



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE
M-2025-3052826

July 24, 2025

To: All Interested Parties

Re: Implementation of Act 129 of 2008—Phase V
Energy Efficiency and Conservation Plan Template
Docket No. M-2025-3052826

The Pennsylvania Public Utility Commission (Commission) hereby issues, for comment, the proposed Phase V Energy Efficiency and Conservation Plan (EE&C Plan) filing template and EE&C Plan template tables. On June 18, 2025, the Commission adopted an *Implementation Order*, which directed that the Phase V EE&C Program would operate from June 1, 2026, through May 31, 2031, and prescribed further energy consumption and peak demand reduction targets.¹ The June 18, 2025, *Implementation Order* directed the electric distribution companies (EDCs) to file Phase V EE&C Plans by November 30, 2025.² With this Secretarial Letter, the Commission continues its process of establishing guidelines for implementing the fifth phase of the Act 129 EE&C Program.

The Final Phase IV EE&C Plan template was issued on September 9, 2020.³ With this Secretarial Letter, the Commission proposes a revised EE&C Plan template for EDCs to prepare and file their Phase V EE&C Plans. While the Commission proposes that the FirstEnergy PA EDC file a single EE&C plan, we request certain high-level information by rate district, or legacy EDC, for the benefit of stakeholder review.

We propose that each EDC post on its website a copy of its initial proposed Phase V EE&C Plan, due to the Commission no later than November 30, 2025. The Commission also proposes that each EDC maintain on its website an electronic copy of its most current, Commission-approved Phase V EE&C Plan. In addition, we propose the EDCs post all subsequent revised versions, both clean and redlined, noting the date of Commission approval or, if not yet approved, a designation indicating that approval is pending before the Commission.

The Commission directs that all interested parties shall have until August 15, 2025, to file written comments on the proposed Phase V EE&C Plan template and EE&C Plan template tables, referencing Docket No. M-2025-3052826, to Secretary, Commonwealth Keystone Building, Second Floor, 400 North Street, Harrisburg, Pennsylvania 17120.

¹ See *Energy Efficiency and Conservation Program Implementation Order*, at Docket No. M-2025-3052826, entered June 18, 2025. <https://www.puc.pa.gov/pcdocs/1883669.pdf>

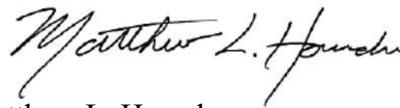
² *Id.* at 198.

³ See *Final Act 129 Phase IV EE&C Plan Template*, at Docket No. M-2020-3015228, served September 9, 2020. <https://www.puc.pa.gov/pcdocs/1676672.docx>

Comments may also be filed electronically, at the above-referenced docket, through the Commission's e-File system.⁴ No reply comments will be accepted.

This Secretarial Letter, the EE&C Plan Template, and EE&C Plan Template Tables Excel Workbook will be published at Docket No. M-2025-3052826 and on the Commission's website at <https://www.puc.pa.gov/filing-resources/issues-laws-regulations/act-129/energy-efficiency-and-conservation-ee-c-program/>. If there are any technical questions regarding the attached proposed Phase V EE&C Plan template and EE&C Plan template tables, please contact the Commission's Bureau of Technical Utility Services at RA-Act129@pa.gov, 717-783-5242. If there are any questions relating to legal or procedural issues regarding this proceeding, please contact Tiffany Tran in the Commission's Law Bureau at tiftran@pa.gov, 717-783-5413.

Sincerely,



Matthew L. Homsher
Secretary

Attachment: EE&C Plan Template
EE&C Plan Template Tables Excel Workbook

cc: Joseph Sherrick, Bureau of Technical Utility Services
Darren Gill, Bureau of Technical Utility Services

⁴ More information regarding the Commission's e-Filing process is available at <http://www.puc.pa.gov/efiling/default.aspx>.

Template for Pennsylvania EDC Energy-Efficiency and Conservation Plans

To be submitted by EDCs no later than November 30, 2025

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Note:

If any of your answers require you to disclose what you believe to be privileged or confidential information, not otherwise available to the public, you should designate at each point in the EE&C plan that the answer requires you to disclose privileged and confidential information. Explain briefly why the information should be treated as confidential. You should then submit the information on documents stamped “CONFIDENTIAL” at the top in clear and conspicuous letters and submit one copy of the information under seal to the Secretary’s Bureau along with the EE&C plan. In addition, an expunged copy of the filing should also be included with the EE&C plan. If someone requests to examine the information, or if Commission staff believes that the proprietary claim is frivolous or otherwise not justified, the Secretary’s Bureau will issue a Secretarial Letter directing that the EDC file a petition for protective order pursuant to 52 Pa. Code § 5.423.

