STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
John Tuma	Commissioner

In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2026, Tracker True-Up, and Revised Adjustment Factors	DOCKET NO. E-002/M-25-386 **INITIAL COMMENTS OF THE OFFICE OF THE ATTORNEY GENERAL—RESIDENTIAL UTILITIES DIVISION**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (OAG) respectfully submits the following Initial Comments in response to the Public Utilities Commission's Notice of Extended Comment Period issued on December 8, 2025.

The OAG's comments address two topics within Xcel's Transmission Cost Recovery (TCR) Rider petition: (1) the class allocation of advanced metering infrastructure (AMI) costs and (2) the vintage of data used in the class allocators for costs recovered through the TCR Rider. First, Xcel has proposed changing the class allocator for AMI expenses in this petition. Xcel's proposed change is not reflective of cost causation or the benefits facilitated by AMI and should be rejected in favor of a more appropriate allocator. Second, Xcel allocates all costs recovered through the TCR Rider using class allocators approved in its most recent rate case, which can result in the use of outdated class allocators. In the past, when class load shares have been relatively stable, this practice may have resulted in reasonable allocations. But if data center or other large-load customers lead to significant changes in class composition, using outdated allocators will prevent ratepayers from realizing the cost-sharing benefits of these new customers.

In the comments below, the OAG presents a more detailed discussion of these issues, along with recommendations to help more accurately allocate TCR Rider costs.

ANALYSIS

I. THE COMMISSION SHOULD REJECT XCEL'S UPDATED ALLOCATION METHOD FOR AMI PROJECT EXPENSES BECAUSE IT INACCURATELY CLASSIFIES COSTS.

Xcel seeks to modify its current allocation method for AMI-related costs. Although the current allocation method is imperfect, Xcel's proposal would be a step backwards. The Commission should reject Xcel's proposal because Xcel has provided little to no support for the change, and it would disregard the now-common acknowledgment that AMI meters provide demand- and energy-related services. In contrast with the lack of discussion or support in Xcel's petition, the proposed allocation change would have a large impact on who pays for approximately half of the 2026 TCR revenue requirement. Xcel's proposal would shift costs to Residential and Commercial Non-Demand customers, increasing AMI costs by 16 percent for the Residential class and a whopping 75 percent for the Commercial Non-Demand class, compared to the current allocation method. While Xcel's proposed change would be a move in the wrong direction, the allocator for AMI costs could be changed to better reflect cost causation and benefit accrual, as described below.

A. National Experts and the Commission Have Previously Recognized that Advanced Meters Should Not Be Classified as 100 Percent Customer-Related.

According to Xcel's 2026 TCR Rider petition, costs related to advanced metering infrastructure represent $48.1 million of the requested 2026 revenue requirement of $95.8 million,[1] or about half of the total. Xcel proposes allocating these costs differently that it has in the past, writing that "[t]his year, we introduce an allocator for AMI meter costs and allocate AMI project

[1] Docket No. E-002/M-25-386, Xcel Petition for 2026 Transmission Cost Recovery Rider, attach. 4 at 1, line 2 and line 16 (Oct. 9, 2025) [hereinafter Petition].

expenses accordingly."[2] Xcel further explains that "the distribution allocation factors approved in the Company's last electric rate case (Docket No. E002/GR-21-630) are used to allocate non-AMI Distribution-Grid Modernization costs while the meter cost allocator is used to allocate AMI-meter related costs."[3] In its 2025 TCR Rider approval petition, Xcel allocated AMI costs using the same distribution allocator used for other grid modernization costs.[4] Xcel does not provide an explanation of the rationale for this change in the body of the petition, though it refers readers to "[s]ee Attachment 7 for the details of these [class allocation] calculations."[5]

Attachment 7 to Xcel's petition shows that the $48.1 million in meter costs are allocated using Xcel's C12WM allocator.[6] As Xcel notes, this is the allocator that the Company has typically used to allocate meter costs in their class cost of service studies (CCOSSes). Using this allocator implicitly classifies meter costs as 100 percent customer-related and then allocates them on a weighted per-customer basis, with weights representing the average meter costs of different customer classes.[7] Xcel uses the C12WM allocator from its last approved rate case, Docket 21-630.

