LED Lamp (Specialty)	40	23,280	0.73	1.7%
1.0 Bathroom Aerator	130	7,550	0.78	0.6%
1.5 Kitchen Aerator	291	7,826	0.82	0.6%
1.5 Showerhead	239	55,176	5.74	4.1%
Pipe Wrap	9	1,291	0.15	0.1%
Incentive Adjustment	313	0	0.00	0.0%
Total	**2,102**	**1,343,807**	**359.25**	**100%**

Sums may differ due to rounding.

As illustrated above, the Energy Smart program does in fact perform deeper measures such as duct sealing and air sealing, as well as implement direct install measures in large multifamily complexes.

e. The Energy Smart Program Should Include a Strategy for Avoiding Health and Safety "Deferrals"

The Sierra Club recommends that ENO develop a strategy for handling health and safety issues within homes that may prevent customers from participating in the Program. The Program currently reviews these instances on a case-by-case basis to decide whether to provide up to $500 to help remediate more minor issues. Trade allies refer customers to implementers of other programs such as Quad Area, Total Community Action, and Rebuilding Together that receive federal funding for larger and more complex issues such as the presence of asbestos.

f. The Energy Smart Program Should Prioritize Deep Energy-Saving Measures

The Sierra Club recommends that "ENO should prioritize deep energy-saving measures over simpler direct install measures like lightbulbs." ENO agrees that the goal of an energy efficiency program should be to achieve deep energy-saving measures. The current program design recognizes that ideal by using free direct install products to "break the ice" with the customer during the assessment then following up with offers for deeper energy-saving measures. After assessing the property, each customer is offered all of the follow-up measures that would be beneficial. If a customer received an assessment including direct install measures but does not receive the deeper energy-saving follow-up measures, it is because the customer has chosen not to for reasons that are generally not shared with ENO or contractors acting on its behalf performing installations.

g. ENO should seek to increase spending on income qualified EE instead of decreasing it.

Please see ENO's Reply Comments to the AAE regarding requiring 15% of residential savings to go to IQ customers.

IV. Audubon Comments and Recommendations

a. Demand-Side Management Working Group

Please see ENO's Reply Comments to the AAE regarding establishment of a new DSM Working Group.

V. Conclusion

In conclusion, ENO thanks the Council and the Council Utilities Regulatory Office ("CURO") for the opportunity to reply to Initial Comments provided by stakeholders. ENO

supports increasing the participation of IQ customers in Energy Smart, but the Council and stakeholders must recognize that IQ programs tend to be more expensive on a $/kWh saved basis than other programs. Increasing participation in IQ programs will likely also increase cost and, by consequence, decrease overall Program cost-effectiveness.

ENO recommends that:

- Should the Council set a demand reduction target, it should be set lower than what was projected in the 2021 DSM potential study due to the current status of ENO's DR programs still being in their infancy;
- Should an IQ customer participation target be set, the Council should consider that there is a significant amount of IQ participation in programs other than the IQW program already and, therefore, the historical Energy Smart participation amongst IQ customers is much higher than the level the AAE suggests is occurring today; and
- Should a DSM Working Group be created, semi-annual meetings initially would be frequent enough to accomplish its goals without hindering program implementation.
- With respect to innovative pricing structures regarding ENO's Peak Time Rebate and off-peak electric vehicle DR programs approved for implementation in Energy Smart this year we request that we are allowed sufficient time to operate to understand customer response, effectiveness, and overall desirability.
- The Council and its Advisors thru this proceeding consider a successor cost recovery mechanism to the current Interim Energy Efficiency Cost Recovery Rider ("EECR") such as what ENO proposed in its 2018 Combined Rate Case that allows a return on Energy Smart investments and adequately addresses the issue of lost contributions to fixed costs.

