



June 20, 2024

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities Commission
(Via electronic submittal)

Re: Implementation of the Alternative ENERGY Portfolio Standards Act of 2004: Standards for the Participation of Demand Side Management Resources – Technical Reference Manual 2026 Update – Docket No. M-2023-3044491

Dear Secretary Chiavetta:

Thank you for this opportunity to comment on the proposed 2026 updates to the PA Technical Resource Manual (TRM).

These comments are respectfully submitted on behalf of MaGrann, EAM and ReVireo, together representing three of the longest tenured and most active Energy Rating Companies supporting the utility Residential New Construction (RNC) programs in Pennsylvania since the inception of Act 129.

Together, we would like to provide a whole-hearted market-based endorsement of the comments submitted by Performance Systems Development on this matter.

In particular, we would like to emphasize two key points:

1. The historical failure to maintain alignment of the RNC program with the ENERGY STAR Certified Homes & Apartments standard on which it is based results in significant market confusion, presents a barrier to entry and creates unnecessary inefficiencies in the program participation process. This can and should be addressed by simply linking the RNC “measure” to the latest applicable ENERGY STAR protocols for single and multifamily construction, which are in turn calibrated on an ongoing basis to maintain incremental performance thresholds relative to advances in codes and standards.
2. The failure to assess and attribute savings relative to a standard practice baseline and other relevant market effects artificially penalizes program cost effectiveness. More importantly from a market adoption perspective, since program incentives are linked directly to the incremental savings calculation (\$ per kWh), PA’s incentives are among the lowest in the country. As a result, the program is simply failing to generate the potential for participation that would be realized if incentives were to offset a higher proportion of the builder’s incremental cost. Again, this could be rectified to some extent by applying a more realistic determination of baseline (non-participant) performance.

Every home and multifamily building that elects not to participate in the RNC program because the incentives are insufficient and standards are outdated is a lost opportunity that will last the life of the building. Further, every builder that declines to participate perpetuates the very standard practices that

are being overestimated by the current TRM assumption of full code compliance and uniformly rigorous enforcement from day one of adoption.

On behalf of the energy professionals at MaGrann, EAM and ReVireo, we look forward to continuing to support the evolution of this program that is critical to achieving the Commonwealth's energy goals, to our many builder and developer clients, and most importantly to the construction of sustainable, affordable, high performance housing for Pennsylvania's homeowners and renters. Again, we strongly encourage consideration of the PSD comments and recommendations, and would be happy to discuss further from a trade ally perspective at any time.

Sincerely,



Ben Adams
Vice President



Frank Swol
Vice President



Matthew Kaplan
CEO