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Xcel Energy Data Request No. 1-25
 Docket No.: EL24-016
 Response To: South Dakota Public Utilities Commission
 Requestor: Eric Paulson
 Date Received: August 2, 2024

Question:

Provide an estimate of how many people who use the LED light bulb rebate are actual South Dakota Xcel customers versus out of Xcel SD territory customers.

Response:

The Company does not estimate how many customers may or may not be in our service territory as it is a point-of-sale lighting program, a practice that is supported by national guidance on evaluating programs of this type. Past research on this topic in other jurisdictions has indicated a well-designed program can reduce leakage to an inconsequential level. The Company determines program participation for the Home Lighting program based on actual sales data provided monthly by our participating retailers. Retailers provide the Company with the total number of bulbs sold.

The Company recognizes that a point-of-sale program that does not consider geography in its design could result in non-Xcel Energy customer’s participating in our program. The Company specifically selects retailers participating in the program in part based on their location. We have included our retail partners in Table 1 below.

Table 1: Retail Partners

Batteries Plus - Sioux Falls
Costco - Sioux Falls
Dollar Tree - Sioux Falls 1001
Dollar Tree - Sioux Falls 3130
Dollar Tree - Sioux Falls 507
Goodwill - Sioux Falls 41st St
Goodwill - Sioux Falls Kiwanis
Goodwill - Sioux Falls S Norton
Home Depot - Sioux Falls
Sams - Sioux Falls

As this topic has been discussed in other jurisdictions, the Company and external stakeholders have agreed to focus efforts on retailers that are five or more miles from the border of our service area. This five-mile radius is based on information gathered from retailers, as described in “EL24-016 SDPUC-1-025 - Letter.”¹ We implement that practice in South Dakota as well and continue to believe this establishes a reasonable precedent to claim 100 percent of the bulbs and their respective energy savings towards our achievement.

In addition, the US Department of Energy Uniform Methods Project guidance on upstream lighting² notes that leakage studies are no longer a best practice unless in-store intercept research is already planned. The Company has previously consulted with our evaluation team for Colorado and Minnesota regarding this question and they noted the high cost of such research and did not recommend pursuing it.

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¹ Customer interviews conducted in 2014/2015 showed that approximately 95% of customers shop at stores within a five-mile radius of that store. The Company submitted a letter to the Commission attached to this response explaining these facts in 2015.

² Dimetrosky et. al. “Chapter 6: Residential Lighting Evaluation Protocol; The Uniform Methods Project: Methods for Determining Energy Efficiency Savings for Specific Measures”
<https://www.nrel.gov/docs/fy17osti/68562.pdf>. Accessed 1/2017.