

**BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION**

**MISSISSIPPI POWER COMPANY  
EC-120-0097-00**

**DOCKET NO. 2014-UN-10**

**IN RE: NOTICE OF INTENT OF MISSISSIPPI POWER  
COMPANY TO ESTABLISH THE ENERGY EFFICIENCY  
QUICK START PLAN AND COST RECOVERY RATE  
CLAUSE**

**ORDER**

THIS CAUSE came on for consideration before the Mississippi Public Service Commission (“Commission”) on the filing by Mississippi Power Company (“MPC” or “Company”) of its Notice of Intent to Establish the Energy Efficiency Quick Start Plan and Cost Recovery Rate Clause (“Quick Start Plan”) pursuant to Rules 9.100(7) and 29 of the Mississippi Public Service Commission’s Public Utilities Rules of Practice and Procedure (“Rules”). The Commission, being fully apprised in the premises, having considered the documents and record before it, and upon the recommendation of the Mississippi Public Utilities Staff (“Staff”), hereby finds as follows.

1. On July 11, 2013, the Commission entered its Final Order Adopting Rule in Docket No. 2010-AD-2, adopting Rule 29, entitled “Conservation and Energy Efficiency Programs.” Section 102 of Rule 29 requires that “[e]ach electric and natural gas utility serving more than 25,000 customers (meters) and subject to the jurisdiction of the Commission shall file with the Commission for its approval a Quick Start Plan for energy efficiency programs for its service territory . . . not later than six (6) months following the order adopting this Rule.” In compliance with this provision, MPC submitted its proposed Quick Start Plan on January 10, 2014.

2. After the Final Order Adopting Rule was issued, MPC selected CleaResult and OPower to develop and administer MPC's Quick Start Plan. Each of these companies has administered successful energy efficiency programs in over 20 states. The Company intends to select an independent evaluator to perform Evaluation, Measurement, and Verification (EM&V) after the programs are in place to help monitor and evaluate the overall success of the programs.

3. MPC's Quick Start Plan offers energy efficiency programs for each of MPC's customer classes and is otherwise compliant with Rule 29. The programs cover the period from mid-2014 (or upon Commission approval) through 2016. The portfolio is based on best practices and proven approaches in other jurisdictions. The programs build infrastructure necessary to support potential future comprehensive programs, and explicitly address the needs of all customer classes, including low-income customers. Each of the programs involves customer incentives to spur participation and contributes to the larger Rule 29 objectives of increased energy and demand savings, customer cost savings, and economic development in Mississippi. The cumulative budget for all programs through 2016 is \$9,462,800.

4. The programs in MPC's Quick Start Plan include:

- ***MPC Neighborhood Efficiency.*** This program is an extension and enhancement of the pilot program filed September 5, 2013, to educate and promote energy efficiency to income-qualified customers. MPC plans to audit 100 homes per month and provide efficient lighting, insulation upgrades, HVAC tune-ups, and duct sealing.
- ***MPC School Kits and Energy Education.*** MPC intends to target 4<sup>th</sup> and 5<sup>th</sup> grade students to educate on the benefits of energy conservation. Students will receive a kit of items to install at home.

- ***Residential Energy Audit and Direct Install.*** This program will increase energy awareness by offering home energy assessments to MPC's residential customers which will help homeowners analyze their energy use, identify energy efficiency improvement projects, and install low-cost, energy saving measures in the residence.
- ***Residential and Commercial Air Conditioning Tune-up and Replacement.*** This program will achieve energy and demand savings by offering incentives toward digital high performance tune-ups and HVAC unit replacements.
- ***Small Business Direct Install and Incentive.*** This program will educate and provide direct-installed efficiency measures and incentives to business customers that fall under a 100kW peak demand threshold.
- ***Large Commercial and Industrial Prescriptive and Custom.*** This program will provide facility walkthroughs and incentives toward a suite of energy efficiency measures, allowing for simple approaches to customers with peak demand in excess of 100kW.
- ***Behavioral Analysis.*** This program is designed to bridge the customer engagement gap, providing MPC customers with the tools to understand how they can become better managers of their energy usage.
- ***MPC Residential and Business Lighting.*** This program will provide compact fluorescent light (CFL) bulbs and light emitting diode (LED) bulbs to residential and business customers through MPC bill payment offices as well as various community events throughout the MPC service territory.

