



April 7, 2025

Submitted electronically via: Docket Number M-2025-3052826 e-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Docket No. M-2025-3052826, Energy Efficiency and Conservation Program Tentative Implementation Order for Phase V

Dear Secretary Chiavetta,

On behalf of Northeast Energy Efficiency Partnerships (NEEP)¹, I am pleased to submit comments on the Tentative Implementation Order for Phase V of Act 129. NEEP is a non-profit with a mission to advance energy efficiency and related solutions in homes, buildings, industry, and communities.

We thank the Pennsylvania Public Utilities Commission (PUC) for the opportunity to provide input on the Tentative Implementation Order. We commend the PUC for the work so far on Act 129 and the planning of Phase V. Energy efficiency programs are a critical tool to address rising costs and ensure reliable energy for residents and businesses across Pennsylvania.

NEEP strongly supports the Commission's finding that implementing Phase V is in the public interest. The following comments are intended to provide technical assistance and resources to help in the design of the Final Implementation Order and highlight best practices to ensure successful implementation. In addition to the recommendations below, NEEP has tools and resources available and can offer direct technical assistance to help in design and implementation.

Our top-line recommendations may be summarized as follows:

- Increase Act 129 Phase V budgets for Electric Distribution Companies (EDCs) to account for inflation.
- Increase Act 129 Phase V savings targets to align with regional peers.
- Implement Act 129 programs in coordination with the Home Energy Rebates programs funded through the US Department of Energy.
- Create a statewide workforce network or training program.
- Increase peak demand program offerings for Phase V.
- Implement comprehensive weatherization programs and customer tools, including new coordination plans with other state and local programs.
- Implement more targeted low-income programs.
- Include beneficial electrification, which is not in violation of Act 129 but rather supports its objectives to lower household energy bills.
- Implement best practices in data sharing.

¹ These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners. NEEP is a 501 (c)(3) non-profit organization.



- Increase tracking and reporting of Act 129 program impacts including participation rates and pilot results.
- Provide additional opportunities for stakeholder engagement during the evidentiary hearing.

Increase Act 129 Phase V budgets for electric distribution companies (EDCs) to account for inflation.

The Tentative Order notes that the Energy Efficiency & Conservation (EE&C) Plan funding limits are a central parameter in setting the Phase V consumption reduction targets because the level of savings an electric distribution company (EDC) can acquire is a function of its budget to deliver programs and pay incentives. The Tentative Order also acknowledges that inflation has occurred since the enactment of Act 129, so the proposed EDC budgets are effectively decreasing each program year in terms of real dollars and purchasing power.

Increasing the budget can be achieved without violating the Act; the [statutory language](#) states that “[t]he total cost of any plan must not exceed two percent of the EDC’s total annual revenue as of December 31, 2006, excluding Low Income Usage Reduction Programs established under 52 Pa. Code § 58 (relating to residential Low-Income Usage Reduction Programs).” While the statutory language of Act 129 does not explicitly require an inflation adjustment, it also does not prohibit one, which permits a reasonable interpretation that accounts for rising costs. Moreover, households and small businesses have felt the impacts of inflation and need more access to energy efficiency programs to lower energy bills.

Inflation adjustments are important to consistently achieve the impacts of the budgets established in the initial Act 129 legislation. Without such an adjustment, Act 129 programs will not achieve the savings and benefits intended with the Act’s passage. The [Phase V SWE EE market potential study](#) shows substantial cost-effective efficiency potential remains, and that energy savings are constrained by the Act 129 cost cap; increased budgets would lead to higher savings.

Recommendation: Increase the Phase V budget to account for inflation.

We calculate inflation of 52% between 2006 to 2025, using a gross domestic product (“GDP”) implicit price deflator sourced from the [United States Federal Reserve](#). Utilizing a GDP price deflator is a reasonable approach because it measures changes in the value of all goods and services in the economy, rather than specific goods or services. Energy efficiency programs cover many parts of the economy, requiring a more holistic approach than a simple Consumer Price Index (the price of a basket of consumer goods) or other inflation adjustments. This adjustment would result in a budget of approximately \$1.85 billion, or roughly \$600 million over the proposed budget of \$1.22 billion.

