

Community Benefits and Impacts Advisory Group for Oregon Tribal Nations

January 31, 2025



Community Benefits and Impacts Advisory Group for Oregon Tribal Nations

January 31, 2025, 9:00-11:00 a.m., PT

For a Better Meeting Experience



- Use Gallery View (icon at top right) when in group discussion



- For technical support, chat "**Chad Garrett/ E Source**" as recipient, and send your message



- Questions are welcome at any time
- Please mute until speaking
- Speak by clicking the "Raise Hand" in the tool bar

Agenda

TIMING	TOPIC
9:00 am	Objectives and Presenters
9:05 am	Demand Response Workshop
9:55 am	Break
10:05 am	Check In and Closing the Loop
10:10 am	Tracy Moreland: Tribal Liaison Updates
10:15 am	Updates: <ul style="list-style-type: none">• Rate Case Updates• Biennial Report Filing• 2025 Engagement & Filing Roadmap• Clean Energy Planning• Conservation Potential Assessment Report
10:50 am	Next Steps and Closing

Community Benefits & Impacts Advisory Group for Tribal Nations Purpose:

Focus on equity and a clean energy future in Oregon in accordance with HB 2021

Today's Objectives

1. Discuss 2025 engagement updates and road mapping
2. Communicate General Rate Case updates
3. Review Demand Response program changes

Presenters



Ryan Harvey
Program Manager, Customer
Innovations



Kimberly Alejandro
Clean Energy
Planning Regulatory
Manager



Matt McVee
Vice President
Regulatory Policy &
Operations



Sierra Gentry
Associate Customer
Solutions Program
Manager



Laura James
Senior Customer
Solutions Program
Manager



Chris Kanoff
Customer Solutions
Program Manager



Christina Medina
Manager, Stakeholder
Policy & Engagement



Tracy Moreland
Government Affairs,
Tribal Liaison
Representative



Morgan Westberry



Jeffrey Daigle



Zanya Morgan

Demand Response Workshop

Demand Response Concepts

Demand Response programs help balance electricity supply and demand



Supply –

Utilities manage the supply of energy to various user types

Demand –

In consuming energy, users create an **electrical load** – anything that consumes power, including:

- Plug Loads (computers, hair dryers, lamps)
- Lighting
- Electric Vehicles
- Etc.

Benefits of Demand Response:

- Reduces the need for new generating capacity, which is costly
- Addresses real-time reliability challenges
- Mitigates peak prices and peak volatility
- Limits supplier market power

Demand Response Explained



- Portfolio of customer programs that group together different types of devices that the utility can temporarily turn off, which balances supply and demand
- Cheaper than building out grid infrastructure, or purchasing power in a spot market
- Creates management options to make grid more flexible, resilient

Grid Management with DR

Demand Response Events can be classified by *time* and *notice*

Rapid Events	Contingency Reserve	~20 minute curtailment	Less than 10 minutes notice
	Frequency Response	5 minute curtailment	None – instant dispatch notice
Longer Events	Peak Shaving	~1-4 hours curtailment	Typically 4-8 hours notice

DR Portfolio Overview

Customer Type	Programs
Residential Homes	Wattsmart Battery Wattsmart Drive Cool Keeper <i>Optimal Time Rewards</i>
Business and Industrial	Wattsmart Business DR*
Commercial Irrigation	Irrigation Load Control

Programs are typically designed to target a specific customer type, and sometimes a specific kind of equipment