CERTIFICATE OF SERVICE
Docket No. UD-22-04

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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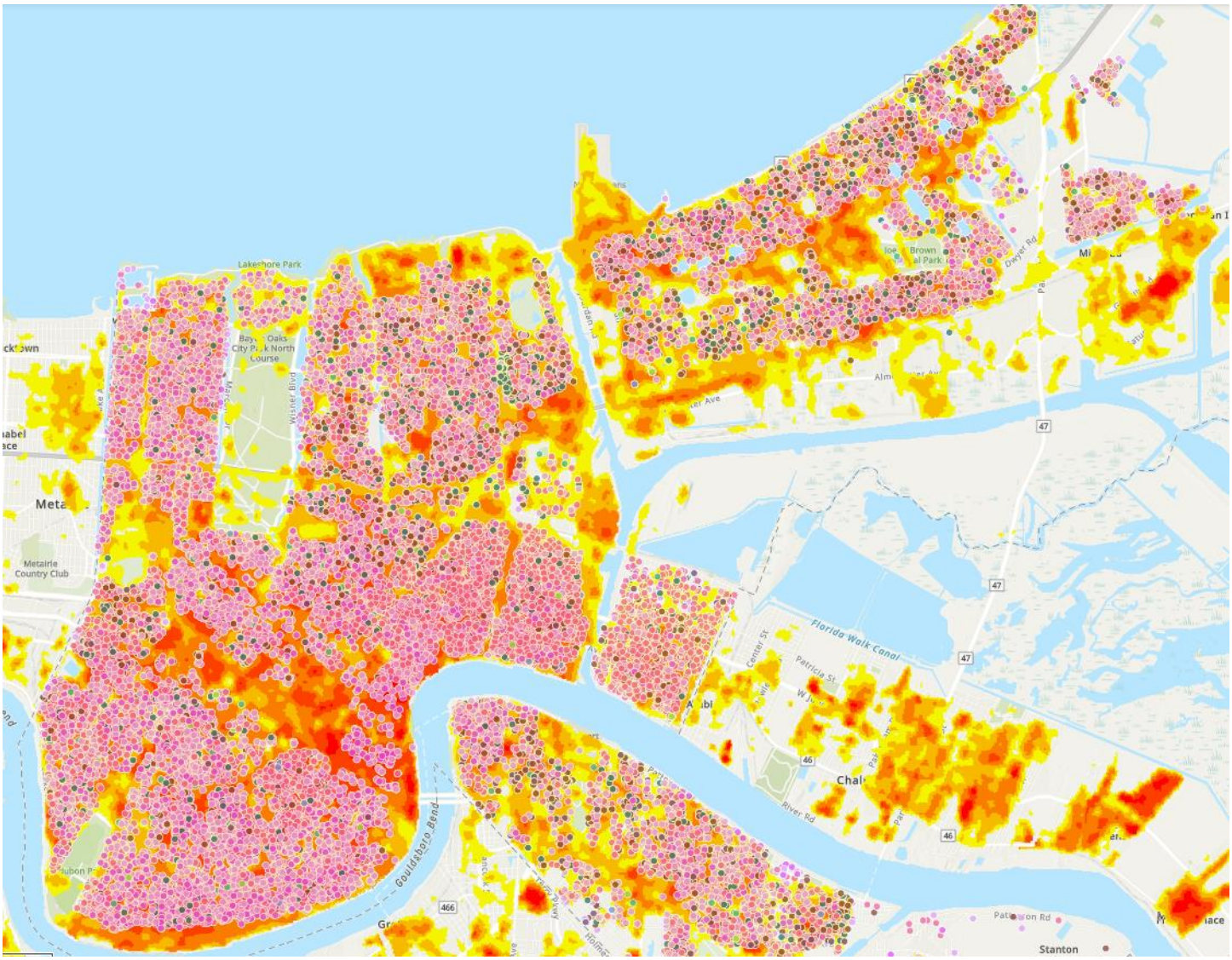
New Orleans, Louisiana, this 12th day of January, 2023.

