

**RE: Comments to the Pennsylvania Public Utility Commissions Tentative Implementation Order - Docket No. M-2020-301522**

April 27, 2020

Comments on Phase IV of the Energy Efficiency and Conservation Program

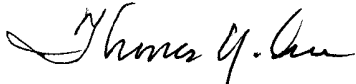
The Pennsylvania Public Utility Commission's (PUC) proposed plan for Phase IV of the Energy Efficiency and Conservation Program, created by Act 129 of 2008, sets important electricity reduction targets for the next few years. The plan needs to incentivize utilities to use all tools at their disposal to reach these targets. Specifically, the plan fails to incentivize the use of dispatchable demand response (DDR) programs which incentivize conservation through increased access to electricity usage data using smart meters.

Demand response programs are designed to strategically move some of the demand or load on the electricity grid to the periods where demand is low. Some customers might run their dishwashers during the day rather than right after dinner. Reducing peak demand is key to ensuring that older standby power plants do not need to be operating during periods of high demand. Additionally, reducing periods of high demand can help to reduce stress on our aging grid infrastructure and prevent blackouts.

By the end of 2023, Pennsylvania's 7 largest electricity distribution systems will be required to have functioning smart meters and will be charging ratepayers a monthly fee. In order for smart meters to create savings for consumers, utilities and customers must have the latest information about electricity usage and be given clear incentives for reducing electricity consumption during periods of high demand. Pennsylvania electric utilities should commit to "Time of Use" pricing where residents can pay less for electricity during times of low demand. This dynamic pricing structure is facilitated by the use of smart meters and gives residents the option to purchase cheaper electricity while reducing peak demand.

Please increase the deployment and usage of smart meters in order to most effectively reduce peak demand electricity consumption, saving consumers money on electricity and reducing the air pollution associated with electricity generation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Y. Au". The signature is fluid and cursive, with the first name "Thomas" being the most prominent.

Thomas Y. Au, President

Clean Air Board of Central Pennsylvania

528 Garland Drive

Carlisle, PA 17013