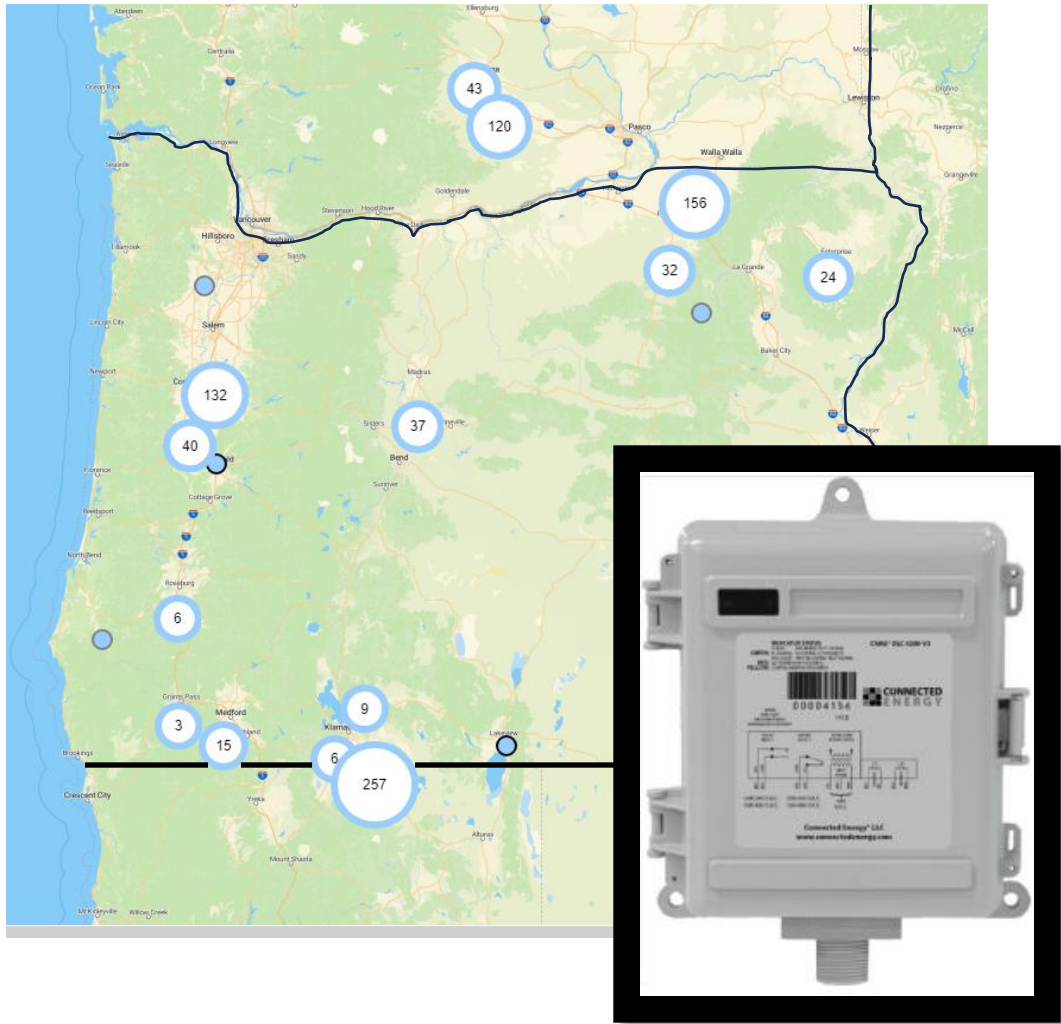
Sch. 106 Stakeholder Review Activity

PacifiCorp's umbrella DR tariff, **Schedule 106**, outlines specific protocols to **capture stakeholder input** on design of new programs, and major program changes.

Key Dates for Sch. 106 - New Programs and Program Changes

Document	Action Type	Docket	Draft Distributed	Stakeholder Comments Due	Final Document Filed/ Posted to Website	Commission Review	Effective Date
Wattsmart Battery	New Program Filing	ADV 1691	17-Oct-24	30-Oct-24	20-Dec-24	Target: Feb 2025	Target: Feb 2025
Irrigation Load Control	Program Changes	ADV 1383	3-Jan-2025	05-Feb-25	Target: Feb 2025	n/a	Target: April 2025
Cool Keeper Program	New Program Filing	TBD	Target: Jan 2025	Target: Jan 2025	Target: Feb 2025	Target: Feb 2025	Target: Feb 2025
Wattsmart Business DR	Program Changes	ADV 1436	Target: Jan 2025	Target: Feb 2025	Target: Feb 2025	n/a	Target: April 2025

Irrigation Load Control (ILC)



- Peak Shaving resource
 - Control irrigation pumps via program-provided switch
 - Available during summer season
 - 1–4-hour events, in afternoon-evening
- Rapid growth since 2023 launch
 - 558 sites, 7 MW capacity
- 3 participation options:
 - 24-hour notice (\$18/kw)
 - 60-minute notice (\$30/kw)
 - 20-minute notice (\$45/kw)

ILC Program Updates

Objectives for 2025

- Improve usability for power management team
- Reduce opt-outs by aligning incentives and improving predictability for participants
- Improve cost-effectiveness by increasing available capacity per pump



Program Changes

- Streamline parameters by merging 3 notice options into **single 4-hour notice option**, plus reductions to eligible hours
- Adjust mandatory incentive to **base amount (\$30/kw-yr), plus 50% bonus** option for 0 opt-outs
- Introduce **voluntary events**, that may occur outside program parameters but do not affect participation status or incentives

1/3 — Change documents emailed to CBIAG, PacifiCorp CEP distribution list, and Tribal representatives

2/5 — **Comments due**

2/13 — Responses to all comments will be shared

2/13 — Final changes posted to the PacifiCorp website

3/31 — (After 45 days) Changes effective

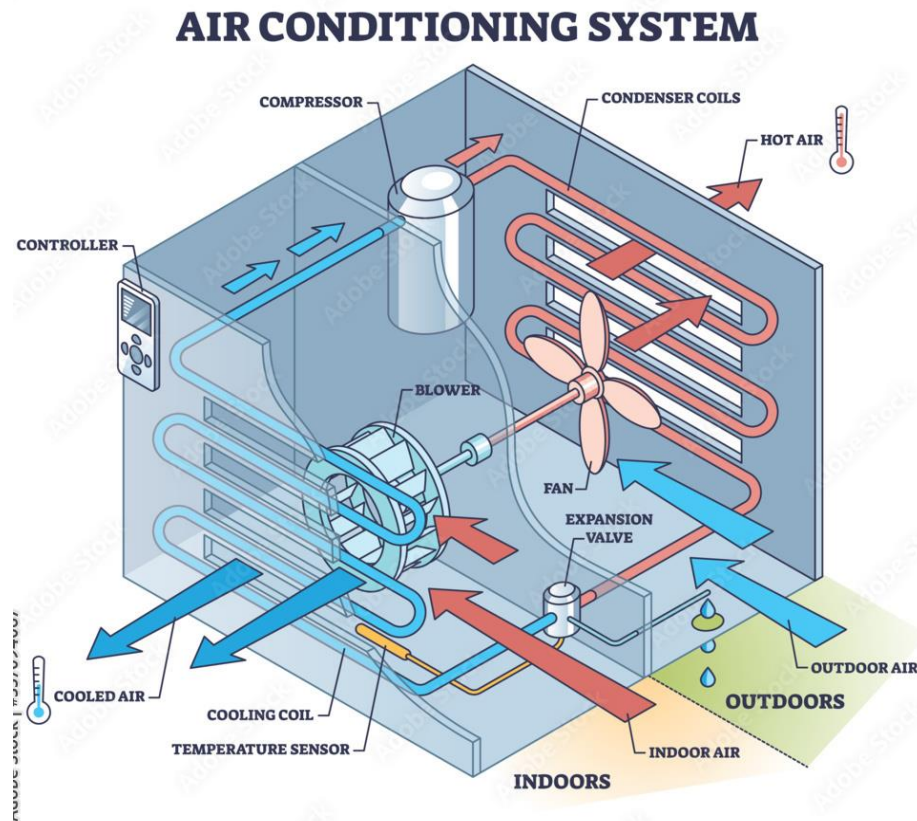
Cool Keeper

- New program to be filed under Sch. 106
- Captures residential AC load – alternative to smart thermostat program
- Extends long-running UT program to OR
 - Captures economies of scale
 - Leverages proven program design
- Provides fast-response resource
 - Frequency response and contingency events
 - 5-30 minutes
 - Instant dispatch
 - Operates 24/7 from May 1 to September 30

