

**COMMONWEALTH OF PUERTO RICO  
PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU**

**NEPR**

**Received:**

**Feb 14, 2024**

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**IN RE:**

ENERGY EFFICIENCY AND DEMAND  
RESPONSE TRANSITION PERIOD  
PLAN

**CASE NO.: NEPR-MI-2022-0001**

**SUBJECT:** Submittal of Second Quarterly  
Report on Administrative Costs and Expenditures  
of TPP DR Programs and Request to Consolidate  
Reporting Requirements

**MOTION TO SUBMIT SECOND QUARTERLY REPORT ON ADMINISTRATIVE  
COSTS AND EXPENDITURES OF TPP DR PROGRAMS AND REQUEST TO  
CONSOLIDATE REPORTING REQUIREMENTS**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME** now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

**I. Relevant Background and Procedural History**

1. On February 16, 2023, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (the “February 16<sup>th</sup> Resolution and Order”) in which it considered, amended, and approved the proposed Energy Efficiency (“EE”) and Demand Response (“DR”) Transition Period Plan filed by LUMA on June 1, 2022<sup>1</sup> (“Proposed TPP”), containing the EE and DR Programs to be implemented by LUMA during a transition period and associated budgets for Fiscal Years (“FY”) 2023 and 2024, among others (as approved, the “TPP”). In the February 16<sup>th</sup> Resolution and Order, the Energy Bureau ordered

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<sup>1</sup> See *Motion Submitting Proposed EE/DR Transition Period Plan* in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation and Monitoring* of that date and its *Exhibit 1*.

LUMA to administer a specified budget for FY2023 EE and DR programs and fund the FY2024 budget of the TPP using the EE Rider funding or alternative funding sources (*see* February 16<sup>th</sup> Resolution and Order on page 27) and established requirements related to various TPP program-related tasks and associated deadlines (*see id.* at pages 20-21 and Table 2), as well as reporting requirements and deadlines (*see id.* at page 18 and Table 1).

2. With respect to reporting, the Energy Bureau noted that the Proposed TPP provided for quarterly reports to be filed within sixty (60) days from the end of the quarter and annual reports within ninety (90) days following the end of the Program Year. *See id.* at page 18. The Energy Bureau then ordered LUMA to deliver quarterly and annual reports on a fiscal year schedule; produce annual reports within one hundred and twenty (120) days following the end of the program year as required by the Energy Bureau’s Regulation for Energy Efficiency (each a “TPP Annual Report” and, collectively, “TPP Annual Reports”); and adopt the updated reporting schedule in Table 1 of the February 16<sup>th</sup> Resolution and Order, titled “Transition Period Report and Filing Schedule” (“Table 1”), among others. *See id.* at page 18. Specifically, in Table 1 the deadlines for submitting quarterly reports remained at sixty (60) days from the end of the quarter<sup>2</sup>, establishing the deadlines for the TPP quarterly reports (each a “TPP Quarterly Report” and collectively, “TPP Quarterly Reports”) for FY2024 of November 23, 2023, March 29, 2024<sup>3</sup>, May 29, 2024 and August 29, 2024 corresponding to the first quarter (“Q1”), second quarter (“Q2”), third quarter (“Q3”) and fourth quarter (“Q4”), respectively. *See id.* The Energy Bureau also ordered LUMA to review and provide input on the Energy Bureau’s data reporting templates for the TPP Quarterly

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<sup>2</sup> This timeline meets the reporting requirements of the Regulation on Energy Efficiency, Regulation 9637, which provides that quarterly reports on the implementation of the Transition Period Plan must be filed within sixty (60) day of the end of the quarter. *See* Regulation 9637, Section 2.02(E)(1)(a).

<sup>3</sup> Given the sixty (60)-day quarterly report filing timeline proposed in the Proposed TPP and established in Regulation 9637, this date appears to be a typographical error and should be February 29, 2024.

Reports and TPP Annual Reports and “until such time as the reporting templates are available, report on all metrics identified in Section 6 of the Proposed TPP”. *See id.* at page 19.

