STF-PIA-2-8

Question:

For the years, 2019-2024, please provide the percentage and calculation for DSM as a percentage of the Company's Total Retail Sales that has been achieved by the Company.

Response:

Year	Georgia Power Total Retail Sales (MWh)	Energy Savings Achieved by Demand Side Management (DSM) Programs (MWh)	DSM Energy Savings Percentage of Total Retail Sales
2019	84,700,194	391,092	0.46%
2020	80,814,387	240,513	0.30%
2021	82,944,041	303,724	0.37%
2022	85,956,486	428,659	0.50%
2023	84,130,035	278,502	0.33%
2024	87,225,926	425,662	0.49%

Contact: Carley Goff

EXHIBIT

STF 5

Q4 2023 Summary

Program Name	Annual Target (kWh)	YTD Savings (kWh)	% of Goal	Annual Budget	YTD Costs	% Spent
Behavioral	33,595,836	48,971,239	145.77%	$ 1,896,285	$ 1,601,996	84.48%
Specialty Lighting	30,705,422	45,949,095	149.64%	$ 3,860,697	$ 4,214,868	109.17%
Thermostat Demand Response*	-	-	0.00%	$ 1,870,050	$ 1,777,861	95.07%
Refrigerator Recycling	6,366,937	2,587,291	40.64%	$ 3,662,489	$ 2,883,607	78.73%
HEIP	31,072,997	10,772,552	34.67%	$ 14,216,278	$ 7,146,608	50.27%
EASE	10,390,904	10,646,902	102.46%	$ 9,118,034	$ 10,347,218	113.48%
HopeWorks	425,017	241,825	56.90%	$ 698,592	$ 811,776	116.20%
Residential Programs	**112,557,113**	**119,168,904**	**105.87%**	**$ 35,322,424**	**$ 28,783,934**	**81.49%**
Behavioral	8,002,058	874,193	10.92%	$ 662,125	$ 553,957	83.66%
Custom	68,047,906	42,225,026	62.05%	$ 7,782,496	$ 5,783,747	74.32%
Prescriptive	286,199,379	102,901,173	35.95%	$ 25,228,849	$ 15,821,884	62.71%
SCDI	23,412,299	13,332,273	56.95%	$ 6,148,639	$ 3,814,477	62.04%
Commercial Programs	**385,661,642**	**159,332,666**	**41.31%**	**$ 39,822,110**	**$ 25,974,065**	**65.23%**
Total	**498,218,755**	**278,501,570**	**55.90%**	**$ 75,144,533**	**$ 54,757,999**	**72.87%**

*There are no kWh Savings reported for the Thermostat Demand Response program - only kW.

STF 5

Certified DSM Programs - Q4 Performance Report 2023

		Energy Assistance for Savings & Efficiency		Portfolio Total	Portfolio Total	Certified DSM Program Totals
		Multi	Single			
Year to Date	Measures	37,402	22,267	1,323,721	35,287	1,359,008
	Energy Savings (kWh)	6,407,065	4,239,837	119,168,904	159,332,666	278,501,570
	Annual Savings Target (kWh)		10,390,904	112,557,113	385,661,642	498,218,755
	% of Goal		102.46%	105.87%	41.32%	55.90%
	Demand Savings (kW)	1,953	1,177	162,967	24,285	187,253
	Incentive Costs	$	8,545,655	$ 14,870,430	$ 13,165,846	$ 28,036,210
	Non-Incentive Costs	$	1,801,563	$ 13,887,005	$ 12,834,785	$ 26,721,789
	YTD Costs	$	10,347,218	$ 28,783,934	$ 25,974,065	$ 54,757,999
	Total Annual Budget	$	9,118,034	$ 35,322,424	$ 39,822,110	$ 75,144,533
	Annual Budget Variance	$	1,229,185	$ (6,538,489)	$ (13,848,045)	$ (20,386,534)
	% Spent		113.48%	81.49%	65.23%	72.87%

Other Costs:	YTD Spend	2023 Budget
DSM Cross Cutting/Training	$ 3,141,970	$ 3,550,000
Residential Pilot Program	$ 1,569,084	$ 1,500,000
IQ Tariff Based Pilot	$ 369,945	$ 500,000
Commercial Pilot Programs	$ 967,354	$ 1,700,000
Residential EE Consumer Awarene	$ 4,408,985	$ 4,500,000
Commercial EE Consumer Awaren	$ 1,089,197	$ 1,100,000
Power Credit	$ 306,985	$ 15,000
Education Initiative-Learning Powe	$ 3,837,771	$ 4,000,000
Midstream (program charged in err	$ 26,566	$ -
TOTAL	**$ 15,717,923**	**$ 16,865,000**

Q4 2024 Summary

Program Name	Annual Target (kWh)	YTD Savings (kWh)	% of Goal	Annual Budget	YTD Costs	% Spent
Behavioral	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Specialty Lighting	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Thermostat Demand Response*	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Refrigerator Recycling	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
HEIP	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
EASE	10,390,904	12,195,479	117.37%	$ 9,293,196	$ 11,281,239	121.39%
HopeWorks	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Residential Programs	**113,794,608**	**117,894,175**	**103.60%**	**$ 36,155,635**	**$ 32,743,897**	**90.56%**
Behavioral	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Custom	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Prescriptive	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
SCDI	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
Commercial Programs	**385,661,642**	**307,767,892**	**79.80%**	**$ 40,591,695**	**$ 34,343,812**	**84.61%**
Total	**499,456,250**	**425,662,067**	**85.23%**	**$ 76,747,330**	**$ 67,087,709**	**87.41%**

*There are no kWh Savings reported for the Thermostat Demand Response program - only kW.