5. The budgets for the above programs are shown below:

<b>Quick Start Portfolio Budget</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Residential Energy Audit & Direct Install	\$87,000	\$332,000	\$332,000
Residential & Commercial HVAC Tune-Up & Replacement	\$123,000	\$335,000	\$335,000
Small Business Direct Install & Incentive	\$92,000	\$521,000	\$521,000
Large Commercial & Industrial Prescriptive & Custom	\$159,000	\$847,000	\$847,000
MPC Neighborhood Efficiency	\$297,000	\$446,000	\$446,000
MPC School Kits & Energy Education	\$92,000	\$185,000	\$185,000
Behavioral Analysis	\$264,000	\$255,000	\$253,000
MPC Residential and Business Lighting	\$18,000	\$50,000	\$50,000
Administrative Costs	\$167,100	\$438,150	\$437,850
EM&V	\$55,700	\$146,050	\$145,950
Marketing & Advertising	\$200,000	\$400,000	\$400,000
<b>Total Quick Start Budget</b>	<b>\$1,554,800</b>	<b>\$3,955,200</b>	<b>\$3,952,800</b>

6. These programs are expected to address MPC's customer classes as follows:

	<b>Residential</b>	<b>Residential - Low Income</b>	<b>Commercial</b>	<b>Industrial</b>
Residential Energy Audit and Direct Install	X	X		
Residential and Commercial Air Conditioning Tune-Up and Replacement	X		X	
Small Business Direct Install & Incentive Program			X	
Large Commercial and Industrial Prescriptive and Custom			X	X
Behavioral Analysis	X			
MPC Neighborhood Efficiency	X	X		
MPC Residential and Business Lighting Program	X		X	
MPC School Kits and Energy Education	X			

7. The estimated energy savings are:

<b>Quick Start Portfolio Projected Savings</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Residential Energy Audit & Direct Install	174,107	677,075	677,075
Residential & Commercial HVAC Tune-Up & Replacement	227,377	680,390	680,390
Small Business Direct Install & Incentive	487,320	3,321,110	3,321,110
Large Commercial & Industrial Prescriptive & Custom	1,120,364	6,779,061	6,779,061
MPC Neighborhood Efficiency	1,512,424	2,268,636	2,268,636
MPC School Kits & Energy Education	371,350	742,699	742,699
Behavioral Analysis	469,329	3,500,413	912,258
MPC Residential and Business Lighting	325,003	928,580	928,580
<b>TOTAL KWh Savings</b>	<b>4,687,274</b>	<b>18,897,964</b>	<b>16,309,809</b>

8. MPC now seeks Commission approval of its Quick Start Energy Efficiency Program Plan and of MPC's recovery of costs associated with the Plan's implementation. Section 106 of the Commission's July 11<sup>th</sup> Order in Docket 2010-AD-2 indicates that a utility may request recovery of costs from approved program budgets.

9. Pursuant to Rule 29, the Commission intends to establish specific numerical energy savings targets expressed as percentages of energy sales based on the experience of Quick Start and other relevant information. Thus, any request made by the Company to earn a return on energy efficiency investments through a performance-incentive mechanism during the Quick Start phase shall be deferred until the Comprehensive Portfolio Plan phase, so that energy savings targets may be established in advance of the approval of such performance-incentive mechanisms.

10. The Company may, in accordance with Rule 29, shift funds among the various programs within its Quick Start Plan as needed to meet changing conditions, such as addressing oversubscriptions and avoiding stop-start funding. The Commission will review spending at the time of the Annual Report to ensure that shifts in spending have not eliminated benefits for a given customer class or otherwise compromised the Company's overall portfolio compliance.

