

# Summit Utilities Oklahoma Demand Side Management Programs

## Annual Report 2024 Program Year

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PY 2024 DEMAND SIDE MANAGEMENT PROGRAM ANNUAL REPORT  
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**Executive Summary**

On October 7, 2010, CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Oklahoma Gas (“CenterPoint Oklahoma” or the “Company”) proposed a comprehensive portfolio of Conservation Improvement Programs (“CIP,” and as a whole, the “CIP Portfolio”) in response to the Oklahoma Corporation Commission’s (“OCC” or the “Commission”) Rules for Demand Programs, OAC § 165:45-23-1 et seq. On March 25, 2011, the Commission approved the program portfolio in Order No. 583869 in Cause No. PUD 201000148, and CenterPoint Oklahoma began to implement the program portfolio thereafter in 2011. On February 1, 2012, the Commission approved modifications and additions to the Company’s previously approved CIP portfolio in Order No. 593649 in Cause No. PUD 201100149. On August 13, 2013, the Commission approved an updated CIP portfolio for program years (“PY”) 2014 - 2016 in Order No. 616573 in Cause No. PUD 201300085. On October 26, 2016, the Commission approved an updated CIP portfolio for PY 2017 - 2019, in Order No. 657250 in Cause No. PUD 201600263. On August 8, 2019, the Company requested approval of an updated comprehensive CIP Portfolio for PY 2020 - 2022. The OCC approved this request on December 10, and CenterPoint Oklahoma began delivery of this CIP Portfolio on January 1, 2020, in Order No. 706092 in Cause No. PUD 201900060. As of January 10, 2022, CenterPoint Energy Oklahoma was acquired by Summit Utilities, Inc. (“Summit”) and is now operating as Summit Utilities Oklahoma, Inc (“Summit Utilities Oklahoma” or “SUO”). On September 19, 2022, Summit filed an application for an updated comprehensive CIP Portfolio for PY 2023 - 2025. The OCC approved this request on January 12, 2023, in Order No. 732328 in Cause No. PUD 202200087 and Summit Utilities Oklahoma began delivery of this CIP Portfolio the same day.

This report is filed in response to the Commission’s reporting requirements specified in OAC § 165:45-23-7, which requires SUO to report the performance of its energy efficiency programs for the preceding program year. Consistent with the requirements, this report will outline the activities and results of the Company’s CIP Portfolio performance for PY 2024.

Summit Oklahoma implemented and administered the following CIP programs in PY 2024:

- **Summit Utilities Education Program (“SUEP”)** - The SUEP is intended to educate residential and commercial customers to help them understand their natural gas energy usage and learn about ways to conserve energy. The SUEP program is intended to promote general awareness and customer education and will also help promote the overall awareness of Summit Utilities Oklahoma's Demand Side Management (“DSM”) offerings.
- **Residential Solutions (“RSOL”) Program** – A suite of DSM channels that offer several comprehensive channels designed to help residential customers reduce their energy costs and carbon emissions.

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- **The Natural Gas Equipment Channel** is designed to promote high efficiency equipment solutions for residential, commercial, and multifamily customers and developers. Rebate inducements will be offered to consumers and developers to encourage the purchase and installation of new high efficiency natural gas water heaters, furnaces, clothes dryers, gas ranges, and thermostats.
- **The High Efficiency Home Channel** will provide financial inducements to encourage builders to construct new homes that are equipped with efficient natural gas appliances.
- **The Do-It-Yourself (“DIY”) Channel** will provide no or low-cost energy - saving measures to Summit Utilities Oklahoma consumers. The low flow showerheads, aerators, smart thermostats, and other energy savings products will be available for order on Summit Utilities’ marketplace. Customers will be given the option to request multiples of each energy-saving product within prescribed limits.
- **The Home Energy Reports (“HERs”) Channel** An educational and behavioral change program which provides individualized information and recommendations regarding energy usage through Home Energy Reports, sent to select Summit Utilities customers. The direct mail Home Energy Reports utilize energy usage data with customer demographic, housing, and GIS data to develop specific, targeted recommendations that educate and motivate customers to reduce their energy consumption.
- **Access to Affordable Energy and Conservation (“AAEC”) Program** – The Summit Utilities Oklahoma’s AAEC Program is designed to provide low to moderate (“LMI”) income customers and severely energy burdened customers the opportunity to save energy and money by leveraging a number of channels designed to encourage hard-to-reach customers to participate in the Company’s conservation programs. Weatherization, DIY, behavioral energy reports, elementary conservation education, and equipment rebate channels are designed specifically to remove barriers to participating in DSM programs by identifying high risk customers and engaging them with comprehensive programs to meet each household’s specific needs. These channels are also designed to reach a spectrum of age groups starting with conservation education for fifth or sixth graders to behavioral and weatherization measures for age 65+ households. This comprehensive suite of pathways will make certain all LMI and severely energy burdened customers have full access to affordable and comprehensive energy and conservation services.
  - **Low-Income Saving Homes (“LISH”) Channel** is designed to provide weatherization retrofits that will improve the efficiency and comfort of Summit Utilities Oklahoma’s low-income and hard to reach residential customers. In partnership with Public Service Company of Oklahoma (“PSO”), weatherization

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measures are performed by a contractor and paid for by both Summit Utilities Oklahoma and PSO. The measures include a health and safety evaluation, air infiltration reduction, attic insulation, duct blasting and sealing, and water heater jackets and hot water pipe insulation.

- **LMI DIY Channel** will offer an identical pathway to the Do-It-Yourself Program, offering low flow options, smart thermostats, and other energy savings measures, with the addition of health and safety measures such as smoke and carbon monoxide detectors, and home-sealing measures to low- and moderate-income customers. LMI customers will be identified and marketing campaigns crafted to maximize LMI customer engagement.
- **LMI HERs Channel** will offer an identical pathway to Home Energy Reports to customers that meet the criteria determined for low or moderate income. Customers will receive specific messaging that will encourage LMI customers to reduce energy consumption and be provided with information about additional DSM information and offerings. The Home Energy Reporting System is a unique software platform that combines energy usage data with customer demographic, housing and GIS data to develop specific, targeted recommendations that educate and motivate consumers to reduce their energy consumption.
- **LMI LivingWise Channel** is designed to provide Title I School teachers with a curated curriculum for students that promotes conservation. Elementary school children will be provided with a kit of energy and water saving measures to take home. These kits will also include instructions on how to track the effectiveness of conservation equipment by instructing the student to measure consumption before and after the equipment is installed. Parents are encouraged to participate with their children to maximize learning.
- **Affordable Housing Equipment Rebate (“AHER”) Channel Pilot** is designed to promote high efficiency equipment solutions in residential, commercial, and multifamily properties. Enhanced rebate inducements will be offered to affordable housing landlords and property managers to encourage the purchase and installation of new high efficiency natural gas water heaters and furnaces.