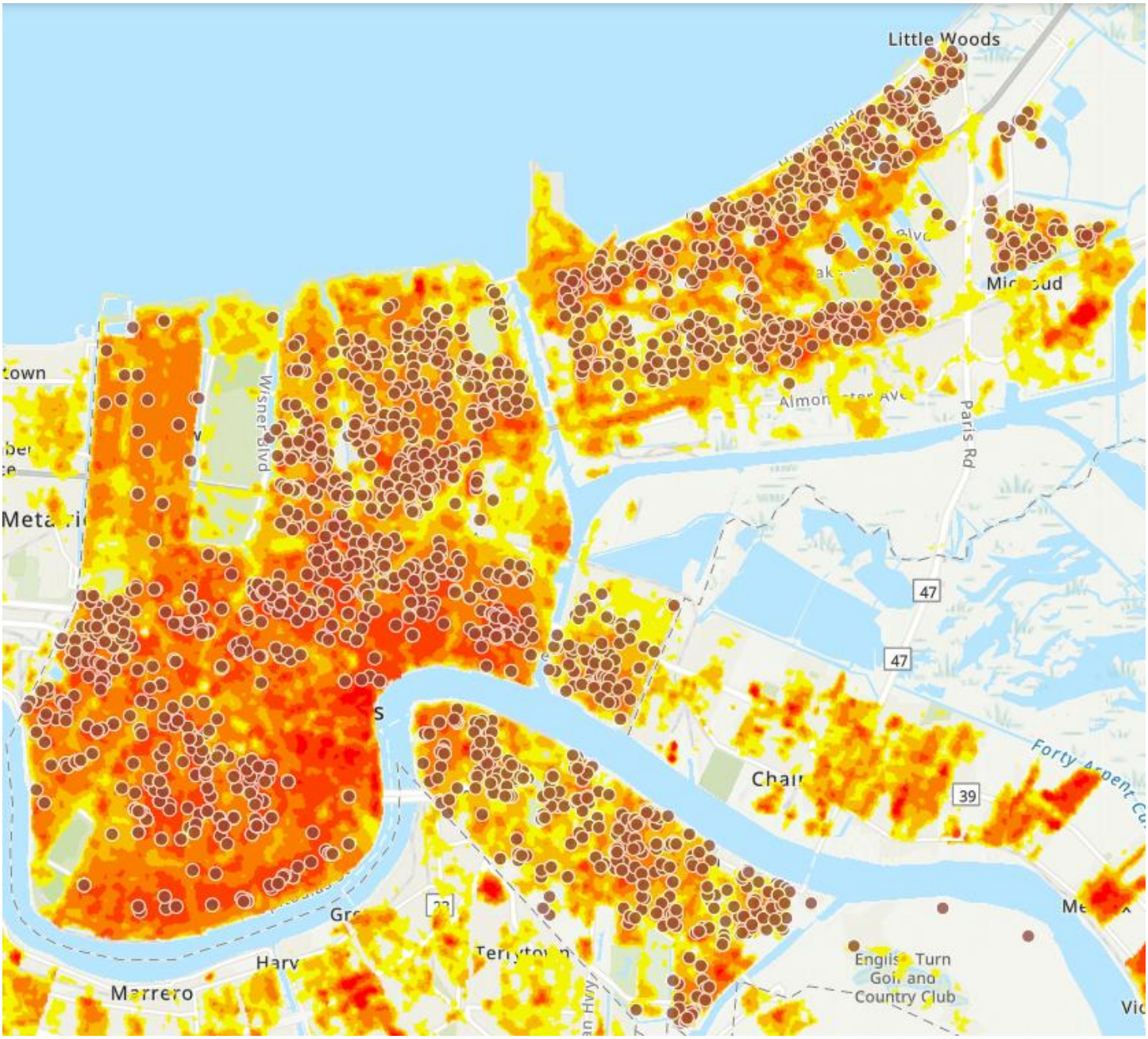
Courtney R. Nicholson

Courtney R. Nicholson



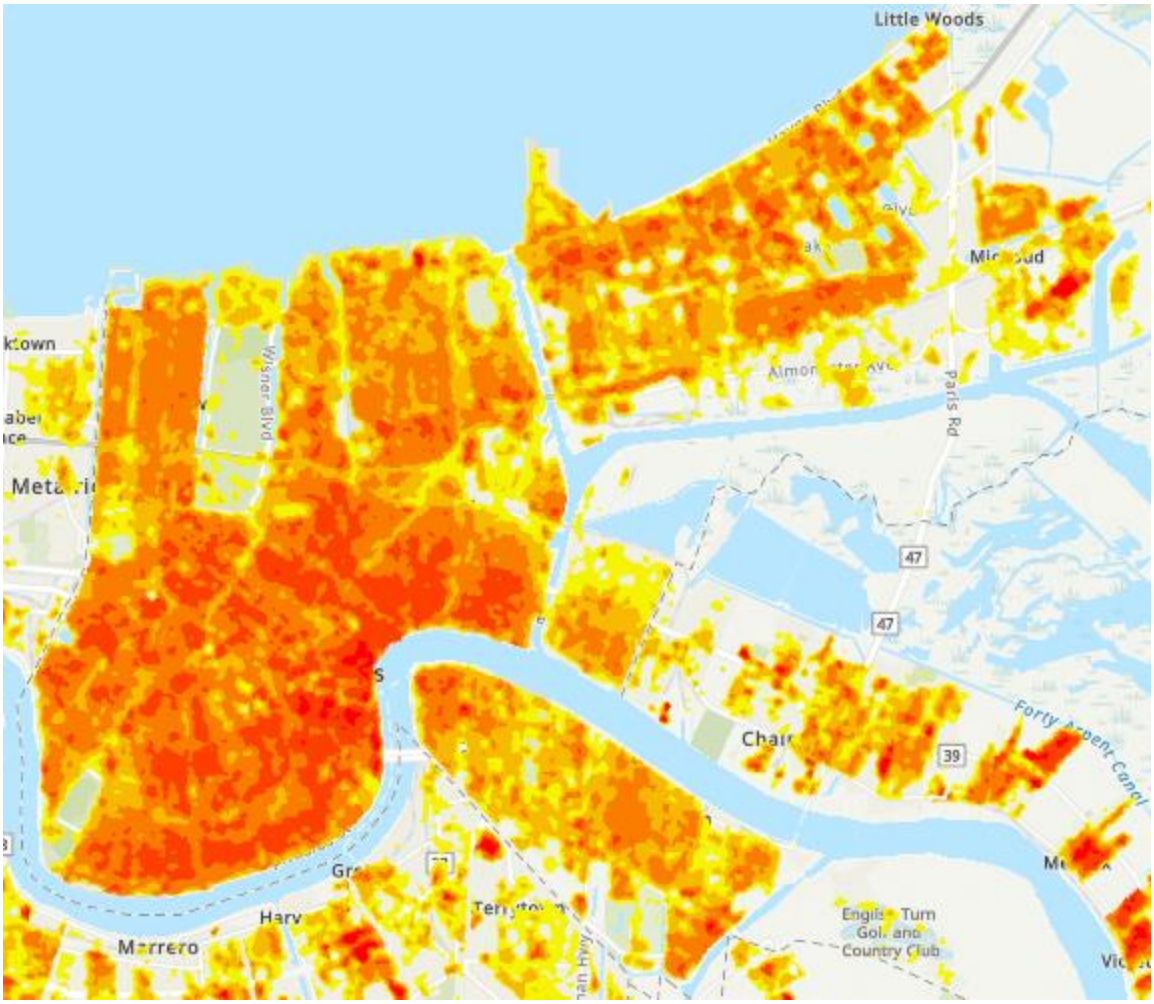
Includes PY10-12 as of 8/30/2022 residential portfolio projects.

Heat Severity GIS Data source: [Full Range Heat Anomalies - USA 2021 - Overview (arcgis.com)]

