

**PECO ENERGY COMPANY
STATEMENT NO. 1**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY
FOR APPROVAL OF ITS
MARKET RATE TRANSITION ENERGY EFFICIENCY
PACKAGE**

DOCKET NO. P- _____

DIRECT TESTIMONY

WITNESS: FRANK J. JIRUSKA

SUBJECT: DETAILS OF PECO ENERGY COMPANY'S
MARKET RATE TRANSITION ENERGY
EFFICIENCY PACKAGE

DATED: SEPTEMBER 10, 2008

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1 I became PECO's Vice-President for Customer and Marketing Services in 2002. In
2 this position, I was responsible for managing PECO's call centers, its billing and
3 collection efforts, its meter reading, and large account services. From 2003 to the
4 present, I have been Director of PECO's Energy and Marketing Services Department.
5 As Director of this department, I am responsible for PECO's marketing efforts across
6 all of its customer segments, and PECO's customer service for its large Commercial
7 and Industrial customers.

8 **4. Q. Have you previously submitted testimony before the Pennsylvania Public Utility**
9 **Commission (the "Commission")?**

10 A. Yes. I have submitted testimony in the matter of PECO's Petition for Approval of
11 Phase I of its Residential Real-Time Pricing Program, which is docketed as
12 Commission petition number P-2008-2032333.

13 **5. Q. What is the purpose of your direct testimony in this proceeding?**

14 A. The purpose of my direct testimony is to explain the details of PECO's Market Rate
15 Transition Energy Efficiency Package (the "Energy Efficiency Package" or "EEP").
16 PECO is presenting its EEP for Commission approval as part of the Company's
17 comprehensive mitigation plan to help its customers transition to market rates for
18 electricity on January 1, 2011, following 12 years of capped rates. The EEP will
19 provide PECO's customers with useful tools to help them reduce their electric
20 consumption. By doing so, it will give them the ability to better manage their energy
21 bills when rate caps expire.

1 **6. Q. How is your direct testimony organized?**

2 A. I begin my testimony by explaining PECO's post-rate cap goals with regard to energy
3 efficiency and demand response, and how the EEP's tools can be used by PECO's
4 customers to ease their transition to market prices. Second, I discuss the specific
5 programs that are part of the EEP. In this part of my testimony, I will start by
6 discussing PECO's existing energy efficiency and demand response programs that it
7 plans to continue to offer after its rate caps expire. I will conclude this part of my
8 testimony by discussing the new energy efficiency and demand response programs
9 PECO is proposing to implement in the post-rate cap, market price environment.
10 Third, I discuss PECO's plans for customer outreach and education to ensure that its
11 customers are aware of the EEP's programs and that the programs will have robust
12 enrollment. Finally, I discuss PECO's program evaluation plans.

13 **II. PECO'S MARKET RATE TRANSITION ENERGY EFFICIENCY PACKAGE**

14 **7. Q. What are PECO's goals with regard to its Market Rate Transition Energy**
15 **Efficiency Package?**

16 A. PECO believes that energy efficiency and demand response are critical elements of a
17 comprehensive strategy to mitigate the customer impact of higher energy prices.
18 PECO's EEP is part of the Company's mitigation strategy, and is intended to give
19 customers tools to manage their energy usage and bills. We believe that these tools
20 will provide substantial value to customers. Indeed, we estimate that the Net Present
21 Value of the EEP tools to be more than \$158 million. Moreover, the EEP represents
22 the Company's first step toward PECO's goal of reducing cumulative customer

1 electric usage across all of PECO's rate classes by 1%-2% of 2007 sales by the year
2 2014.

3 **8. Q. How will PECO's 1%-2% reduction goal benefit customers?**

4 A. It will benefit customers by reducing their overall energy usage, particularly during
5 periods of extremely high electricity demand. In the short run, customers will save
6 money directly by being able to lower their energy bills. Over the longer term, the
7 reduction in overall usage will help mitigate future price increases that result from
8 increasing peak demands on the power system.

9 As we move forward in the competitive market price environment, PECO will offer
10 additional programs to achieve its goal of a 1%-2% reduction in energy use. As the
11 new programs are developed, PECO will seek Commission approval for each
12 program – and for program cost recovery – prior to implementation.