**Natural Gas Commercial Solutions (“NGCS”) Program**

- **C&I Custom Channel** is administered by CLEAResult and provides financial incentives and technical consulting assistance designed to help commercial and industrial customers identify, develop, and implement cost effective energy efficiency solutions at their facilities.

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- No-Cost Facility Audit - Program representatives will perform a valuable no-cost facility audit, to determine if any natural gas is being used inefficiently and help identify cost-effective solutions to reduce energy waste and save money.
- Custom Project Measures - target commercial and industrial customers. Projects identified will be eligible for custom incentives based on final program design, after applying documented and defensible calculated energy savings.
- **C&I Direct Install Channel** targets small to mid-size commercial customers and is also administered by CLEAResult. It is a turnkey equipment replacement program designed to reduce customer energy usage costs through the installation of low-flow pre-rinse spray valves, faucet aerators, showerheads, weather-stripping, and steam traps.
- **Commercial Food Service Channel** promotes the reduction of natural gas energy usage for commercial food service customers via inducements ranging from \$500 to \$2,400 for the purchase and installation of qualified new energy efficient food service equipment. This program is also administered by CLEAResult.
- **Commercial Boiler Channel** encourages commercial customers to install efficient natural gas comfort heating boilers via inducements ranging from \$1,400 to \$2,000 per MMBTU of input for the purchase of qualified new energy efficient boilers. This program is also administered by CLEAResult.

### Portfolio Insights

The CIP Portfolio produced net energy savings of 94,603 Mcf. The programs generated a Utility Cost Test (UCT”) net economic benefit of \$1,309,610 and helped participants save money through a combination of prescriptive and custom rebates, direct-install measures, energy usage reports, and weatherization services.

Key insights from PY 2024 program delivery include:

- **Natural Gas Equipment and High Efficiency Homes Channels** – Program Year 2024 was challenging for the Natural Gas Equipment Channel. The rising cost of natural gas furnaces and water heaters made it more difficult for customers to afford replacement equipment, opting instead to repair aging equipment. Another factor impacting the Channel is the interest rate, which continues to remain high compared to the last several years.

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Financing replacement equipment is difficult for customers who do not have the means to afford the higher monthly payments. In contrast, the High Efficiency Homes Channel proved to be more resilient despite the rising cost of equipment and high interest rates. The new construction market remains steady with new housing starts continuing its pace in PY 2024.

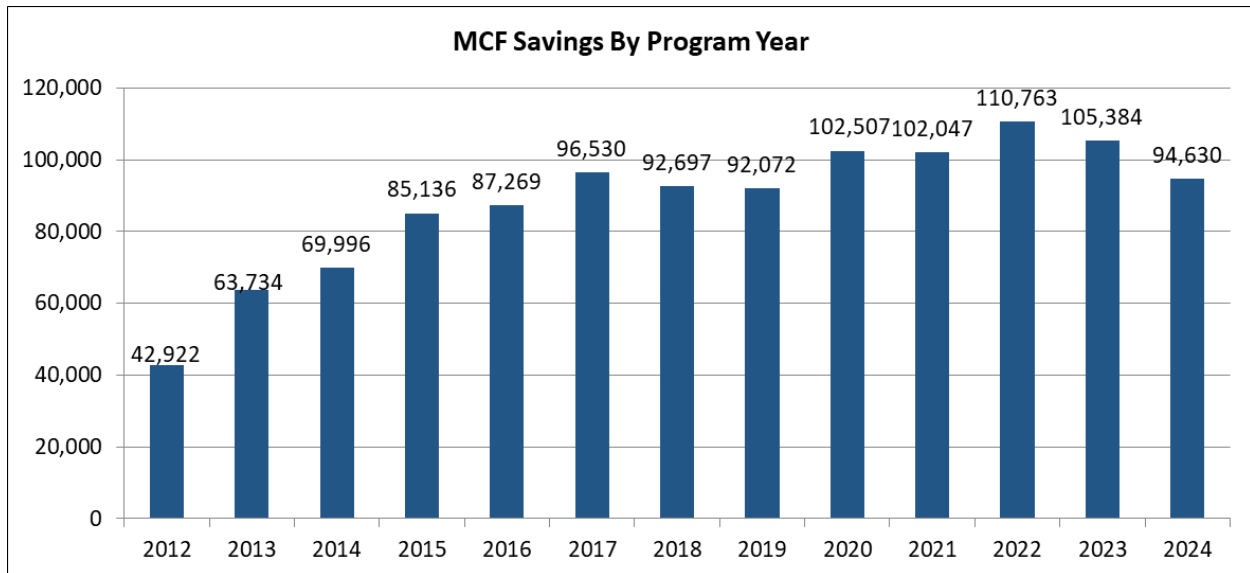
- **Natural Gas Commercial Solutions Program** – PY 2024 was another year of strong growth for the Company’s Natural Gas Commercial Solutions Program. This program includes the C&I Custom, C&I Direct Install, Commercial Food Service, and Commercial Boiler channels. Both Food Service and Boiler measures produced more savings than the previous year, supporting the Commercial Solutions Program’s higher net savings achievement in PY 2024. The direct-installation measures continued to be a very effective inducement to drive commercial energy savings at no cost to participants and achieved a significantly higher amount of savings compared to PY 2023. The custom portion of the program provided participants with technical assistance, recommendations, and financial inducements to implement energy saving measures such as insulation upgrades and equipment controls. The custom program continues to be a stable source of savings and will continue to grow as more industrial customers recognize the value of DSM programs. The C&I program delivered the highest amount of energy savings, at 53,108 Mcf, since the inception of DSM programs in Oklahoma. The savings achieved in PY 2024 were 15% higher than the previous year.
- **Home Energy Reports and LMI Home Energy Reports Channel** – The HERs channel has historically been a high performing component of the portfolio, effectively driving energy-saving behavior through targeted reporting and cross-promotion of other offerings. However, recent years have seen a decrease in savings. Since its inception, the channel has primarily delivered energy reports to the same group of recipients, with a few periodic exceptions for a refill of customers. This has led to declining group sizes due to attrition as customers move out, creating a relatively static recipient base. The channel has also been operating from seven different control/recipient groups, which has proven to be too many for this territory’s current population size and has resulted in diluted data and less significant statistical outcomes. The LMI segment of this channel has been realigned to be more congruent with LIHEAP standards. This shift resulted in lower reported savings for PY 2024. Despite these challenges, the channel continues to be an impactful tool for customer engagement and energy education.
- **Affordable Housing Equipment Rebate Pilot Channel** – In the affordable housing market, landlords and rental property managers typically install standard efficiency equipment due to low rental margins. Program participation was low again in PY 2024, due to slow adoption of the Channel by landlords and property management companies. To improve participation, the program was expanded to include homeowners, who qualify by age or income, and housing authorities.