3. In addition, in the February 16<sup>th</sup> Resolution and Order, the Energy Bureau established the deadlines of December 2, 2023 to prepare a draft FY2025-2027 Three-Year Plan (*see id.* at page 27); December 2023, to conduct a stakeholder meeting to discuss the Three-Year Plan and the TPP annual report (for FY 2023); and March 1, 2024, to file the FY2025-2027 Three-Year Plan (*see id.* at page 18).

4. On March 8, 2023, LUMA filed a motion requesting reconsideration of certain requirements in the February 16<sup>th</sup> Resolution and Order relating to performance targets. *See Motion for Reconsideration of Resolution and Order of February 16, 2023, and Request to Vacate Deadlines* of that date (“March 8<sup>th</sup> Motion”).

5. On April 3, 2023, the Energy Bureau issued a Resolution and Order (“April 3<sup>rd</sup> Resolution and Order”) in which, among others, it vacated the performance target requirements in the February 16<sup>th</sup> Resolution and Order, made several determinations regarding LUMA’s March 8<sup>th</sup> Motion, and ordered LUMA to file a petition for approval of the EE Rider on or before April 11, 2023. *See April 3<sup>rd</sup> Resolution and Order* on page 5. The April 3<sup>rd</sup> Resolution and Order did not modify the requirements pertaining to the TPP Quarterly Reports and TPP Annual Reports.

6. On April 11, 2023, LUMA submitted a petition for approval of the EE Rider (“EE Rider Petition”). *See Motion to Submit EE Rider* filed on that date. In the EE Rider Petition, LUMA provided a budget for the EE and DR Programs for FY2024. *See id.* Exhibit 1 at page 7.

7. On May 19, 2023, in compliance with an Energy Bureau bench order of May 5, 2023, LUMA filed a revised EE Rider Petition contemplating that the entire budget for the FY2024 programs would be fully funded by the EE Rider (“Revised EE Rider”). *See Motion to Submit*

*Revised Exhibit 1 to EE Rider Petition and Translation Thereof, in Compliance with Bench Order of May 5, 2023* of that date.

8. On June 30, 2023, the Energy Bureau issued a Resolution and Order in Case No NEPR-MI-2020-0001, *In Re: Permanent Rate of the Puerto Rico Electric Power Authority* (“Permanent Rate Case”) (“June 30<sup>th</sup> Resolution and Order”) wherein it determined, among others, to suspend the EE Rider for the month of July 2023 given the “great probability that the costs associated with [EE] programs will be paid with funds not associated with the EE Charge [EE Rider].” *See* June 30<sup>th</sup> Resolution and Order, page 11.

9. On July 31, 2023, the Energy Bureau issued a Resolution and Order in Case No. NEPR-MI-2020-0001, *In Re: Permanent Rate of the Puerto Rico Electric Power Authority*, (“July 31<sup>st</sup> Order”), in which it determined, in pertinent part, that the cost of DR programs will not form part of the EE Rider and ordered LUMA to contemplate the DR programs as part of the proposal of factors corresponding to the purchase power charge adjustment (“PPCA”) mechanism. *See* July 31<sup>st</sup> Order on pages 8 and 10.

10. On August 11, 2023, the Energy Bureau issued a Resolution and Order (“August 11<sup>th</sup> Order”) in which, among others, it ordered LUMA to file on or before August 23, 2023, for the Energy Bureau’s approval, the associated cost related to the compensation to be offered to the DR Aggregators and/or ratepayers that participate in the Battery Emergency DR Program of the TPP (now referred to by LUMA as the Customer Battery Energy Sharing Initiative or “CBES”) to be recovered through the PPCA. *See* August 11<sup>th</sup> Order on page 3.

11. In compliance with the August 11<sup>th</sup> Order, on August 23, 2023, LUMA submitted to the Energy Bureau the proposed estimated costs associated with the CBES, including the cost related to the compensation to be offered to the DR Aggregators that participate in the CBES to be

recovered through the PPCA. *See Motion to Submit Costs Associated with Emergency DR Program In Compliance with Resolution and Order of August 11, 2023, and Request for Confidential Treatment* filed August 23, 2023 (“August 23<sup>rd</sup> Motion”). LUMA indicated that the costs of the CBES to be recovered through the PPCA would be approximately \$5,060,938. *See* August 23<sup>rd</sup> Motion on page 10.

