
PUC Request for Information

GPA Docket 2026-06

February 11, 2026

1. **Please provide a copy of the "Guam Power Authority Demand Side Management Review," prepared by UFS dated February 4, 2024.**

   GPA Response: Attached hereto as Exhibit A is copy of the "Guam Power Authority Demand Side Management Review," prepared by UFS and dated February 4, 2024.

   Additional documents referenced in the RFI responses below include:

   Exhibit B – Leidos. DSM and EE Implementation Plan – Final Report. Prepared for Guam Power Authority in cooperation with Lummus Consultants, International. December 2014.

   Exhibit C - Leidos. Energy Sense Program Plan – Final Report. Prepared for Guam Power Authority in cooperation with Lummus Consultants. June 2016.

2. **GPA' s Petition Requests additional budget/ funding for new Demand Side Initiatives in the amount of $786,500 for CY2026 and $506,500 for CY2027. Are these amounts in addition to the annual LEAC funded budget for DSM in the amount of $3M, or will the cost for these new initiatives be paid out of the existing budget?**

   GPA Response: The amounts identified for the proposed DSM initiatives for CY2026 and CY2027 are not in addition to the existing $3 million annual DSM budget previously authorized through LEAC.

   GPA intends to fund these initiatives within the currently approved $3 million per 12-month DSM funding level. At this time, GPA is not seeking any additional funding beyond the previously approved annual $3 million.

   Of the existing DSM budget, approximately $950,000 per year has been allocated to the commercial rebate program. While participation in the commercial rebate program has shown steady growth as awareness has increased among commercial and government customers, it has not expanded at the pace originally projected (see Table 1 below).

   As a result, GPA intends to reallocate a portion of the funds budgeted for the commercial rebate program to support the proposed new initiatives. This reallocation would be implemented as a one-time adjustment within the existing DSM funding envelope.

   Table 1 – Historic Commercial Rebate Program Amounts

| Fiscal Year | Rebates Paid |
|---|---|
| 2021 | - |
| 2022 | $7,300 |
| 2023 | $12,250 |
| 2024 | $123,800 |

| | |
|---|---|
| 2025 | $164,500 |
| 2026 (Through December, 2025) | $550 |

3. **If the funding for these new initiatives is not included in the existing annual $3M budget, please specify what the total annual budgets would be for CY2026 and CY2027 if the new initiatives are approved.**

   GPA Response: The total annual DSM budget for CY2026 and CY2027 remains $3,000,000 per 12-month period, consistent with the previously authorized funding level.

4. **In the formula specified, GPA recovers $1.5M per 6-month LEAC period in a ratepayer charge through LEAC of $0.003 per kWh. Is this the current per kWh charge through LEAC that GPA is using to calculate the $1.5M per 6-month LEAC period? If not, what current per kWh charge is GPA using?**

   GPA Response: The DSM charge of $0.003 per kWh was approved by the PUC effective June 1, 2020, and remained in effect through January 31, 2024. During this 44-month period, the charge generated approximately $13.8 million in DSM revenues, averaging about $314 thousand per month, or approximately $1.9 million per 6-month LEAC period.

   Consistent with the findings of the *Guam Power Authority Demand Side Management Review* (UFS, 2024), attached as Exhibit A, and in consideration of the then-existing Energy Sense account balance of $5.3 million, GPA petitioned in PUC Docket No. 24-08 to reduce the DSM component of the LEAC to $0.00 per kWh. Effective February 1, 2024, the DSM component of the LEAC has remained at $0.00 per kWh.

5. **The cost for the new initiatives for CY2026 and 2027 is $1,293,000. How and when will these amounts be charged to ratepayers? By how much will these amounts increase the LEAC rate for ratepayers?**

   GPA Response: DSM funding through LEAC was authorized to take effect on June 1, 2020. The DSM funding component through LEAC ceased on January 31, 2024 pursuant to GPA Docket No. 24-08 and has not resumed since.

   GPA intends to fund the proposed initiatives within the existing $3M per 12-month DSM budget through reallocation of amounts previously budgeted for the Commercial Rebate Program.

   GPA is not proposing an increase to the LEAC rate at this time. Upon resumption of DSM collections, the appropriate LEAC carve-out would be determined and remain subject to Commission approval. Historically, a $0.003 per kWh DSM component has generated over $3 million annually. The DSM factor ($/kWh) may be adjusted, as necessary and subject to Commission approval, to maintain approximately $3 million in annual DSM funding.