Certified DSM Programs - Q4 Performance Report 2024

		Energy Assistance for Savings & Efficiency		Portfolio Total	Portfolio Total	Certified DSM Program Totals
		Multi	Single			
Year to Date	Measures	22,670	40,457	1,170,719	42,274	1,212,993
	Energy Savings (kWh)	3,760,916	8,434,563	117,894,175	307,767,892	425,662,066.90
	Annual Savings Target (kWh)		10,390,904	113,794,608	385,661,642	499,456,250
	% of Goal		117.37%	103.60%	79.80%	85.23%
	Demand Savings (kW)	1,201	2,473	98,191	49,039	147,229.98
	Incentive Costs	$	9,861,075	$ 19,023,760	$ 20,218,064	$ 39,241,824
	Non-Incentive Costs	$	1,420,164	$ 13,720,138	$ 14,125,748	$ 27,845,886
	YTD Costs	$	11,281,239	$ 32,743,897	$ 34,343,812	$ 67,087,709.41
	Total Annual Budget	$	9,293,196	$ 36,155,635	$ 40,591,695	$ 76,747,330
	Annual Budget Variance	$	1,988,043	$ (3,411,738)	$ (6,247,883)	$ (9,659,621)
	% Spent		121.39%	90.56%	84.61%	87.41%

Other Costs:		**YTD Spend**		**2024 Budget**
DSM Cross Cutting/Training	$	2,647,989	$	3,454,000
Residential Pilot Program	$	967,168	$	1,500,000
IQ Tariff Based Pilot	$	50,115	$	576,500
Commercial Pilot Program	$	1,354,958	$	1,500,000
Residential EE Consumer Awarene	$	3,851,785	$	4,500,000
Commercial EE Consumer Awaren	$	1,019,065	$	1,100,000
Power Credit	$	775,194	$	15,000
Education Initiative-Learning Powe	$	3,772,302	$	4,000,000
TOTAL	**$**	**14,438,575**	**$**	**16,645,500**

STF 6

SOUTHERN ALLIANCE FOR CLEAN ENERGY

ENERGY EFFICIENCY IN THE SOUTHEAST

SIXTH EDITION REPORT

cleanenergy.org
Clean Energy

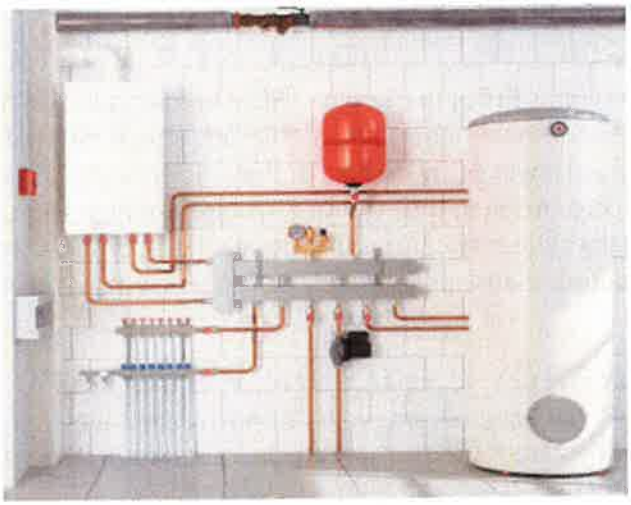
JANUARY 2025

INTRODUCTION

Energy efficiency is a proven low-cost clean energy resource, but Southeastern utilities and regulators continue to underinvest and deprioritize it. As a result, the region lags behind the rest of the country in utility energy efficiency. The sixth edition of the "Energy Efficiency in the Southeast" report examines the connection between energy efficiency and electric utility resource planning, as well as the status of federal investments in deploying energy efficiency in the region from the Inflation Reduction Act (IRA). Additionally, the report details the slow rebound of utility energy efficiency programs from the COVID-19 pandemic.

Utility energy efficiency portfolios are ranked based on the first-year energy saved reported in 2023 as a percentage of the utility's total amount of electricity sold to customers. Additional policy context is then added along with comparisons to state, regional, and national averages that highlight recent trends. The appendices include data for each of the utilities that fall within the scope of this report, which generally covers electric utilities operating in Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina, and Tennessee that are not part of interstate electricity markets.

The purpose of this report is to document current progress and trends at both utility and state levels, as well as identify policies and practices to drive continued energy efficiency in the Southeast.