Benefits relative to smart thermostats

- Program can better control for eligibility
- More customers can participate – no smart thermostat required
- Captures more load per unit, on average
- Cellular communication more reliable than WiFi, no WiFi required
- Not limited to peak load reduction
- Not subject to thermostat OEM program design mandates

Cool Keeper



- Load control switch installed on residential ACs and central heat pumps
 - Switch controls compressor only, not fan
 - Can be operated with full curtailment or 50% run-time curtailment (similar to a t-stat setback)
- Easy participation
 - Switch installed free of charge
 - Online or phone application
 - Outdoor install doesn't require scheduled appt
- Negligible disruption to participant
 - Primarily used for 5–30-minute events
 - Fan still runs, customers don't usually notice event
- \$30 per year, as monthly bill credit

Wattsmart Business Demand Response (WSB DR)

4 ways to participate that meet unique grid management needs and offer flexibility to customers

Pathway	Load Shed	Hybrid (Load Shed/ Cont. Reserve)	Contingency Reserve	Frequency Response
Minimum Notice	60 Minutes	20 Minutes	7 minutes	None (Instant)
Typical Duration	1-4 hours	1 hour	15-30 minutes	5 minutes
Eligible Times	Summer only, weekday evenings	All year, weekdays	24/7/365	24/7/365
Limits (Yearly)	40 hours	60 hours	20 events, 60 hours	50 events, 5 hours
Incentive	\$30/kw	\$55/kw	\$75/kw	\$85/kw

- All load eligible – customers choose what to curtail
 - Program works with customers to develop ‘Energy Action Plan’
 - Provides training, energy monitoring
 - Performance measured at the meter
 - Incentives based on performance

WSB DR Program Updates

Objectives for 2025

- Align program options with grid management needs
- Improve usability for Energy Supply Management
- Increase volume by identifying and removing bottle necks for enrollment



Program Changes

- Eliminate the 20 min product - does not fit grid needs.
- Change 60 minute product to standard Peak Management product with 4 hour minimum notice, 4 hr max duration and hours 2 – 9 PM
- Remove caps on dispatch for 7 Minute and Real-Time products:
 - Remove cap on number of events for both products
 - No change to 7 min cap of 60 hours.

Jan

– Change documents emailed to CBIAG, PacifiCorp CEP distribution list, and Tribal representatives

Feb

Comments due

Responses to all comments will be shared

Final changes posted to the PacifiCorp website

March

(After 45 days) Changes effective

Wattsmart Battery Program Incentives



Enrollment Incentive

\$150 per kW upfront during commitment period (4 years)
Early program termination will require prorated repayment of upfront incentive



Annual Incentives

\$15 per kW during commitment period years 2 – 4
\$50 per kW after year 4



Example incentives for 5 kW battery

Enrollment incentive: $5\text{kW} \times \$150 \times 4 \text{ years} = \3000
Annual incentive years 2 – 4: $5\text{kW} \times \$15 = \75
Annual incentive year 5 and beyond: $5\text{kW} \times \$50 = \250



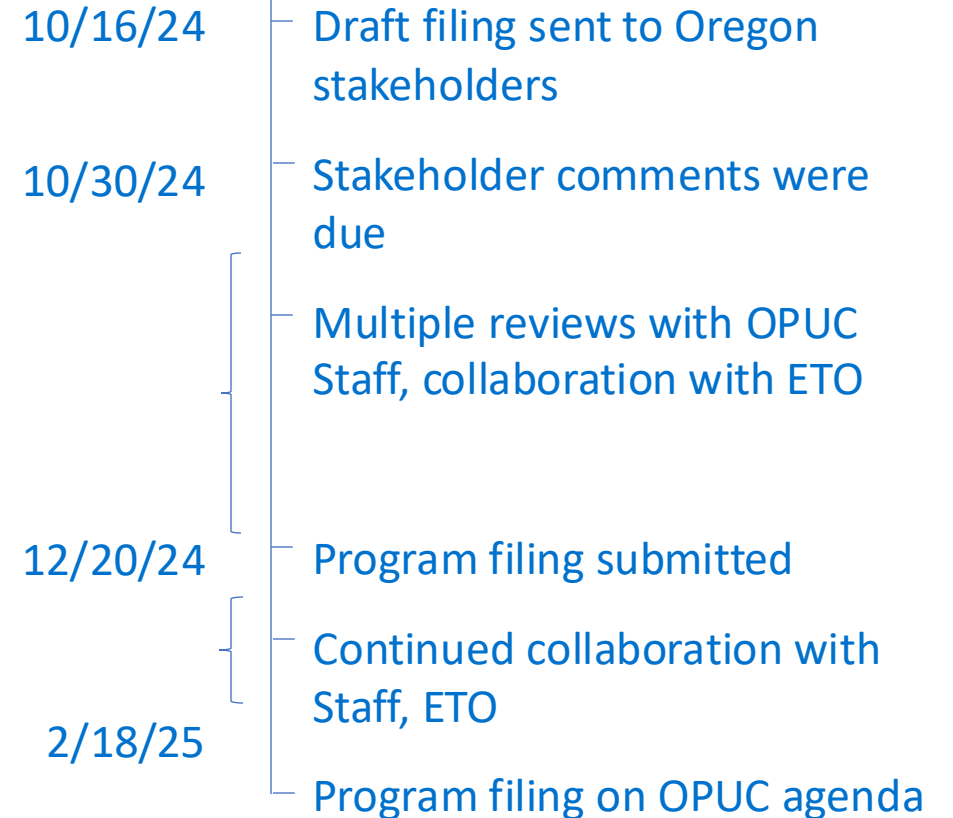
Potential future lease option

Lease option will be evaluated based on customer feedback and participation levels

Wattsmart Battery Timeline

Program anticipated to be approved in February, with an effective date of February 19, 2025.