Increase Act 129 Phase V savings targets to align with regional peers.

Nationwide, electricity prices have risen in recent years. From 2022 to 2023, residential electricity prices rose 6.2 percent. When energy costs increase, more households face high or severe energy burden leading to [economic energy insecurity](#) – the inability to adequately meet basic household energy costs – and must make [difficult](#)



[choices](#) like trading off costs for heating or eating. Energy efficiency is a [least cost resource](#) to the utility system and a critical tool for helping customers lower energy bills by lowering overall energy consumption. Programs promote high-efficiency technologies, provide targeted incentives and assistance to customer segments such as low-to-moderate-income customers and renters, improve grid efficiency to constrain costs, and promote prudent long-term utility strategies and investments. More targeted investments are needed to give households and businesses a strategy for lowering energy bills.

For [Phase I](#), the PUC set targets of 3% of 2009-2010 energy consumption in accordance with [Act 129](#)'s statutory language. The Tentative Implementation Order for Phase V now sets a lower target at 2.37% energy consumption from 2009-2010 levels over the five-year phase. This represents a significant decline in savings targets over time. If 20% of the goal is achieved every year, that represents only 0.47% electric savings achieved annually. These are much lower compared to annual goals in similarly situated states. [Maryland](#) sets annual goals of 2.25% electric savings, expressed as a percentage of sales; [New Jersey](#) sets annual goals of 1.66%; [New York](#) sets annual goals of 3%.

Recommendation: Increase the energy savings targets for Phase V.

The proposed Phase V energy savings targets are lower than Phase IV, despite clear indicators that suggest far greater levels of energy savings are achievable and needed for customers in Phase V. Even deeper overall energy savings can be achieved this Phase with the anticipated launch of multiple state and federal programs, including the IRA-funded Home Electrification and Appliance Rebate program, that can and should be effectively leveraged with Act 129 programs. Additionally, EDCs consistently underspend available Act 129 funding, leaving opportunities on the table for delivery of additional cost-effective energy efficiency services. According to the [Statewide Evaluator's Final Report on Phase III](#) "all actual EDC expenditures were 14% lower than planned. All EDCs had expenditures between 14% and 33% less than planned, except for PECO which had expenditures 4% greater than planned." This indicates there is opportunity to increase targets and drive greater savings with higher goals.

Implement Act 129 programs in coordination with the Home Energy Rebates through the US Department of Energy.

The Tentative Order specifically addresses the need for enhanced coordination with "other state conservation programs." The Commission states that EDCs may claim full gross savings for any project they support to promote collaboration over competition. As outlined in the Tentative Order, pooling funding can potentially enable more program participants and allow the EDCs to accomplish more with the funding available to them. Several potential areas of coordination are identified, including exploration of opportunities for braided funding, advanced data sharing, support for AEPS registrations, coordination of energy audits, and consideration of joint marketing campaigns.

The Department of Energy (DOE) Home Energy Rebates provide an opportunity for state energy offices to work with current energy efficiency program administrators to [streamline program offerings and coordinate all available resources](#). In many states, current program administrators may [already run programs](#) similar to what



the state is considering and have knowledgeable staff and resources that can be used. Pulling all available funds under one program can [save consumers money](#) through lowering upfront costs and provides opportunities to streamline involvement for administrators, contractors, distributors, and other market actors, as all programs operate under the same structure. This can create partnerships and resources that would still be available after the state has spent down DOE funding, [ensuring stability and long-term market transformation](#).

Various states have determined full attribution to program administrators when programs combine funding sources to lower costs and/or present a seamless experience for customers, as outlined in NEEP's report, [Expanding the Energy Savings Pie: Attribution Frameworks to Align IRA Home Energy Rebates and State Programs](#). In [Illinois](#), program administrators were allocated full attribution of project savings provided they contributed 50 percent of funding and administrative support. These conditions were agreed to through a stakeholder process. To ensure that the coordination between DOE Home Energy Rebates and Act 129 programs leverages all available resources, NEEP makes several recommendations:

Recommendation 1: Establish a working group with stakeholders such as utilities, program implementers, and community agencies to begin identifying and coordinating different funding sources.