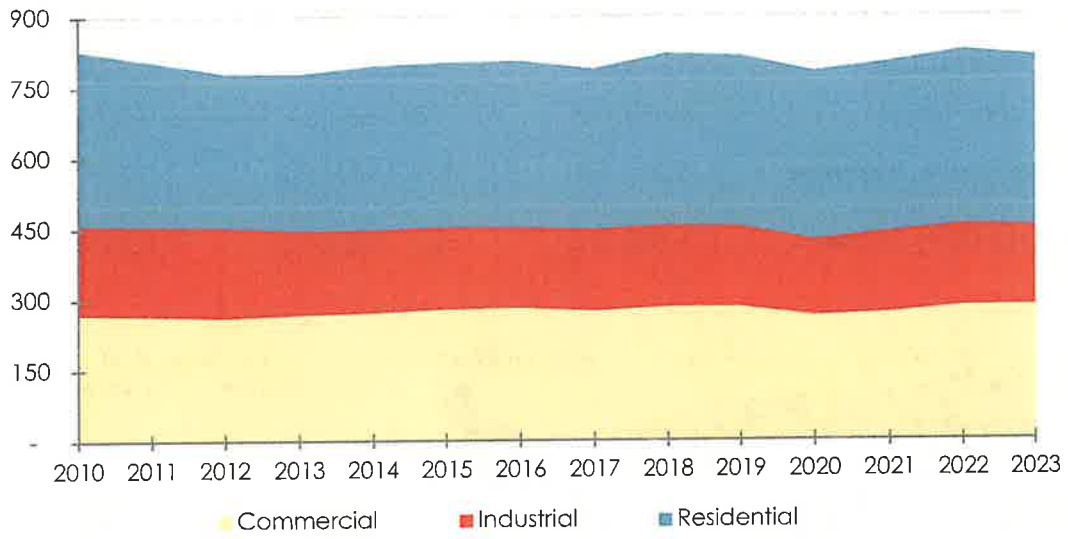


ENERGY EFFICIENCY AS A RESOURCE

WHY ENERGY EFFICIENCY?

Many electric utilities offer energy efficiency programs, incentives, and rebates to customers because it is often cheaper to invest in helping customers cut energy waste than it is to meet the same energy needs by building new power plants. ***Energy efficiency***, which reduces the total amount of energy needed to produce a service (such as lighting or cooling), is a subset of the broader concept of "***demand-side management***," which also includes programs that shift customer energy usage to less expensive, non-peak times for grid services.

SOUTHEAST ELECTRICITY SALES (GWH) BY CUSTOMER TYPE



WHAT SAVINGS DO ENERGY EFFICIENCY PROGRAMS PRODUCE?

Energy efficiency programs produce energy savings, which in turn can also produce cost savings. A well-designed portfolio of energy efficiency programs should offer opportunities for significant cost savings for residential, commercial, and industrial customers while also scaling energy savings for the utility.

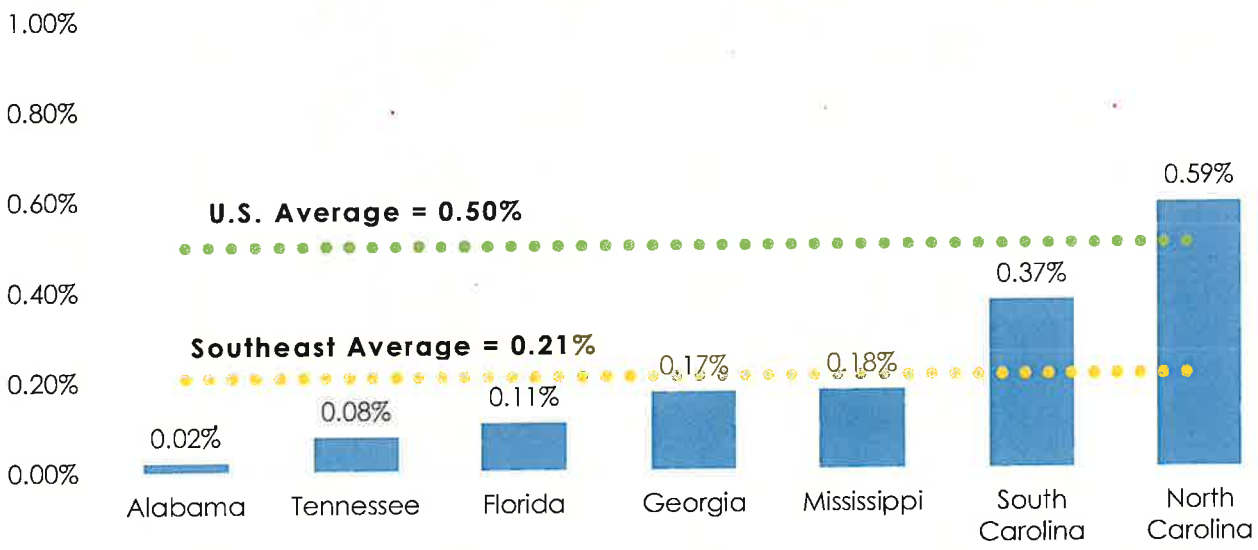
In the ***residential*** sector, the biggest energy use is for home heating and cooling, which is often driven by air leakage in ducts or walls, and by a lack of adequate insulation. Replacing outdated equipment or technology can also produce energy savings, such as a more efficient air conditioner or heat pump. More recently, heat pump water heaters are a major savings opportunity in the residential sector.

In the ***commercial and industrial*** sectors, a wide range of operations offer efficiency opportunities, from HVAC and refrigeration to food service equipment, to industrial processes such as pumping, compressed air systems, and management of fan systems.