Program elements (webpage, application, etc.) to be finalized in the 90 days following approval.



Wattsmart Drive

- Frequency demand response program
 - Vehicle charging paused up to 5 minutes
- Command sent directly to vehicle, not charger
 - Events may include vehicles at fast charges
 - Only vehicles in Pacific Power's territory will receive the event signal
- Customer compensated up to \$100 for first year of enrollment, \$50 each following year
- Customer can always opt out
 - Two penalty free opt outs
 - \$10 incentive reduction for additional opt outs

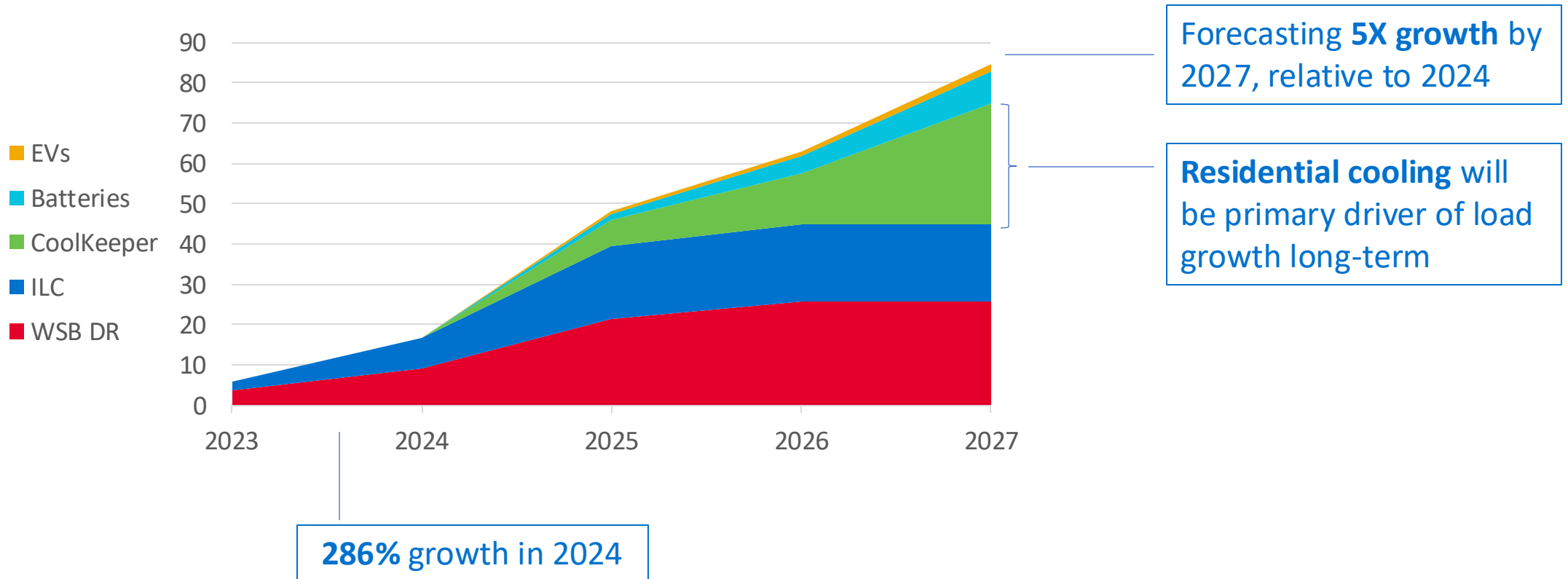


Wattsmart Drive Timeline

Approved under the Oregon Transportation Electrification Plan in 2023, this managed charging pilot will be launching in **early 2025**

January	-	Final contracting agreements with vendor
February - March	-	Deployment Testing Website configuration
April	-	Program launch, customer recruitment
Quarterly after launch	-	Continued customer recruitment and engagement

DR Portfolio Forecast



Break

Check-In

Do you have a New Year's
resolution?

Closing the Loop

Closing the Loop from Last Meeting

December's Focus

1. Review and discuss additional feedback on the biennial report
2. Share and solicit feedback on the 2025 Engagement Workgroup Plan
3. Review activities from 2024 and celebrate our achievements



Tribal Liaison Updates

Tribal Liaison Update



- ATNI Winter Conference and Energy Committee presentation
- Blueprint South Transmission Line Project
- Wildfire Safety outreach and community forums
- Business Oregon State-Tribal Cluster meeting

tracy.moreland@pacificorp.com

503-813-5258 (office)

503-869-2922 (cell)

Rate Case Updates

Four separate proceedings contributed to the rate change on January 1, 2025

- Change to base rates (investments and cost of operations)
- Change to net power cost forecasts for 2025 (cost of providing power)
- Recovery of costs from the Oregon Solar Incentive Program (OSIP)
- Update to the System Benefit Charge

General Rate Case

- On December 19, 2024, the Commission issued its decision in PacifiCorp's 2024 General Rate Case
 - PacifiCorp submitted its compliance filing on December 27, 2024
- As a result of the findings in the Commission's order and updates to actual capital investments in service by the end of 2024, the average **increase** to the base rates was 7.5%

Transition Adjustment Mechanism (TAM)