Energy-Efficiency and Conservation Plan

A. Transmittal Letter – with reference to statutory and regulatory requirements and Electric Distribution Company (EDC) contact that PA PUC should contact for more information.

B. Table of Contents – including lists of tables and figures.

C. Table of Acronyms – include definitions of any acronyms used in the plan.

D. Mapping of Program Years to Dates – show table identifying the start and end dates of all program years.

Program Year	Start Date	End Date
PY18	6/1/2026	5/31/2027
PY19	6/1/2027	5/31/2028
PY20	6/1/2028	5/31/2029
PY21	6/1/2029	5/31/2030
PY22	6/1/2030	5/31/2031

This EE&C plan template reflects Commission guidance issued in previous Act 129 Orders. Specifically:

- Phase V Implementation Order. Docket No. M-2025-3052826. Entered June 18, 2025. [Weblink](#) (henceforth referred to as “2025 IO”)
- Phase I Implementation Order. Entered January 16, 2009. Docket No. M-2008-2069887. [Weblink](#) (henceforth referred to as “2009 IO”)
- 2026 TRC Test Final Order. Docket No. M-2024-3048998. Entered November 7, 2024. [Weblink](#) (henceforth referred to as “TRC Test Order”)
- 2026 Technical Reference Manual Final Order. Docket No. M-2023-3044491. Entered September 12, 2024. [Weblink](#) (henceforth referred to as “TRM Order”)

1 Overview of Plan

(The objective of this section is to provide an overview of the entire plan)

- 1.1 Summary description of plan, plan objectives, and overall strategy to achieve energy-efficiency and conservation goals.
- 1.2 Summary description of process used to develop the EE&C plan and key assumptions used in preparing the plan. Provide the basis for key assumptions and discuss sources of uncertainty that may affect the plan. This summary should include a description of the EDC’s process for stakeholder engagement.
- 1.3 Summary tables of portfolio savings goals, budget, and cost-effectiveness (see Tables 1, 2, 3 and 4 of the EE&C Plan Template Tables Excel Workbook).⁵ Introduce Table 2 with a high-

⁵

EDCs should review carefully the ‘Introduction’ tab of the EE&C Plan Template Tables Excel Workbook prior to populating the workbook.

level overview of Act 129 energy accounting (incremental annual, gross vs. net, meter-level savings vs. system-level savings, weather-normalization of savings estimates, etc.). Introduce Tables 3 and 4 with a summary of the key peak demand accounting elements for Phase V (2025 IO at 147-157). FirstEnergy should also provide Table 2a showing the expected first-year MWh and budget by rate district.

- 1.4 Summary of program implementation schedule over the five-year plan period. Utilize the Mapping of Program Years to Dates table above to align calendars with Act 129 program years.
- 1.5 Summary description of the EDC implementation strategy to acquire at least 15% of its portfolio consumption reduction and peak demand reduction target in each program year.
- 1.6 Summary description of the EDC implementation strategy to acquire at least 75% of the portfolio MW compliance target in each season. (2025 IO at 142) If an alternative summer or winter performance window is proposed for daily load shifting programs, provide a rationale for the alternative window. If the proposal calls for differentiated windows based on local distribution system needs, summarize the proposed taxonomy and prepare a supplemental table that maps distribution assets or transmission zones to peak demand performance windows. (2025 IO at 154)
- 1.7 Summary description of the EDC implementation strategy to manage EE&C programs and engage customers and trade allies.
- 1.8 Summary description of EDC's data management, quality assurance and evaluation processes; include how EE&C programs will be updated and refined based on evaluation results.
- 1.9 Summary description of cost recovery mechanism. FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class and the rationale for separating or consolidating rate districts from a cost recovery standpoint.

2 Energy-Efficiency Portfolio/Program Summary Tables and Charts

(The objective of this section is to provide a quantitative overview of the entire plan for the five-year period. The audience will be those who want to see the "numbers" but not all the details.)

