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August 15, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Homsher:

Enclosed for filing are the Comments of PPL Electric Utilities Corporation on the Phase V Energy Efficiency and Conservation Plan Template issued in the above-referenced proceeding.

Copies are being served as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/sa
Enclosures

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: August 15, 2025



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2. Energy Efficiency Portfolio/Program Summary Tables and Charts

The Company has no comments on this section.

3. Program Descriptions

In Section 3.1.7, the Commission directs the electric distribution company (“EDC”) to “[d]escribe 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.” (EE&C Plan Template, p. 4.) The Commission also refers the EDC to “Table 8 Addendum” in the Microsoft Excel version of the template tables for “a list of residential measures designated as ‘comprehensive.’” (*Id.*) PPL Electric requests that the Commission clarify whether the EDC is directed to define what measures it considers as “comprehensive,” such that the “comprehensive” measures listed in Table 8 Addendum are recommended to be considered as “comprehensive” by the EDC, or whether the “comprehensive” measures identified in the Table 8 Addendum is a prescriptive list of “comprehensive” measures.

Further, in Section 3.2, the Commission provides a series of headings that the EDC must use when organizing the Residential sector program descriptions. (EE&C Plan Template, p. 5.) One of those headings is “[p]rogram start date with key schedule milestones.” (*Id.*) The Company requests that the Commission clarify whether an overall statement at the beginning of Section 3.2 that all the Residential sector programs will launch at the start of Phase V on June 1, 2026, is sufficient, or whether the EDC must repeat the same start date under this heading in each program description.

Another one of the headings required under Section 3.2 is “[p]rogram issues and risks and risk management strategy.” (EE&C Plan Template, p. 5.) For this heading, the EE&C Plan Template goes on to require that “[i]f EE&C measure eligibility is aligned with an external standard such as ENERGY STAR,” then the EDC must “describe contingency plans if the external

standard becomes unavailable.” (*Id.*) PPL Electric respectfully believes that such contingency plans should be the responsibility of the Commission, the Statewide Evaluator (“SWE”), or both. Requiring EDCs to create contingencies would lead to a patchwork response if an external standard became unavailable. Also, EDCs rely on the Pennsylvania Technical Reference Manual (“TRM”), which provides the ENERGY STAR requirement. The Company recommends that the Commission remove this requirement to describe contingency plans from the EE&C Plan Template, and separately communicate a unified contingency plan to which all EDCs may adhere if such a situation occurs.

4. Program Management and Implementation Strategies

Section 4.4 requires the EDC to describe various aspects of the EDC’s coordination of the Phase V EE&C Plan with other state conservation programs. (EE&C Plan Template, pp. 7-8.) However, details of external program funding, budgets, and processes have not been shared with every EDC and, therefore, may be unavailable during development of the Phase V EE&C Plans. As such, the Company suggests that the Commission clarify whether it is permissible to use general approaches and basic assumptions to meet this requirement.

5. Reporting and Tracking Systems

PPL Electric has no comments on this section.

6. Quality Assurance and Evaluation, Measurement, and Verification

The Company has no comments on this section.

7. Cost Recovery Mechanism

PPL Electric has no comments on this section.

8. Cost Effectiveness

PPL Electric has no comments on this section.

9. Plan Compliance Information and Other Key Issues

In Section 9.1.2, the EE&C Plan Template directs the EDC to “[p]rovide 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).” (EE&C Plan Template, p. 10.) The Company requests clarification on how this requirement is different from the similar requirement in Section 1.1, which requires the EDC to provide a “[s]ummary description of plan, plan objectives, and overall strategy to achieve energy-efficiency and conservation goals.” (*Id.*, p. 2.)

As for Section 9.2.2, the EE&C Plan Template requires the EDC to “[d]escribe 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.” (*Id.*, p. 11.) However, Section 4.4 already requires descriptions about coordination with other state conservation programs. Thus, the Company requests that the Commission clarify the difference between what is being required under Section 9.2.2 and how it differs from Section 4.4.

10. Appendices

The EE&C Plan Template directs the EDC to include an approved Conservation Service Provider (“CSP”) Contract or CSP Contract terms and conditions. (EE&C Plan Template, p. 11.) Since the Company files its CSP Contracts on a confidential basis, PPL Electric would like confirmation that the CSP Contract(s) included with the Phase V EE&C Plan need not be filed publicly.

11. Tables Excel Workbook

The Company has a few comments about the tables in the EE&C Plan Template Tables Excel Workbook published in the Commission’s website and referenced in the EE&C Plan

Template. First, PPL Electric has found instances in the Workbook where the same tables are listed as a requirement in separate sections. The Company requests that the Commission clarify whether it prefers tables repeated multiple times throughout the Phase V EE&C Plan in different sections or whether subsequent sections should refer or link to the tables in the earlier sections, where applicable.

Second, in the Table 8 tab, the Company maintains that the column Incremental Cost, when utilized for Low-Income programs, should be Full Cost instead. Therefore, the Company requests that the Commission make that change.

Third, in the Table 8 Addendum tab, the Company recommends that the Commission not require the pairing of a measure to consider the measure as comprehensive. From PPL Electric's perspective, a measure is either comprehensive or not comprehensive. Moreover, this requirement would impact measures such as ENERGY STAR Refrigerators, which have significant costs and are a major household appliance. In addition, Solar Photovoltaic ("PV") is a major customer investment that changes the dynamic of energy use in a home or facility. Accordingly, the Company recommends that the Commission consider the following measures as comprehensive: (1) 2.4.1 – ENERGY STAR Refrigerators; (2) 2.4.2 – ENERGY STAR Freezers; (3) 2.4.8 – ENERGY STAR Clothes Washers; (4) 2.4.9 – ENERGY STAR Clothes Dryers; (5) 2.4.10 – ENERGY STAR Dishwashers; (6) 2.4.11 – ENERGY STAR Dehumidifiers; and (7) 2.8.3 – Photovoltaic (PV) Solar Generation.

Finally, in the Table 9 tab, PPL Electric believes that Footnote 3 should reference Table 8, not Table 7.

II. CONCLUSION

For all of the reasons set forth above, PPL Electric Utilities Corporation requests that the Pennsylvania Public Utility Commission consider its Comments in the development of the Phase V Energy Efficiency and Conservation Plan filing template.

Respectfully submitted,



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