- On September 19, 2024, the Commission adopted the parties' stipulated agreement on PacifiCorp's 2025 TAM
 - PacifiCorp submitted its final net power costs forecast update on November 15, 2024
- As a result of the stipulation and final update, the average **decrease** to net power costs rates was 2.8%

Oregon Solar Incentive Program (OSIP)

- PacifiCorp's was allowed to recover costs for the program from October 2023 through September 2024
 - OSIP costs are costs incurred to implement the volumetric incentive rate (VIR) program required under ORS 757.365. Although the OSIP is now closed to new participants, the program was designed to provide payments to participating customers for 15 years at a specified volumetric incentive rate, or through 2032
- As a result, customers see an average increase of 0.1%

System Benefit Charge

- PacifiCorp's Systems Benefits Charge (Schedule 291) collects funds for energy efficiency programs including Energy Trust of Oregon , transportation electrification programs, demand response programs, and the Company's Community Benefits and Advisory Group
- The update was required to fund energy efficiency programs administered by Energy Trust of Oregon, which results in an annual Energy Trust collection amount in rates of approximately \$120.6 million, or an increase of \$24.2 million over 2024 levels
- As a result, customer see an average increase of 1.2%

January 1, 2025 Rate Changes

Rate Schedule	Proceeding				Combined
	Rate Case	TAM	OSIP	SBC	
Residential	9.4%	-2.4%	0.1%	1.5%	8.6%
Schedule 23, Small General Service <=30kW	9.4%	-2.2%	0.1%	1.5%	8.8%
Schedule 28, General Service 31-200kW	3.3%	-2.6%	0.1%	1.5%	2.3%
Schedule 30, General Service 201-999kW	5.0%	-2.9%	0.1%	1.4%	3.6%
Schedule 48, General Service >=1,000kW	5.5%	-4.0%	0.1%	0.4%	2.0%
Schedule 41, Agricultural Pumping/Irrigation	9.4%	-2.3%	0.1%	1.4%	8.6%
Lighting	0.0%	-2.3%	0.1%	1.5%	-0.7%
Overall	7.5%	-2.8%	0.1%	1.2%	6.0%

Additional Significant Rate Changes

Power Cost Adjustment Mechanism (PCAM)

- On November 5, 2024, the Commission adopted the parties' stipulated agreement regarding PacifiCorp's 2023 Power Cost Adjustment Mechanism
- PacifiCorp will recover through Schedule 206 the actual net power costs incurred in 2023
- After application of the deadband and sharing mechanism, the collectible balance is \$118.4 million over a two-year period
 - Recovery of \$70.4 million from non-residential customers began December 1, 2024
 - Recovery of \$48.0 million from residential customers will begin April 1, 2025
- As a result, non-residential customers see an average increase of 3.7% and residential customers will see an increase of 3.0%

Biennial Report Update

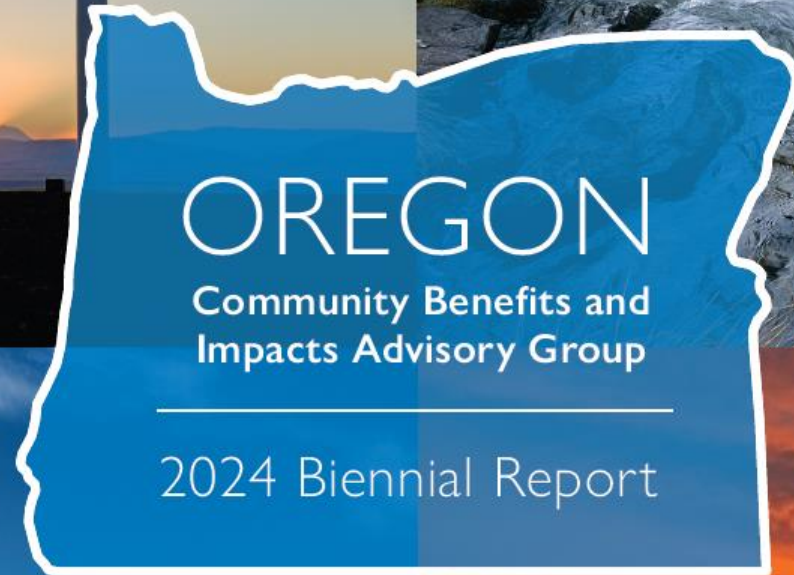
Biennial Report Update

On December 30, 2024, the inaugural biennial report was published. Members are encouraged to review the final report, which reflects the collaborative efforts between the Oregon advisory groups and Pacific Power.

Please stay tuned for additional information and instructions regarding the next steps.

Thank you for your continued commitment and participation.

[State of Oregon: Public Utility Commission of Oregon](#)



2025 Engagement Roadmap

Accessibility Updates

We aim to make this engagement space accessible to our communities. If you have any accessibility requests, please let us know.

Currently, we:

Bring in live Spanish translators for each meeting

Have a live American Sign Language (ASL) Interpreter for each meeting

Provide online and in-person access

Ask presenters to have their cameras on

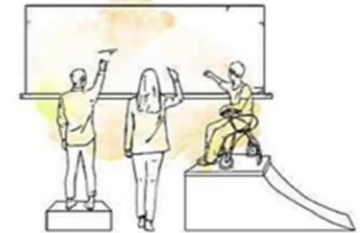
Translate meeting materials into Spanish

Simplify the language when possible

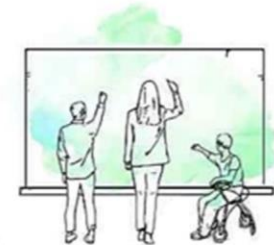
Equality



Accommodation



Accessibility



Courtesy: Section508.gov

Accessibility Measures



- Are there any barriers preventing full participation for users with disabilities?
- Is there sufficient support for screen readers or other assistive technologies?
- Do participants feel that all content is accessible, regardless of their needs?
- Are language preferences being accommodated, beyond just live translations (e.g., localized materials, bilingual support)?
- Are there any specific accessibility features that could improve the experience?