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**LivingWise Channel** – The LivingWise channel continues to play a vital role in educating fifth and sixth graders on the importance of energy conservation. Offered to Title I schools at no cost, the program not only supports classroom learning but also extends energy-saving practices into students' homes—engaging both students and their families in meaningful conservation behavior. In PY 2024, participation declined due to concern for double counting as 5<sup>th</sup> grade participants moved into the 6<sup>th</sup> grade curriculum. In response, the channel was suspended for 6<sup>th</sup> graders and focused on 5<sup>th</sup> grade classroom enrollment. This concern has been addressed, and the implementation team has established protocols to prevent duplicate participation, ensuring data integrity and allowing continued engagement for both grade levels for future program years.

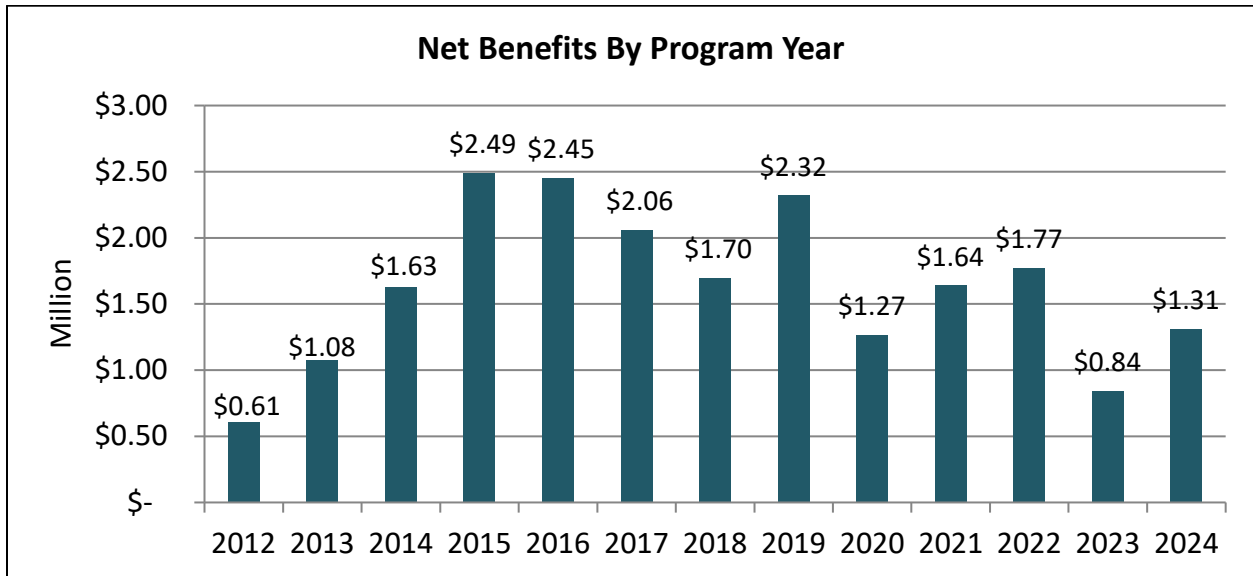
- **UCT Net Benefits** – UCT net benefits were higher for PY 2024 due to improved expense management, slight reduction in cost of program implementation due to lower participation, the reduction of startup costs associated with new program implementation, and higher savings per measure as compared to previous years.

**Figure 1: Energy Savings by Program Year**





**Figure 2: Net Benefits by Program Year**



The remainder of this report is organized according to the OCC’s reporting requirements specified in OAC § 165:45-23-7(c).

### **§ 165:45-23-7(c)(1): Demand Programs by Customer Category**

#### **OAC § 165:45-23-7(c)(1): The name of Demand Program listed by Category**

Table 1 lists the customer categories (by class) served by each Conservation Improvement Program delivered by Summit Utilities Oklahoma in PY 2024.

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**Table 1: Programs & Customer Categories**

Program	Customer Category Served			
	Residential	Commercial CS-1	Commercial CS-2	Commercial LCS
Residential Solutions Program	✓	✓	✓	✓
Access to Affordable Energy & Conservation (AAEC) Program	✓			
Natural Gas Commercial & Industrial Solutions (C&I) Program		✓	✓	✓
Summit Utilities Education (SUEP) Program	✓	✓	✓	✓

**§ 165:45-23-7(c)(2): Programs and Date Started**

**OAC § 165:45-23-7(c)(2): a list of all programs and the date each program started.**

Upon OCC approval of the first CIP Portfolio on March 25, 2011, Summit Utilities Oklahoma began the delivery of the following energy efficiency programs:

- CenterPoint Energy Education Program (“CEEP”)
- Residential Home Energy Reports
- Water Heating
- Space Heating Systems
- Low-Flow Showerhead and Faucet Aerator
- Commercial Boiler
- Commercial Food Service

The OCC approved a modified CIP Portfolio on February 1, 2012, and CenterPoint Energy began the delivery of the following programs for 2012:

- Multi-Unit Market Transformation
- Clothes Dryer

On August 13, 2013, the OCC approved a new CIP Portfolio triennial plan for PY 2014 - 2016. In January of 2014, CenterPoint Oklahoma began implementing this triennial plan, which included

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the previously approved programs along with the following additional programs and program updates:

- Electronic Ignition Hearth
- Cooking Range
- New Home Construction
- Residential Energy Audit
- Furnace Tune Ups (addition to Space Heating Program)

On October 26, 2016, the OCC approved a new CIP Portfolio triennial plan for PY 2017 - 2019. In January of 2017, CenterPoint Oklahoma began implementing this new triennial plan, which includes modifications to previously approved programs and discontinues implementation of the Electronic Ignition Hearth and Residential Energy Audit Programs delivered in 2014-2016.

On December 10, 2019, the OCC approved a new CIP Portfolio triennial plan for PY 2020 - 2022. On January 1, 2020, CenterPoint Oklahoma began implementation of the new triennial plan, which included the consolidation of the natural gas clothes dryer, natural gas cooking range, and multifamily program into the Natural Gas Equipment program as measures. A residential low-income program was also added to the portfolio. Finally, the boiler and foodservice programs were consolidated into the Commercial and Industrial Program as measures.