It may seem intuitively reasonable for Xcel to use its traditional meter allocator to allocate AMI costs, but while pre-AMI meters could reasonably be classified as fully customer-related in class cost allocation, AMI meters cannot. Meters have traditionally been classified as customer-

[2] Petition at 9.
[3] *Id.*
[4] *See* Docket No. E-002/M-24-371, Xcel Petition for 2025 Transmission Cost Recovery Rider, attach. 7 at 1 (Nov. 1, 2024) [hereinafter 2025 TCR Petition].
[5] Petition at 9.
[6] Xcel uses a variant of the C12WM allocator that excludes the street lighting class. *See* Petition, attach. 7 at 1.
[7] *See, e.g.*, Docket No. E-002/GR-24-320, Direct Test. of Christopher J. Barthol, sched. 2, app. 2, at 1 (Nov. 1, 2024) (describing Xcel's C12WM meter cost allocator).

related on the basis that each customer needed a meter to allow them to connect to the grid.[8] While meters still serve this purpose, the incremental costs of AMI meters relative to traditional meters are incurred to provide a range of benefits that do not increase in direct proportion to the number of customers. The Regulatory Assistance Project (RAP) lists some of these benefits, including

- Benefits at every level of system capacity, by enabling peak load management . . . .
- Distribution line loss savings from improved power factor and phase balancing.
- Reduced energy costs due to load shifting.
- Reliability benefits, saving time and money on service restoration after outages . . . .
- Allowing utilities to determine maximum loads on individual transformers.[9]

Because the benefits of AMI span the demand, energy, and customer classifications, RAP recommends classifying AMI meters, as well as smart grid data collection and data management systems, as demand-, energy-, and customer-related.[10]

In addition to recognition by experts in the field that advanced meters serve fundamentally different purposes from traditional meters, the Commission itself has recognized these differences for many years.[11] In Minnesota Power's 2021 rate case, the Commission required Minnesota

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[8] *See, e.g.,* Nat'l Ass'n of Regul. Util. Comm'rs, *Electric Utility Cost Allocation Manual* at 96 (Jan. 1992) (explaining that meters, at the time of publication in 1992, were generally classified as customer-related).

[9] Jim Lazar et al., Regul. Assistance Project, *Electric Cost Allocation for a New Era: A Manual* at 157 (Jan. 2020) [hereinafter *RAP Manual*].

[10] *See id.* at 157 tbl.31. After AMI meters are classified as demand-, energy-, and customer-related, they can then be allocated to classes using corresponding allocators. Demand-related costs are generally allocated based on a class's contribution to peak coincident demand. Energy-related costs are generally allocated based on a class's contribution to overall electricity use. Customer-related costs are generally allocated based on a class's share of customers, which may be weighted if some customers contribute more to customer-related costs than others.

[11] *See, e.g.*, *In re Application of Otter Tail Power Co. for Authority to Increase Rates for Elec. Serv. in Minn.,* Docket No. E-017/GR-15-1033, Findings of Fact, Conclusions, and Order at 75 (May 1, 2017) ("[T]he added meter costs borne by subscribers to the Residential Controlled Demand service are more appropriately understood as demand or energy costs. These costs are

Power to modify the traditional treatment of allocating metering costs as 100 percent customer-related in its subsequent rate case.[12] To do so, the Commission gave Minnesota Power a choice of either analyzing how AMI meters are associated with customer costs as well as energy and demand costs or allocating AMI costs equally to customer, demand, and energy factors.[13] In its 2023 rate case Minnesota Power classified its AMI costs as 1/3 energy-related, 1/3 demand-related, and 1/3 customer-related.[14]

Xcel's previous method of allocating AMI costs in the TCR Rider, the P60 allocator, implicitly recognized that these costs serve the demand function in addition to the customer function.[15] The P60 is a composite allocator that represents, for each class, the share of total distribution costs allocated to the class. It therefore reflects the way that sub-components of the distribution system—such as conductors, transformers, service lines, and meters—are classified and allocated. Since Xcel uses a "minimum system" approach to classify distribution system costs as demand- and customer-related, the P60 allocator also classifies costs to these functions and

incurred to benefit [the utility's] system as a whole, not just the customer receiving electricity through the meter.").

[12] *In re Application of Minn. Power for Authority to Increase Rates for Elec. Serv. in Minn.*, Docket No.E015/GR-21-335, Findings of Fact, Conclusions, and Order at 61 (Feb. 28, 2023).