Creating meetings with utilities, program implementers, and community agencies can serve as a starting point in this process. The PUC might consider convening a working group comprised of electric and gas utilities, consumer advocates, contractors, and representatives of state and local agencies that provide efficiency, weatherization, and home repair services.

Recommendation 2: Coordinate programs to alleviate barriers to participation.

Leveraging all available non-federal pools of funding can lower the initial upfront costs of projects and enable programs to tackle other barriers, such as health and safety issues, wiring, or panel upgrades. Often energy efficiency programs only target a certain aspect of home improvement or cannot address issues that may prevent efficiency upgrades. This can lead to gaps in services and missed opportunities. To address this problem, program administrators can braid funding and create programs that offer a wide variety of services that address all energy efficiency, health, and other needs. Coordination also provides opportunities to streamline involvement for administrators, contractors, distributors, and other market actors, as all programs operate under the same structure. This can create partnerships and resources that would still be available after the state has spent down DOE funding, ensuring stability and [long-term market transformation](#).

Recommendation 3: Identify changes to current regulatory structures to help accelerate implementation.

DOE-funded programs focus on implementing weatherization and electrification measures with specific intent to serve low- and moderate- income communities. Weatherization and electrification programs often have high upfront costs and can take longer to fully realize their energy savings. This makes it less likely that states will invest in them as energy efficiency regulatory structures tend to prioritize near-term, low-cost savings. States could consider modifying benefit cost ratio requirements for programs, changing tracking metrics and targets, and modifying the structure of implementation for low- and moderate-income programs.



Create a statewide workforce network or training program.

Investment in energy efficiency programs increases demand for all kinds of workers, including contractors to accelerate heat pump adoption, home auditors that understand stacked efficiency and electrification opportunities, building operators, code officials, and design professionals. Intentionally designed workforce development programs can have beneficial impacts on underserved communities by providing desirable skills and well-paying jobs. NEEP encourages the Commission to ask utilities to start to align on workforce best practices at the state level to ensure participants have knowledgeable contractors and receive quality installations. Below are some recommendations:

Recommendation 1: Establish statewide minimum qualifications for contractor participation in the rebate programs.

These qualifications can be focused on heat pump installation or weatherization, as well as other measures offered by the program. Minimal requirements will ensure quality installation and performance, which will be important in growing consumer trust and helping contractors identify the best products for the projects. For contractor qualifications and sizing tools, NEEP has resources that are utilized in our region and nationally that can help establish these standards and guidance, including an [online contractor certificate for whole home energy retrofits](#) and [a heat pump sizing tool](#). The [New York State Clean Heat Program](#) has developed a [Quality Policies and Procedures manual](#), as well as a series of inspection checklists.

Recommendation 2: Establish a statewide contractor portal online.

A unified state network that certifies contractors who have been trained on heat pump and heat pump water installation can create uniform standards and training expectations across the state to ensure success of these programs. This can also provide an opportunity to help new businesses enter the field, holding networking events and continuing education classes where businesses meet and learn from one another. For example, [Vermont's Efficiency Excellence Network](#) provides free training and networking opportunities to contractors. The state does this because it has recognized that without trained contractors, programs cannot work.

Increase peak demand program offerings for Phase V.

Flattening peak demand is critical for affordability because much of the necessary expense of grid modernization is driven by peak demand, as energy infrastructure is built to meet the needs during peak demand for reliability. The Phase V Tentative Implementation Order sets a statewide peak demand reduction (DR) target of 2.29%, which is set from a baseline of 2007-08 peak demand, totaling 607.6 MW reduction over Phase V. The PUC proposes that peak demand reduction targets may be achieved either through coincident demand reductions from energy efficiency measures or verified demand reductions from daily load-shifting demand response programs. The SWE found that the most effective approach for DR in Phase V is “daily load-shifting” programs such as connected thermostats, EV charging, domestic hot water heaters, and behind-the-meter storage, such as battery programs.