On January 10, 2022, Summit Utilities Inc. acquired CenterPoint Energy's Oklahoma assets and is now recognized as Summit Utilities Oklahoma.

On February 22, 2023, The OCC approved Summit Utilities Oklahoma's PY 2023-2025 CIP Portfolio. Highlights of the new Summit Utilities Oklahoma CIP Portfolio include the consolidation of programs, as channels, under three customer categories: residential, low to moderate income, and commercial customers. The following new channels were added to the AAEC Program: LMI DIY, LMI HERs, LMI LivingWise, and Affordable Housing Rebate Program.

### **§ 165:45-23-7(c)(3): Customer Participation**

#### **OAC § 165:45-23-7(c)(3): The number of Participating Customers per Demand Program.**

Listed on Table 2 are Summit Utilities Oklahoma PY 2024 CIP Portfolio participation results which had a total of participants and measures installed.

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**Table 2: Participation by Program**

Program	Participants
Residential Solutions (RSOL) Program	27,862
Access to Affordable Energy and Conservation (AAEC) Program	11,954
Natural Gas Commercial Solutions (NGCS) Program	226
Summit Utilities Education Program (SUEP)	0
<b>Total</b>	<b>40,042</b>

Listed on Table 3 is Summit Utilities Oklahoma PY 2024 CIP Portfolio with total number of eligible customers and distinct customer totals by program and with percentage analysis of district customers who participated and did not participate in the programs.

**Table 3: Participation vs. Nonparticipation**

Program	Total Customers	Direct Participants	% Participants	% Nonparticipants
Residential Solutions (RSOL) Program	87,918	27,668	31.47%	68.53%
Access to Affordable Energy and Conservation (AAEC) Program	87,918	11,091	12.62%	87.38%
Natural Gas Commercial Solutions (NGCS) Program	10,609	39	0.37%	99.63%
Summit Utilities Education Program (SUEP)	98,768	98,457	99.69%	0.31%

## §165:45-23-7(c)(4-6): Projected & Actual Energy Savings

**OAC § 165:45-23-7(c)(4):** By Demand Program, approved projected energy savings (in decatherms) as approved;

**OAC § 165:45-23-7(c)(5):** The gross energy savings (in decatherms) and performance of each Demand program; and

**OAC § 165:45-23-7(c)(6):** The verified energy savings (in decatherms) by Demand Program and methods used to verify.

Table 4 compares the projected savings to the gross and net savings achieved in 2024 for each program.

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**Table 4: Projected, Gross, and Net Energy Savings by Program**

<b>Program</b>	<b>2024 Projected Annual Savings (MCF)</b>	<b>2024 Annual Gross Savings Achieved (MCF)</b>	<b>2024 Annual Net Savings Achieved (MCF)</b>
<b>Residential Solutions (RSOL) Program</b>	32,351	34,018	22,799
<b>Access to Affordable Energy and Conservation (AAEC) Program</b>	20,588	20,746	14,937
<b>Natural Gas Commercial Solutions (NGCS) Program</b>	48,828	49,321	56,894
<b>Summit Utilities Education Program (SUEP)</b>	0	0	0
<b>Total</b>	101,767	104,086	94,630

### **Energy Savings and Methodology**

The energy savings methodologies and inputs outlined in the Arkansas Technical Reference Manual (“TRM”) were used to calculate energy savings for all programs resulting in energy savings. The TRM can be found on the Arkansas Public Service Commission’s website.<sup>1</sup> All the weather zones in Summit Utilities Oklahoma’s service territory are included in the TRM, so any climate differences between the two states have been appropriately considered.

Summit Utilities Oklahoma also modified the data and methodologies provided in the Arkansas TRM to calculate energy savings from fuel switching activities. The energy savings utilized in electric to gas applications consider the full fuel cycle of energy and account for the source of the fuel in addition to the site emissions. The Arkansas TRM was used to calculate site and baseline emissions. For heating systems, the electric baseline was an air source heat pump (“HSPF 8.2”) with back-up electric resistance heating used for 11% of the heating load. For water heating systems, the standard electric water heater efficiencies were utilized.

In PY 2024, ADM Associates (“ADM”) conducted the Evaluation, Measurement, and Verification (“EM&V”) of Summit Utilities Oklahoma CIP Portfolio. ADM’s review included a process evaluation and an impact evaluation to determine the verified and net savings attributable to the Company’s PY 2024 program activities. The 2024 EM&V Report completed by ADM can be found in Appendix A of this report.

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<sup>1</sup> [http://www.apscservices.info/EFilings/Docket\\_Search\\_Documents.asp?Docket=10-100-R&DocNumVal=199](http://www.apscservices.info/EFilings/Docket_Search_Documents.asp?Docket=10-100-R&DocNumVal=199)

## § 165:45-23-7(c)(7): Education Programs

**OAC § 165:45-23-7(c)(7): For Education Programs measurements of outreach efforts, including pre-program and post-program results and copies of evaluations, surveys, focus group results, and other measurement techniques used to gauge the effectiveness of education efforts.**

As part of their PY 2024 EM&V effort, ADM conducted participant surveys to determine how customers became aware of the Company's programs. These survey results are provided in ADM's EM&V Report, and they provide insights on which outreach efforts were the most effective at creating program awareness.

## § 165:45-23-7(c)(8): Levelized Cost

**OAC § 165:45-23-7(c)(8): The levelized cost per decatherm for the Demand Portfolio, Demand Programs, and by customer sector, including all assumptions used to make the calculation.**

The levelized cost for the Company's PY 2024 CIP Portfolio was \$2.29 per Mcf. This is a decrease of \$0.81 from PY 2023. Summit Utilities Oklahoma used the following methodology to calculate the levelized cost:

*Levelized TRC Cost =*

$$\frac{\text{Capital Recovery Factor} * (\text{Total Program Administrator Costs} + \text{Total Participant Costs (net of incentives)})}{\text{Annual Energy Savings (MCF)}}$$

*Where:*

$$\text{Capital Recovery Factor} = [A * (1 + A)^B] / [(1 + A)^B - 1]$$

*A = Discount Rate (Societal Rate)*

*B = Weighted Average Life of Savings*

Tables 5 and 6 provide details on the levelized cost at the program, customer sector, and portfolio levels.