6. **To funds these new DSM initiatives, is GPA proposing to increase the per kWh charge through LEAC? If so, what would the new ratepayer charge per kWh be?**

   GPA Response: The authorized funding level of $1.5M per 6-month period is projected to be sufficient to support the proposed initiatives. If the same rate of $0.003 per kWh is charged for DSM through LEAC, the potential revenues to be collected for a 6-month LEAC period is approximately

$1.9 million or $3.8 million for one fiscal year. The DSM factor ($/kWh) may be adjusted, as necessary and subject to Commission approval, to maintain approximately $3 million in annual DSM funding.

7. **In GPA Docket 20-05, GPA was ordered to comply with certain requirements regarding the DSM charges to ratepayers. GPA was authorized to recover $1.5M during each LEAC period through the imposition of a per kilowatt charge of $0.003 on all meters read on or after July 1, 2020. The Order in GPA Docket 20-05 stated that there would be a "true-up" of the DSM charges in January of 2021. Was there ever a true-up conducted of the DSM charge of $1.5M for LEAC period or the per kilowatt charge of $0.003? (see copy of the Order in GPA Docket 20-05 attached hereto).**

   GPA Response: Please refer to the attached Exhibit D – GPA-24-08-LEAC-PETITION-120623. This report was submitted in December 2023 in conjunction with GPA's LEAC filing for the period February 2024 through July 2024. DSM collections through the LEAC ceased following this filing and have not resumed.

8. **Please provide copies of any "true-up" that has been conducted by GPA on the DSM LEAC charges.**

   GPA Response: Please refer to the attached Exhibit D – GPA-24-08-LEAC-PETITION-120623.

9. **GPA was further required to submit with its normal LEAC filing a "true-up" of the amount collected in the prior LEAC period and whether the amount collected was more or less than the anticipated $1.5M. Has GPA been complying with this reporting requirements? If so, please provide copies of any true-ups provided in GPA's Petitions in the last two LEAC proceedings, or any document evidencing compliance with the true-up requirements.**

   GPA Response: Please refer to the attached Exhibit D – GPA-24-08-LEAC-PETITION-120623. A summary table outlining DSM collections to date, program expenditures, and energy and fuel savings per LEAC period.

10. **GPA Resolution No. FY2026-10 states that there is an existing account balance in the Energy Sense Account of $1.8 million. Will these funds be used to fund the expanded demand sides initiatives requested? Aren't such funds sufficient to cover the cost of the new DSM initiatives proposed without recovery of any increased cost through LEAC?**

    The approximately $1.8 million balance in the Energy Sense Account represented remaining DSM funds as of December 2025. These funds are currently being utilized to support ongoing DSM programs, including rebates and administrative expenses.

    For FY2026, GPA's DSM rebate expenditures are projected at approximately $80k per month (excluding contracts, dues, and subscriptions), as shown in Table 2 below. In order to sustain DSM program operations beyond the current balance, collections through LEAC would need to resume. If the same rate of $0.003 per kWh is charged for DSM through LEAC, the potential revenues to be collected for a 6-month LEAC period is approximately $1.9 million.

Table 2 – Expenditures through 01/31/2026

| GL Account # | Description | FY26 | |
|---|---|---|---|
| 1000.135000.75 | Energy Sense Fund | 01/31/2026 - Prelim | |
| 30600.908000.01 | Regular pay - SPORD | | 10,652.70 |
| 42100.908000.01 | Regular pay - Finance | | 14,661.96 |
| 42900.908000.01 | Regular pay - Accounts Payable | | 1,957.79 |
| 42100.908000.02 | Overtime - Finance | | 311.64 |
| 42900.908000.02 | Overtime - Accounts Payable | | 2,333.77 |
| 30600.908000.43 | Other contractual* | | 287,957.00 |
| 31900.908000.43 | Other contractual* | | 2,340.00 |
| 30600.908000.76 | Dues & Subscriptions | | 500.00 |
| | Total Non-Rebate Expenses | | 320,714.86 |
| | | | |
| 30600.908001.43 | Rebates-Split A/Cs | | 266,625.00 |
| 30600.908002.43 | Rebates-Central A/Cs | | 800.00 |
| 30600.908003.43 | Rebates-Washer/Dryers | | 17,400.00 |
| 30600.908004.43 | Comm'l Ductless Split Air Cond | | 550.00 |
| 30600.908005.43 | Comm'l Central Air Cond | | - |
| 30600.908006.43 | Comm'l Package Air Cond | | - |
| 30600.908007.43 | Comm'l VRF Air Conditioner | | - |
| 30600.908008.43 | Comm'l LED Lighting | | - |
| 30600.908009.43 | EV Managed Charging Ser | | - |
| 30600.908010.43 | Water Heater Cont Pilot | | - |
| 30600.908011.43 | Home Energy Audit | | - |
| 30600.908012.43 | Residentl VRF Air Condi | | - |
| | Total Expenses FY26 | $ | 606,089.86 |
| | Labor Expenses | $ | 29,917.86 |
| | Rebate Expenses | $ | 285,375.00 |
| | Subtotal | $ | 315,292.86 |
| | Monthly Avg | $ | 78,823.22 |