Generally, all of these residential, commercial, and industrial energy uses are becoming gradually more efficient as technology improves. Utility-funded energy efficiency programs incent customers to adopt efficient measures sooner than they would have otherwise, or to adopt more efficient equipment than they would have otherwise purchased. Program managers then measure the difference between baseline energy usage (often defined by federal minimum efficiency standards) and the equipment installed through energy efficiency programs. **These energy savings are then measured in megawatt hours (MWh) and often expressed as a percent (%) of the amount of energy sold by the utility.**

REGIONAL TRENDS – SNAPSHOT OF 2023 ENERGY SAVINGS AND SALES

ENERGY SAVINGS AS A % ELECTRICITY SALES IN 2023



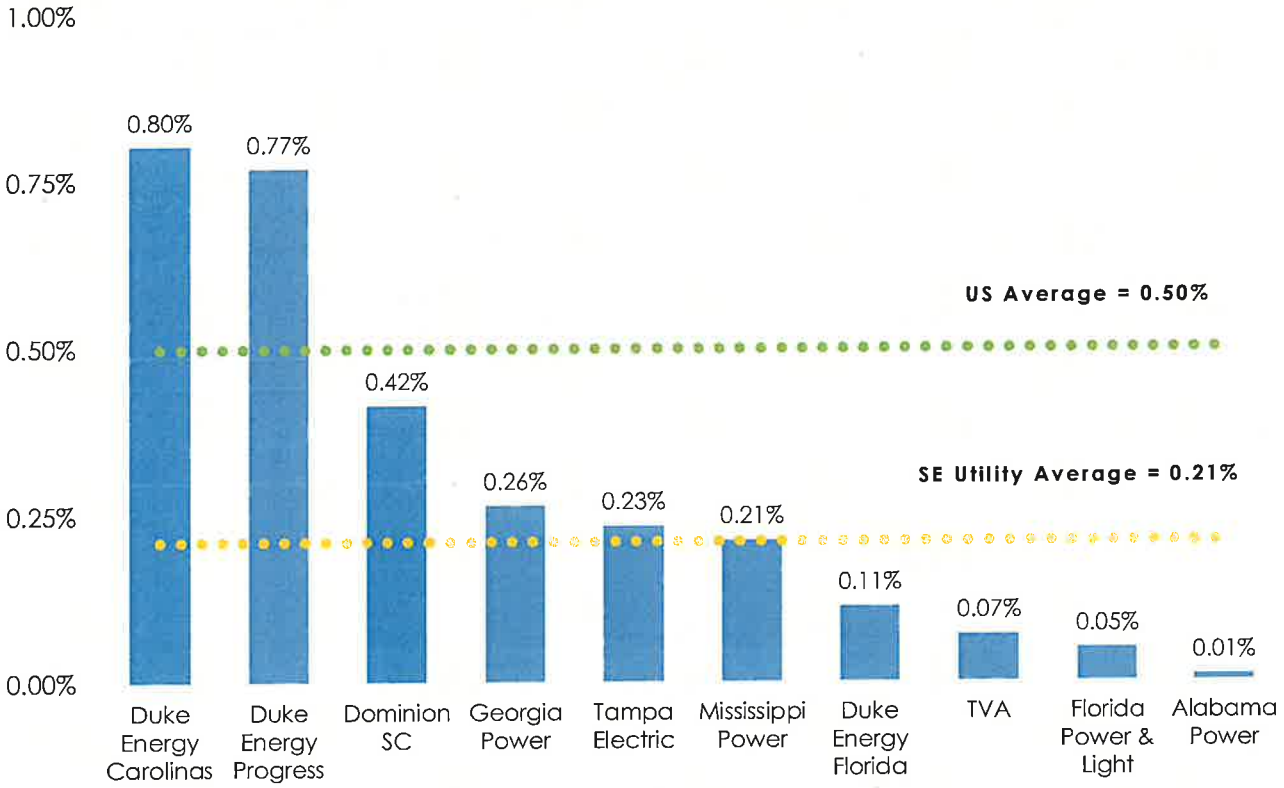
Savings are measured by the difference between baseline energy usage (often defined by federal minimum efficiency standards) and the equipment installed through energy efficiency programs. These energy savings are then measured in megawatt hours (MWh) and often expressed as a percent (%) of the amount of energy sold by the utility.

To provide a normalized comparison among hundreds of different utilities in the Southeast, SACE uses a standard metric that compares the percentage of annual energy saved by utility programs to total retail electricity consumption. Some states use this metric to set energy efficiency portfolio standards, although no states in the Southeast have adopted this policy. While some utilities in the Southeast have seen modest efficiency savings increases over their past performances, each state failed to return to their pre-pandemic levels in 2023. North Carolina remains the only state to exceed the national average, while all others fall short.

Some utilities in the Southeast, like FPL and TVA, have incorrectly argued in the past that building codes and federal standards make utility energy efficiency programs unnecessary. Yet utilities and states with similar or higher codes and standards in other parts of the country have still managed to deliver savings that are many times higher than the Southeast.

UTILITY TRENDS – LARGE UTILITY RANKINGS

EFFICIENCY PERFORMANCE OF SOUTHEASTERN UTILITIES IN 2023



MAJOR UTILITIES IN THE SOUTHEAST

- **Duke Energy's utilities in North & South Carolina** once again hold up the regional average and are the only major utilities in the region to actually exceed the national average. However, they still have yet to fully rebound to their pre-pandemic levels of approximately 1%.

- **Dominion Energy South Carolina** reported savings that bring it near the regional average, a marked difference when compared to its own performance in previous years or when compared to its peers.

