

November 26, 2025

**VIA E-FILE**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2nd Floor  
Harrisburg, PA 17105

M-2025-3057327-AEL-11/26/25

**RE: Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation - Docket No. ~~M-2025-3052826~~**

Dear Secretary Homsher:

Enclosed for filing is the Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan along with:

- Attachment A – the proposed Phase V Energy Efficiency and Conservation Plan;
- Direct Testimony of Edward C. Miller (FE PA Statement No. 1); and
- Direct Testimony of Stephanie R. Zieger (FE PA Statement No. 2).

Should you have any questions, please contact me.

Sincerely,



Shane P. Simon

SPS/FCN  
Encls.

cc. Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
~~M-2025-3052826~~**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 26th day of November, 2025 served a true copy of the

**Petition** upon the persons listed below *via Electronic Mail*:

**Via E-File Only**

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*Shane P. Simon*

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Shane P. Simon

Date: November 26, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition for Approval of the Phase V** :  
**Energy Efficiency and Conservation** : **Docket No. M-2025-3052826**  
**Plan of FirstEnergy Pennsylvania** :  
**Electric Company** :

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**PETITION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY FOR  
APPROVAL OF A PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN**

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## I. INTRODUCTION

Pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa.C.S. §§ 2806.1 and 2806.2, FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) hereby files this Petition with the Pennsylvania Public Utility Commission (“Commission”) requesting approval of its Phase V Energy Efficiency and Conservation (“EE&C”) Plan (“Phase V Plan” or “Proposed Plan”) and cost recovery mechanisms related thereto. This filing is being made pursuant to the June 18, 2025 Implementation Order of the Commission issued at Docket No. M-2025-3052826.<sup>1</sup>

The Phase V Plan is designated as Attachment A. A discussion of and details of the Proposed Plan are set forth in the direct testimony of Edward C. Miller (FE PA Statement No. 1). Copies of the Company’s proposed *pro forma* tariff supplements for the Phase V EE&C cost recovery mechanisms are included with the direct testimony of Stephanie R. Zieger (FE PA Statement No. 2). The Phase V Plan includes a suite of programs that are designed to meet the additional consumption reduction targets and coincident peak demand reduction targets adopted by the Commission’s Phase V Implementation Order during the five-year period from June 1, 2026 through May 31, 2031 (“Phase V Period”).

For the reasons set forth below, the Company respectfully requests that the Commission approve the Phase V Plan and authorize the Company to implement the proposed tariff riders for cost recovery purposes, as described herein.

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<sup>1</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Implementation Order entered June 18, 2025) (“Phase V Implementation Order”).

## II. BACKGROUND AND HISTORY

1. FE PA is an electric distribution company certificated as a public utility permitted to operate within the Commonwealth of Pennsylvania. FE PA previously operated as four separate electric distribution companies (“EDCs”) in Pennsylvania: Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively referred to herein as the “Predecessor Companies.”). On January 1, 2024, the Predecessor Companies were consolidated into a single tariffed EDC.<sup>2</sup>

2. The Company’s attorneys are:

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<sup>2</sup> See *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid- Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company, et al.*, Docket Nos. A-2023-3038771, *et al.* (Final Order entered December 7, 2023).

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The Company's attorneys are authorized to receive all notices and communications regarding this Petition.

3. Act 129 was signed into law on October 15, 2008, and became effective on November 14, 2008. Among other things, Act 129 created an EE&C Program, codified in the Pennsylvania Public Utility Code at 66 Pa.C.S. §§ 2806.1 and 2806.2. This initial program, which was in effect through May 31, 2013 ("Phase I Period"), required an EDC with at least 100,000 customers to adopt an EE&C Plan ("Phase I Plan"), approved by the Commission, to reduce electric consumption by certain percentages by May 31, 2010 and May 31, 2013, and to reduce peak demand by a certain percentage by May 31, 2013. The Predecessor Companies achieved all final Phase I Plan targets by May 31, 2013.

4. Act 129 also required the Commission, by November 30, 2013, and every five years thereafter, to assess the cost-effectiveness of the EE&C Program and set additional incremental reductions in electric consumption if the EE&C Program's benefits were found to exceed its costs.