- 2.1 Market Rate Residential (exclusive of Low-Income), Residential Low-Income, Small Commercial and Industrial, and Large Commercial and Industrial Sector Summaries (see Table 6).⁶
- 2.2 Plan data: Costs, Cost-effectiveness, and Savings by program, sector, and portfolio (see Tables 1-6).
- 2.3 Budget and Parity Analysis (see Table 7). EDC total annual revenue is inclusive of collections on behalf of Electric Generation Suppliers. (2009 IO at 35) EDCs should use calendar year

⁶ A *project* is an activity or course of action involving one or multiple energy-efficiency measures, at a single facility or site. A *program* is a group of projects, with similar characteristics and installed in similar applications. Programs should be organized around a common customer class, technology, end-use, market, or delivery mechanism. The *portfolio* consists of all the programs in the Residential, Small C&I, and Large C&I sectors. The applicable EE&C sector designation is based on a customer's rate schedule not the size of the energy-efficiency project or the type of building.

2024 to compute the share of revenue and MWh sales by customer sector. Total annual sales should include both bundled and delivery-only sales.

3 Program Descriptions

(The objective of this section is to provide detailed descriptions of each proposed program and the background on why particular programs were selected and how they form balanced/integrated portfolios.)

- 3.1 Discussion of criteria and process used for selection of programs:
 - 3.1.1 Describe portfolio objectives and metrics that define program success (e.g., energy and demand savings, customers served, number of units installed, market transformation).
 - 3.1.2 Describe how programs were constructed for each sector to provide market coverage sufficient to reach overall energy and demand savings goals. Describe analyses and/or research that were performed (e.g., benchmarking of other jurisdictions, best practices, requests for information from CSPs).
 - 3.1.3 Describe how different components such as energy-efficiency, combined heat and power, renewables, load-shifting, and other measures are included in the portfolio of programs as applicable.
 - 3.1.4 If the plan includes measures that promote fuel switching from electricity to fossil fuel, include a proposed minimum standard and provide justification for the threshold to receive program support. Combined heat and power projects are considered fuel switching. (TRC Test Order at 84)
 - 3.1.5 Confirm that the plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR and other non-Act 129 program participants. (2025 IO at 174) Describe how program delivery will target these bundled, or interwoven, funding opportunities for measures that encourage fuel switching from fossil fuels to electricity. Summarize how efficiency requirements or qualified product lists for heat pumps and heat pump water heaters will be aligned with non-Act 129 programs.
 - 3.1.6 Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan and the expected contribution to portfolio MWh and MW savings. Note that the contribution of FTM measures is limited to ten percent of total plan savings. (2025 IO at 78)
 - 3.1.7 Describe how the EDC defines “comprehensive” in the context of EE&C plan design and delivery and the comprehensive program(s) to be offered to the residential and non-residential rate classes. Describe the measure mix or delivery mechanism that qualifies each program as comprehensive consistent with the requirements of the Phase V Implementation Order. Refer to the “Table 8 Addendum” in the Microsoft Excel version of the template tables for a list of residential measures designated as “comprehensive.” (2025 IO at 49-52 and 72)
 - 3.1.8 If Time of Use rate(s) are part of the portfolio, describe how Act 129 support will lead to improved outcomes over simply offering the time-varying tariff through rates. (2025 IO at 124)

3.2 Residential Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the following headings:

- Program Name and Program years during which program will be implemented.
- Objective(s).
- Target market – including market size to help frame participation estimates (*e.g.* number of households, electric sales etc.).
- Program description.
- If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.
- If the program is an umbrella program (*e.g.*, a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports.
- Implementation strategy (including expected changes that may occur in different program years).
- Program issues and risks and risk management strategy. If EE&C measure eligibility is aligned with an external standard such as ENERGY STAR, describe contingency plans if the external standard becomes unavailable.
- Anticipated costs to participating customers.
- Ramp up strategy.
- Marketing strategy.
- Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (*e.g.*, \$ per measure, \$ per kWh or MW saved). See Table 8.
- The basis for the proposed level of incentives and the sharing of incremental measure costs between participants and the EDC.
- Maximum deadlines for rebates, including a clear and reasonable rationale for any timeframe longer than 180 days.
- Program start date with key schedule milestones.
- Assumed evaluation, measurement, and verification (EM&V) requirements required to document savings by the Commission’s statewide evaluator (SWE).
- Administrative requirements – include internal and external staffing levels expressed on a full-time equivalent (FTE) basis.
- Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9.
- Estimated participation – include tables with key assumptions of estimated participation. See Table 9.
- Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)
- Estimated percentage of sector budget attributed to the program.
- Cost-effectiveness – include gross and net TRC and net-to-gross ratio (NTGR) for each program. For gross tables, NTGR should be “1.0”. See Table 14, Gross and Net versions. (2025 IO at 217-221)

- Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.
 - Other information deemed appropriate.
- 3.2.1 Low-Income Sub-Sector (as defined by 66 Pa. C.S. § 2806.1) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Also include:
- Details on how the plan will meet the proportionate number of measures requirement.
 - Confirmation that all low-income compliance savings will come from specific low-income programs or low-income verified participants in multifamily housing programs.
 - Include estimates of any applicable low-income carryover savings from Phase IV. Carryover savings from Phase IV may not exceed 20% of the Phase V low-income compliance target.
- 3.3 Small C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).
- 3.4 Large C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).
- 3.5 Government/Nonprofit/Institutional Sector (as defined by 66 Pa. C.S. § 2806.1) – Qualitatively describe how the Government/Nonprofit/Institutional Sector will be served.

4 Program Management and Implementation Strategies

The objective of this section is to provide detailed description of how the EDC plans to manage and implement programs, including their approach to and use of Conservation Service Providers (CSPs).

- 4.1 Overview of EDC Management and Implementation Strategies:
- 4.1.1 Describe the types of services to be provided by the EDC, as well as consultants, trade allies, and CSPs. Indicate which organizations will provide which services and the basis for outsourcing versus staffing in-house. Reference reporting and EM&V information from Sections 5 and 6 below.⁷
- 4.1.2 Describe how the risk categories of performance, technology, market, policy, and evaluation can affect the programs and any risk management strategies that will be employed to mitigate those risks.⁸

⁷ Services to be offered by the EDC or others may include marketing, customer recruiting, demonstration projects, audits and or installation of new efficiency measures, verification of installations and or baseline usage, response to customer concerns, program tracking and program evaluation.

⁸ Performance risk is the risk that, due to design or implementation flaws, the program does not deliver expected savings. Technology risk is the risk that technologies targeted by a program fail to deliver the savings expected. Market risk is the risk that customers, or other key market players (e.g., contractors), choose not to participate in a program. Policy risk is the risk that changes to state or federal policies outside the control of the EDC will alter the demand for EE&C programs, the cost of efficient technologies, or disrupt process upon which the plan relies. Evaluation risk is the risk that independent EM&V will, based on different assumptions, conclude that savings fall short of what the implementers have estimated.

- 4.1.3 Describe how the EDC plans to address human resource and contractor resource constraints to ensure that adequate personnel and contractors are available to implement the EE&C plan successfully.
 - 4.1.4 Describe “early warning systems” that will be utilized to indicate progress towards the goals and whether they are likely to be met. Describe the EDC’s approach and process for shifting goals and funds, as needed, between programs and adding new measures/programs.
 - 4.1.5 Provide implementation schedules with milestones. Describe the status of CSP solicitations and transition plans for programs or sectors that change CSPs from Phase IV to Phase V.
 - 4.1.6 Provide a brief overview of how stakeholders will be engaged throughout Phase V. Describe how low-income communities and other marginalized populations will be represented in stakeholder engagement.
- 4.2 Executive management structure:
- 4.2.1 Describe the EDC structure for addressing portfolio strategy, planning, review of program metrics, internal and external communications, budgeting and financial management, program implementation, procurement, program tracking and reporting, and quality assurance/quality control (QA/QC). Include the EDC organization chart for the management team responsible for implementing the EE&C plan.
 - 4.2.2 Describe the approach to overseeing the performance of CSPs and other contractors and how they can be managed to achieve results, within budget, and ensure customer satisfaction.
 - 4.2.3 Describe the basis for administrative budgets and the proposed approach to accounting for EDC staff time who manage the EE&C plan.
- 4.3 Conservation Service Providers (CSPs):
- 4.3.1 Provide detailed justifications for why the EDC did or did not choose to use a CSP to perform specific EE&C plan functions.
 - 4.3.2 List any selected CSPs, describe their qualifications and basis for selection (include contracts in Appendix). If the EDC plans to forego the competitive bidding process for any CSP, describe the rationale. Confirm that the contract value of CSP contracts that are not bid competitively is less than 1% of the total plan budget. (2025 IO at 226)
 - 4.3.3 Describe all pending CSP solicitations for which the EDC plans to retain CSP services but has not selected the winning bidder.
- 4.4 Coordination with Other State Conservation Programs:
- 4.4.1 Describe how the EDC plans to collaborate with other state or federal programs to achieve savings, detailing coordinated program management, tracking and reporting of outside funds, and implementation strategies. EDCs may claim the full gross verified savings for any EE&C project they support if they also incentivize or directly install eligible electric measures. (2025 IO at 186-187)