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**Table 5: Levelized Cost by Program**

Total Resource Cost Test and TRC Levelized Cost By Program		Total Resource Cost Test (TRC)					
		Annual Net Lifetime Energy Savings MCF	Total Cost \$	Total Net Benefits \$	TRC Ratio	Measure Life Years	TRC Levelized Cost (\$/MCF)
Program	Savings Type						
Residential Solutions (RSOL) Program	Natural Gas	94,599	\$829,207	(\$401,211)	0.52	4.30	\$8.77
Access to Affordable Energy and Conservation (AAEC) Program	Natural Gas	152,631	\$556,574	\$66,902	1.12	10.60	\$3.65
Natural Gas Commercial Solutions (NGCS) Program	Natural Gas	613,683	\$550,787	\$1,899,038	4.45	11.19	\$0.90
Summit Utilities Education Program (SUEP)	Educational Program	0	\$31,633	(\$31,633)	0.00	0	
Total Portfolio		860,913	\$1,968,201	\$1,533,096	1.78	9.43	\$2.29

**Table 6: Levelized Cost by Customer Sector**

Total Resource Cost Test and TRC Levelized Cost By Customer Sector	Net Energy Savings	Total Resource Cost Test (TRC)		
	Annual Net Lifetime Energy Savings MCF	Total Net Benefits \$	TRC Ratio	TRC Levelized Cost (\$/MCF)
Customer Sector				
Residential	247,230	-\$358,118	0.76	\$5.70
Commercial GS-1	333,039	\$1,042,359	4.64	\$0.26
Commercial CS-1	280,643	\$855,843	4.24	\$1.79
Commercial LCS	0	-\$6,988	0.00	
Total Portfolio	860,913	\$1,533,096	1.78	\$2.33

## **§ 165:45-23-7(c)(9): Reduced Emissions and Water Consumption**

**OAC § 165:45-23-7(c)(9): The amount of reduced emissions and water consumption experienced by the utility, including all assumptions and calculation details, during the Demand Program period for the current program year.**

### **Reduced Emissions**

Summit Utilities Oklahoma used the United States Environmental Protection Agency's Greenhouse Gas Equivalencies Calculator<sup>2</sup> to estimate the impact of reduced emissions attributable to the 94,630 in Mcf savings delivered through the PY 2024 CIP Portfolio. Overall, the Company's programs reduced carbon dioxide (CO<sub>2</sub>) emissions by 5,187 metric tons. This is equivalent to:

Greenhouse gas emissions from:

- 1,210 passenger vehicles driven for one year; or
- 13,209,312 miles driven by an average passenger vehicle.

Carbon dioxide emissions from:

- Annual energy use of 697 homes;
- 5,761,931 pounds of coal burned; or
- 583,675 gallons of gasoline consumed.

### **Reduced Water Consumption**

Table 7 Summit Utilities Oklahoma calculated the reduction in water consumption delivered through the Low-Flow Showerhead and Faucet Aerator Program. Based on the count, by weather zone, of each low-flow equipment type, an estimated annual reduction in gallons of water use was calculated.

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<sup>2</sup> [epa.gov/energy/greenhouse-gas-equivalencies-calculator?unit=MCF&amount=102,507](https://epa.gov/energy/greenhouse-gas-equivalencies-calculator?unit=MCF&amount=102,507)



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**Table 7: Reduced Water Consumption**

<b>Annual Water Savings Low Flow Showerhead And Faucet Aerator Program</b>		
Measure	Equipment Count	Net Water Savings (Gallons)
Faucet Aerators	214	89,354
Low-Flow Showerheads	221	576,880
Total	435	666,234

**§ 165:45-23-7(c)(10): Portfolio Budget & Total Annual Gas Revenue**

**OAC § 165:45-23-7(c)(10):** The Demand Portfolio funding as a percent of total annual gas revenue

Table 8 displays the PY 2024 CIP Portfolio budget as a percentage of Summit Utilities Oklahoma 2024 revenue.

**Table 8: Demand Portfolio Funding as a Percent of Total Annual Gas Revenue**

<b>2024 Portfolio Budget</b>	<b>2024 Revenue</b>	<b>Demand Portfolio Funding % Total Revenue</b>
\$2,544,632	\$80,056,121	3.18%

**§ 165:45-23-7(c)(11): Portfolio Energy Savings & Annual Gas Usage**

**OAC § 165:45-23-7(c)(11):** The Demand Portfolio Net source energy savings as a percent of total gas annual usage

Table 9 displays the PY 2024 CIP Portfolio net energy savings as a percentage of Summit Utilities Oklahoma 2024 natural gas throughput.

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**Table 9: Demand Portfolio Savings as a Percent of Total Natural Gas Usage**

<b>2024 Net Energy Savings (MCF)</b>	<b>2024 Natural Gas Usage (MCF)</b>	<b>Energy Savings %Annual Gas Usage</b>
94,630	12,248,298	0.77%

**§ 165:45-23-7(c)(12): Projected Program Costs**

**OAC § 165:45-23-7(c)(12): The projected program costs;**

**These costs should be separated into the following categories to allow review of spending:**

- (i) Administrative costs;
- (ii) Inducements: direct payments and other inducements
- (iii) Education and marketing costs;
- (iv) Program delivery costs; and
- (v) EM&V costs

Table 10 provides the PY 2024 budgets for each program by cost category.

**Table 10: Program Budgets by Category**

<b>Program</b>	<b>Admin/Internal Delivery</b>	<b>Rebate &amp; Incentive</b>	<b>Education/ Advertising</b>	<b>Delivery</b>	<b>Evaluation</b>	<b>Total Program</b>
<b>Residential Solutions (RSOL) Program</b>	\$244,090	\$776,882	\$75,000	\$178,775	\$51,000	\$1,325,747
<b>Access to Affordable Energy &amp; Conservation (AAEC) Program</b>	\$88,682	\$316,940	\$35,000	\$89,758	\$18,000	\$548,380
<b>Natural Gas Commercial Solutions (NGCS) Program</b>	\$55,709	\$355,526	\$40,000	\$128,750	\$35,000	\$614,985
<b>Summit Utilities Education Program (SUEP)</b>	\$520	\$0	\$55,000	\$0	\$0	\$55,520
<b>Total Program Costs</b>	<b>\$389,001</b>	<b>\$1,449,348</b>	<b>\$205,000</b>	<b>\$397,283</b>	<b>\$104,000</b>	<b>\$2,544,632</b>

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**§ 165:45-23-7(c)(13): Actual Program Costs**

**OAC § 165:45-23-7(c)(13): The projected program costs;**

**These costs should be separated into the following categories to allow review of spending:**

- (i) Administrative costs;
- (ii) Inducements: direct payments and other inducements
- (iii) Education and marketing costs;
- (iv) Program delivery costs; and
- (v) EM&V costs

Table 11 provides the actual PY 2024 expenditures for each program by cost category.