12. On August 29, 2023, the Energy Bureau issued a Resolution and Order (“August 29<sup>th</sup> Resolution and Order”) approving the compensation level proposed by LUMA in the August 23<sup>rd</sup> Motion and determining that the CBES budget proposed by LUMA “is aligned with the budget for the equivalent program as approved in the [TPP]” and determined such estimated budget was reasonable to launch the program. *See* August 29<sup>th</sup> Resolution and Order on page 2. The Energy Bureau also determined that administrative costs for DR Programs will be recovered through the PPCA. *See id.* at page 3. To ensure that expenditures are reasonable and strictly related to the DR Program, the Energy Bureau required LUMA to submit reports quarterly, within forty-five (45) days after each quarter of a fiscal year closes (each a “DR Administrative Costs Quarterly Report” and, collectively, “DR Administrative Costs Quarterly Reports”). *Id.* The Energy Bureau also indicated that the Q4 report would include the year-end report (“DR Administrative Costs Year-End Report”). *See id.* footnote 8.

13. Regarding the quarterly reports, the Energy Bureau directed LUMA to “conform to the quarterly and annual (year-end) financial reporting requirements in line with the requirements listed in NEPR-MI-2021-0004 (Re: LUMA Initial Budgets and Related Terms of Service)” with quarterly reports including an explanation for material variances (greater than 10%). *Id.* The Energy Bureau also required: (1) detailed quarterly and fiscal year-to-date fund actuals receipt as compared to budgeted in-flows from the PPCA and the to-date fund balance; (2) summarized

quarterly and fiscal-year-to-date program information in line with and compared to the assumptions used to develop the cost estimate in the August 23<sup>rd</sup> Motion, detailing any variances; (3) quarterly and fiscal-year-to-date spending amounts for the program, detailing any variances and other details to allow this Energy Bureau to assess funding, withdrawals, and outstanding balances. *See id.* Finally, the Energy Bureau required that the reports include a breakdown of program administrative costs among the following categories: (1) program management, (2) system operations, (3) customer service, (4) professional services, (5) program evaluation, and (6) other expenses, and include a summary of the primary purposes for which funds have been spent and how the funds have been attributed and allocated to the CBES. *See id.* at page 4.

14. On August 29, 2023, LUMA submitted the FY2023 Q4 Quarterly TPP Report, in compliance with the February 16<sup>th</sup> Resolution and Order. *See Motion to Submit FY 2023 Q4 TPP Report* of that date.

15. On September 20, 2023, LUMA filed a motion with the Energy Bureau submitting, among others, a proposed revised budget for the CBES reflecting reduced administrative costs for FY2024 and proposing to shift this cost reduction to increase the budget for estimated annual DR events while maintaining a total budget slightly below the approved \$5,060,938. *See Informative Motion and Request for Extension of Deadline to File Proof of Execution of Aggregation Agreements and Approval of Revised Program Budget* of that date on pages 8-9.

16. On October 30, 2023, LUMA filed a motion requesting this Energy Bureau to extend for an additional fiscal year the Approved TPP and to extend by one year the deadline to file the EE and DR Three-Year Plan, with the same cadence of quarterly and annual reporting as in the Approved TPP and associated one-year delays in other milestones for the preparation of a draft Three-Year Plan and stakeholder engagement regarding that plan. *See Request to Extend by*

*One Additional Year the Deadline to File the Three-Year Plan, Concomitant Deadlines and Extend the Term of the Transition Period Plan for An Additional Fiscal Year* (“October 30<sup>th</sup> Motion”) of that date, pages 15-16 and Exhibit 1.

17. On November 14, 2023, LUMA submitted the FY 2024 Q1 DR Administrative Costs Quarterly Report in compliance with the August 29<sup>th</sup> Resolution and Order. *See Motion to Submit First Quarterly Report on Administrative Costs and Expenditures of TPP DR Programs* filed on November 14, 2023.