11. In an effort to address the reporting requirements of Rule 29 and this Order in a uniform manner among utilities, the Commission has established recommended formats for the Company's implementation of the Commission's findings in this Docket. See Attachment A, Energy Efficiency Cost Recovery (EECR) Rider Example; Attachment B, Energy Efficiency Cost Recovery (EECR) Factor Calculation Example; and Attachment C, Lost Contribution to Fixed Costs (LCFC) Calculation Example. While the Company may deviate from the suggested formats, any compliance cost recovery filing must address all of the provisions in the examples

provided in Attachments A, B and C of this Order. Note that carrying costs should not be calculated on the under- and over-recoveries in the EECR calculation during Quick Start.

12. Based upon the Company's filing and the recommendation of the Staff, the Commission finds that MPC's Quick Start Plan complies with the requirements of Rule 29 of the Commission's Rules of Practice and Procedure and should be approved.

IT IS, THEREFORE, ORDERED by this Commission that MPC's proposed Quick Start Plan is approved as described in MPC's Notice and as set out herein, and MPC shall begin the implementation process of the programs described in its Quick Start Plan following the entry of this Order. Rule 29 provides for the recovery of costs associated with implementing the plan, but MPC's request for rate recovery is deferred for a future order following compliance filing.

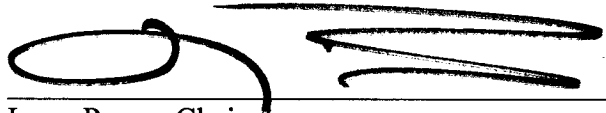
IT IS, FURTHER, ORDERED that, within thirty (30) days of the entry of this Order approving MPC's Quick Start Plan, the Company shall submit re-determined Energy Efficiency Cost Adjustment Factors to the Public Utilities Staff. This compliance filing shall be calculated in accordance with all of the provisions set forth in Attachments A, B and C of this Order.

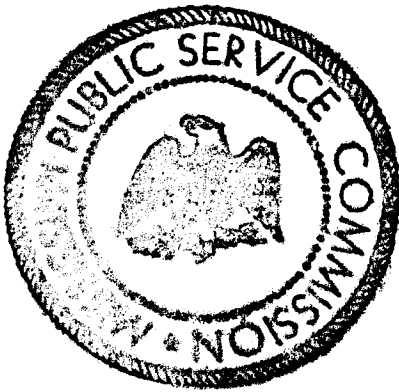
This Order shall be deemed issued on the day it is served upon the parties herein by the Executive Secretary of this Commission who shall note the service date in the file of this Docket.

Chairman Lynn Posey voted Aye; Vice Chairman R. Stephen Renfroe voted Aye; Commissioner Brandon Presley voted Aye.

SO ORDERED by the Commission on this the 3<sup>rd</sup> day of June, 2014.

MISSISSIPPI PUBLIC SERVICE COMMISSION

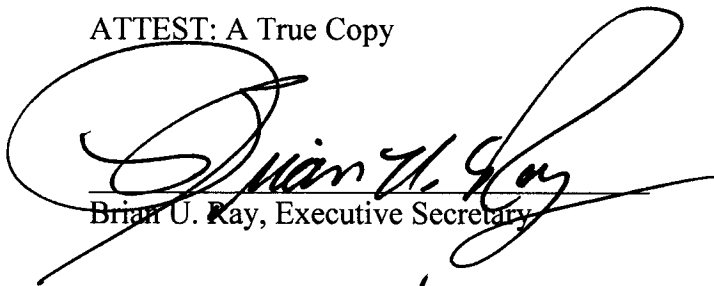
  
\_\_\_\_\_  
Lynn Posey, Chairman



  
\_\_\_\_\_  
R. Stephen Renfroe, Vice Chairman

  
\_\_\_\_\_  
Brandon Presley, Commissioner

ATTEST: A True Copy

  
\_\_\_\_\_  
Brian U. Ray, Executive Secretary

Effective this the 3<sup>rd</sup> day of June 2014.