**Table 11: Program Spending by Category**

Program	Admin/Internal Delivery	Rebate & Incentive	Education/ Advertising	Delivery	Evaluation	Total Program
<b>Residential Solutions (RSOL) Program</b>	\$98,352	\$366,424	\$34,229	\$201,515	\$57,865	\$758,384
<b>Access to Affordable Energy &amp; Conservation (AAEC) Program</b>	\$36,948	\$296,292	\$19,911	\$73,642	\$10,385	\$437,178
<b>Natural Gas Commercial Solutions (NGCS) Program</b>	\$22,504	\$428,500	\$52,500	\$176,616	\$77,927	\$758,047
<b>Summit Utilities Education Program (SUEP)</b>	\$210	\$0	\$31,423	\$0	\$0	\$31,633
<b>Total Program Costs</b>	<b>\$158,015</b>	<b>\$1,091,215</b>	<b>\$138,063</b>	<b>\$451,772</b>	<b>\$146,177</b>	<b>\$1,985,242</b>

**§ 165:45-23-7(c)(14-15): Incentives**

**OAC § 165:45-23-7(c)(14): Projected incentives – including projected cost effectiveness tests;**

**OAC § 165:45-23-7(c)(15): Actual calculated incentives – including workpapers and working spreadsheets (formulas, calculations, linkages, and assumptions) or for updated cost effectiveness tests, in sufficient detail to allow review of cost effectiveness calculations.**

Summit Utilities Oklahoma calculated incentive is \$182,665 based on the results of its PY 2024 CIP Portfolio. Pursuant to OAC § 165:45-23-8, eligibility to receive an incentive requires that the Company's Demand Portfolio reach a goal ratio (Verified savings divided by Projected Savings) of at least 80% and achieve a total resource cost test benefit/cost ratio of greater than one. For PY

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2024, the Company is eligible for an incentive because Summit Utilities Oklahoma CIP portfolio goal ratio was 93% and it achieved a cost/benefit ratio of 1.78.

Table 12 provides the calculation for the requested 2024 CIP Portfolio incentive.

**Table 12: Incentive Calculation**

<b>Table 12: Incentive Calculation</b>		
<b>Line No.</b>	<b>Incentive Calculation Input</b>	
1	Projected Energy Savings (MCF)	101,767
2	Actual Portfolio Energy Savings (MCF)	94,630
3	Program Expenditure	\$1,985,242
4	TRC Ratio	1.78
5	Portfolio Net Benefits	\$1,309,610
6	Maximum Incentive, Percentage Net Benefits	15%
7	Goal Ratio (Line 2/Line 1)	92.99%
8	Maximum Eligible Incentive \$ (Line 5 X Line 6 X Line 7)	\$196,442
9	Incentive Cap Percentage Portfolio Expenditure	8%
10	Incentive Cap (Line 3 X Line 9)	\$297,786
11	2024 Incentive	\$182,665

**§ 165:45-23-7(c)(16): Utility growth or reduction**

**OAC § 165:45-23-7(c)(16):** The utility’s annual growth or reduction in metered natural gas for the previous three years, with a calculation of the average growth or reduction rate over that entire period.

Summit Utilities Oklahoma metered sales volumes are provided by customer class in Table 13.

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**Table 13: Metered Sales Volumes (CCF) per Customer Class**

Customer Class	2018	2019	2020	2021	2022	2023	2024	Average Rate of Change Per Year
Residential	53,639,082	54,106,960	47,029,340	48,894,439	48,469,243	44,972,373	40,221,459	-8.90%
Commercial GS-1	13,715,340	11,860,902	9,443,865	10,992,565	10,796,796	10,492,543	9,702,611	-5.20%
Commercial CS-1	17,254,304	19,685,831	21,830,008	17,016,011	18,152,499	17,442,962	15,674,481	-7.08%
TSO	50,120,091	51,583,016	47,980,262	51,502,349	52,806,312	50,184,420	51,146,219	-1.58%

## § 165:45-23-7(c)(17): Market Conditions

**§ 165:45-23-7(c)(17): The most current information available comparing the base line and milestones to be achieved under market transformation programs with actual conditions in the market.**

Program year 2024 marked the second year of Summit Utilities Oklahoma updated CIP Portfolio for PY 2023-2025. As Summit Utilities Oklahoma implements the new portfolio, it remains important for the Company to evaluate market conditions to improve program performance.

The RSOL Program is made up of four channels: Natural Gas Equipment, Do-It-Yourself, Home Energy Reports, and High Efficiency Homes Channel. Overall, all Channels within the RSOL Program underperformed due various factors that include inflation driving up the cost of goods, services, and labor as well as higher customer attrition rates in the Home Energy Reports Channel.

The AAEC Program is a new addition to Summit Utilities Oklahoma's CIP portfolio, created to serve the LMI community. The AAEC Program consists of the following channels: LMI Do-It-Yourself, LMI Home Energy Reports, Low-Income Saving Homes, LivingWise, and Affordable Housing Equipment Rebate Pilot Channels. The CIP portfolio provides LMI customers with a comprehensive suite of channels that help conserve energy and save money. In the AAEC Program's second year, the Program fell short of its goal due to lower than expected savings in the Home Energy Reports and LivingWise Program. The highlight of the AAEC Program is the better than expected savings in the Low-Income Savings Homes Channel, achieving 131% of the goal. The Affordable Housing Equipment Rebate Channel continued its underperformance; however,

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Summit requested a change to the Channel that will improve its performance by opening up the program to housing authorities and homeowners.

The Natural Gas Commercial Solutions Program again proved to be a high-performing program delivering 53,108 MCF in energy savings. The commercial market continues to have a good amount of potential projects allowing for a healthy pipe of customers for the next several years.

**§ 165:45-23-7(c)(18): Summary of Spending by Demand Program**

**OAC § 165:45-23-7(c)(18): By Demand Program, provide a summary of spending, including the following:**

- (A) Administrative Costs;
- (B) Inducements, including direct payments and other inducements;
- (C) Education and marketing costs;
- (D) Program Delivery Costs; and
- (E) EM&V Costs.

Table 14 provides the actual 2024 program expenditures by Demand Program and cost category.