18. On November 29, 2023, the Energy Bureau issued a Resolution and Order (“November 29<sup>th</sup> Order”) in which the Energy Bureau granted LUMA’s request to extend the TPP by one year, to June 30, 2025, and to delay the schedule (including all required drafts and stakeholder engagement processes) for the Three-Year EE and DR Plan by one year, “so that the Three-Year EE and DR Plan shall be filed by March 1, 2025”. *See* November 29<sup>th</sup> Order on page 7. In addition, “in order to evaluate LUMA’s plans for the Extended [TPP]” the Energy Bureau ordered LUMA to file by December 8, 2023 a revised TPP and submit certain information specified therein, including information on program plans, program schedules, and the expenditures and costs for FY2024 and FY2025, among others.

19. On November 29, 2023, LUMA submitted the FY2024 Q1 Quarterly TPP Report, in compliance with the February 16<sup>th</sup> Resolution and Order. *See Motion to Submit FY 2024 Q1 TPP Report* of that date.

20. On December 20, 2023, LUMA submitted to the Energy Bureau the revised version of the TPP (“Revised TPP”) and the information requested under the November 29<sup>th</sup> Resolution

and Order<sup>4</sup>. *See Motion to Submit Revised TPP and Other Information Requested Under the Resolution and Order of November 29, 2023* filed on December 20, 2023. The Revised TPP maintains the same requirements pertaining to the TPP Quarterly Reports and TPP Annual Reports for FY2024, while extending these to FY2025, and adds the DR Administrative Costs Quarterly Reports. *See id.* Exhibit 1, Section 6.0.

## **II. Submission of Q2 TPP Administrative Costs Quarterly Report**

21. In compliance with the August 29<sup>th</sup> Resolution and Order, LUMA submits herein its FY2024 Q2 DR Administrative Costs Quarterly Report. *See Exhibit 1.*

## **III. Request for Consolidation of DR Administrative Costs Quarterly Reports and TPP Quarterly Reports**

22. To create efficiencies and savings in the administration of the TPP, LUMA respectfully requests that the Energy Bureau allow for the DR Administrative Costs Quarterly Reports and the TPP Quarterly Reports to be consolidated into a single quarterly report containing the information required for both reports, and that these quarterly reports be filed within forty-five (45) days following the end of each quarter. This timeline is within the sixty (60)-day post-end-of-quarter deadline for filing the TPP Quarterly Reports under Regulation 9637<sup>5</sup> and is aligned with the forty-five (45)-day post-end-of-quarter deadline for the quarterly financial reporting requirements in case NEPR-MI-2021-0004 (*In Re: LUMA Initial Budgets and Related Terms of Service*).

23. LUMA respectfully submits that both reports overlap in terms of information. Specifically, in addition to information on the progress of the EE and DR programs,

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<sup>4</sup> The deadline to submit the revised TPP and other information required under the November 29<sup>th</sup> Resolution and Order was extended by the Energy Bureau by Resolution and Order of December 12, 2023 in attention to a request for extension filed by LUMA on December 7, 2023 (*see Request for Extension to Comply with the Order for LUMA to Provide Information Under the Resolution and Order of November 29, 2023* filed by LUMA on December 7, 2023).

<sup>5</sup> *See* Regulation 9637, Section 2.02(E)(1)(a).



implementation experience, participant enrollment, and performance. The TPP Quarterly Reports are required to include a discussion of costs to date for each program during the quarter and a description of any budget updates. *See Revised TPP, Section 6.0.* The DR Administrative Costs Quarterly Reports, in turn, are required to provide information on funds collections and balances, spending amounts per program, program administrative costs, broken down by category, and an explanation of material variances, among others. *See August 29<sup>th</sup> Resolution and Order at pages 3-4.* Since both reports must include information on DR program costs, similar efforts and resources are required to develop this information. In addition, the preparation of a report entails an internal process for review and approval of the report which is time- and resource-consuming and is recurrent for each report. All of these efforts would be consolidated and undertaken more efficiently if they were to be expended in the preparation of a single report.