NEEP encourages the Commission to require EDCs to expand their demand response program offerings and utilize existing smart meter infrastructure. [Demand response](#) will shift load and shave peak demand, which provides grid benefits and lowers infrastructure investment costs. When aggregated, large appliances (refrigerators, washers and dryers, and dishwashers) in households can account for [30 percent of electricity](#) used in residential buildings in the United States. Demand response programs spread this aggregated use across the customer base, which reduces peak electricity demand and lowers stress on the grid. Demand response programs are typically designed so that customers agree to not run a large appliance, such as a dishwasher, during peak periods in exchange for a discount on their utility bill. Further, demand response programs that are focused on large appliances (refrigerators, washers, dryers, and dishwashers) are particularly beneficial to consumers since altering their time of use will not significantly affect the comfort of the indoor environment.

As a point of comparison, New Jersey's Triennium 2 electric peak demand reduction goals [total 409.23 MW](#) across its electric utilities. Note that New Jersey runs energy efficiency plans in three-year cycles; the state would achieve 682 MW if this total was scaled to a five-year period with the same annual peak demand reductions. [Per capita](#), this represents about 55% higher electric savings as compared to Pennsylvania's proposed Phase V electric savings.

Recommendation 1: Offer residential appliance- or behavior-based programs that allow customers to be part of the grid.

When aggregated, large appliances can change demand and load on the grid as needed. Additionally, appliance-based programs provide an opportunity to [use price signals to incentivize customers](#) to participate in the programs, helping to lower customer rates. For example, a study by [Ecotope and NRDC](#) found that using heat pump water heaters for demand flexibility can reduce electricity costs by 15 percent for customers and operating costs by 34 percent for the utility. In [Hawaii](#), demand response programs have been designed to reduce residential lighting and water loads, as the state found that those tend to be the largest coincident peak loads. Further, studies exist that allow for a [side-by-side breakdown](#) of residential energy usage by appliance. With this data, program administrators can make more informed decisions about which appliances to target and how to [best design programs to help both customers and the grid](#).

Behavioral programs will use real time data feedback plus the tools of behavioral science to enhance savings for residents and businesses. These programs can be applied generally to reduce monthly usage by providing insights into customer-specific usage patterns, such as home energy reports or high bill alerts, or can be applied in times of need, such as a resource to lower peak demand at certain hours. Providing this information to customers empowers them to take actions to reduce or modify their energy use in ways that benefit the grid and receive money for providing this service.

Recommendation 2: Consider updating baselines for peak demand reductions.

The current baseline for Act 129's demand response programs is from 2008 – 2009. Seasonal conditions are becoming [more extreme](#), as each summer is progressively hotter and each winter is progressively colder. NEEP encourages the Commission to consider adjusting and updating baselines to reflect the extreme weather changes and to ensure that utility program planning is based on current realities and targets the greatest needs.



Implement comprehensive weatherization programs and other customer tools, including new coordination plans with other state and local programs.

To enhance the effectiveness of Act 129 and ensure that all households, particularly those in underserved and low-income communities, can benefit from energy efficiency upgrades, the Commission must prioritize improved coordination between Act 129 programs and other health, safety, and home repair funding streams. Pennsylvania has some of the [oldest housing stock](#) in the nation. Low-income families are much more likely to live in homes that require substantial health and safety improvements before energy efficiency measures can be installed. Barriers such as chronic moisture issues, mold, structural deficiencies, and outdated electrical systems often result in homes being deferred from energy efficiency upgrades. Without addressing critical health and safety barriers, many of Pennsylvania's most vulnerable residents will remain unable to participate in energy efficiency programs, perpetuating high energy burdens and economic disparities.

[Deep energy retrofit programs](#) can save 50 percent or more of energy used in the home and include measures such as building shell improvements, insulation and air sealing, and upgrades to high-efficiency heating and cooling and hot water systems. Current energy efficiency programs are offered in a “program-centric manner” with incentives, technical assistance, and strategic planning administered across multiple programs and agencies. This puts the burden on customers or implementers to identify which rebates apply to their project and separately apply for each one. Programs can shift away from a measure-by-measure to a multi-measure approach. This can be achieved through changes in energy efficiency program implementation and design, by developing pre-determined suites of retrofit solutions that can be replicated in similar homes within a state or region, or through other program innovations. For customers, this means providing a streamlined set of options from insulation to appliance replacement. For program implementers, this requires shifting away from thinking about measures on an individual basis to thinking about measures holistically (weatherization, HVAC, and appliances) with modeled or measured savings programs.