13 A. **Existing Programs That Will Be Part Of The Energy Efficiency Package**

14 **9. Q. What are the existing energy efficiency and demand response programs that will
15 be offered to PECO's customers as part of the EEP?**

16 A. For residential customers, they are: PECO's Energy-Saver Kit Program; the On-Line
17 Energy Store; and the On-Line Home Energy Efficiency Calculators. For
18 Commercial and Industrial ("C&I") customers, the current programs PECO will
19 continue to offer after the expiration of rate caps are: the "e-Valuator" energy
20 monitoring and management program and the "Smart Returns" demand response
21 program.

1 10. Q. Please briefly describe each of the existing residential programs.

2 A. **Energy-Saver Kits.** PECO offers Energy-Saver Kits to its customers at a reduced
3 cost through an arrangement we have negotiated with a third-party vendor. The kits
4 contain various energy efficiency items – for example, faucet aerators and compact
5 fluorescent lamps (“CFLs”) – that help customers save on their energy bills.

6 As part of the EEP, we will offer a kit containing energy efficiency items that can be
7 used throughout the year, including CFLs, energy efficient night-lights and low-flow
8 showerheads. The kit will cost approximately \$20 or \$25 depending on the type of
9 showerhead (fixed or handheld) customers order. By fully utilizing the kit, customers
10 can expect to save about \$150 to \$300 on their annual energy bills.

11 **The On-Line Energy Store.** PECO currently promotes an On-Line Energy Store
12 that PECO customers can visit through our website (www.peco.com/save), which
13 offers a 20% discount off all energy efficiency product purchases. The store provides
14 a wide array of products including CFLs, programmable thermostats, insulation, solar
15 outdoor lighting, low-flow showerheads, and energy efficient night-lights. Customer
16 energy savings vary depending on the products they purchase.

17 **The On-Line Home Energy Efficiency Calculators.** PECO’s On-Line Home
18 Energy Efficiency Calculators enable customers to evaluate the energy consumption
19 of the lighting and appliances they use. These calculators provide information that
20 can be used to make informed decisions about operating lights, appliances, and
21 heating and cooling systems already in the home, or the calculators can be used as a

1 guide when considering the purchase of new lighting, appliances or heating and
2 cooling equipment.

3 **11. Q. Does PECO plan to offer any programs specifically for low-income customers?**

4 A. Yes, PECO will continue to offer its Low-Income Usage Reduction Program
5 (“LIURP”). LIURP supports energy efficiency, and provides energy bill relief for
6 qualified low-income customers, through home weatherization assistance,
7 conservation education, and financial aid. PECO’s LIURP offering has a current
8 annual budget of \$5,600,000. While LIURP is part of PECO’s comprehensive
9 mitigation strategy, it is addressed in the Company’s default service procurement
10 filing.

11 **12. Q. Please briefly explain each of the existing C&I EEP programs.**

12 A. **The e-Valuator Program.** “e-Valuator” is a web-based electrical energy monitoring
13 tool available to PECO’s C&I customers for a fee. The program allows C&I
14 customers to monitor and manage their energy consumption and load profiles.
15 Customers in the program have access to their historical usage data and the ability to
16 view hourly and peak load data on a daily, monthly and annual basis.

17 **The “Smart Returns” Program.** The “Smart Returns” Program is a demand
18 response program that pays PECO customers financial incentives for reducing their
19 electric demand during times of high use or at the direction of PJM Interconnection,
20 L.L.C. (“PJM”), which is the regional electricity transmission organization for the
21 area that includes PECO’s service territory. Smart Returns also provides benefits to
22 all customers by reducing overall demand during peak periods.

1 13. Q. How will these existing EEP programs be funded?

2 A. All of the existing energy efficiency and demand response programs that will be part
3 of the Energy Efficiency Package will continue to be funded from existing
4 distribution revenues.

5 B. New Programs That Will Be Part Of The Energy Efficiency Package

6 14. Q. What are the new energy efficiency and demand response programs PECO is
7 proposing as part of the Energy Efficiency Package?

8 A. PECO plans to implement four new residential energy efficiency and demand
9 response programs prior to the transition from rate caps to market prices so the
10 programs will be in place as its residential customers adjust to market rates. These
11 programs are: PECO's Phase I Residential Real-Time Pricing ("RRTP") Program;
12 the Residential Compact Fluorescent Lamp Discount Program; the Enhanced
13 Residential On-Line Energy Audit; and the Residential Direct Load Control Program.