5. The Commission determined in its Phase II Implementation Order<sup>3</sup> that additional reductions in electric consumption were cost-effective and prescribed targets to be met by May 31, 2016.<sup>4</sup> At that time, though, the Commission did not have enough information to determine the cost-effectiveness of peak demand reduction ("PDR") programs.<sup>5</sup>

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<sup>3</sup> *Energy Efficiency and Conservation Programs*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Implementation Order entered August 3, 2012) ("Phase II Implementation Order").

<sup>4</sup> *Id.* at 24.

<sup>5</sup> *Id.* at 32.

6. Therefore, the Commission's Phase II Implementation Order only established energy reduction targets, which were to be met between June 1, 2013 and May 31, 2016 ("Phase II Period"). The Predecessor Companies timely submitted their Phase II EE&C Plans ("Phase II Plans"), which were approved by the Commission with minor modifications in an Order entered on March 14, 2013, at Docket Nos. M-2012-2334387 (Met-Ed), M-2012-2334392 (Penelec), M-2012-2334395 (Penn Power), and M-2012-2334398 (West Penn).

7. In order for the Commission to obtain the requisite cost analysis on potential future demand reduction requirements, the Commission directed the Statewide Evaluator ("SWE") to provide the Commission with a demand response study to analyze the cost-effectiveness of the legislative PDR requirements and of potential improvements to the PDR program.<sup>6</sup> In a May 17, 2013 Secretarial Letter, the Commission released the *Act 129 Demand Response Study - Final Report* at Docket No. M-2012-2289411.<sup>7</sup> Based upon comments received from stakeholders during a Commission-sponsored meeting on June 11, 2013, the Commission directed the SWE to conduct a Preliminary Wholesale Price Suppression and Prospective Total Resource Cost ("TRC") Test Analysis of the demand response program.

8. The SWE's *Act 129 Demand Response Study - Final Report; Amended November 1, 2013*<sup>8</sup> was released for comment on November 14, 2013.<sup>9</sup> Following a review of comments, the Commission issued its Peak Demand Reduction Cost Effectiveness Determination Final Order, which directed the SWE to perform a demand response market potential study ("DR Potential

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<sup>6</sup> See *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Secretarial Letter served Mar. 4, 2011).

<sup>7</sup> See *Release of the Act 129 Demand Response Study - Final Report and Stakeholders' Meeting Announcement*, Docket No. M-2012-2289411 (May 17, 2013).

<sup>8</sup> The May 2013 and November 2013 versions of the *SWE's Act 129 Demand Response Study-Final Report* are available on the Commission's website at <https://www.puc.pa.gov/filing-resources/issues-laws-regulations/act-129/act-129-statewide-evaluator-swe/>.

<sup>9</sup> See *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Tentative Order entered Nov. 14, 2013) ("Tentative Phase III Implementation Order").

Study”) using proposed load curtailment models.<sup>10</sup> The SWE submitted its final version of the DR Potential Study to the Commission on February 25, 2015.<sup>11</sup>

9. The SWE was also tasked with performing an energy efficiency market potential study (“EE Potential Study”) to determine the cost-effective consumption reduction potential in Pennsylvania.<sup>12</sup> The SWE submitted its final version of the EE Potential Study to the Commission on February 25, 2015.<sup>13</sup> Based upon the results of the EE and DR Potential Studies, and following a comment and reply comment period on the Commission’s Tentative Phase III Implementation Order, the Commission issued the Phase III Implementation Order.<sup>14</sup>

10. In that Order, the Commission directed EDCs subject to Act 129 to submit an EE&C Plan that would achieve certain energy efficiency targets during the period June 1, 2016 through May 31, 2021 (“Phase III Period”) and certain demand reduction targets during program years 2 through 5 of the Phase III Period.<sup>15</sup> Because the SWE’s DR Potential Study concluded that no cost-effective potential for demand reduction exists in Penelec’s service territory, Penelec had no demand reduction requirement during the Phase III Period.<sup>16</sup> The Commission, however, indicated that Penelec could propose a voluntary demand reduction program if it fit within Penelec’s program budget.<sup>17</sup>

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<sup>10</sup> See *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order entered Feb. 20, 2014) (“PDR Cost Effectiveness Determination Final Order”).