Recommendation 1: Establish comprehensive building assessments to identify the necessary suite of upgrades needed for health, safety, comfort, and affordability.

Customers requiring building improvements should be directed to a centralized system for all available assistance across utility, state, and community-based programs, in a seamless process. Customers should receive one comprehensive audit that is designed for interoperability in terms of data standards and auditor credentials across agencies and programs, so efforts do not need to be duplicated for each service provider.

Recommendation 2: Require utilities to plan coordination of efficiency programs with other state and local healthy home, weatherization, and other programs.

Programs to coordinate with may include but are not limited to lead and asbestos remediation programs, Indoor Air Quality (IAQ) improvement programs, aging-in-place programs, hoarding support, and pest management programs administered through the Department of Community and Economic Development (DCED), the Department of Human Services (DHS), and the Department of Health (DH) and community organizations, as well as electrification and renewable energy programs administered by the Department of Environmental Protection



(DEP) or other local agencies. This coordination should involve direct referrals to home remediation services, streamlined enrollment processes, regular engagement with program staff to align timelines and improve service delivery, and prioritizing the use of contractors trained in both energy efficiency and home remediation. By integrating these efforts, EDCs can address structural and environmental barriers that often prevent energy efficiency upgrades, leading to more comprehensive home improvements, improved indoor environments, and greater long-term energy savings.

Recommendation 3: Encourage weatherization through residential contractors with Total Energy Pathways or similar approach.

A contractor-based program that combines weatherization, electrification, and renewable energy into one package for customers can reduce complexity for the owner and achieve drastic energy savings at a more affordable cost than doing each measure separately. One program the state could consider is the [Total Energy Pathways \(TEP\) program](#). This program is contractor-driven and includes a contractor certificate, the [Total Building Performance \(TBP\) Certificate](#), that can enable the workforce in Pennsylvania to deliver whole-home solutions. The TBP certificate is the only one of its kind designed to prepare individuals with the holistic knowledge needed to assist and guide whole-building retrofits that center customer satisfaction and maximize residential energy and emissions savings. To earn the TBP certificate, contractors can study using the [free online training modules](#) before challenging the certificate exam. The Pennsylvania College of Technology is running the class [Introduction to Residential Electrification Retrofits](#), which is based on the TBP training modules, for the third time beginning in Q2 of 2025.

Recommendation 4: Present all program offerings through a coordinated statewide online portal.

NEEP encourages the Commission to require EDCs to invest into a single statewide platform for customers and contractors that participate in the program. This platform should provide comprehensive information on the rebates available for residential and commercial customers in the state. [Massachusetts](#) and [Connecticut](#) are example states that have core energy efficiency and electrification programs that are offered on a statewide platform where customers can learn more about their rebates and to find local contractors. This streamlines program offerings and aligns utility efforts across the state. A single touch point can also provide an opportunity for customers to find contractors and for contractors and customers to find education materials.

Implement more targeted low-income programs.

In the Tentative Order, the Commission proposes that each EDC's EE&C Plan include specific energy efficiency measures for households at or below 150% of the Federal Poverty Income Guidelines (FPIG), in proportion to that sector's share of the total energy usage in the EDC's service territory. The proposed carve-out for low-income savings targets represents the savings from 13% of each EDC's budget directed to low-income customers, resulting in 7.1% of the statewide MWh target. NEEP supports the prescribed proportion of low-income customers targeted to be served by Act 129 programs and the planned proportionate savings. A carve-out for low-income savings is an important step in working towards ensuring energy efficiency programs are implemented and adopted in low-income homes and communities. In addition to this goal, NEEP would like to



highlight a few more recommendations that could help ensure the low-income residents and communities have access to these programs and their benefits.