- **Mississippi Power** is notably one of the only utilities to exceed its pre-pandemic levels. In 2023 it was even close to matching the performance of its sister company, **Georgia Power.** Georgia Power reported a slight dip in 2023 and fell to the lowest performance it has seen aside from the pandemic.

- Utility giants **Florida Power & Light (FPL)** and the **Tennessee Valley Authority (TVA)** made slight improvements when compared to previous years. ***But due to the size of each utility system, the relatively low performance of both TVA and FPL signals a significant missed opportunity for the region as a whole.***

application approved. Still, as a matter of process, utilities should continue to diligently explore the implications of federal efficiency spending. Ultimately, it is up to regulators to ensure utility resource plans appropriately consider and incorporate the impacts of IRA on utility resource planning.

HOME ENERGY EFFICIENCY REBATE FEDERAL FUNDING

STATE	APPLICATION STATUS	FUNDING ALLOCATED
Alabama	Preparing	$145,495,685
Florida	Approved	$345,975,930
Georgia	Available*	$218,778,746
Mississippi	Submitted	$104,674,339
North Carolina	Approved	$209,014,397
South Carolina	Preparing	$137,168,611
Tennessee	Submitted	$167,098,736
Southeast Home Efficiency Rebate Total		**$1,328,206,444**

Currently, three states have had their application approved[2] and will be offering rebates ranging from 50-100% of project costs for energy efficiency upgrades depending on income level. The first state in the region to launch its efficiency rebate program is Georgia, where a limited pilot administered by the Georgia Environmental Finance Authority (GEFA) will allow the state to test processes and develop the participating contractor network. Program design and planning will continue throughout early 2025, with a full rollout expected by March 31, 2025. North Carolina's application was similarly approved in September 2024, and is expected to launch in early 2025. Florida's application has also been approved, though no further details are available at the time of writing this report.

Tennessee and Mississippi are two states that are in limbo for now. While each state agency has submitted its application and program design blueprints, they sometimes get feedback from the Department of Energy (DOE) and need to submit additional materials. Alabama and South Carolina have not yet submitted an application to receive funds. In general, it is difficult to tell what incentive levels or total project costs will be covered since those specifications are left up to each state and are not finalized until approved.

HOME ELECTRIFICATION AND APPLIANCE REBATES

Although not strictly designed to be an energy efficiency program, most states also plan on offering another separate rebate program that provides discounts for high efficiency home appliances and equipment. Because there is no requirement to model energy savings to receive the rebate, any energy savings that occur would not be attributable to the customer's utility company.

[2] U.S. Department of Energy, Office of State and Community Energy Programs. Home Energy Rebates Progress Tracker Status as of January 9, 2025.

encouraging them to implement and improve such programs despite their limited ability to generate shareholder returns.

In 2023, the North Carolina Utilities Commission (NCUC) ordered Duke to initiate a review of this mechanism in order to encourage further energy efficiency and demand-side management to meet its carbon plan targets. This process yielded many promising changes with the NCUC approving the revisions to the DSM/EE mechanisms in May 2024. Such changes include modifying incentives to encourage Duke's portfolio to programs with longer-lived measures that provide deeper savings, and to increase the percentage of annual electricity saved by residential programs that are derived from income-qualified weatherization programs. There are also tariff changes that expand *how* funds can be used to deliver more energy efficiency upgrades to income-qualified households. These changes are particularly impactful given that North Carolina is one of the few states in the Southeast to already have its application for Inflation Reduction Act (IRA) rebate programs approved, thus the federal investments in income-qualified energy efficiency and electrification have already been secured.

Another aspect of the proposed changes is the revision of the Residential New Construction (RNC) program, which includes modifications to enhance energy efficiency in new homes. Despite some opposition from gas distribution companies, the revised program is designed to improve whole-house building practices and is fuel-agnostic, meaning it does not mandate a switch to electric appliances. These efforts are especially crucial as delays in updating the state's Energy Conservation Code have resulted in setbacks to improving energy efficiency standards for new residential buildings, making the RNC program even more vital for reducing energy waste in new construction. However, since these changes won't go into effect until 2025, it will take time for any increase in energy savings to appear in reporting.