<sup>11</sup> See DR Potential Study.

<sup>12</sup> See *Proposal to Pennsylvania Public Utility Commission — Statewide Evaluator RFP*, submitted by GDS Associates, Inc, *et al.*, January 11, 2013.

<sup>13</sup> See EE Potential Study.

<sup>14</sup> See *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Implementation Order entered June 19, 2015) (“Phase III Implementation Order”).

<sup>15</sup> *Id.*; In response to a Petition filed by the Energy Association of Pennsylvania, the Commission modified the Phase III Implementation Order to measure compliance with DR targets based on EDC performance during the second, third, and fourth program years of Phase III, and permitted EDCs to implement approved DR programs for the fifth program year on a voluntary basis. See *Petition to Amend the Commission’s June 19, 2015 Implementation Order*, Docket No. M-2014-2424844 (Order entered June 3, 2020).

<sup>16</sup> *Id.* at 45.

<sup>17</sup> *Id.*

11. Also in accordance with Act 129, the Commission determined in its June 18, 2020 Order at Docket Nos. M-2020-3015228<sup>18</sup> that additional energy efficiency programs would be cost effective and established Phase IV of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth for the period June 1, 2021 through May 31, 2026 (“Phase IV Period”). The Company submitted plans to comply with the Phase IV Implementation Order, which were approved by the Commission and are currently being implemented (“Phase IV Plans”).<sup>19</sup>

12. Act 129 also required the Commission to develop and adopt an EE&C Program that sets out specific issues the EE&C Program must address.<sup>20</sup> During the Phase I Period, the Commission adopted the Phase I Implementation Order establishing the EE&C Program in compliance with Section 2806.1(a), 66 Pa.C.S. § 2806.1(a). In addition to adopting the Phase I Implementation Order, the Commission also adopted orders implementing specific and essential components of the EE&C Program, including the establishment of a TRC Test,<sup>21</sup> updates to the Technical Reference Manual (“TRM”),<sup>22</sup> and the establishment of a SWE. As was done for Phases II, III, and IV each of these components has been updated for the Phase V Period through various Commission actions.<sup>23</sup>

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<sup>18</sup> See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2020-3015228 (Order entered June 18, 2020) (“Phase IV Implementation Order”).

<sup>19</sup> See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Consolidation of Proceedings and Approval of Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket Nos. M-2020-3020820, M-2020-3020821, M-2020-3020822, and M-2020-3020823 (Opinion and Order entered March 25, 2021).

<sup>20</sup> See 66 Pa.C.S. § 2806.1(a).

<sup>21</sup> See *Implementation of Act 129 of 2008 - Total Resource Cost (TRC) Test*, Docket No. M-2009-2108601 (Order entered June 23, 2009) (“2009 TRC Test Order”).

<sup>22</sup> See *Implementation of the Alternative Energy Portfolio Standards Act of 2004: Standards for the Participation of Demand Side Management Resources - Technical Reference Manual Update*, Docket No. M-00051865 (Order entered June 1, 2009) (“2009 TRM Final Order”).

<sup>23</sup> See *Implementation of Act 129 of 2008 - Phase IV Energy Efficiency and Conservation Plan Template*, Docket No. M-2020-3015228 (Secretarial Letter dated Sept. 9, 2020); *Implementation of the Alternative Portfolio Standards Act of 2004: Standards for the Participation of Demand Side Management Resources - Technical Reference Manual 2021 Update*, Docket No. M-2019-3006867 (Order entered Aug. 8, 2019), *amendment tentative order pending, 2021 Total*

13. The Commission concluded in the Phase V Implementation Order that additional energy efficiency and demand reduction programs would be cost-effective and established Phase V of the EE&C Program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth.

14. The Commission further acknowledged the consolidation of the four EDCs (Met-Ed, Penelec, Penn Power, West Penn) into Rate Districts of a single EDC, FE PA, and aggregated these to reflect a single EDC.<sup>24</sup>

15. Pursuant to the Commission's Phase V Implementation Order, the Company submits this Petition, along with its Phase V Plan, which was developed to achieve all statutory and regulatory requirements, as established by Act 129 and Commission directives.