11. Please provide the most recent and up to date full accounting for the Energy Sense Account and the budgets for such account for calendar years 2025, 2026, and proposed budget for 2027. Provide documents which indicates budgeted amounts, contributed funds obtained through LEAC, expenses, withdrawals, etc., for the DSM program.

GPA Response: See attached DSM Expenditures Report in Exhibit E.

12. In Attachment A to GPA Resolution No. FY2026-10, GPA is proposing at least 11 new DSM initiatives for adoption and implementation. These include EV Managed Charging Services Pilot, Hot Water Controller 100 Unit Pilot, Home Area Network Services, New Online Home Energy Assessment, Commercial LED Expansion, Electrical Transient Analyzer Program, PV Design and Calculation Annual Software and others. Please describe in detail the steps and process which GPA went through to select these 11 new initiatives. Did GPA work with its consultants in selecting these new initiatives?

GPA Response:

The proposed initiatives build upon the Commission-directed development of GPA's Energy Sense Demand Side Management Program. The foundational framework for the program was established through the *DSM and EE Implementation Plan – Final Report* (Exhibit B), prepared by Leidos in December 2014, and further refined in the *Energy Sense Program Plan – Final Report* (Exhibit C), issued in June 2016.

The 2016 Program Plan was developed in response to a Guam Public Utilities Commission Order dated July 31, 2014, which directed GPA, the Administrative Law Judge, and Lummus Consultants to collaboratively develop a comprehensive DSM and Energy Efficiency program. The initiatives proposed below are a continuation and modernization of that established DSM portfolio.

**1.1 EV Managed Charging Services Pilot**

Section 2.12 of the *Final DSM & EE Implementation Plan* defines demand response as programs that reduce consumption during peak periods through behavioral incentives or direct control of end uses, enabled by real-time meter data and two-way communications. The EV Managed Charging Services Pilot is a direct application of a demand response program. Through managed charging, GPA can use load control strategies and time-of-use price signals to shift EV charging away from system peak periods, including encouraging charging during daytime solar hours.

Section 3.4 of the *Energy Sense Program Plan* explicitly discusses plug-in electric vehicles: "The potential benefits of PEVs for GPA and its stakeholders may include reducing consumption of fossil fuels on Guam and lowering total energy costs, reducing vehicular and power plant emissions, lowering fleet operating costs, and increasing sales for GPA in the face of declining demand due to high power prices and customers opting to use distributed generation." Section 3.20 of the *Energy Sense Program Plan* discusses Demand Response, time-of-use rates, peak pricing, and real-time pricing, which GPA intends to further evaluate and advance through this pilot program.

GPA selected this initiative as a priority in response to the increasing penetration of electric vehicles on Guam and the need to proactively manage this emerging load. Unmanaged EV charging presents a risk of concentrating new demand during evening peak periods, which would strain generation resources and reduce system efficiency.

GPA has entered into a contract for Electric Vehicle Managed Charging Services (GPA-RFP-24-007) with FlowEV by Triple J Technologies on February 14, 2025. The contract includes implementation of a pilot study to evaluate load management strategies, customer participation, and grid impacts, which will inform broader program design and operational controls for EV integration. In addition, the contract supports the installation of EV supply equipment at GovGuam facilities, funded through a U.S. Department of Energy grant administered by the Guam Energy Office as a pass-through award.

In addition, GPA was awarded participation in the U.S. Department of Energy's Grid Operator Technical Assistance Program (Key Assist), which provides utilities with up to $1 million in comprehensive technical assistance, including access to facilities such as NREL's Advanced

Research on Integrated Energy Systems (ARIES), to address grid integration challenges. As noted by DOE, "Guam Power Authority (GPA) is a municipal utility seeking technical assistance to support the planning and deployment of vehicle-grid integration (VGI) technologies. GPA's goal through this technical assistance is to integrate electric vehicles (EVs) and deploy chargers while ensuring grid reliability, optimizing energy usage, and delivering sustainable, cost-effective solutions."