2025 Roadmap



March – Community Based Renewable Energy, Low-Income Bill Assistance, Transportation Electrification, OPUC



April – Wildfire Mitigation, Integrated Resource Planning



June – Clean Energy Plan, SME Community Benefit Indicators



July – Clean Energy Plan, SME Community Benefit Indicators



September – 2025 CEP Filing*: Document in Review

December – Year in Review, 2026 Planning

**Pending extension approval*

New! Pre-read

Looking Ahead:

Please join us for the following
February engagements:

1. **Oregon Clean Energy Planning**
[February 19, 2025, 9:00am – 12:00pm \(PST\)](#)

March engagements:

2. **Community Benefits and Impacts Advisory Group Meeting**
[March 20, 2025, 1 – 4pm \(PST\)](#)
3. **Clean Energy Planning Engagement Series for Oregon Tribal Nations Meeting**
[March 28, 2025, 1 – 4pm \(PST\)](#)



Are there additional tools you'd like to request to allow you to participate to your fullest ability?

Preparation Tools:

Meeting Technicality:



To better prepare for January's meeting, please review the slides and notes from our previous meeting in December:

- [Oregon CEP Tribal 2024-12 December Slides.pdf](#)
- [Oregon CEP Tribal 2024-12 December Public Notes.pdf](#)

Note: Pacific Power's website is undergoing changes and engagement tools will now live on a new hub @ [Tribal Relations](#)

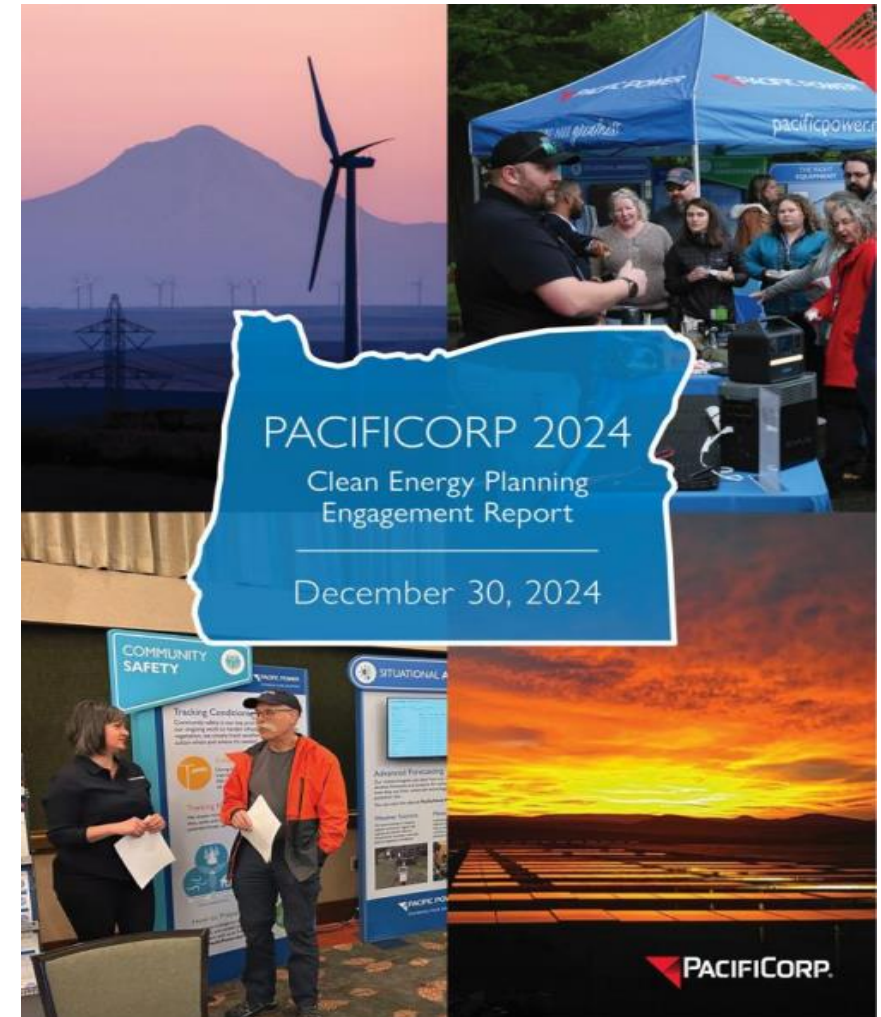
3-month format: past month, current month, and future month

Past	Current	Future
<ul style="list-style-type: none"> • Presentation review • Public notes 	<ul style="list-style-type: none"> • Technical meter • Overview of agenda 	<ul style="list-style-type: none"> • Other engagement opportunities • Meeting links

Clean Energy Planning

Key Updates

- On December 20, 2024, PacifiCorp filed a [Motion for Extension](#) to file its 2025 Clean Energy Plan
 - Requested an extension of 180 days (~6 months)
 - If granted, pushes PacifiCorp's CEP filing deadline back to September 2025 instead of March 31, 2025 (concurrently with the IRP)
- On December 30, 2024, PacifiCorp filed its Clean Energy Planning Engagement Report to meet [LC 82](#) requirement #8 on engagement
 - The report outlines PacifiCorp's Clean Energy engagement efforts and improvement commitments
 - Can be accessed here: [PacifiCorp's 2024 Report on CEP Engagement](#)
- On December 31, 2024, PacifiCorp shared its 2025 Integrated Resource Plan Draft with stakeholders
 - The draft can be accessed online at [Integrated Resource Plan](#)