Recommendation 1: Use data to identify potential participants and alleviate the highest energy burden.

Barriers to successful LMI programs arise not only in spending and achieved savings, but also in engaging and enrolling customers in the programs. To overcome these barriers, energy efficiency program administrators can use data on the front-end to design programs that identify and reach previously overlooked customers. Program implementers can use data to create analytical and mapping tools that drive energy decarbonization and target those with the highest energy burden. By using consumer data and geographic data, a utility in the Northeast was able to identify [78 percent more](#) energy burdened households and create programs designed to help with their energy bills. To see more about ways energy efficiency programs have used data to improve program design and implementation for low-income customers, see NEEP's [Using Data to Help Achieve Decarbonization and Equity Goals](#).

Recommendation 2: Partner with existing community organizations already on the ground.

Community-based organizations can help market energy efficiency programs and provide community-based technical assistance. For example, Massachusetts has the [Community First Partnerships Program](#) that focuses on increasing program participation and community engagement with environmental justice communities through various strategies.

Recommendation 3: Meaningfully engaging stakeholders in the process by establishing an Act 129 Low-Income Advisory Group.

Advisory groups (a term this paper will use for either committee or proceeding) are decision-making bodies that consist of representatives of underserved and marginalized communities. A [low-income advisory group](#) helps policymakers and program administrators learn about and implement equity metrics important to historically marginalized and/or excluded communities. It is an intentional space where communities engage with and are partners in driving equitable energy efficiency policies and programs. High-impact stakeholder processes in several NEEP states could serve as models, such as the Connecticut Department of Energy and Environmental Protection's [Equitable Energy Efficiency Proceeding \(E3\)](#) and the Massachusetts Energy Efficiency Advisory Council's [Equity Working Group \(EWG\)](#).

Include beneficial electrification, which is not in violation of Act 129 but rather supports its objectives to lower household energy bills.

NEEP supports the PUC's proposal to ask EDCs to explain how they will leverage non-Act 129 funds and work with non-Act 129 programs to support beneficial electrification, with the recognition that Act 129 has a clear focus on reductions in electricity consumption and peak demand. If another state program incentivizes the fuel-switching upgrade, EDCs should support the adoption of high-efficiency electric equipment by incentivizing the installation of the highest-performing models. This approach aligns with Act 129's core goal of reducing energy



consumption in a cost-effective manner and provides a seamless pathway for customers to transition to efficient technologies when external funding opportunities are available.

Implement best practices in data sharing.

Laying the groundwork for a strong [data sharing arrangement](#) would allow Pennsylvania to create lasting change in the energy sector by improving efficiency, lessening strain on the electric grid, lowering energy burden for customers, and ensuring that Act 129 funds and external funding sources are leveraged effectively. Energy data can provide insight into customer energy use and behaviors. Unlocking this data can enhance energy efficiency programs by [identifying new ways to save energy](#) and can foster equitable program design and delivery. Given the planned federal funding sources, [improved data access will be critical](#) to aligning state-administered programs with Act 129 energy efficiency and conservation initiatives.

Recommendation 1: Establish a formal stakeholder process for data collection and transparency.

NEEP encourages the Commission to coordinate with stakeholders such as utilities, program implementers, and community agencies to establish statewide data collection and transparency policies. Collecting real time data on energy use and grid load is important to enable grid interactive homes and buildings. Establishing standard data policies ensures customers can more easily share data with third-party providers that implement demand reduction and flexible grid programs. The data gathering process should build on the prior data access proceedings which had significant participation and include clear procedures for EDCs to share data with relevant state agencies while incorporating cybersecurity safeguards and protections for personally identifiable information. Data sharing should only occur with informed, affirmative customer consent and proper protections for privacy in place.

Recommendation 2: Establish standards for secure, consumer-protective aggregate data sharing across providers that serve the same household.

