



COMMONWEALTH OF PENNSYLVANIA

April 7, 2025

E-FILED

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

Re: Energy Efficiency and Conservation Program / Docket No. M-2025-3052826

Dear Secretary Chiavetta:

Enclosed please find the Comments to the Tentative Implementation Order, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Kevin Higgins
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Energy Efficiency and Conservation Program :
: **Docket No. M-2025-3052826**

**COMMENTS OF THE
OFFICE OF SMALL BUSINESS ADVOCATE
TO THE TENTATIVE IMPLEMENTATION ORDER**

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Attorney ID No. 77538

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: April 7, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Energy Efficiency and Conservation Program :
: **Docket No. M-2025-3052826**

**COMMENTS OF THE
OFFICE OF SMALL BUSINESS ADVOCATE
TO THE TENTATIVE IMPLEMENTATION ORDER**

The Office of Small Business Advocate (OSBA) supports the Pennsylvania Public Utility Commission's (Commission) Tentative Implementation Order regarding Phase V of the Act 129 Energy Efficiency and Conservation (EE&C) program. The OSBA agrees that it is important to consider how the budgets allocated in this next phase can most effectively support both affordability and resource adequacy.

The Tentative Implementation Order affirms that Act 129 requires all EE&C measures to be funded by the customer class that directly receives the energy efficiency and conservation benefits of those measures. The OSBA supports the principle that costs which can be clearly and exclusively attributed to measures or programs serving a specific customer class should be assigned solely to that class. Additionally, the OSBA supports the Commission's proposal to ensure that each customer class is offered at least one program.

The Order notes that the Act 129 EE Potential identified in the EEPDR Potential Study is subject to a budget ceiling—specifically, two percent of each Electric Distribution Company's 2006 annual revenue. The OSBA recognizes the importance of balancing the implementation of EE&C programs with the financial burden these programs may impose on ratepayers. Accordingly, the OSBA supports maintaining the current budget limitation and stresses the need to continually consider the impact on customer rates.

Respectfully submitted,

/s/ Steven C. Gray
Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. 77538

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