24. For the same reasons, LUMA proposes that the DR Administrative Costs Year-end Reports be included in the TPP Annual Reports. The information required for the latter is the same as that for the DR Administrative Costs Quarterly Reports, but for the fiscal year. The TPP Annual Reports, in turn, are required to contain information on updated program budgets, costs for each program during the Program Year and other costs and funding updates, in addition to other information on the programs' progress, participant enrolled, activities and achievements, and performance. *See Revised TPP, Section 6.0.* LUMA proposes that the TPP Annual Reports continue to be filed within one hundred and twenty (120) days following the end of the fiscal year and include the information for the DR Administrative Costs Year-End Report. Although this change would result in a later submittal of the DR Administrative Costs Year-End Reports (currently required to be submitted with the Q4 DR Administrative Costs Quarterly Reports- that is, within forty-five (45) days of the end of Q4), this later submittal does not appear to affect any

other regulatory processes. In addition, the additional time to submit this report will allow for the use of better-quality information and a more complete picture of processes. The information available for a quarterly report may not reflect the complete picture of progress achieved in the process of data collection.

25. LUMA respectfully submits that consolidated reporting will ensure alignment and consistency of the reporting in this proceeding. Consolidated reporting will create efficiencies in the time and efforts of the LUMA teams to prepare the reports, potentially resulting in overall savings.

26. LUMA proposes that the consolidation of these reports commence with the FY2024 Q3 report (due on May 15, 2024) and continue throughout the rest of the term of the TPP; the TPP Q2 Quarterly Report will be filed separately on February 29, 2024.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the Q2 DR Administrative Costs Quarterly Report in *Exhibit 1* in compliance with the August 29<sup>th</sup> Resolution and Order; **grant** LUMA's request to consolidate the DR Administrative Costs Quarterly Reports and the TPP Quarterly Reports into a single quarterly report to be filed within forty-five (45) days of the end of each fiscal year quarter, commencing with the reports for 2024 Q3; and **grant** LUMA's request to consolidate the DR Administrative Costs Year-End Reports and the TPP Annual Reports into a single annual report to be filed within one hundred and twenty (120) days following the end of the fiscal year, commencing with the annual report for FY2024.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 14<sup>th</sup> day of February 2024.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion to the attorneys for PREPA at

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*Exhibit 1*

*Q2 DR Administrative Costs Quarterly Report*

# Customer Battery Energy Sharing (CBES) Initiative Administrative Costs Q2

## FY2024 Report

Reporting Period October – December 2023

# Content

- Introduction
- Historic Progress Towards System Resiliency
- Capacity Dispatched, December 7, 2024 Event
- Regulatory Context
- Program Administrative Cost
- Program Administrative Costs: Quarterly FY2024
- CBES FY2024 Q2 Updated Indicators

# Introduction

As operator of the electric transmission and distribution system, LUMA is responsible for helping to implement Puerto Rico's public energy policy, including important customer initiatives such as Energy Efficiency ("EE") and Demand Response ("DR") programs that are required by law and mandated by the Puerto Rico Energy Bureau (Energy Bureau).

LUMA is committed to working with the Energy Bureau to build a more reliable, more resilient, more customer-focused, and cleaner energy system that benefits everyone in Puerto Rico. To move toward this goal and to make it feasible for energy service customers to become prosumers as envisioned in Law 17-2019, reliability solutions are being implemented to benefit all customers. Among these solutions is the incorporation of important energy-saving resources like DR programs that help reduce electricity usage during peak periods or when generation capacity is insufficient to meet customer demand.

Behind the meter ("BTM") batteries have the potential to provide significant grid benefits. The Customer Battery Energy Sharing Initiative (CBES) is a DR program designed to leverage distributed batteries to reduce service interruptions. The pilot program will allow LUMA to develop procedures to leverage distributed batteries as a DR resource. The CBES is directed at residential and commercial LUMA customers with BTM batteries who are registered in the Net Energy Metering Program. Participants of the CBES receive compensation from DR Aggregators for operating their BTM batteries during Events. Customer participation in CBES program Events is voluntary, and Participating Customers may opt out of any CBES program Event at any time.