14 15. Q. Please describe PECO's Phase I RRTP Program.

15 A. PECO has separately filed a petition for approval of its Phase I RRTP Program that is
16 currently pending Commission approval. Although today many consumers do not
17 know it, electricity prices vary based on the time of day, demand levels, and the
18 availability of power plants to generate energy. The proposed Phase I RRTP Program
19 is voluntary and would permit residential customers to receive electric generation
20 service through PECO at hourly Day-Ahead energy prices.

1 Under the program, participating RRTP customers will be notified daily of the hourly
2 Day-Ahead Market prices. They will also be able to access these prices through a
3 PECO-provided web based tool. This program, and the price information PECO will
4 provide to RRTP participants, will enable them to modify their energy consumption
5 as a result of those pricing signals.

6 Customers who participate in the RRTP Program will also have access to additional
7 web-based education and support resources; for example, “Frequently Asked
8 Questions” web-pages that will provide tips for reducing or shifting energy
9 consumption during high-priced time periods to lower-priced periods to help them
10 achieve energy cost savings. We believe real-time pricing will be useful to many of
11 our customers when the transition to market-based electricity prices is complete. Our
12 Phase I Program begins the process of implementing a full-scale RRTP offering.

13 **16. Q. Please describe the Residential Compact Fluorescent Lamp Discount Program.**

14 A. Through this program, PECO proposes to provide discounts to customers on CFLs
15 through participating retailers. The initial phase of the program will include 500,000
16 lamps that will be discounted at the retailer’s point-of-sale. The Company plans to
17 launch the program in the fall of 2009 to coincide with nationwide ENERGY STAR®
18 CFL promotions.

19 The Residential CFL Discount Program will be available to all PECO residential
20 customers. We will offer 500,000 lamps in the first year in order to gather data and
21 assess the success of the program. The program could then increase to as many as 1
22 million CFLs by 2012. Since the manufacture of incandescent lamps generally used

1 in households will be phased-out in 2012-2014 as a result of federal regulations, we
2 anticipate reducing the number of discounted lamps to approximately 100,000 in
3 2013.

4 **17. Q. What are the projected benefits and costs of the Residential Compact**
5 **Fluorescent Lamp Discount Program?**

6 A. The Residential Compact Fluorescent Lamp Discount Program will run for five years
7 and we anticipate providing 3,350,000 CFLs to customers over that period. The
8 cumulative energy benefits we expect to realize over ten years (the cumulative life of
9 all the CFLs provided) are 1,134,750 in MWh savings. Total program costs over five
10 years are estimated to be approximately \$10,180,000. Exhibit FJJ-1, which is
11 attached to my testimony, sets forth the benefits and costs of this program in
12 additional detail.

13 **18. Q. Considering that PECO's Energy Saver Kits and the On-Line Energy Store**
14 **already offer discounted CFLs to customers, why is PECO implementing**
15 **another CFL discount program?**

16 A. First, lighting is the easiest component of a customer's household energy
17 consumption to influence. The incentive is designed to encourage customers to try a
18 CFL rather than a traditional incandescent bulb. Second, CFLs provide tangible
19 energy savings and are easy to install. Third, by making CFLs available at retail
20 outlets, customers can purchase them and achieve energy savings without needing
21 internet access or needing to purchase an entire energy kit. In short, this is an

1 effective energy efficiency tool that can be used by all of PECO's residential
2 customers.

3 **19. Q. Please describe the Enhanced Residential On-Line Energy Audit.**

4 A. The Enhanced Residential On-line Energy Audit is a third-party vendor application
5 that will be offered by PECO to its customers at no charge. The Enhanced Audit has
6 a similar functionality to PECO's other on-line energy calculators. However, it has
7 additional features that can be customized to reflect the customers' usage and to
8 enable them to optimize their savings.

9 For example, customers will have the option to perform a simple audit or a more
10 detailed audit in which specific information regarding their appliances and their home
11 construction can be typed into the audit system. With this information, the audit
12 program can estimate home energy usage and break down that usage into major
13 categories such as heating, cooling, lighting, and appliances. Customers will also be
14 able to compare the energy use of existing appliances and equipment with more
15 efficient models.