The EV Managed Charging Services Pilot is an implementation of the demand response category identified in the 2014 Implementation Plan and a necessary grid modernization measure to manage accelerating EV adoption.

<https://www.energy.gov/cmei/articles/doe-selects-utilities-groundbreaking-technical-assistance-program-advance-grid>

**1.2 Water Heater Controller Pilot**

The *Final DSM & EE Implementation Plan* identifies water heating as a targeted DSM category (Section 2.6) and further describes demand response programs (Section 2.12) as measures that reduce or shift load during peak periods through behavioral incentives or direct control of end uses.

Section 4 of the *Energy Sense Program Plan* discusses Demand Response programs to include "smart water heater controllers [which are] still in the process of being fully commercialized..." Since issuance of the Plan, these technologies have matured in the market, and GPA intends to further evaluate and advance their application through this pilot.

Electric water heating is a flexible and controllable residential load. The controller technology enables GPA to shift water heating operation to off-peak hours while maintaining customer comfort. By pre-heating tanks during lower-demand periods or during times of higher renewable generation, the program reduces contribution to evening system peak and improves overall load factor.

PUC Docket 13-14 approved a 100-customer ESS pilot program. This water heater controller pilot allows GPA to treat each water heater as a form of thermal energy storage, enabling the shifting of heating load to off-peak periods and times of higher renewable generation while maintaining customer comfort. Unlike battery energy storage systems (BESS), which store energy in electrochemical form and require significant capital investment, thermal storage leverages existing infrastructure to store energy as heat within the tank, providing a cost-effective and scalable approach to demand-side load shifting.

This pilot is designed to validate demand response functionality at the customer level using controllable end-use technology. Similar to air conditioning direct load control programs referenced in prior DSM discussions, the water heater controller provides GPA with a dispatchable demand-side resource that can be scaled over time if proven effective.

GPA selected this initiative to test the operational feasibility, customer acceptance, and peak reduction potential of controllable water heating in Guam's residential sector. The pilot-scale

deployment allows GPA to collect performance data, quantify peak demand impacts, and evaluate cost-effectiveness before considering broader implementation.

GPA issued a solicitation for this initiative (GPA-RFP-24-003) and has identified a sole-source vendor, pending funding approval.

**1.3 Home Area Network Devices (HAN)**

Section 2.12 of the *Final DSM & EE Implementation Plan* describes demand response as being enabled by real-time meter data and two-way communications between the utility and the customer site.

Section 4 of the *Energy Sense Program Plan* discusses Demand Response programs that include "residential electric loads, e.g. water heater, HVAC systems and pool pumps..." The Home Area Network (HAN) is capable of interfacing with such smart devices to enhance visibility and, ultimately, enable load control.

HAN devices interface with GPA's advanced metering infrastructure and allow customers to access near real-time energy usage data. The embedded Zigbee communication capability can also interface with compatible smart devices, providing the foundation for future direct load control and automated demand response functionality. This infrastructure enables load visibility, customer alerts, peak-time notifications, and potential integration with controllable end-use technologies.

GPA selected this initiative to strengthen the communications backbone necessary for scalable demand response deployment. While behavioral programs can provide incremental savings, sustained peak reduction and flexible load management require reliable two-way communication between customer devices and the utility.

GPA will proceed with issuing a solicitation for this initiative contingent upon approval of an identified funding source.

**2.1 New Online Home Energy Assessment Tool (MEX)**

Section 2.11 of the *Final DSM & EE Implementation Plan* references internet-based tools that allow residential and commercial customers to evaluate their energy usage and identify potential savings opportunities. The proposed online tool directly implements this recommendation by providing an online home energy assessment tool that supports customer engagement, energy awareness, and participation in DSM programs.

Section 3.7 of the *Energy Sense Program Plan* specifically recommends energy audits. The proposed online tool enables customers to conduct a preliminary self-assessment before requesting an in-home audit. It also identifies low- and no-cost energy efficiency measures and directs customers to the Energy Sense Rebate Program where appropriate.

GPA's current online energy audit program license is expiring on June 30, 2026. GPA plans to procure a new online energy audit platform to ensure continuity of digital audit services and uninterrupted access for customers seeking to evaluate energy efficiency improvements and participate in rebate programs.