- 4.4.2 Discuss how the EDC will highlight the availability of multiple funding sources and provide prospective Act 129 participants information where they can learn more about external funding opportunities. (2025 IO at 190)
- 4.4.3 Propose a process to facilitate Alternative Energy Portfolio Standards (AEPS) registration for C&I participants of Act 129 programs to register their energy-efficiency projects and take advantage of the elevated AEC pricing. EDCs can design this support in a way that aligns with the needs of its customers and treat the cost of AEPS registration support as a recoverable administrative cost. (2025 IO at 182-184)
- 4.4.4 Describe plans to address health and safety issues that arise in the delivery of Act 129 services. Discuss any plans to refer Act 129 participants that could not be treated due to health and safety issues to other program administrators.
- 4.4.5 Discuss strategies to collect information about dual participation to facilitate accurate reporting on braided funding opportunities and calculation of the “leverage ratio” by program. The Phase V Implementation Order defines the leverage ratio as the amount of known external funding for Phase V EE&C projects relative to the incentives issued by the Act 129 program. (2025 IO at 159)

5 Reporting and Tracking Systems⁹

(The objective of this section is to provide a detailed description of the tracking and reporting systems that the EDCs need to implement programs and which the Commission and SWE need to access to evaluate plan performance.)

- 5.1 Indicate that the EDC will provide semiannual and annual reports as prescribed in the June 18, 2025, Implementation Order.
- 5.2 Program Tracking Systems:
 - 5.2.1 Provide a brief overview of the data tracking system for managing and reporting measure, project, program, and portfolio activities, status, and performance, as well as EDC and CSP performance and expenditures.
 - 5.2.2 Describe the software format, data exchange format, and database structure the EDC will use for tracking participant and savings data. Provide examples of data fields captured.
 - 5.2.3 Describe how CSPs will integrate with the tracking system and the procedures to ensure the upload and exchange of data from CSPs to the EDCs is sound.
 - 5.2.4 Indicate that the EDC will fulfill all quarterly and annual data requests issued by the Commission and its SWE. Describe the level of access and mechanism for access for the Commission and its SWE.
 - 5.2.5 Describe the cybersecurity procedures the EDC will use to protect the personally identifiable information of program participants.

⁹ This section may be modified if the SWE develops further reporting and tracking systems that are approved by the Commission.

6 Quality Assurance and Evaluation, Measurement and Verification

(The objective of this section is to provide detailed description of how the EDC's quality assurance/quality control, verification and internal evaluation process will be conducted and how this will integrate with the statewide evaluation activities)

- 6.1 Describe the overall approach to quality assurance and quality control.
- 6.2 Describe procedures for measure and project installation verification, quality assurance and control, and savings documentation.
- 6.3 Describe the process for collecting and addressing participating customer, contractor, and trade ally feedback (e.g., suggestions and complaints).
- 6.4 Describe any planned market and process evaluations and how results will be used to improve programs.
- 6.5 Describe strategy for coordinating with the EDC EM&V contractor and the SWE.
- 6.6 Describe the approach to incorporating changes to codes and standards which may occur during Phase V of Act 129. (TRM Order at 12-14)

7 Cost Recovery Mechanism

(The objective of this section is to provide detailed descriptions and estimated values for cost recovery mechanism.)

- 7.1 Provide the total allowable EE&C costs based on 2% of 2006 revenue. Confirm alignment with the EDC budget limit specified in the 2025 IO Section A.2.
- 7.2 Description of plan to fund the EE&C plan in accordance with 66 Pa. C.S. §§ 1307 and 2806.1. Plan costs include both incentives and administrative costs. Administrative costs may include capital expenditures for any equipment and facilities that may be required to implement the EE&C plan, as well as depreciation, operating and maintenance expenses, a return component based on the EDC's weighted cost of capital, and taxes. (2025 IO at 231) Demonstrate that all such costs are reasonable and prudent considering the goals of Act 129.
- 7.3 Provide data tables (see Tables 10, 11, 12, 13 and 14).
- 7.4 Provide and describe tariffs and a Section 1307 cost recovery mechanism, in accordance with 66 Pa. C.S. § 1307, that will be specific to Phase V Program costs. Provide all calculations and supporting documentation.
 - 7.4.1 FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class, and the rationale for separating or consolidating rate districts from a cost recovery standpoint.
- 7.5 Describe how the cost recovery mechanism will ensure that measures are financed by the same customer class that will receive the direct energy and conservation benefits.
- 7.6 Describe how Phase V costs will be accounted for separately from costs incurred in prior phases.