**Table 14: 2024 Program Spending by Category**

Program	Admin/Internal Delivery	Rebate & Incentive	Education/ Advertising	Delivery	Evaluation	Total Program
Residential Solutions (RSOL) Program	\$98,352	\$366,424	\$34,229	\$201,515	\$57,865	\$758,384
Access to Affordable Energy & Conservation (AAEC) Program	\$36,948	\$296,292	\$19,911	\$73,642	\$10,385	\$437,178
Natural Gas Commercial Solutions (NGCS) Program	\$22,504	\$428,500	\$52,500	\$176,616	\$77,927	\$758,047
Summit Utilities Education Program (SUEP)	\$210	\$0	\$31,423	\$0	\$0	\$31,633
Total Program Costs	\$158,015	\$1,091,215	\$138,063	\$451,772	\$146,177	\$1,985,242

**§ 165:45-23-7(c)(19): Funds Planned versus Funds Expended**

**§ 165:45-23-7(c)(19): A statement of any funds that were committed but not spent during the year, by program, with an explanation for non-spending.**

Summit Utilities Oklahoma PY 2024 CIP Portfolio expenses were \$1,985,242, which is 80% of the approved budget of \$2,478,279.

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Program	Comment
RSOL	The RSOL funds budgeted for PY 2024 was \$1.29 million of which 57% of the budget was spent. Residential customer participation was down compared to years past. This is generally due to the higher equipment and labor costs and customers opting to repair rather than relace equipment.
AAEC	The AAEC funds budgeted for PY 2024 was \$0.55 million of which 80% of the budget was spent. In the second year of the AAEC Program's existence, the cost to implement the channels was close to what we anticipated. Expense management and leveraging existing marketing and advertising channels helped reduce costs for the AAEC program.
NGCS	The NGCS funds budgeted for PY 2024 was \$0.64 million of which 123% of the budget was spent. The commercial & industrial custom and direct install channel continues to have a strong pipeline of projects that provide a sizable amount of savings. Additional program funds were spent to keep up with high demand.

**Table 15: Budgeted Funding and Actual Expenditures by Program**

Program	Program Funds Budgeted	Program Funds Expended	% Budget Spent
<b>Residential Solutions (RSOL) Program</b>	\$1,325,747	\$758,384.37	<b>57%</b>
<b>Access to Affordable Energy &amp; Conservation (AAEC) Program</b>	\$548,380	\$437,177.88	<b>80%</b>
<b>Natural Gas Commercial Solutions (NGCS) Program</b>	\$614,985	\$758,047.03	<b>123%</b>
<b>Summit Utilities Education Program (SUEP)</b>	\$55,520	\$31,633.19	<b>57%</b>
<b>Total Program Costs</b>	<b>\$2,544,632</b>	<b>\$1,985,242</b>	<b>78%</b>



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§ 165:45-23-7I(20): Description of Each Demand Program

**§ 165:45-23-7(c)(20): A detailed description of each Demand Program reflecting the scale of the program as part of the Demand Portfolio that includes the following:**

- (A) Number of customers served by each Demand Program or program category;
- (B) Program or program category expenditures;
- (C) Verified energy and peak demand savings achieved by the Demand Program or program category, when available; and
- (D) A description of proposed changes in the Demand Program plans.

Detailed information related to 2024 expenditures, participation, energy savings, overall program scale, as well as recent or proposed changes are provided below for each program:

## Residential Solutions Program



A suite of DSM channels that offer a number of comprehensive measures designed to help residential customers reduce their energy cost and carbon emissions. The RSOL Program consists of the following channels: Natural Gas Equipment, DIY, Home Energy Reports, and High Efficiency Homes Channels.

### Participation & Energy Savings

Customer Class	Participation	Gross Energy Savings (MCF)	% Portfolio Gross Savings	Net Energy Savings (MCF)	% Portfolio Net Savings
Residential	27,862	23,450	24.42%	22,799	24.09%

### Program Expenditures

Customer Class	Implementation	Admin/Internal Delivery	EM&V	Rebate	Education/Advertising	Total Program	% Total Portfolio
Residential	\$346,850	\$142,748	\$70,499	\$503,780	\$0	\$1,063,876	49.9%



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## Access to Affordable Energy and Conservation Program



The Summit Utilities Oklahoma's AAEC Program is designed to provide low to moderate income customers and severely energy burdened customers the opportunity to save energy and money by leveraging a number of channels designed to encourage hard-to-reach customers to participate in the Company's conservation programs.

### Participation & Energy Savings

Customer Class	Participation	Gross Energy Savings (MCF)	% Portfolio Gross Savings	Net Energy Savings (MCF)	% Portfolio Net Savings
<b>Residential</b>	11,954	14,937	15.55%	14,937	15.78%

### Program Expenditures

Customer Class	Implementation	Admin/Internal Delivery	EM&V	Rebate	Education/Advertising	Total Program	% Total Portfolio
<b>Residential</b>	\$81,198	\$59,382	\$10,443	\$195,842	\$0	\$346,864.16	16.3%

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## Natural Gas Commercial Solutions Program



The Natural Gas Commercial Solutions Program encourages Commercial and Industrial (C&I) customers to use natural gas efficiently by installing cost-effective energy efficient equipment, adopting energy-efficient designs, and using energy-efficient operations at their facilities. The program provides financial incentives to C&I customers installing or implementing cost-effective energy efficiency measures through the Direct-Install, Custom, or Prescriptive measure components of the program.

The Company does not propose any major changes to the program at this time.

### Participation & Energy Savings

Customer Class	Participation	Gross Energy Savings (MCF)	% Portfolio Gross Savings	Net Energy Savings (MCF)	% Portfolio Net Savings
<b>GS-1</b>	113	31,095	32.38%	30,876	32.63%
<b>CS-1</b>	112	26,548	27.65%	26,018	27.49%
<b>LCS - TSO</b>	0	0	0.00%	0	0.00%
<b>Total</b>	225	57,642	60.03%	56,894	60.12%

### Program Expenditures

Customer Class	Implementation	Admin/Internal Delivery	EM&V	Rebate	Education/Advertising	Total Program	% Total Portfolio
<b>GS-1</b>	\$40,754	\$4,465	\$9,240	\$44,113	\$0	\$98,571.88	4.6%
<b>CS-1</b>	\$241,888	\$26,500	\$54,844	\$261,825	\$0	\$585,056.49	27.4%
<b>LCS - TSO</b>	\$0	\$0	\$0	\$0	\$0	\$0.00	0.0%
<b>Total</b>	\$282,642	\$30,965	\$64,084	\$305,938	\$0	\$683,628.37	32.0%

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## Summit Utilities Education Program (SUEP)



CEEP is an education and awareness program that has no directly attributable energy savings associated with program implementation.