# Historic Progress Toward System Resiliency

Key milestones achieved during the quarter for the Customer Battery Energy Sharing (CBES) Initiative.

Successfully  
launched in  
November 2023

1,952  
customers  
enrolled

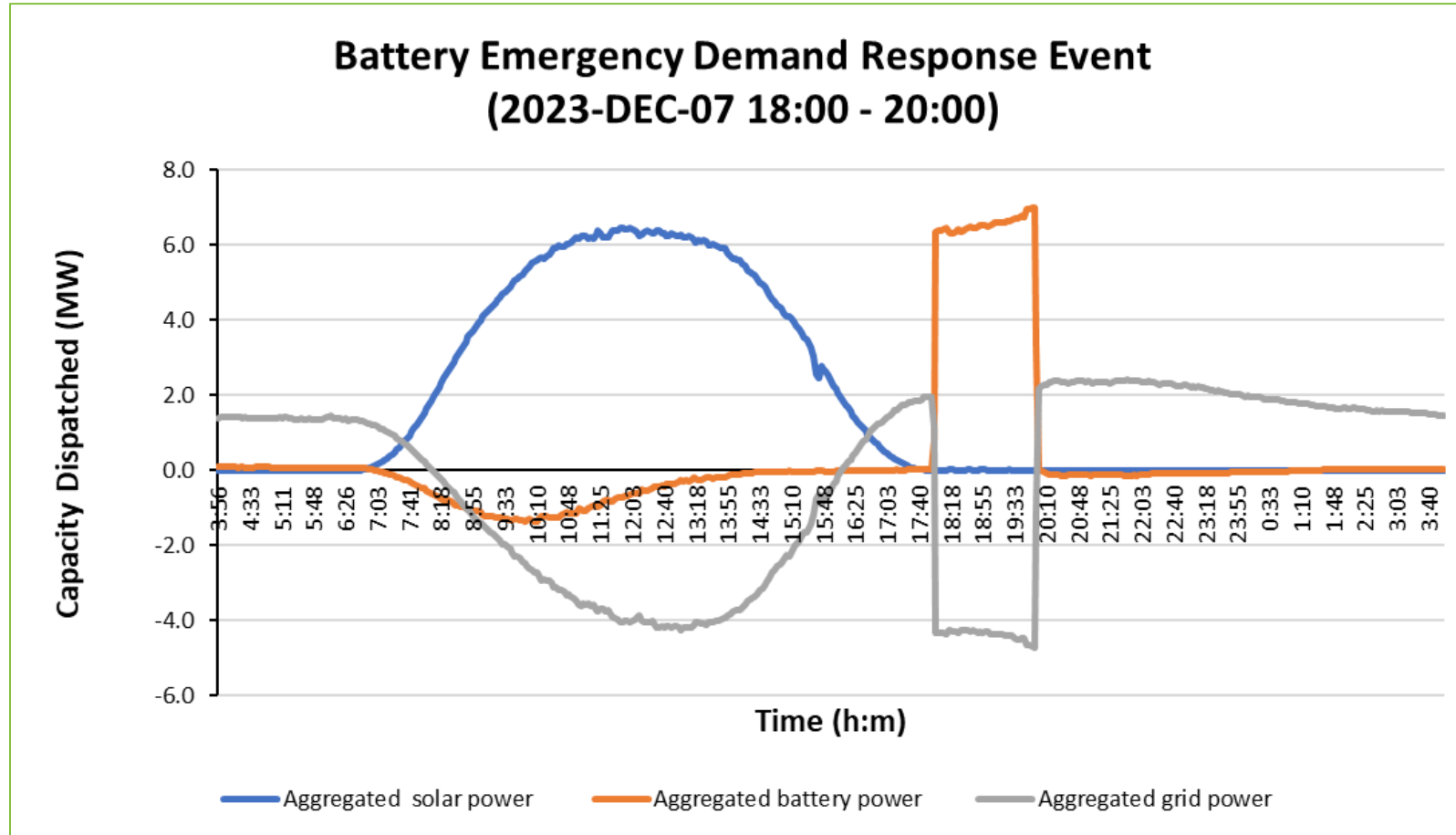
3 events  
completed

Enrolled  
capacity per  
event  
12.5 MW

Energy  
available per  
Event  
23.2 MWh



# Capacity Dispatched- Dec/07/2023 Event



On December 7, 2023, LUMA issued an Event Notice to Demand Response (DR) Aggregators requesting the dispatch of all enrolled batteries. The orange line illustrates the peak of energy supplied to the grid.