**ATTACHMENT A  
EECR RIDER EXAMPLE**

**ENERGY EFFICIENCY COST RECOVERY (EECR) RIDER EXAMPLE**

**1.1 PURPOSE**

The purpose of the Energy Efficiency Cost Recovery (EECR) Rider is to establish the EECR Rate(s) by which the Company will recover its energy efficiency Quick Start Plan program costs approved by the Mississippi Public Service Commission ("Commission"), including (1) the incremental energy efficiency program costs ("Incremental Program Costs") and (2) lost contribution to fixed cost ("LCFC") (collectively, the "Recoverable Costs"), all as described in Rule 29, "Conservation and Energy Efficiency Programs," of the Commission's Rules and Regulations Governing Public Utility Service, and as approved by the Commission in Docket 2010-AD-2 on July 11, 2013. Recovery of Incremental Program Costs is limited to the incremental costs which represent the direct program costs that are not already included in the then current rates of the Company.

**1.2 ANNUAL RE-DETERMINATION**

On or before August 1st of 2014 and May 1st of each subsequent year, re-determined EECR Rate(s) shall be filed by the Company with the Commission. The re-determined EECR Rate(s) shall be determined by application of the EECR Rate Formula set out in Attachment B. The re-determined EECR Rate(s) shall reflect (1) the projected Incremental Program Costs for the 12-month period commencing on January 1 of each year ("Filing Year"), (2) projected LCFC for the Filing Year, and (3) a true-up adjustment reflecting the over-recovery or under-recovery of the EECR Recoverable Costs for the 12-month period ended on December 31 of the prior calendar year ("Reporting Year"). The Company shall provide to the Mississippi Public Utilities Staff ("Staff") documentation supporting the data and calculations utilized in re-determining the EECR Rate(s) set out in each such annual submission. The EECR Rate(s) so re-determined shall be effective on and after the first billing cycle of September for the first year and August of the Filing Year for subsequent years or the first practicable billing cycle after Commission approval and shall then remain in effect for twelve (12) months ("EECR Cycle"), except as otherwise provided for below.

**1.3 TRACKING AND MONITORING PROGRAM COSTS AND BENEFITS**

The Company shall develop and implement appropriate accounting procedures, subject to the review of the Staff, which provide for separate tracking, accounting, and reporting of all program costs incurred by the Company. The procedures shall enable energy efficiency program costs to be readily identified and clearly separated from all other costs. The Company shall secure and retain all documents necessary to verify the validity of the program costs for which it is seeking recovery. Such documents shall include, but shall not be limited to, vouchers, journal entries, program participant's billing history (including usage and payment records), and the date the participant's project was completed.

The Company shall develop and implement appropriate accounting procedures, subject to the review of the Staff, which provide for separate tracking, accounting, and reporting of revenues collected through the EECR Rider. The procedures shall enable the EECR revenues to be readily identified and clearly separated from all other revenues. The Company shall secure and retain all documents necessary to verify the accuracy of the EECR revenues. Such documents shall include, but shall not be limited to, billing determinants, journal entries, and summary revenue reports.

For the purpose of assessing the benefits and effectiveness of the programs, the Company shall develop and implement appropriate procedures, subject to the review of the Staff, which provide for separate tracking of the benefits and the effectiveness of the programs. The data that shall be tracked shall include, but shall not be limited to, information that will enable the Commission to assess the effectiveness of the programs. The Company shall secure and retain all documents necessary to verify its assessments. Such documents shall include, but shall not be limited to, customer surveys, usage records, payment history, and customer income level, if available.

#### **1.4 LCFC**

LCFC calculations shall accurately reflect energy savings caused by utility energy efficiency programs, and thus not sales reductions due to weather, changes in population, or background increases or decreases in customers' self-funded energy efficiency efforts. The Company shall maintain and report adequate data to support accurate calculations of revenues lost. Such data collection shall ensure that LCFC is not collected for measures for which the measure life has expired between rate filings. The Company shall base LCFC applications and calculations on the best information available at the time of the applications. Recovery of the LCFC in this rider will necessitate an adjustment to the Company's formula rate plan to ensure that the LCFC revenue is not double-counted in the annual formula rate plan filing. LCFC shall be calculated according to Attachment C.

#### **1.5 EFFECTIVE DATE AND TERM**

This EECR Rider shall be effective on and after the first billing cycle of September 2014 or the first practicable billing cycle after Commission approval and shall continue in effect until modified or terminated by the Commission.