16 In addition, a "bill analyzer" component will enhance the audit program. The bill
17 analyzer will combine the customer's home profile with the customer's actual billing
18 and local weather data to illustrate where energy dollars are being used in the home.
19 Energy bills will be displayed month by month in relation to the weather, so
20 customers can see an estimate of their heating, cooling, lighting and appliance costs.
21 Customers will also be able to compare the effects of weather on their heating and

1 cooling costs year to year. Benchmarking data will be provided so customers can see
2 how their homes stack up against similar homes in the region.

3 Customers who complete the audit can print out reports and elect to receive follow-up
4 e-mails with personalized energy efficiency recommendations. The Enhanced
5 Residential On-Line Energy Audit will also provide customers with the
6 environmental impacts of the energy conservation and efficiency steps they take; for
7 example, CO2 emissions reductions.

8 **20. Q. How do you plan to measure how many customers are using the Enhanced On-**
9 **Line Audit?**

10 A. The vendor will maintain a database that will track the number of visits to the website
11 and the number of customers who complete the audit, and PECO will receive periodic
12 reports from the vendor.

13 **21. Q. What are the projected benefits and costs of the Enhanced Residential On-Line**
14 **Energy Audit?**

15 A. The Enhanced Residential On-Line Energy Audit will increase customer education
16 and awareness of energy reduction opportunities to help them lower their energy
17 usage. We anticipate that customers who use the Enhanced Residential On-Line
18 Energy Audit will make energy reduction improvements in their homes based on the
19 audit results and thereby achieve savings on their bills.

20 We will not be able to determine whether a customer's energy savings are directly
21 related to the audit. However, we believe that the Enhanced Residential On-Line

1 Energy Audit will be a valuable tool to help PECO's customers mitigate price
2 increases resulting from the expiration of capped rates.

3 The estimated total cost of the program will be \$3,135,000 over five years.

4 **22. Q. Please describe the Residential Direct Load Control Program ("RDLC") that the**
5 **Company intends to offer PECO customers as part of the EEP.**

6 A. The RDLC Program is a voluntary demand response program whereby participating
7 customers allow PECO to control their central air conditioning compressor during
8 periods of high demand or localized transmission and distribution system constraints,
9 which often result in high electricity prices. RDLC participants will receive an
10 incentive each month during the four-month period of June through September in
11 exchange for PECO's ability to control (i.e., cycle on and off) their air conditioner
12 compressors.

13 PECO will offer two options to customers: a 50% cycling option and a 100% cycling
14 option. The 50% cycling option will provide a \$5 credit on a customer's monthly
15 PECO bill and will permit PECO to cycle the customer's air conditioning compressor
16 on and off during periods of high demand or system constraints every fifteen minutes
17 for up to six hours per day. The 100% cycling option will provide a \$10 credit on a
18 customer's bill and will allow PECO to completely interrupt a customer's air
19 conditioning compressor for up to three hours per day or allow PECO to cycle the
20 compressor in accordance with the provisions of the 50% cycling option. A diagram
21 explaining how the RDLC technology functions is attached to my testimony as

1 Exhibit FJJ-2. An illustration of a typical RDLC control switch is attached to my
2 testimony as Exhibit FJJ-3.

3 **23. Q. How many customers does PECO expect to participate in the RDLC program?**

4 A. If the Commission approves the program, PECO will pilot RDLC in 2009 with a goal
5 of enrolling up to 1,000 participants during the first full year the program is
6 operational. The pilot will allow PECO to test the infrastructure needed to administer
7 the program. Full-scale deployment would begin in 2010 with a goal of 75,000
8 participating households by the end of 2013.

9 **24. Q. What are the projected benefits and costs of the RDLC Program?**

10 A. With respect to benefits, we estimate a demand response resource exceeding 70 MW
11 will result by the 5th year of the program based on our projection of 75,000
12 participants. Total program costs are estimated to be \$43,402,000 over five years.
13 Exhibit FJJ-1 provides further details on the benefits and costs of this program.