### 2.2 Commercial LED Expansion & Automation of Rebate Applications

Sections 2.1 and 2.2 of the *Final DSM & EE Implementation Plan* identify internal and external lighting efficiency programs as foundational DSM measures. Lighting retrofits, including LED conversion, were recognized as cost-effective opportunities for reducing energy consumption and peak demand across residential, commercial, and government sectors.

The commercial LED rebate program an approved initiative under PUC Docket 13-14. The proposed Commercial LED Expansion and automation of rebate applications supports implementation of the lighting portfolio. Enhancing the online rebate platform and automating verification processes improves administrative efficiency, reduces processing time, and lowers program overhead. These improvements increase customer participation and accelerate adoption of high-efficiency lighting technologies.

### 2.3 Electrical Transient Analyzer Program (ETAP)

Section 6 of the Final *DSM & EE Implementation Plan* recommends that GPA conduct ongoing DSM screenings as part of the Integrated Resource Planning process to evaluate emerging technologies and identify new DSM opportunities. ETAP supports this requirement by providing analytical capabilities to model grid impacts, assess load-shifting strategies, and evaluate the system-level effects of DSM measures.

Electromagnetic Transient (EMT) modeling in ETAP can support DSM program development by capturing the fast, time-domain behavior of controllable loads and distributed energy resources under dynamic conditions. By simulating demand response actions, managed EV charging, and smart device controls at high temporal resolution, EMT analysis allows GPA to evaluate real-time load shifting impacts, control interactions, and potential system stability concerns, particularly in a grid with high renewable penetration. This provides a more accurate assessment of how DSM strategies perform under transient conditions and supports the design of reliable, grid-responsive programs.

The primary end user for ETAP will be GPA Engineering Department.

### 2.4 PVsyst

Section 2.4 of the *Final DSM & EE Implementation Plan* identifies rooftop solar photovoltaic programs as part of the DSM portfolio. PV modeling software such as PVsyst supports accurate system evaluation, performance validation, and production forecasting for distributed solar installations.

In addition to validating solar production estimates and supporting benefit-cost analysis, PV modeling informs DSM planning and grid alignment. The software will also support analysis associated with customer-owned battery energy storage system (BESS) incentives previously approved by the Commission, enabling evaluation of solar-plus-storage configurations and their operational impact on the system.

GPA currently maintains an active PVsyst subscription. This request seeks approval to use DSM funds for future subscription renewals.

**2.5 DesignLights Consortium (DLC) Subscription**

Sections 2.1 and 2.2 of the *Final DSM & EE Implementation Plan* identify internal and external lighting efficiency programs as core components of the DSM portfolio. Implementation of these programs requires clear technical standards to ensure that incentivized lighting products deliver verified energy savings and maintain performance quality. The commercial LED rebate program an approved initiative under PUC Docket 13-14.

The DesignLights Consortium (DLC) Qualified Products List provides an industry-recognized technical standard for high-efficiency commercial lighting products. Utility membership provides GPA with access to verified product listings, technical specifications, performance criteria updates, and program support resources. Ensuring rebate-eligible products meet established efficacy, quality, and reliability thresholds, and enables faster rebate processing through integration of the DLC product listing into GPA's DSM online portal.

Maintaining DLC membership supports program integrity, simplifies rebate qualification and verification processes, reduces risk of incentivizing non-compliant products, and strengthens verification of lighting savings.

GPA currently maintains an active DLC membership. This request seeks approval to continue using DSM funds to cover future membership fees, estimated at approximately $500 per year.

**2.6 Hitachi**

Section 6 of the *Final DSM & EE Implementation Plan* calls for updated DSM screenings as part of the Integrated Resource Planning process and ongoing evaluation of new DSM opportunities. Generation expansion planning software supports this requirement by allowing GPA to model long-term capacity needs and evaluate the role of DSM relative to supply-side resources.

The software enables comparative analysis of demand-side measures versus generation additions, quantifies avoided capacity impacts, and supports optimization of DSM within GPA's overall resource portfolio.

GPA currently maintains a contract for Generation Expansion Planning Software and seeks authorization to fund future contract extensions through DSM funds.

**3.1 Home Energy Audit Tools**

Section 2.11 of the *Final DSM & EE Implementation Plan* explicitly includes free energy audits and professional audit services as DSM measures. Procurement of professional-grade audit tools directly implements this program element.

Section 3.7 of the *Energy Sense Program Plan* directly recommends energy audits, "Leidos recommends GPA establish a certain number of free home energy audits for its low-income customers each year, conducted by GPA's staff who are certified energy auditors."