[13] *Id.* at 61. Similarly, in Otter Tail Power's 2020 rate case, the Commission ordered Otter Tail to perform an analysis to guide future cost classification for advanced meters in either its next rate case or a subsequent advanced-metering infrastructure proposal. *See In re Application of Otter Tail Power Co. for Authority to Increase Rates for Elec. Serv. in the State of Minn.*, Docket No. E017/GR-20-719, Findings of Fact, Conclusions, and Order at 49-50, 70 (Feb. 1, 2022). In its current rate case, Otter Tail Power continues to recommend classifying advanced meters as 100 percent customer-related, but this case is currently pending before the Court of Administrative Hearings and the OAG anticipates this classification to be contested. *See In re Application of Otter Tail Power Co. for Authority to Increase Rates for Elec. Util. Serv. in Minn.*, Docket No. E017/GR-25-359, Direct Testimony of Amber Grenier at 11-12 (Oct. 31, 2025).

[14] *See In re Application of Minn. Power for Authority to Increase Rates for Elec. Serv. in Minn.*, Docket No. E015/GR-21-335, Direct Testimony of Stewart Shimmin at 3 (Nov. 1, 2023).

[15] Xcel used a variant of the P60 allocator that excludes the street lighting class. *See* 2025 TCR Petition, attach. 7 at 1.

reflects the assumptions of the minimum system method. The P60 allocator would change if, for example, the "basic customer" or "peak-and-average" methods that have been discussed in Xcel's rate cases were used instead of the minimum system method.

For the purposes of allocating AMI costs in the TCR Rider, the P60 distribution allocator that Xcel used prior to this proceeding is superior to the C12WM meter allocator that the Company proposes now, since it appropriately classifies some AMI costs as demand-related. The OAG discusses a better alternative below, but in any case, the Commission should reject Xcel's proposal to allocate AMI costs using the C12WM allocator, which implicitly classifies them as 100 percent customer-related.

B. Xcel's Proposed Allocation Would Unfairly Shift Significant Costs to Residential and Small Business Customers.

In addition to being a step backward from a cost allocation perspective, Xcel's proposed change would unfairly shift significant costs to the Residential and Commercial Non-Demand classes. Table 1 shows the effect of Xcel's proposed change to AMI class allocation. For the $48.1 million in AMI costs included in the 2026 TCR Rider petition, Row C in the table shows how these costs would have been allocated using the P60 allocator that Xcel has used prior to this year, and Row E shows how Xcel proposes to allocate those costs this year, using the C12WM allocator. The proposed change has the effect of shifting $5.3 million to the Residential class and $1.5 million to the Commercial Non-Demand class, which represent increases of 16 percent and 75 percent, respectively.

Table 1[16]

Effect of Xcel's Change in Class Allocator used for AMI Costs

	Total	Residential	Commercial Non-Demand	Demand	Street Lighting
(A) AMI costs - 2026 TCR Rider	$48,063,119				
(B) 2025 Allocator: P60 w/o Lighting	100.00%	68.37%	4.23%	27.40%	0.00%
(C) AMI costs allocated using P60 w/o Lighting allocator	$48,063,119	$32,860,754	$2,033,070	$13,169,295	$0
(D) 2026 Allocator: C12WM w/o Lighting	100.00%	79.38%	7.41%	13.20%	0.00%
(E) AMI Costs allocated using C12WM w/o Light. allocator	$48,063,119	$38,152,504	$3,561,477	$6,344,332	$0
(F) Cost shift in 2026 due to allocator change ($)	$0	$5,291,749	$1,528,407	-$6,824,963	$0
(G) Cost shift in 2026 due to allocator change (%)	0%	16%	75%	-52%	0%

The OAG is not suggesting that class cost allocation should depend on outcomes rather than cost causation. Rather, our argument is that Xcel's proposed change to AMI cost allocation represents a move *away* from allocation based on cost causation, relative to the Company's previous practice, and doing so inappropriately shifts costs to the Residential and Commercial Non-Demand classes. The Commission should not take such a weighty action lightly, particularly given the minimal support and explanation provided by Xcel.