Summit Utilities Oklahoma continues to implement the SUEP in its 2024 CIP Portfolio and does not propose any major changes to the program at this time.

### Program Expenditures

Customer Class	Admin	Inducement	Marketing	Delivery	EM&V	Total Program	% Total Portfolio
<b>Residential</b>	\$0	\$262	\$0	\$0	\$32,041	\$32,302.62	1.5%
<b>GS-1</b>	\$0	\$9	\$0	\$0	\$1,072	\$1,080.85	0.1%
<b>CS-1</b>	\$0	\$0	\$0	\$0	\$44	\$44.54	0.0%
<b>LCS</b>	\$0	\$51	\$0	\$0	\$6,266	\$6,317.02	0.3%
<b>Total</b>	\$0	\$322	\$0	\$0	\$39,423	\$39,745.03	1.9%

Summit Utilities Oklahoma does not plan to make any changes to programs for PY 2024.

**§ 165:45-23-7(b)(21): Research and Development Activities**

**§ 165:45-23-7(c)(21): A list of research and development activities included in the demand portfolio, their status, and a report on the connection between each activity and effective energy efficiency programs.**

Summit Utilities Oklahoma did not conduct any research and development activities during PY 2024.

**§ 165:45-23-7©(22): Program Implementers**

**§165:45-23-7(c)(22): Identification of program implementers, including names, job titles, business postal addresses, business electronic mail addresses, and business telephone numbers.**

Summit Utilities Oklahoma implements the following programs and channels in-house: SUEP, Natural Gas Equipment, DIY, LMI DIY, High Efficiency Homes, and AHER Channel. The remainder of the programs are vendor implemented.

The contact information is:

Name of Program Implementer: Jose Laboy

Job Title: CIP Implementation Manager

Business Postal Address: 101 Bringer Drive, Maumelle, AR 72113

Business Email Address: [jlaboy@summitutilities.com](mailto:jlaboy@summitutilities.com)

Business Telephone Number: 501-658-5278

The HERs and LMI HERs channel is implemented by Oracle Utilities (formerly Opower Inc.) with oversight and management by Summit Utilities Oklahoma. The Summit Utilities Oklahoma contact is as above and the Oracle contact is:

Name of Program Implementer: David Ware

Job Title: Assoc. Director, Service Delivery

Business Postal Address: 2311 Wilson Blvd., 8<sup>th</sup> Floor, Arlington, VA 22201

Business Email Address: [david.a.ware@oracle.com](mailto:david.a.ware@oracle.com)

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Business Telephone Number: 757-237-2125

Summit Utilities Oklahoma manages DIY, but it utilizes the fulfillment services of CLEAResult. The CLEAResult contact is:

Name of Program Implementer: Shelly Baron

Job Title: Program Manager

Business Postal Address: One Allied Dr., Suite 1600, Little Rock, AR 72202

Business Email Address: shelly.baron@clearesult.com

Business Telephone Number: 501-221-4063

The Low-Income Saving Homes Program is delivered by our vendor Titan ES, in partnership with Public Service Company of Oklahoma (“PSO”). The Titan ES contact is:

Name of Program Implementer: Scott Carter

Job Title: Program Manager

Business Postal Address: 9700 S. Pole Rd. Oklahoma City, OK 73160

Business Email Address: scarter@titanes.us

Business Telephone Number: 405-632-1700

The LivingWise Channel is implemented by AM Conservation. The AM Conservation contact is:

Name of Program Implementer: Chase Griswold

Job Title: Program Manager

Business Postal Address: 1701 Charleston Regional Parkway, Suite A, Charleston, SC 29492

Business Email Address: cgriswold@AMConservation.com

Business Telephone Number: 775-398-7814

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The Natural Gas Commercial Solutions Program is delivered by our vendor, CLEAResult. The CLEAResult contact is:

Name of Program Implementer: Shelly Baron

Job Title: Program Manager

Business Postal Address: One Allied Dr., Suite 1600, Little Rock, AR 72202

Business Email Address: shelly.baron@clearesult.com

Business Telephone Number: 501-221-4063

### **Conclusion**

PY 2024 was the second year of the three-year portfolio plan cycle spanning PY 2023 – 2025. The Summit Utilities Oklahoma CIP Portfolio includes three customer categories: residential, low- to moderate-income, and commercial customers.

Summit Utilities Oklahoma DSM programs experienced a decrease in savings in many channels in PY 2024 mostly related to the higher costs of goods and services, labor market shortages, and high interest rates that negatively impact both residential and LMI programs. Our continued partnership with trade allies and supply houses helped strengthen our relationship resulting in the mitigation of some of the impacts to program participation and it is the primary key to program success in the residential equipment rebate channels. Savings from the DIY and LMI Channels continue to be low due to program maturity, though the DIY Channel savings did not see a significant decline and the LMI DIY Channel experienced a slight increase in savings. Summit Utilities Oklahoma will continue to work with portfolio evaluators and program implementers to identify additional measures that will increase traffic to the existing marketplace. Home Energy Reports Channel, the second highest energy savings producer, experienced a substantial reduction in energy savings due to customer attrition and program maturation. Efforts are underway to improve energy savings in both the HERs and LMI HERs program by working with the channel implementor and our portfolio evaluators to determine the best way to achieve better outcomes. The LivingWise Channel also experienced lower energy savings due to reduced access to 6<sup>th</sup> graders and they were exposed to the curriculum in 5<sup>th</sup> grade. Plans are in place to improve savings by employing strategies that will be more schools to participate.

Despite economic headwinds, participation in Low-Income Saving Homes Channel, and Natural Gas Commercial Solutions Program helped drive savings and net benefits for Summit customers. Overall, the CIP Portfolio achieved lower savings for Oklahoma customers in PY 2024 when compared to the previous program year, achieving 94,630 MCF in natural gas savings. The low

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avoided costs filed in the CIP Portfolio for PY 2023 - 2025, increasing cost of implementation, higher measure costs in the C&I customer projects, and one-time new channel set-up costs reduced the UCT net benefits as compared to the previous three-year plan cycle. Despite this fact, the CIP portfolio remains cost effective resulting in a TRC ratio of 1.78 and producing \$3.4 million in net benefits to Oklahoma customers. As Summit Utilities Oklahoma strives to grow its programs, insights from PY 2024 will help the Company better understand both the strengths of its CIP Portfolio, and the aspects that need improvement. The Company remains committed to building on its successes, addressing its challenges, improving its programs, and delivering a high-performing and comprehensive CIP Portfolio.

## **Appendix A – EM&V Report**



## **Appendix B – Marketing Samples**