14 **25. Q. Does the RDLC provide any additional benefits to PECO's electric consumers?**

15 A. Yes. As I discussed earlier, all customers benefit from reduction in electricity usage
16 during times of high demand and reliability constraints. The RDLC Program will be
17 implemented during times of high demand, which in turn will reduce the need to
18 bring on additional higher priced generation. In addition, if through the use of
19 cycling the Company is able to satisfy reliability needs, customers benefit by the
20 avoidance or delay of new transmission and generation being built.

1 Indeed, a 2007 study prepared by The Brattle Group for PJM based on 2005 data
2 found that a modest load reduction of 3% in each of five PJM zones¹ during the top
3 twenty five-hour price blocks (amounting to 0.9% of PJM's peak load) yields an
4 energy market price reduction of \$8 - \$25 per MWh during the period in which
5 curtailment occurs. The potential benefit to the entire PJM system was approximately
6 \$65 million to \$203 million per year. The Brattle Group study found that further
7 benefits of such load reductions include a capacity price decrease due to reduced
8 demand, enhanced competitiveness in energy and capacity markets, reduced energy
9 market volatility and avoided transmission and distribution costs.

10 In sum, the RDLC Program yields benefits not only for program participants, but also
11 for the entire PECO service territory.

12 **26. Q. What costs were included in PECO's economic analysis of the new EEP**
13 **programs and what tests did PECO use to determine the programs' cost-**
14 **effectiveness?**

15 A. PECO's economic analysis included all relevant program costs, including the costs of
16 program incentives, promotion, administration and evaluation. PECO used the Total
17 Resource Cost Test ("TRC Test") to determine the programs' cost-effectiveness. The
18 TRC Test is based on the methodology from the publication *California Standard*
19 *Practice Manual: Economic Analysis of Demand-Side Programs and Projects, State*
20 *of California, Governor's Office of Planning and Research, July 2002*, and it is the
21 standard means for measuring the cost-effectiveness of energy efficiency programs.

¹ These zones were the PECO, PSEG, Delmarva, BGE and PEPCO zones.

1 **27. Q. Briefly explain what the TRC Test measures.**

2 A. The TRC Test measures the net cost or benefit of a particular program based on a
3 comparison of the total costs and benefits of the program, including those
4 experienced by the utility and the program's participants. The benefits applied in the
5 TRC Test are the avoided supply costs (the reduction in generation, transmission,
6 distribution and capacity costs) valued at marginal cost. The costs applied in the TRC
7 Test are the program costs of both the participants and the utility, including the
8 increase in supply costs.

9 **28. Q. What were the results of the TRC Test analysis for the new programs, excluding**
10 **the RRTP program that is pending in a separate Commission docket?**

11 A. The results of the TRC test are shown in Exhibit FJJ-4, which is attached to my
12 testimony. This exhibit shows the net present value ("NPV") and benefit-cost ratio
13 ("BCR") for each of the selected programs. Also attached to my testimony are
14 exhibits summarizing the programs' costs (Exhibit FJJ-5); the programs' MWh
15 savings (Exhibit FJJ-6); and PECO's lost distribution revenues resulting from the
16 Residential CFL Program (Exhibit FJJ-7).

17 **29. Q. Will PECO be seeking cost recovery for the new programs that are part of the**
18 **EEP?**

19 A. Yes. We will seek full and current cost recovery for the new programs through an
20 automatic reconciliation mechanism charged to all residential customers. In addition,
21 PECO will seek recovery of the lost distribution revenues associated with the

1 Residential CFL Discount Program. Mr. Richard Schlesinger, PECO's Principal Rate
2 Administrator for Retail Rates, discusses the Company's cost recovery plans more
3 fully in his testimony (PECO Statement No. 2).

4 **30. Q. Why is PECO seeking to recover lost distribution revenues associated with its**
5 **EEP programs?**

6 A. In this filing, PECO is only seeking to recover the direct revenues it will lose through
7 the implementation of the Residential CFL Discount program. As a general matter,
8 however, PECO believes it is entitled to recover distribution revenues lost through
9 conservation and energy efficiency programs which it implements for the benefit of
10 its customers. Recovery of those revenues ensures that utilities are not faced with the
11 difficult decision of choosing between offering energy efficiency programs and losing
12 revenue or not offering these programs at all.