Providers may include the gas utility provider, the WAP provider, the LIURP provider, and the Act 129 provider. Using its existing authority, the Commission can require utilities to set up processes to aggregate data and make it available to customers or third-party implementers. Regulatory orders and mandates that recognize the value of long-term investment in utilities creating and maintaining building level data can also enable utilities to invest in data infrastructure for near-term and future grid-planning needs. Utilities should establish aggregated data sharing processes with agencies that administer home energy programs (including DEP, DCED, and DHS), and should include the information necessary to facilitate coordinated cross-program engagement (such as usage data and contact information).

Recommendation 3: Lay out guidelines for third-party eligibility criteria.

Given the degree to which states may also work with third parties in different aspects of energy programs, it is also important to create guidelines for any entity that will be using customer utility data. Pennsylvania can establish processes and enforcement mechanisms that govern third parties' ability to handle data safely and



implement effective programs, which would enable better remote load management, enhance demand-side flexibility, and optimize grid performance.

Increase tracking and reporting of Act 129 program impacts including participation rates and pilot results.

Tracking metrics are a [largely untapped resource](#) to incentivize energy efficiency programs. These tools can also work to [align the utility business model with state policies and priorities](#). Several states across the mid-Atlantic and Northeast require EDCs to report on specific metrics during implementation. In Vermont, Green Mountain Power (GMP) [measures the societal benefits of its AMI deployment](#), such as commercial and industrial outage cost reduction, decreased energy costs, and energy conservation connected to AMI-based web portals. NEEP has many resources that could help with identifying metrics including materials on how to measure [decarbonization policies](#), [equity](#), and metrics to track various aspects of programs including [climate policies](#), [equitable access to programs](#), and [tracking market transformation](#).

Recommendation: Consider requiring a more comprehensive set of metrics to be reported by EDCs including participation rates and pilot results.

NEEP encourages the Commission to require EDCs to track metrics that will help inform program design and success and require EDCs to publish this data on a regular basis so that stakeholder can be informed and any success or barriers in program implementation can be identified and addressed immediately. Metrics for EDCs to consider tracking include: program participants and number of households served, participation rates by customer class, and total dollars spent (in addition to savings achieved), deferrals, and the results of pilot programs.

Provide additional opportunities for stakeholder engagement during the evidentiary hearing.

Stakeholder engagement plays a crucial role in shaping effective and equitable EE&C programs. However, public comments for Act 129 are not considered once plans have been submitted and the formal evidentiary hearing process has started. Additionally, if a party is able to participate in the hearing, past cycles have offered limited time for them to do so. In Phases III and IV, the prehearing conference for each of EE&C Plans was not held until early January, leaving just a few weeks for non-statutory parties to engage in discovery and develop formal testimony.

Recommendation: Provide additional opportunities for stakeholder engagement during the formal evidentiary hearing.

NEEP urges the Commission to extend the opportunity for public comment and provide opportunities for feedback on Act 129 plans during the evidentiary hearing process. For example, the Commission can require each EDC to hold public meetings with informational presentations on their portfolio and provide opportunities for verbal and written feedback. These presentations can explain the program portfolio, goals of the program,



and metrics of success to stakeholders. More targeted meetings and opportunities for engagement, educational materials, and presentations allow stakeholders to learn more about the specifics of these programs and provide more targeted feedback. Several NEEP states have developed high-impact stakeholder processes that could serve as models, such as the Connecticut Department of Energy and Environmental Protection's [Equitable Energy Efficiency Proceeding \(E3\)](#) and the Massachusetts Energy Efficiency Advisory Council's [Equity Working Group \(EWG\)](#).

Conclusion

We thank the Pennsylvania Public Utility Commission for the opportunity to provide comments. These comments are intended to support the work currently underway with the implementation of Phase V of Act 129, and we appreciate the opportunity to provide input. In addition to these comments, NEEP is available to provide technical assistance to the PUC on Phase V and other energy efficiency policies and programs. If you have questions or would like additional information, please reach out to Erin Cosgrove, ecosgrove@neep.org.

Sincerely,

A handwritten signature in black ink that reads "Erin Cosgrove". The script is fluid and cursive, with a prominent loop on the 'C' and a long tail on the 'e'.

Erin Cosgrove
Director, Policy and Programs
Northeast Energy Efficiency Partnerships
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