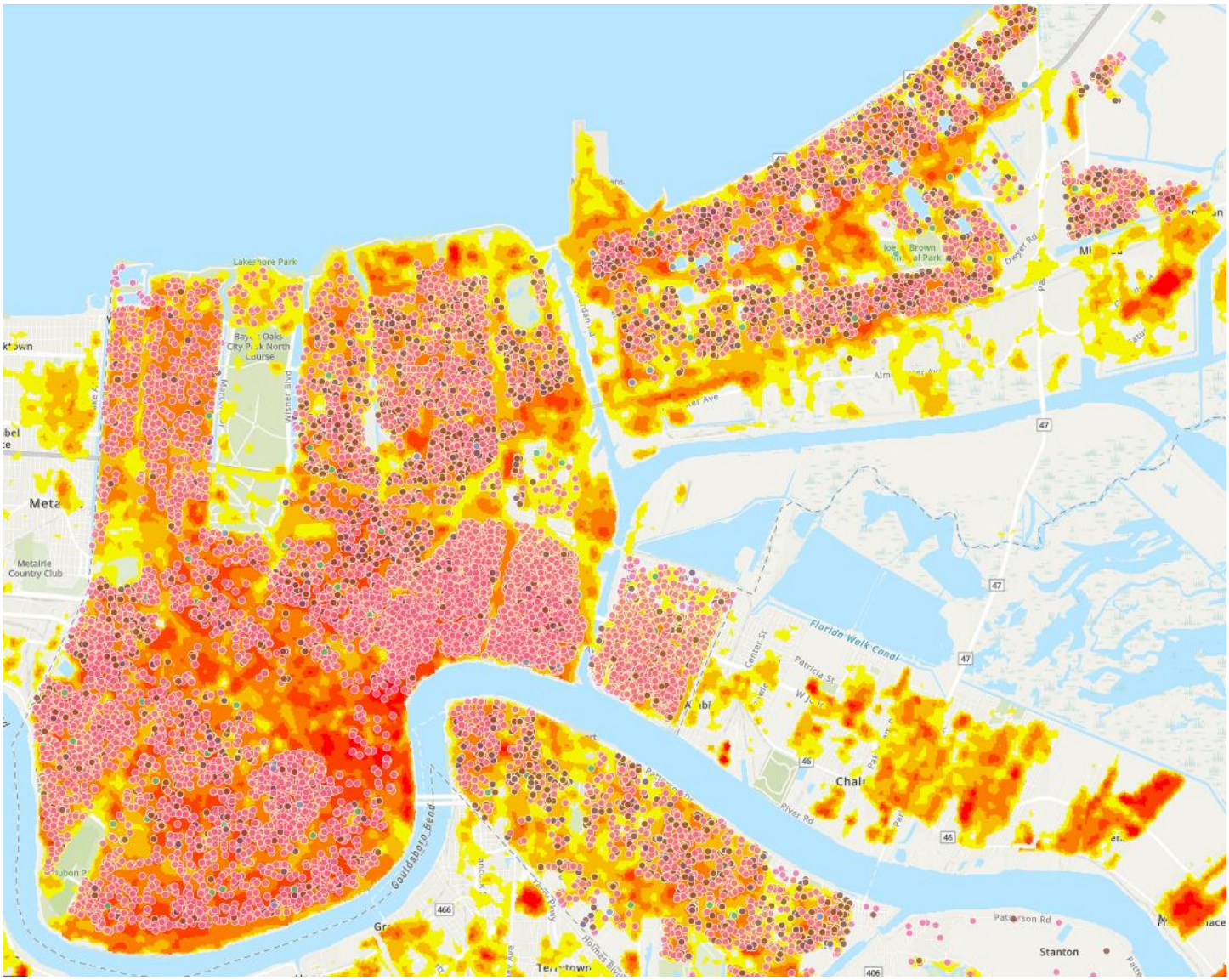


Includes PY10-12 as of 8/30/2022 Income Qualified Weatherization projects.

Heat Severity GIS Data source: [Full Range Heat Anomalies - USA 2021 - Overview (arcgis.com)]



Heat Severity GIS Data source: [Full Range Heat Anomalies - USA 2021 - Overview (arcgis.com)]



Includes PY10-12 as of 8/30/2022 Income Qualified Weatherization, Home Performance with ENERGY STAR, AC Solutions, Multifamily Solutions and School Kit projects. (Does not include any Retail Lighting & Appliances)

Heat Severity GIS Data source: [Full Range Heat Anomalies - USA 2021 - Overview (arcgis.com)]