DUKE DIVIDE

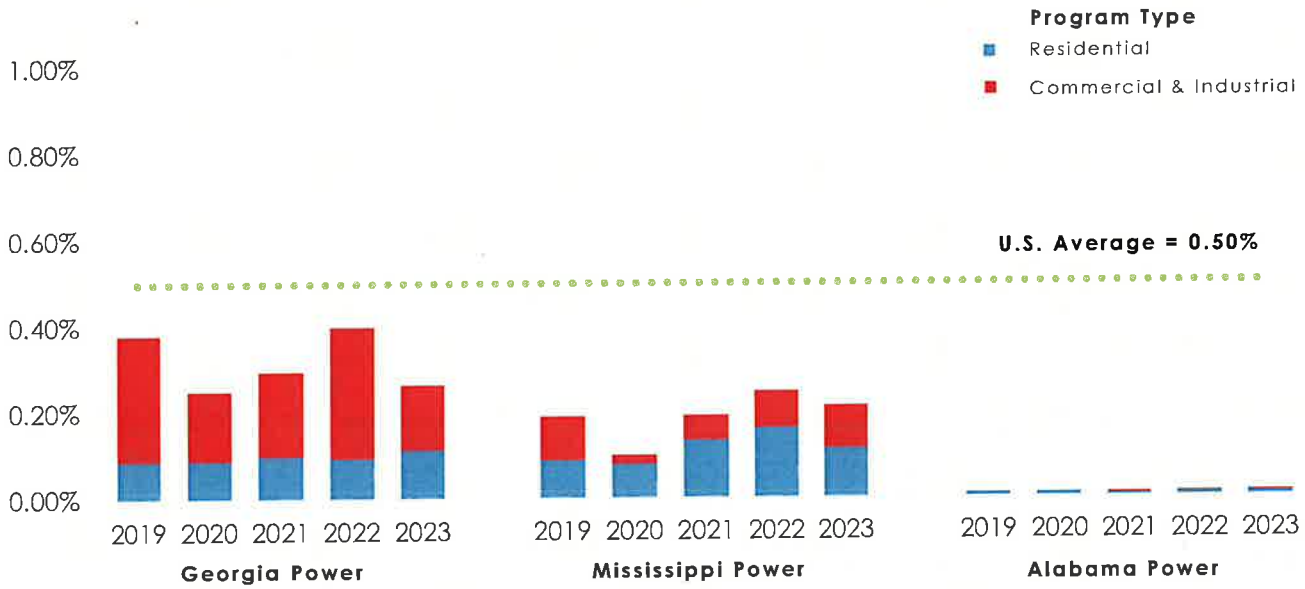
Duke Energy's Florida subsidiary continues to trail behind its sister companies in the Carolinas. This is largely due to the differing regulatory environments. In Florida, the Florida Energy Efficiency Conservation Act (FEECA) drives utility energy efficiency savings targets since the state lacks a robust IRP process. Unfortunately, it has only received minor updates since it was initially enacted in 1980, and remains one of the only policies in the state that requires utilities to consider energy efficiency. Plus, the energy efficiency that is included in Florida's planning process equivalent, a Ten-Year Site Plan (TYSP), is often among the lowest in the nation for major electric utilities, and the TYSP process does not include analysis to determine whether higher levels of utility investment in energy efficiency would reduce total utility system costs for customers.

SOUTHERN COMPANY

Southern Company has three electric utility subsidiaries, all within the geographic scope of the Southeast. Historically, there have been big differences in energy efficiency policies and the company's utility efficiency savings performance in these states.

- **Alabama Power** serves approximately 1.5 million homes, businesses, and industries in Alabama.
- **Georgia Power** serves approximately 2.6 million customers across Georgia.
- **Mississippi Power** serves approximately 190,000 customers in Mississippi.

SOUTHERN CO. | ENERGY SAVINGS AS % OF RETAIL ELECTRIC SALES



GEORGIA COMMISSION ORDERS HIGHER EFFICIENCY SAVINGS - AGAIN

Georgia Power has been ordered to increase its efficiency savings multiple times, yet there has been little movement in its performance. In both the 2019 and 2022 IRP proceedings, the PSC issued final orders that directed Georgia Power to increase their savings targets. Most recently as part of a settlement agreement following the construction of Plant Vogtle, Georgia Power agreed to a target of 0.75% energy efficiency savings, higher than it's been in years. Will this agreement be the one that finally sticks?

EFFICIENCY TO GO HEAD-TO-HEAD WITH POWER GENERATION

Georgia Power unexpectedly filed an updated IRP in 2023 outside its regular schedule due to unanticipated load growth, but it did not make substantial alterations to its treatment of energy efficiency yet. In the upcoming full IRP expected to be filed in late January 2025, demand side resources like energy efficiency will compete head-to-head against traditional power plants.

MISSISSIPPI POWER EFFICIENCY EXPANSION

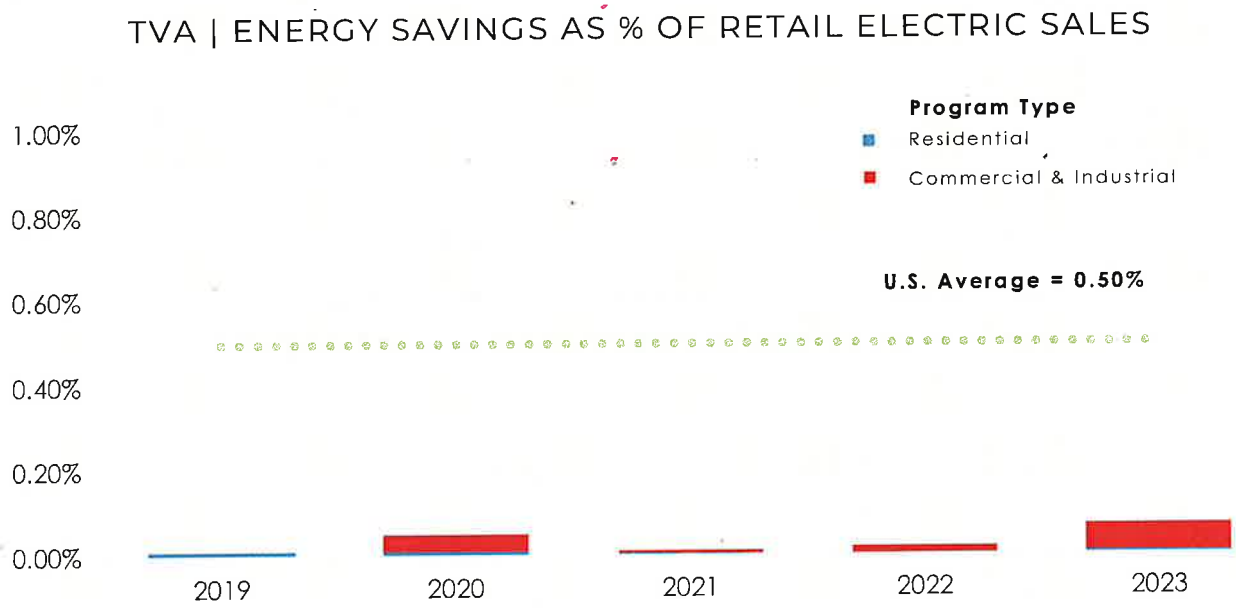
Mississippi Power developed a 7-year plan that is projected to double its annual efficiency savings to about 0.5% by 2028. However, it still has quite a way to go to attain this goal, especially after citing federal efficiency standards and labors shortages as potential barriers in its latest IRP. Even if successful it will still trail behind most major utilities, but it is a step in the right direction.