[16] Total AMI costs in the 2026 TCR Rider petition in Row A are from Petition, attach. 4 at 1, line 2. The P60 w/out Lighting class allocation factors in Row B are from 2025 TCR Petition, attach. 7 at 1. The C12WM w/out Lighting class allocation factors in Row D are from Petition, attach. 7 at 1. The class cost allocations in Row C represent total costs in Row A multiplied by the allocation factors in Row B. The class cost allocations in Row E represent total costs in Row A multiplied by the allocation factors in Row D. These class cost allocations do not sum to the total because Xcel provided allocation factors to only two decimal points. The cost shift values in Row F represent the difference between Row E and Row C. The cost shift percentages in Row G represent the cost shift values in Row F divided by the costs in Row C.

C. AMI Costs Should Be Classified as Customer-, Energy-, and Demand-Related.

To better align cost allocation with the nature of the benefits facilitated by AMI, the OAG recommends classifying AMI costs as customer-, energy- and demand-related. In its most recent rate case, Xcel has argued that allocating AMI meter costs in this way would be inappropriate, since "[a]llocators must be based on cost causation, not the benefits that are provided by the technologies."[17] Both the theory of cost allocation and Xcel's own practices, however, contradict this assertion. The RAP electric cost allocation manual explains that the two primary conceptual principles used to guide cost allocation are "cost causation" on one hand and "costs follow benefits" on the other.[18] While these two principles are often aligned, RAP notes that on occasions where the principles conflict, they "believe that 'costs follow benefits' is usually, but not always, the superior principle."[19]

Within rate cases, Xcel has allocated some costs based on the benefits provided rather than a narrower interpretation of cost causation. For example, Xcel's stratification method for classifying production plant costs classifies a portion of baseload resource costs as energy-related based on the cost-saving benefits of these plants, relative to peaking plants.[20] The Company also allocates economic-development discounts to all classes on the basis that the recipients of the discounts will help lower costs for all ratepayers.[21] Though residential and small business customers do not "cause" the revenue shortfalls from the discounts, they are allocated these costs

[17] Docket No. E-002/GR-24-320, Rebuttal Test. of Christopher J. Barthol at 28 (Oct. 10, 2025).
[18] *RAP Manual* at 18.
[19] *Id.*
[20] *See, e.g.*, Docket No. E-002/GR-24-320, Direct Test. of Christopher J. Barthol, sched. 2 at 4 (Nov. 1, 2024) (explaining the generation cost stratification method).
[21] *See, e.g.*, Docket No. E-002/GR-12-961, ALJ Order at 137 (July 5, 2013) (noting that Xcel argued that the allocation of economic development discount costs should reflect the fact that adding and retaining load allows the Company to spread overhead costs more broadly, which benefits all customers by lowering their average cost of service).

based on the cost-sharing benefits that the discounts purportedly provide. Therefore, there is precedent in Xcel's own allocation practices for allocating costs based on the benefits provided.

Since allocating costs based on benefits provided is supported in both theory and practice, we can turn to the question of how AMI costs should be divided among the energy, demand, and customer functions. According to Xcel's FERC Form 1 submissions, the original (undepreciated) value of Xcel's meter plant was between $100-$111 million for the years 2015-2021 and then grew to $316 million by the end of 2024.[22] Since Xcel's AMI meter rollout was not yet complete in 2024, it is safe to conclude that the value of meter plant roughly tripled due to the introduction of AMI meters.

Given the incremental costs of AMI relative to pre-AMI metering infrastructure, it makes sense to classify one-third of meter costs as customer-related. This represents the traditional meter functionality that allows customers to connect to the grid and receive bills. The remaining two-thirds of meter costs can reasonably be classified as demand- and energy-related. While the customer-related portion can be justified on the basis of the incremental costs of AMI relative to traditional metering infrastructure, the division among the energy and demand categories is necessarily somewhat imprecise, since Xcel completed its AMI meter rollout very recently. As Xcel gains more experience with AMI, additional analysis on the nature and magnitude of AMI-related benefits could help increase the precision of the classification.

