

April 22, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
Harrisburg, PA 17120

**Re: Docket No. M-2025-3052826 – Act 129 Phase V Energy Efficiency & Conservation Implementation Order**

Dear Secretary Homsher:

Oracle Utilities Opower submits for filing the attached Reply Comments in response to the Tentative Implementation Order issued on February 20, 2025.

Thank you for the opportunity to weigh in on this important matter and appreciate the Commission's consideration of Oracle's comments.

Sincerely,



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Oracle Utilities Opower appreciates the opportunity to provide Reply Comments on the Public Utility Commission's Tentative Implementation Order. Oracle filed its Initial Comments on April 7, 2025, expressing support for the continuation of the utilities' energy efficiency and conservation programs in Phase V. These reply comments respond to a few issues raised in other stakeholder comments.

**Shorter lived measures like Home Energy Reports still provide substantial value and should be used as a complement to deeper measures.**

In comments their comments, CAUSE-PA, TURN, and CEEH-PA assert that deeper, more comprehensive measures should be prioritized over less expensive, shorter lived measures like behavioral programs. Oracle agrees that comprehensive measures are critical to ongoing energy savings, but disagrees that behavioral programs like Home Energy Reports (HERs) are any less valuable simply because they have a shorter measure life. Deeper measures and shorter lived measures like HERs deliver different sets of benefits, both of which are valuable to customers.

- All customers, and especially low-income customers, benefit from energy savings that can be achieved immediately, like the savings from Home Energy Reports. While deeper measures provide savings that will, in part, be realized further into the future, Home Energy Reports provide savings that are realized now.
- Low-income customers have varying ability to enroll in deeper measures. For those who cannot participate in whole-home programs, like renters, Home Energy Reports can still provide valuable energy insights and savings opportunities.
- Low income HERs achieve distributional equity by reaching more customers. Low income HERs can reach 4-5 times the number of customers as compared to other low income programs.
- Home Energy Reports have a demonstrated ability to drive increased participation in other, deeper measures. According to the Evaluation Framework Guidance, HER messaging often motivates participants to take advantage of other program offerings, with treatment customers participating at higher rates than those who do not receive HERs. This is confirmed by all recent evaluations of the low income HER programs.

As noted in our Initial Comments, low-income HERs remain a critical low-cost measure that both saves energy and increases participation in other, deeper energy efficiency measures, both of which contribute to utilities low-income savings targets.

**Oracle supports the following comments provided by other stakeholders:**

- Oracle supports the comments of PECO and others noting that time of use (TOU) rates are well suited to provide the kind of daily load shifting contemplated by the Demand Response Potential Study. We agree that TOU rates should be able to be counted in this framework towards demand reduction goals.
- Oracle also supports the comments of utilities and others noting that data sharing considerations are best considered in a dedicated stakeholder process. A working group or other stakeholder convening on data sharing would provide a good opportunity to explore the various opportunities and areas of concern.