- A/C Solutions
- Appliance Recycling & Replacement Pilot
- Commercial & Industrial Construction Solutions
- DR - Large Commercial/Industrial
- DR - Residential BYOT
- DR - Residential DLC
- DR - Small Commercial
- Home Performance with ENERGY STAR
- Income-Qualified Weatherization
- Large Commercial & Industrial Solutions
- Multifamily Solutions
- Publicly Funded Institutions
- Retail Lighting & Appliances
- Rewards
- School Kits & Community Outreach
- Small Commercial & Industrial Solutions

Program Year 13-15								
	Program Year 13		Program Year 14		Program Year 15		Ability to Opt-In All	Explanation and Notes
Projected Savings	kWh	kW	kWh	kW	kWh	kW	Customers?	
Residential Energy Efficiency Programs								
Home Performance with Energy Star ("HPwES")	16,461,506	883	3,404,313	966	2,392,127	898	Not as currently designed	Every residential customer is eligible for this set of offerings and the program will take a more proactive approach to targeting, identifying, contacting, and enrolling participants within the available budgetary and contractor framework. However, as currently designed, all residential customers cannot be opted into these programs to participate every year. Such an approach would result in prohibitively high costs, likely exceed contractor availability, impact program evaluation, cost effectiveness, and individual program measure mix, and encounter reluctance among some customers to participate.
Multifamily Solutions	2,678,475	142	2,526,471	145	2,402,578	139		
Income Qualified Weatherization	3,817,679	108	3,220,972	66	2,989,692	32		
A/C Solutions	2,848,496	1,239	3,322,555	1,453	3,651,365	1,602		
Appliance Recycling & Replacement	1,701,810	25	1,785,774	26	1,917,201	28		
Commercial and Industrial Energy Efficiency Programs								
Small C&I Solutions	4,925,994	949	6,349,948	1,112	6,846,039	1,331	No	Commercial programs cannot automatically enroll customers. The programs require that a customer submit an energy efficiency project that meets program standards. If the project is approved the customer recieves an incentive based on the kWh savings associated with that project.
Large C&I Solutions	35,008,874	6,475	45,589,079	7,291	47,767,306	7,780		
Publicly Funded Institutions	10,799,767	409	15,730,841	397	15,981,018	491		
C&I Construction Solutions	3,512,971	806	4,301,994	987	5,000,235	1,147		
Retail Point of Purchase Program								
Retail Lighting and Appliances	7,997,811	1,110	1,558,999	16	1,587,308	16	Yes	All customers are eligible to participate in the retail program. Energy efficient products are rebated throughout the service territory at participating retailers and customers benefit by purchasing products at cheaper price points.
Educational Programs								
School Kits & Education and Community Outreach	797,088	107	797,089	107	797,089	107	No	The School Kits program is designed to teach children in certain grades about energy efficiency inside their school classrooms. All customers cannot be opted in.
Behavioral Energy Efficiency Education	14,067,914	-	19,186,619	-	20,051,684	-	Effectively, yes	Nearly all residential customers can be opted into the behavioral program. Evaluation, measurement, and verification of the program requires that a small subset of customers be placed into a control group such that a non-treated baseline can be established to compare the rest of the customer base (the treatment group) against. There would likely be an increase in cost for the program depending on how many customers would require Home Energy Reports delivered via direct mail versus email each month.
Demand Response Programs								
Residential Peak Time Rebate Pilot	-	714	-	998	-	1,254	Yes, at significant cost	All residential customers could be automatically enrolled in the Peak Time Rebate pilot but costs for the program would drastically increase because, as structured, every participant recieves a yearly incentive of $25.
Residential - Bring Your Own Thermostat	-	9,600	-	11,600	-	13,600	No	All customers cannot be opted into these demand response offerings. The programs require equipment to be installed in the home or business and the customer has to accept certain T's & C's to be able to participate.
Large C&I DR	-	6,970	-	8,870	-	10,470		
Bring Your Own Charger (BYOC) Pilot	-	525	-	1,125	-	1,575	No	This pilot is only eligible to customers with an electric vehicle.
TOTAL	77,110,419	27,663	93,514,569	32,503	98,030,678	37,771		