Although the exact proportion of benefits that are energy- versus demand-related may be an open question, the fact that AMI provides benefits in both categories is not disputed. RAP notes that AMI meters provide benefits at every level of system capacity—generation, transmission, and

[22] Docket No. E-002/24-320, Surrebuttal Test. of Helen Scharber at 26 tbl.4 (Nov. 25, 2025).

distribution—by enabling peak load management.[23] In its 2025 annual AMI and Field Area Network (FAN) report, Xcel discusses AMI-enabled load-management benefits, including residential and commercial time-of-use rates, as well as electric vehicle detection,[24] which could help shift charging to less-constrained times. Xcel has stated that it recently began utilizing AMI meters to enhance existing demand-response programs, including the Peak Day Partners, Peak Partner Rewards, Residential Demand Response, and Critical Peak Pricing programs.[25] Xcel has also highlighted energy-saving benefits related to AMI meters, including opportunities for conservation that arise from access to real-time information on energy usage,[26] allowing for the connection of smart devices,[27] and enabling theft detection.[28] Better usage data can also enable cost savings through better energy market bids, enabled by improved forecasts.

Based on the incremental costs of AMI meters and the demand- and energy-related benefits enabled, the OAG recommends classifying AMI costs as one-third each customer-, demand-, and energy-related. Classifying one-third of AMI costs as customer-related is reasonable, based on the incremental costs of AMI meters. The OAG currently proposes splitting the remaining two-thirds equally between the demand and energy classifications, based on the potential for benefits in each of these areas, but the Commission may wish to update this division based on further analysis in future proceedings. The costs can then be allocated using relevant allocators, including Xcel's

[23] *RAP Manual* at 157.
[24] Docket Nos. E-002/M-21-814 and E-002/M-25-386, Xcel's 2025 AMI Annual Report at 11 (Oct. 31, 2025) (eDocket No. 202510-224502-02) [hereinafter 2025 AMI Report].
[25] *See* Attach. 1 (24-320 Xcel Energy Response to OAG IR 7050).
[26] 2025 AMI Report at 5.
[27] *Id.* at 6.
[28] *Id.* at 8.

C12WM allocator for customer-related costs, the E8760 energy allocator for energy-related costs, and an appropriate peak demand allocator for demand-related costs.[29]

III. THE COMMISSION SHOULD REQUIRE XCEL TO UPDATE ALLOCATION FACTORS TO ALIGN WITH CURRENT FORECASTS IN EACH TCR RIDER FILING.

To allocate TCR Rider costs among customer classes, Xcel currently uses allocators from its most recently approved rate case. For example, Xcel notes that "[t]he transmission demand, distribution, and sales allocation percentages were established in Xcel Energy's last approved electric rate case, Docket No. E002/GR-21-630."[30] In that rate case, Xcel produced allocators reflecting projected sales and customer counts for the years 2022 through 2024, but they are based on forecasts produced in 2021. Basing allocators on outdated forecasts can cause the allocators themselves to become outdated. Although using outdated allocators may have created roughly appropriate class cost allocations in the recent past, when class energy and load shares have not changed a great deal from year to year, that scenario may not be the case going forward. If the data center additions that Xcel projects materialize[31]—or if class compositions change materially for any other reason—using outdated allocators will lead to a misallocation of TCR Rider costs.

Aligning the allocators with the best-available forecasts is important because it is the mechanism through which the cost-spreading benefits of new customers are operationalized. For example, in Google's comments related to Xcel's proposed very large customer tariff, it notes that the addition of large customers benefits other customers partly through "the ability to spread fixed

[29] The OAG does not specifically recommend Xcel's D10S peak demand allocator, since it does not adequately reflect class load shares at relevant MISO peak hours. *See, e.g.,* Docket No. E-002/24-320, Surrebuttal Test. of Helen Scharber at 2 (Nov. 25, 2025) (summarizing the problems with Xcel's D10S allocator).
[30] Petition, attach. 7 at 1.
[31] Docket E-002/25-289, Xcel's Petition for Large General Time of Day Service and Large Peak Controlled Time of Service Tariffs at 5 (explaining that one of the primary reasons for expected increases in net energy sales and net peak demand is the anticipation of growing data center loads).

costs over a larger customer base and usage."[32] The one example Google provides relates to the broader sharing of costs for the Midcontinent Independent System Operator's (MISO's) Multi-Value Portfolio (MVP) and Long Range Transmission Plan (LRTP) transmission lines. Google writes that "[b]y increasing energy sales with [very large] customers, the costs of MVP and LRTP lines will be divided by a larger amount of energy sales, thus reducing the transmission rate for these regional projects for all customers."[33]

These are exactly the types of costs that are recovered through Xcel's TCR rider, but data centers and other large customers will not help bear these costs unless their load is included in the allocators. Therefore, the OAG recommends the Commission order Xcel to update the class allocators with each TCR Rider petition. The methods used to calculate relevant allocators may reflect the methods used in the most recent rate case, but the allocators should reflect customer count, energy sales, and class demand forecast data corresponding to the year(s) included in the petition.