13 **31. Q. Does PECO plan to offer any additional energy efficiency or demand response**
14 **programs in the future as part of its EEP?**

15 A. Yes. PECO will propose additional programs to achieve its goal of a 1%-2%
16 reduction in 2007's overall energy use by 2014. We wish to begin with these
17 programs, however, because of their ease of implementation and broad application
18 across our customer base.

19 **32. Q. Please describe the programs PECO is considering introducing in the future to**
20 **achieve a 1%-2% reduction in overall energy use.**

1 A. While an in-depth study would be required to develop a portfolio that delivers this
2 level of reduction, typical energy efficiency portfolio programs include:

- 3 • Residential ENERGY STAR Appliance Rebates that provide rebates to
4 customers who purchase select ENERGY STAR qualifying refrigerators,
5 washers and room air conditioners.
- 6 • Residential High Efficiency Central Air Conditioning Rebates that provide
7 rebates to customers installing ENERGY STAR qualified central air
8 conditioning systems.
- 9 • Discounted Energy Saver Kits that provide significant discounts on the current
10 Energy Saver Kits.
- 11 • On-Line Energy Store Rebates that provide rebates on “featured” energy
12 efficiency items.
- 13 • Residential ENERGY STAR New Home Construction incentives that provide
14 financial incentives for customers to qualify for ENERGY STAR Home
15 Certification.
- 16 • Residential Appliance Recycling Program that provide rebates to customers
17 who recycle old refrigerators, freezers and window air conditioners.
- 18 • Commercial Lighting Rebates that provide rebates for qualifying energy
19 efficient lighting upgrades in existing buildings.
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- 1 • Commercial Motor Rebates that provide rebates for installing qualifying
2 premium efficiency motors to replace standard efficiency motors.
- 3
- 4 • Commercial HVAC Rebates that provide rebates for qualifying energy
5 efficient HVAC equipment and controls upgrades in existing buildings.
- 6
- 7 • Custom Commercial and Industrial Energy Efficiency Programs that provide
8 customized energy efficiency rebates to qualifying commercial and industrial
9 customers.

10 **33. Q. Will PECO modify its planned programs to take into account any energy**
11 **conservation and efficiency measures passed by the Pennsylvania General**
12 **Assembly?**

13 A. Yes. We are monitoring several energy bills that are under consideration in the
14 Pennsylvania General Assembly and we will modify our programs in accordance with
15 any energy efficiency and conservation measures that are passed by the Legislature
16 and signed into law by the Governor.

17 **III. CUSTOMER OUTREACH AND PROGRAM EVALUATION**

18 **28. Q. How does PECO plan to inform its customers about the Energy Efficiency**
19 **Package Programs?**

20 A. There will be slight differences in our customer outreach efforts depending on the
21 program, but overall we plan to reach out to our customers through press releases, the
22 PECO web site, and the Energy@Home newsletter. We plan to implement a robust

1 outreach program to reach all of our customers to: 1) make them aware of the Energy
2 Efficiency Package, and 2) enable them to choose the right programs for their homes
3 or businesses. For programs like RRTP and RDLC, we will employ a more targeted
4 outreach to customers who are likely to participate in these programs.

5 **29. Q. How does PECO plan to evaluate the success of the EEP programs?**

6 A. Again, it will depend on the program. For programs such as the Residential CFL
7 Discount Program, we can measure success based on the number of lamps sold and
8 then project the expected energy savings. For web-based programs such as the on-
9 line energy calculators, we can track the number of customers who use them. For our
10 load reduction programs, the success can be quantified by the amount of load
11 reduced. Ultimately, however, we will measure the overall success of our programs
12 by how close we come to meeting our goal to reduce electric usage by 1%-2% of
13 2007 usage by the year 2014.

14 IV. CONCLUSION

15 **30. Q. Please summarize your direct testimony.**

16 A. PECO's Market Rate Transition Energy Efficiency Package is an integral part of
17 PECO's comprehensive strategy to ease the transition of its customers from capped,
18 regulated rates to market-based pricing. We urge the Commission to approve the
19 Energy Efficiency Package, so that PECO can begin to expand its existing energy
20 efficiency and demand response programs, and develop and implement new programs
21 to prepare its customers for the expiration of rate caps.

1 31. Q. Does this conclude your direct testimony?

2 A. Yes.