ALABAMA POWER ENERGY EFFICIENCY REMAINS LOW

The efficiency savings that Alabama Power does have come from the commercial and industrial sector. It is designed to assist with system load shape management, and it has allowed for the deferral of 1,102 MW of supply-side resource capacity in the winter.

TENNESSEE VALLEY AUTHORITY

Federally-owned **Tennessee Valley Authority** (TVA) serves approximately 4.9 million customers in Tennessee, Alabama, Georgia, Kentucky, Mississippi, North Carolina, and Virginia. TVA once sought to be a leader on energy efficiency in resource planning, but its actions never lived up to its plans, and TVA's previous IRP essentially eliminated efficiency as a resource.



Based on SACE's estimates, TVA is planning to achieve first-year programmatic energy efficiency savings that are in line with roughly 0.20 – 0.50% of retail sales within the next several years depending on the final scenario selected in its latest IRP. The lower end may pale in comparison to some of the other benchmarks in this report but it is still notable that **if TVA were to achieve any energy efficiency performance within this range, it would represent a significant step forward for the region.**

In contrast, in past IRPs, TVA has modeled bundles of energy efficiency programs alongside supply-side resources. In its 2024 draft IRP, TVA again modeled energy efficiency programs as selectable resources, and also included two levels of promoting energy efficiency above the base for select strategies, which each required the model to select a certain amount of energy efficiency. Energy efficiency resources, however, were treated differently from supply-side resources (power plants) in TVA's modeling, because the model was not allowed to freely select energy efficiency program funding levels based upon the least cost measures to meet its full load. Thus, while the draft IRP seems to indicate that TVA does not *intend* to go back to doing essentially zero energy efficiency, there are still many remaining questions about whether and how TVA plans to sustain or even grow its portfolio of programs.

TVA's assumptions around energy efficiency costs and potential are based on an energy efficiency potential study that has not been released publicly, as is common practice for energy efficiency potential studies to serves as a foundational document for both demand-side management/energy efficiency programs and IRP planning. Based on a summary of that study provided by TVA, it appears that there are gaps in cost-effective energy efficiency that the draft IRP is missing. One of these is industrial energy efficiency. A large portion of TVA's load falls into the industrial category, and industrial energy efficiency can often be the most cost-effective to implement. Yet that category is surprisingly small in the IRP. Both its latest load growth forecast and new funding opportunities resulting from the IRA create the conditions for TVA to become the energy efficiency leader it once promised to be.

FLORIDA

In Florida, the Florida Energy Efficiency Conservation Act (FEECA) drives utility energy efficiency savings targets. Unfortunately, it has only received minor updates since it was initially enacted in 1980 and remains one of the only regulatory policies that requires utilities to consider energy efficiency.

FLORIDA ENERGY EFFICIENCY PERFORMANCE IN 2023

UTILITY	% EE
Orlando Utilities Commission	0.31%
JEA	0.26%
Tampa Electric Company	0.23%
Southeast Average	0.21%
Duke Energy Florida	0.11%
Florida Average	**0.11%**
Florida Power & Light	0.05%
Florida Public Utilities Company	0.02%

When Florida utilities submitted their proposed plans for energy efficiency in April of 2024, SACE intervened in the FEECA dockets and eventually agreed to settlement terms with each utility that will increase the number of low-income people that the utilities will reach in home weatherization programs.

Utilities in Florida do not conduct formal integrated resource planning, instead they produce what is called a Ten-Year Site Plan each year. The only efficiency included in the TYSP are savings levels established in a separate efficiency goalsetting process that occurs once every five years. These savings levels are often among the lowest in the nation for major electric utilities, and the Ten-Year Site Plan process does not include analysis to determine whether higher levels of utility investment in energy efficiency would reduce total utility system costs for customers.

Without a robust IRP process in Florida, the FEECA dockets are one of the only avenues open to advocates working on energy efficiency. The Florida PSC had an opportunity to overhaul the FEECA process in a recent update to the rules on these proceedings, but failed to do so, electing to forego most substantive recommendations in favor of merely clarifying procedural changes. That leaves Florida customers unlikely to see major expansion in energy efficiency programs that could reduce all customer bills.