RECOMMENDATIONS

Based on the analysis presented above, the OAG recommends that the Commission require Xcel to make the following changes to its TCR Rider proposal:

I. AMI Costs

A. Primary Recommendation: AMI costs in the TCR Rider should be classified as one-third each customer-related, demand-related, and energy-related, based on the incremental costs of AMI and the additional benefits it provides.

[32] Docket E-002/25-289, Google Reply Comments at 9.
[33] *Id.* at 10.

B. Alternative Recommendation: AMI costs in the TCR Rider should not be allocated using Xcel's C12WM allocator, which classifies AMI costs as entirely customer-related, and instead should be allocated with the P60 allocator used previously.

II. Allocator Updates

A. Update the class allocators used to allocate TCR Rider costs to reflect customer count, energy sales, and class demand forecast data corresponding to the year(s) included in each TCR Rider petition.

January 5, 2026

Respectfully submitted,

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MINNESOTA OFFICE OF THE
ATTORNEY GENERAL—
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☐ **Not-Public Document – Not For Public Disclosure** Attachment 1
☐ **Public Document – Not-Public Data Has Been Excised**
☒ **Public Document**

Xcel Energy		Information Request No.	7050
Docket No.:	E002/GR-24-320		
Response To:	Minnesota Office of the Attorney General		
Requestor:	Peter G. Scholtz		
Date Received:	October 20, 2025		

Question:

Reference: Xcel's 2024 Status Report and Associated Compliance Filings for Docket No. E,G-002/CIP-23-92, Minnesota Electric and Natural Gas Energy Conservation & Optimization Program at 11, table titled "2024 Electric Energy Efficiency Cost-Effectiveness Summary – Actual"

A. For the demand response programs included in the table (Battery Connect, Commercial AC Control, Critical Peak Pricing, Electric Rate Savings, Peak Day Partners, Peak Partner Rewards, Residential Demand Response), list those that utilize advanced metering infrastructure (AMI) or information made available through AMI. Also explain what AMI-derived information each program uses.

B. For the demand response programs included in the table, provide the workpapers showing the data and calculations used to arrive at the cost-effectiveness ratios shown in the table.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact. For any live models that Xcel asserts are trade secret in their entirety, provide both the trade secret, live model and a public version of the model.

Response:

A. See Table 1 below for the connection between our current Demand Response programs and AMI.

Table 1: AMI integration with Demand Response

Program	AMI Utilized (2024)	AMI Utilized (2025)	AMI-Derived Information	Notes
Battery Connect	N/A	N/A	N/A	Program launch in 2026.
Commercial AC Control	No	No	N/A	New generation of Saver's Switch to use AMI infrastructure anticipated for commercial customers in 2026
Critical Peak Pricing	No	Yes	Interval Data, Near Real-Time Use Reading (Instant Read), Displaying Historic Use	Interval Data used by company for Event/Performance M&V and Billing. Instant Read and Historic Use are available to the customer through My Account portal and are utilized by customers for their participation in the program.
Electric Rate Savings	No	No	N/A	ERS currently utilizes legacy non-AMI interval metters.rs
Peak Day Partners	No	Yes	Interval Data, Near Real-Time Use Reading (Instant Read), Displaying Historic Use	Interval Data used by company for Event/Performance M&V and Billing. Instant Read and Historic Use are available to the customer through My Account portal and are utilized by customers for their participation in the program.
Peak Partner Rewards	No	Yes	Interval Data, Near Real-Time Use Reading (Instant Read), Displaying Historic Use	Interval Data used by company for Event/Performance M&V and Billing. Instant Read and Historic Use are available to the customer through My Account portal and are utilized by customers for their participation in the program.
Residential Demand Response	No	Yes	New generation of Saver's Switches use AMI infrastructure for communications to and from the switch. Behavioral Demand Response utilizes AMI data to calculate load reductions during control events. AC Rewards does not utilize AMI data.	Saver's Switches will start utilizing AMI data in the next generation of switches, AC Rewards utilizes the Smart Thermostat devices to provide event data.

B. The Company provides the working papers as Attachment A to this response.

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Attachment A

Working papers are included as Attachment A.