GPA currently has nine (9) employees capable of performing residential and commercial energy audits, including personnel certified by the Association of Energy Engineers (AEE) as Certified Energy Auditors (CEA) and Certified Energy Managers (CEM). An additional nine employees have completed the required training coursework and are eligible to sit for the certification

examinations, which would bring GPA's total in-house audit-capable staff to eighteen (18) upon successful completion.

These professionals are qualified to conduct ASHRAE-level assessments, which require calibrated diagnostic instruments and field measurement equipment to evaluate building envelope performance, equipment operation, load profiles, and develop accurate energy savings reports.

GPA will procure the necessary audit tools to support accurate field measurements and defensible savings calculations. Without this instrumentation, GPA's ability to deliver technically sound audit services and maintain DSM program integrity would be constrained.

**4.1 LEAC DSM Savings Report**

The *Final DSM & EE Implementation Plan* calls for quantification of avoided costs, tracking of program participation, and evaluation of overall DSM performance. Independent savings verification supports this monitoring and reporting requirement by providing objective validation of program impacts. The LEAC DSM Savings Report ensures that measured savings, fuel reductions, and program results are transparently documented and defensibly incorporated into regulatory filings.

13. **Provide any documents or work papers which GPA prepared concerning these new initiatives.**

    GPA Response: Attached hereto as Exhibit F are documentation prepared by GPA concerning these proposed initiatives.

14. **Provide any written analysis or recommendations in GPA's possession concerning these initiatives.**

    GPA Response: Attached hereto as Exhibit G are documents in GPA's possession reflecting written analyses and recommendations concerning the proposed initiatives.

15. **If not provided in documentation requested above, what is the justification for adoption and implementation of these initiatives?**

    GPA Response: The justification for adoption and implementation of these initiatives is addressed in GPA's responses to RFI Nos. 13 and 14 above.

16. **Provide any consultant reports which analyze the new initiatives requested, or state reasons for adoption of these initiatives.**

    GPA Response: The proposed DSM initiatives are supported by consultant analyses and prior Commission-directed planning documents.

    The foundational consultant document guiding GPA's DSM portfolio is the *Final DSM and EE Implementation Plan* prepared by Leidos Engineering, LLC in cooperation with Lummus Consultants International, dated December 2014 & the *Energy Sense Program Plan*, 2016. These report identified and screened multiple DSM categories, including lighting, water heating, energy audits, demand response, rooftop solar, and behavioral programs, which form the basis for many of the initiatives currently proposed.

To the extent that certain initiatives represent modernization or technological enhancements (e.g., HAN devices, online assessment tools, rebate portal automation), these measures are operational implementations of the program categories previously identified in the 2014 Implementation Plan and subsequent DSM program evolution. Their adoption is based on:

1. Improving program delivery efficiency,
2. Enhancing measurement and verification capability,
3. Supporting grid modernization and demand response, and
4. Aligning DSM implementation with GPA's Integrated Resource Plan objectives

While not every initiative is supported by a standalone consultant feasibility report, the initiatives are grounded in prior consultant-developed DSM planning, IRP analysis, and ongoing technical advisory input.

17. **In prior dockets, there was an established process used by GPA and PUC for adoption of DSM initiatives. That process involved a period of more than 120 days for discussion of the proposed DSM initiatives between GPA, its consultant, and the PUC consultant. Should PUC approve these new initiatives before such a process is undertaken regarding the new initiatives proposed? Can the PUC conclude at present that due diligence has been conducted on these new proposed initiatives?**

GPA Response: The initiatives identified in the present Petition are not entirely new programs. They are largely based on program categories previously identified in the *Final DSM and EE Implementation Plan* (December 2014), the *Energy Sense Program Plan* (2016), as well as GPA's subsequent DSM implementation experience. Several of the proposed items represent modernization, technology upgrades, or pilot-scale deployment of program types that were previously evaluated and contemplated within the DSM portfolio framework.

GPA is not requesting that the Commission bypass or waive its established review process. The purpose of this Petition is to seek authorization to utilize existing DSM funds for these initiatives. GPA remains willing to participate in any additional technical review, consultant evaluation, or structured discussion the Commission determines is appropriate prior to final approval.

From a due diligence standpoint, GPA has performed internal technical and operational evaluation of the proposed initiatives. Certain initiatives are supported by prior consultant work, third-party technical input, Integrated Resource Planning analyses, and GPA's ongoing DSM program performance data. GPA understands that the Commission may determine that further consultant review is appropriate and will cooperate fully with that process.