#### **1.6 APPLICABLE RATE SCHEDULES**

Residential: etc.

## ATTACHMENT B

### ENERGY EFFICIENCY COST RECOVERY (EECR) FACTOR CALCULATION EXAMPLE

1	Projected Energy Efficiency Program Costs (PEEC)	\$ --
2	Projected Lost Contribution to Fixed Costs (LCFC)	\$ -- (Attachment C)
3	Prior Period Over/Under Amount (TUA)*	\$ --
4	Recoverable Costs (PCRC)** (1 + 2 + 3)	\$ --
5	Billing Units (PES)***	XX
6	Rider EECR Rate (4/5)	\$ --

\* The prior period true-up adjustment (TUA) shall not include carrying costs.

\*\* Projected Costs by Rate Class or "PCRC" includes the total of (1) the projected EECR Incremental Program Costs for the Filing Year (PEEC); (2) the projected LCFC for the Filing Year (LCFC); and (3) the prior period true-up adjustment (TUA).

\*\*\* Projected Energy Sales or "PES" includes the projected sales by rate class (Note 5)

- 1) The Company's workpapers shall provide the rationale for the particular billing units selected and for the assignment of the Recoverable Costs to the rate classes.
- 2) The Projected Energy Efficiency Cost Period is the twelve-month period commencing on January 1 of the Filing Year.
- 3) The Energy Efficiency Cost Period is the calendar year immediately preceding the Filing Year.
- 4) The Projected Energy Sales billed for each rate class (PES) for the Projected Energy Efficiency Cost Period
- 5) The LCFC portion of the TUA shall be included in the LCFC calculation shown in Attachment C.

ATTACHMENT C  
LOST CONTRIBUTION TO FIXED COSTS (LCFC)  
CALCULATION EXAMPLE

	(1) Projected Current Year Savings	(2) Actual Prior Year's	(3) Projected Prior Year Savings	(4) LCFC Rate By Class	(5) Projected Current Year LCFC	(6) Actual Prior Year's LCFC	(7) Projected Prior Year Savings LCFC	(8) Total LCFC with True Up
					(1) x (4)	(2) x (4)	(3) x (4)	(6) - (5) + (7)
<b>Residential</b>								
Program 1				\$ -		\$ -	\$ -	\$ -
Program 2				\$ -		\$ -	\$ -	\$ -
Program 3				\$ -		\$ -	\$ -	\$ -
Program 4				\$ -		\$ -	\$ -	\$ -
<b>Small Commercial</b>								
Program 5				\$ -		\$ -	\$ -	\$ -
Program 6				\$ -		\$ -	\$ -	\$ -
Program 7				\$ -		\$ -	\$ -	\$ -
<b>Large Volume</b>								
Program 8				\$ -		\$ -	\$ -	\$ -
Program 9				\$ -		\$ -	\$ -	\$ -
Program 10				\$ -		\$ -	\$ -	\$ -
Program 11				\$ -		\$ -	\$ -	\$ -
Program 12				\$ -		\$ -	\$ -	\$ -
Total Annual Program Lost Contribution to Fixed Costs	0.00	0.00	0.00					

Current Year Projected LCFC	Projected Annual Sales	LCFC Portion of EBCR
\$ -	-	-
\$ -	-	-
\$ -	-	-
\$ -	-	-

- (1) Taken from Company Energy Efficiency Plan.
- (2) Provided by Company or 3rd Party EM&V provider.
- (3) Taken from Company Energy Efficiency Plan.
- (4) The company shall calculate the rate using the following procedure:  
Begin with base rate revenues and subtract customer charge revenue.  
Divide that number by the projected energy sales for the coming year to produce the fixed cost per kWh or Ccf to be recovered.
- (5) Multiply the LCFC Rate by the projected energy efficiency savings for the current year.
- (6) Multiply the LCFC Rate by the actual energy savings for the prior year.
- (7) Multiply the LCFC Rate by the projected energy savings for the prior year.
- (8) Subtract the Prior Year Actual LCFC from the Projected Current Year LCFC and add the Prior Year LCFC to be recovered in the current year.