8 Cost Effectiveness

(The objective of this section is to provide a detailed description of the cost-effectiveness criteria and analyses. It can refer to appendices with program data.)

- 8.1 Provide in table format the values contained in the Outputs tab of the Avoided Cost Calculator.¹⁰ Additionally, a completed copy of the Avoided Cost Calculator should be provided with the filing. FirstEnergy should prepare and submit a single avoided cost forecast for FirstEnergy PA that combines values for the four legacy EDCs. (TRC Test Order at 99-100) Discuss any sensitivities or key considerations associated with the forecast of avoided costs.
- 8.2 Confirm the use of a 3% real discount rate and a 5% nominal discount rate. (TRC Test Order at 15)
- 8.3 Explain and demonstrate how the proposed plan will be cost-effective as defined by the TRC Test specified by the Commission. (TRC Test Order at 17)
- 8.4 Provide TRC data tables on a gross and net TRC basis. See Tables 14, Gross and Net versions.

9 Plan Compliance Information and Other Key Issues

(The objective of this section is to have specific areas in the EE&C plan where the Commission can review miscellaneous compliance items required in legislation and address key issues in the EE&C plan, portfolio, and program design.)

- 9.1 Plan Compliance Issues.¹¹
 - 9.1.1 Describe how the plan provides a variety of energy-efficiency and conservation measures and will provide the measures equitably to all classes of customers in accordance with the 2025 IO.
 - 9.1.2 Provide a statement delineating the way the EE&C plan will achieve the requirements of the program under 66 Pa. C.S. §§ 2806.1(c) & (d).
 - 9.1.3 Provide a statement delineating how the EE&C plan will achieve the low-income requirements prescribed in the 2025 IO. Additionally, describe any EDC plans to harmonize the Act 129 program delivery with low-income usage reduction programs and other external energy-efficiency, conservation, and healthy housing programs (such as the weatherization assistance program).
 - 9.1.4 Describe how the EDC will ensure that no more than two percent of funds available to implement the plan shall be allocated for experimental equipment or devices. Describe any planned pilot programs in Phase V.
 - 9.1.5 Describe how the plan will be competitively neutral to all distribution customers even if they are receiving supply from an EGS.

¹⁰ Available at <https://www.puc.pa.gov/pcdocs/1855612.xlsx>

¹¹ These sub-sections may reference other chapters of the plan as they may restate what was included elsewhere in the plan and are collected here only for convenience of review.

- 9.1.6 If the plan includes midstream delivery of non-residential lighting, include a description of how participating distributors will document that the replaced lighting equipment is not LED.
- 9.2 Other Key Issues:
 - 9.2.1 Describe how this EE&C plan will lead to long-term, sustainable energy-efficiency savings in the EDC's service territory and in Pennsylvania.
 - 9.2.2 Describe how this EE&C plan will leverage and utilize other financial resources, including strategies to leverage funds from other conservation programming in the Commonwealth, including but not limited to the Inflation Reduction Act funded programs administered by the Department of Environmental Protection.
 - 9.2.3 Describe how the EDC will address consumer education for its programs.
 - 9.2.4 Describe how the EDC will provide the public with information about the results from the programs.

10 Appendices

- A. Approved CSP contract(s) or CSP contract terms and conditions.
- B. Calculation methods and assumptions. Describe methods used for estimating all program costs, including administrative, marketing, and incentives costs; include key assumptions. Describe assumptions and present all calculations, data and results in a consistent format.

Templates for the numbered tables referenced above are provided in the accompanying Microsoft Excel workbook. This EE&C Plan Template, the Secretarial Letter, and EE&C Plan Template Tables Excel Workbook will be published at Docket No. M-2025-3052826 and on the Commission's website at <https://www.puc.pa.gov/filing-resources/issues-laws-regulations/act-129/energy-efficiency-and-conservation-ee-c-program/>. The tables include EDC-specific lookups of key values from the 2025 IO and formulas for totals and other summary statistics.