# Regulatory Context

On August 29, 2023, the Energy Bureau issued a Resolution and Order, (“August 29th Resolution and Order”) approving the compensation level proposed by LUMA for the DR Aggregators participating in the CBES program by Motion filed on August 23, 2023, and determining that the CBES budget proposed by LUMA “is aligned with the budget for the equivalent program as approved in the [TPP] and determined such estimated budget was reasonable to launch the program.”

In the August 29<sup>th</sup> Resolution and Order, the Energy Bureau determined that costs for DR Programs will be recovered through the Purchase Power Charge Adjustment (PPCA) mechanism. To ensure that expenditures are reasonable and strictly related to the DR Program, the Energy Bureau adopted reporting requirements pursuant to which LUMA shall report quarterly, within forty-five days of the close of each quarter.

In compliance with the Energy Bureau’s orders, LUMA will conform to the quarterly and annual (year-end) financial reporting requirements in line with the reporting requirements listed in the Budgets Docket (NEPR-MI-2021-0004).



# Program Administrative Costs

LUMA incurred \$162,697 in program management costs during this quarter. These program management costs were related to conducting regular meetings with aggregators and internal LUMA teams, technical sessions to finalize operational aspects of the pilot, enrollment, reports development and the CBES webpage launch.

LUMA did not incur in costs related to System Operations.

Professional services resulted in \$66,837 for technical assistance development and support of the program.

Program evaluation costs were not incurred during this period.

Other expenses for a total of \$31,342 were related to procurement processes, regulatory filings, and legal support.

Estimated forecast for administrative costs were \$255,000 which resulted in a variance of \$5,877 for this quarter.

**Table 1. Program Administrative Costs**

Categories	Costs
Program Management	\$162,697
System Operations	\$0
Customer Service	\$0
Professional Services	\$66,837
Program Evaluation	\$0
Other Expenses	\$31,342
Total	\$260,877

# Program Administrative Costs: Quarterly for FY2024

Table 2. FY24 Quarterly Costs

Categories	Costs Q1 FY2024	Costs Q2 FY2024	Costs YTD FY2024
Program Management	\$97,221	\$162,697	\$259,918
System Operations	\$0	\$0	\$0
Customer Service	\$0	\$0	\$0
Professional Services	\$55,334	\$66,837	\$122,171
Program Evaluation	\$0	\$0	\$0
Other Expenses	\$42,693	\$31,342	\$74,035
Total	\$195,248	\$260,877	\$456,124

# CBES FY2024 Q2 Updated Indicators

**Table 3. CBES Forecast vs. Actuals**

Program Parameters	Q2 Original Forecast	Q2 Actual	Q2 Original Forecast Vs. Q2 Actual (Variance)
Customers Enrolled (#)	6,500	1,952	4,548
Events (#)	30	3	27
Capacity per Event (kW)	21,125	6,488*	14,637
Energy per Event (kWh)	126,750	12,976*	113,774
Total Energy Delivered (kWh)	1,267,500	17,214**	1,250,286
Incentive Payments	\$1,584,375	\$21,517	\$1,562,858
Administrative Costs	\$255,000	\$260,877	\$5,877
Total Program Costs (\$)	\$1,839,375	\$282,394	\$1,556,981

\* Based on quarter last event (12/07/2023)

\*\*Sum of all events on quarter

A variance between forecasted and actual values for this quarter is due to the difference between the number of events forecasted versus actual ones. This variance is included in the quarterly PPCA reconciliation.

February 14, 2024