Florida utilities are also heavily reliant on fossil gas, which provides approximately 70% of the state's total power generation. Unfortunately, major Florida utilities like FPL have failed to make meaningful investments in energy efficiency resources, leading to more gas being burned, with higher costs passed on to all customers. Meanwhile, insufficient utility efficiency program offerings simultaneously deprive families of a valuable tool to save money on their power bills.

MISSISSIPPI

The Mississippi Public Service Commission is a three-person elected body that has authority over Entergy Mississippi and Mississippi Power. The Tennessee Valley Authority is regulated by a nine-member Board of Directors. Since TVA is a federal agency, board members are appointed by the President and confirmed by the U.S. Senate.

IRP rules were established in Mississippi for the first time in 2019. After many years with energy efficiency programs in a "QuickStart" phase, the Commission rolled its efficiency policies into the new IRP rules. However, in the first cycle of resource planning under the new rules, both Entergy and Mississippi Power submitted resource plans that were demonstrably inferior to the plans submitted by their sister companies in other states. Their IRPs did not move the needle on efficiency, though the utilities indicated intentions to grow their efficiency savings after the plans were finalized. How or whether energy efficiency requirements in future IRPs will be strengthened remains to be seen.

MISSISSIPPI ENERGY EFFICIENCY PERFORMANCE IN 2023

UTILITY	% EE
Entergy Mississippi	0.22%
Southeast Average	0.21%
Mississippi Power	0.19%
Mississippi Average	**0.18%**
Tennessee Valley Authority	0.00%

Mississippi's recently established integrated resource planning rules, unfortunately, delivered no additional energy efficiency in its first planning cycle. But since then both Mississippi Power and Entergy Mississippi have indicated plans to increase efficiency savings in annual Energy Delivery Plans filed with the Commission.

After years of low performance, in 2021 Mississippi Power filed a plan with the Commission that would roughly double its efficiency savings over the next seven years to 0.5% of its 2020 retail sales. Because the pandemic reduced total retail sales in 2020, Mississippi Power's target makes its proposed savings appears higher than it would otherwise be if future efficiency savings were divided by the expected retail sales figures in a more typical year. And 0.5% is still far lower than most of its utility peers nationally. But Mississippi Power's plan to increase its efficiency savings is still a step in the right direction. In the near term, Mississippi Power is seeking additional savings by including large general service customers in its portfolio, expanding its behavioral energy efficiency program, and adding multifamily and manufactured housing efficiency offerings.

SOUTH CAROLINA

There are three main utility systems in the state of South Carolina: Duke, Dominion, and the state-owned public utility Santee Cooper. The South Carolina Public Service Commission is a seven-member regulatory body that now has regulatory oversight for integrated resource planning for these utilities. The Commission has directed utilities to evaluate certain levels of energy efficiency savings, in particular requiring that Dominion evaluates savings levels up to 2% of annual retail sales in its 2023 IRP.

SOUTH CAROLINA ENERGY EFFICIENCY PERFORMANCE IN 2023

UTILITY	% EE
Duke Energy Carolinas	0.80%
Duke Energy Progress	0.77%
Dominion Energy South Carolina	0.42%
South Carolina Average	**0.37%**
Southeast Average	0.21%
Santee Cooper	0.03%

There are major differences in how energy efficiency is overseen in the state of South Carolina. Beyond resource planning, there are other key differences in how each utility's portfolio is regulated. Dominion submits a plan to the Commission every five years, detailing all of its proposed efficiency programs, along with forecasted spending and savings levels. Duke does not come before the Commission for approval of its efficiency portfolio, instead it submits individual program applications on a rolling basis. The Commission does not provide regulatory oversight for Santee Cooper's energy efficiency programs, savings, or spending, which is under the purview of the Santee Cooper board of directors.

APPENDIX C: METHODS, DATA SOURCES, AND ASSUMPTIONS

METHODS

The primary metric in this report is net energy savings as a percentage of current-year retail sales. SACE relies on two sources for historical efficiency savings, the first is annual energy efficiency reports that utilities are required to file by state regulators. In most cases, regulatory reporting requirements for investor-owned utilities allow SACE to gather detailed performance and budget data on specific programs on an annual basis. SACE also obtains energy efficiency savings data from EIA Form 861. For example, nearly all of our data for municipal and co-op utilities come from this data source. In most cases, we opt to use EIA data even when program-level data is available for the sake of consistency when it comes to the reporting year, which may reflect the fiscal year in utility filings or other types of reports, and to include savings from programs that are outside the utility's main portfolio of energy efficiency programs.

EIA's reporting instructions have clarified over the years to direct utilities to report data at the meter rather than at the generator, and to clarify who is responsible for reporting (utility or nonutility demand-side management administrators). As a result, there is greater confidence in the consistency and reliability of more recent data that primarily only requires adjustments to utilities that report gross savings. Due to the fact that some utilities report net savings reflecting technical adjustments to energy efficiency program impacts, while others do not, we apply a net-to-gross ratio of 80% where gross savings are reported.

For the comparison with other regions of the country, our Southeast regional average is compared to regional and national averages from data sources such as EIA. Our regional energy savings calculation distinguishes the Southeast from typical calculations of the U.S. 'South' region, which encompasses a much broader geography as defined by the U.S. Census Bureau.