Pacific Power's Oregon Clean Energy Plan Engagement Series 2025 Meeting Schedule



Date / Time / Meeting Format	Proposed Agenda Topics*
January 2025	No meeting
Date: February 19, 2025 (Wednesday) Time: 9 a.m. - 12 p.m. (PST) Format: Zoom Online	Clean Energy Plan Engagement Series Meeting #1 <ul style="list-style-type: none"> • Integrated Resource Plan Updates CEP Sensitivities • Small-Scale Renewables (SSRs) • Transportation Electrification Updates • Community-Based Renewable Energy (CBREs)
March 2025	No meeting
April 2025	No meeting
Date: May 28, 2025 (Wednesday) Time: 9 a.m. - 12 p.m. (PST) Format: Zoom Online	Clean Energy Plan Engagement Series Meeting #2 <ul style="list-style-type: none"> • Integrated Resource Plan Updates • Demand Response • “Listening Session”
June 2025	No meeting
July 2025	No meeting
Date: August 20, 2025 (Wednesday) Time: 9 a.m. - 12 p.m. (PST) Format: Zoom Online	Clean Energy Plan Engagement Series Meeting #3 <ul style="list-style-type: none"> • Community-Based Renewable Energy (CBREs) • Integrated Resource Plan Updates • “Listening Session”
September 2025	No meeting
October 2025	No meeting
Date: November 19, 2025 (Wednesday) Time: 9 a.m. - 12 p.m. (PST) Format: Hybrid (Onsite at Lloyd Center Tower, Portland, Oregon / Virtual: Zoom Online)	Clean Energy Plan Engagement Series Meeting #4 <ul style="list-style-type: none"> • Overview of PacifiCorp's filed Clean Energy Plan • Integrated Resource Plan Engagement Roadmap
December 2025	No meeting

*Proposed agenda topics and timing may be subject to change

**Leading up to each session, meeting information can also be accessed here: [Oregon Clean Energy Plan](#)

Clean Energy Plan Meeting #1

PacifiCorp invites you to attend its first Clean Energy Plan (CEP) Engagement Series Meeting of 2025. The meeting will take place virtually on **Wednesday, February 19, from 9 am – 12 pm (PST)**.

All interested participants can register for the meeting here: [Zoom Registration](#).

The session will be recorded, and Spanish and American Sign Language (ASL) translation services will be provided for added accessibility.

Participants can also access meeting information at any time on PacifiCorp's [Oregon Clean Energy Plan](#) webpage. Meeting materials, including an outline of the session agenda, will be shared as the meeting date draws closer.

Conservation Potential Assessment Report Updates



PACIFICORP CONSERVATION POTENTIAL ASSESSMENT FOR 2025-2044

Volume 1 - DRAFT



Prepared for: PacifiCorp
By: Applied Energy Group, Inc.
Date: December 16, 2024
AEG Key Contact: Eli Morris

Conservation Potential Assessment

On January 1, 2025, Pacific Power published a draft of its 2025 Conservation Potential Assessment (CPA) report on the IRP Support and Studies webpage.

Any interested advisory group members are invited to review the draft and offer comments by no later than Jan 31, 2025. You can submit feedback using the IRP stakeholder form.

[PacifiCorp 2025 DSM Potential Report Vol 1.pdf](#)

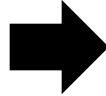
Next Steps

Check Out

Final Thoughts....?

Oregon Tribal Nations Engagement Series 2025 Meeting Schedule (Present/Future)

Date / Time / Meeting Format	Proposed Agenda Topics*
January	BiRep Clean Energy Plan & Tribal Nations 2025 Roadmaps Demand Response
February	No Tribal Nations Engagement Meeting
March 20, 2025 (1:00 – 4:00PM PT) Online	Community Based Renewable Energy Low-Income Billing Assistance Transportation Electrification Guest Presentation: Oregon Public Utility Commission
April 17, 2025 (1:00 – 4:00PM PT) Online	Wildfire Mitigation CBI Overview
May	No Tribal Nations Engagement Meeting
June 15, 2025 (1:00 – 4:00PM PT) Online	*To be determined*
July 17, 2025 (1:00 – 4:00PM PT) Online	*To be determined*
August	No Tribal Nations Engagement Meeting
September 18, 2025 (1:00 – 4:00PM PT) Online	2025 CEP Filing: Document In Review
October 16, 2025 (1:00 – 4:00PM PT) Online	*To be determined*
November	No Tribal Nations Engagement Meeting
December 18, 2025 (1:00 – 4:00PM PT) Online	Year in Review 2026 Planning



Community Benefits and Impacts Advisory Group for Oregon Tribal Nations Calendar

There will be no Tribal Nations meeting in February.

[March 28, 2024, 9:00 – 11:00am PT](#)

Meeting Code:	Password:
883 5291 2102	475990

Link: [Oregon Community Benefits and Impacts Advisory Group \(pacificorp.com\)](#)

Link: [Oregon Community Benefits and Impacts Advisory Group \(pacificorp.com\)](#)

Pacific Power Stakeholder Engagement

Oregon Clean Energy Planning

[February 19, 2025 9am – 12pm \(PST\)](#)

Community Benefits and Impacts Advisory Group Meeting

[March 20, 2025, 1 – 4pm \(PST\)](#)

For more information:

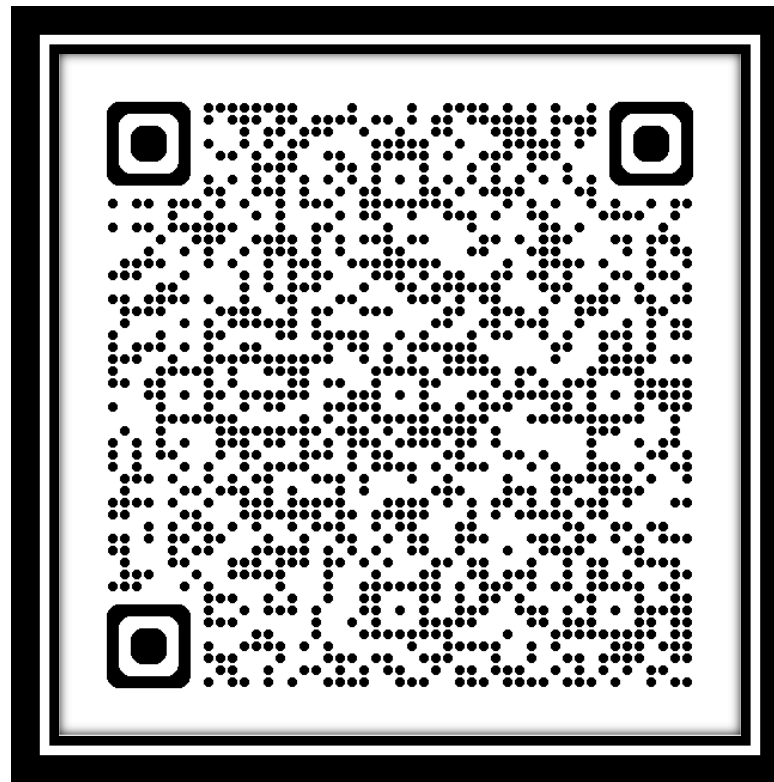
[Oregon Clean Energy Plan Updated Engagement Strategy](#)

Email comments to:

ORCBIAG@pacificorp.com

Community Benefits and Impacts Advisory Group for Oregon Tribal Nations Post-Meeting Survey

Link: <https://forms.office.com/r/5eENV6J8qy>



Appendix

ILC 2024 Summary

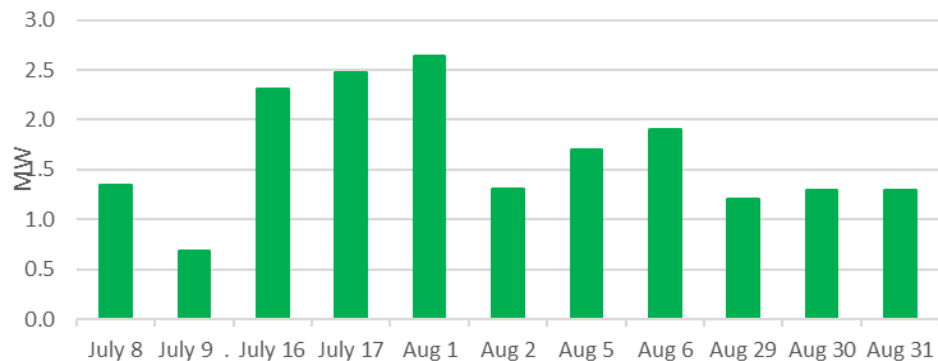
2024 Results

	2023 Season	2024 Season
Devices enrolled	75	299
Avg Capacity Available (MW)	1.1	4
Events	5	11
Average Duration (Hours)	3.1	3.4
Avg Capacity Controlled (MW)	0.1	1.7
Avg Capacity per device (kW)	4.9	7.5
Opt-out Rate (% MW)	~50%	~50%



- 224 new participants
- Increased use by ESM team
- Average capacity curtailed and available increased due to continued successful recruitment and enrollment

2024 Season – Capacity by Event



- Capacity per device below target of 15 kw
- Opt-out rate around 10% of capacity, including several of largest pumps
- Great majority of capacity in 20-min notice group, above target 1/3
- 34 participants unenrolled
- Likely not cost-effective

WSB DR 2024 Summary

2024 Activity

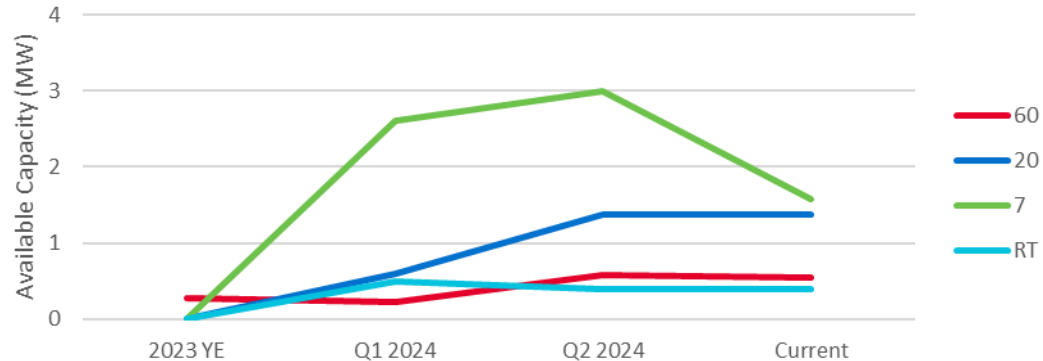
Product	Events	Avg Curtailment* (kw)	Performance – First 2024 Event	Performance – Latest 2024 Event
60 Min	4	430	-85%	84%
20 Min	5	339	-97%	63%
7 Min	4	1,043	105%	84%
Real Time	n/a	n/a	n/a	n/a

*Final performance analysis not yet available for all participants



- Usage increasing
- Enrolled capacity increasing
- Available capacity more stable, based on performance history
- Participant performance improving with experience

Change in Available Capacity



- Rate of enrollment slower than expected due to difficulty re-engaging customers, site-specific issues
- Big box retailer pulled out of DR programs nation-wide, possibly temporarily (reduced 60 Min capacity by 33%)

Optimal Time Rewards

Feb-24	Residential program to enroll smart thermostats and electric water heaters launched to customers
Aug-24	Participant data showed water heater capacity 70% lower than expected
Oct-24	Determined even with potential changes to contract and program design, smart thermostat program not cost-effective without water heater component
Nov-24	Program terminated Nov. 15