16. In support of the Phase V Plan, attached as Attachment A to this Petition and marked as indicated, are the following statements of Direct Testimony:

- FirstEnergy Pennsylvania Electric Company Statement No. 1, Direct Testimony of Edward C. Miller (Overview of the EE&C Plan and the Energy Efficiency Team, Phase IV EE&C Targets and Spending Limitations, Development of the Proposed Plan, Summary of the Predecessor Companies' Phase IV EE&C Plans and Programs, Administration and Implementation of the Proposed Plan and Programs, the Use of Conservation Service Providers and the Company's Competitive Bidding/Contracting Process, Compliance with Statutory and Regulatory Requirements).
- FirstEnergy Pennsylvania Electric Company Statement No. 2, Direct Testimony of Stephanie R. Zieger (Phase IV Final Cost Collection, Phase V Cost Recovery Mechanism and Initial Rates, Program Cost Reconciliation Process).

17. For the reasons that follow, the Company respectfully requests that the Commission approve the Phase V Plan attached to this Petition and authorize the Company to implement its

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*Resource Cost (TRC) Test*, Docket No. M-2019-3006868 (Order entered Dec. 19, 2019) ("2021 TRC Test Order").

<sup>24</sup> Phase V Implementation Order at 13-14.

Phase V EE&C-C Riders<sup>25</sup> and corresponding rates for recovery of the plan budgets, as illustrated in Appendix B, Table 7 and Table 13 of the Phase V Plan, to be effective for services rendered on or after June 1, 2026.

### **III. LEGAL REQUIREMENTS**

#### **A. ADDITIONAL INCREMENTAL REDUCTIONS IN CONSUMPTION AND DEMAND**

18. In its Phase V Implementation Order, the Commission required EDCs subject to Act 129 to file Phase V EE&C Plans that will operate from June 1, 2026 through May 31, 2031. The Commission, in its Phase V Implementation Order, established an energy reduction requirement of 1,097,605 Megawatt Hours for the Company.<sup>26</sup>

19. The Commission also established a peak demand reduction requirement of 191 Megawatts for the Company.<sup>27</sup>

20. Additionally, the Commission directed that each EDC's Phase V EE&C Plan be designed to achieve at least 15% of its overall consumption and peak demand reduction targets in each program year,<sup>28</sup> and to acquire at least 75% of the proposed target in each season.<sup>29</sup>

#### **B. SPENDING**

21. Act 129 allows EDCs to recover all prudent and reasonable costs relating to the provision or management of their Phase V EE&C Plans but limits such costs to an amount not to exceed two percent of the EDC's total annual revenue as of December 31, 2006, excluding Low-Income Usage Reduction Programs ("LIURPs") established under 52 Pa. Code, Ch. 58.<sup>30</sup>

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<sup>25</sup> By Order entered on December 7, 2023, at Docket No. A-2023-3038771 *et al.*, the Commission approved the consolidation of Met-Ed, Penelec, Penn Power, and West Penn into Rate Districts of FE PA. For Phase V, the Company proposes to use consolidated EE&C Charge Phase V Riders ("Phase V EE&C-C Riders").

<sup>26</sup> Phase V Implementation Order at 12.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at 48, 146.

<sup>29</sup> Phase V Implementation Order at 143.

<sup>30</sup> 66 Pa.C.S. § 2806.1(g).

22. The Commission interprets the two percent limitation provision of Act 129 to be an annual amount applicable for the period of the EE&C Plan, rather than an amount for the full proposed five-year period of Phase V.<sup>31</sup>

23. The Company's five-year spending cap, as established in the Phase V Implementation Order is \$390,320,135.<sup>32</sup>

### **C. OTHER LEGAL REQUIREMENTS**

24. The Company's Phase V Plan must also: (i) include a proposed cost recovery tariff mechanism in accordance with 66 Pa.C.S. § 1307<sup>33</sup>; (ii) assign and allocate the costs associated with the EE&C measures to the same customer class that will receive the direct energy and conservation benefits from these measures<sup>34</sup>; (iii) include specific energy efficiency measures for households at or below 150% of the federal poverty income guidelines, in proportion to that sector's share of the total energy usage in the EDC's service territory<sup>35</sup>; (iv) obtain a certain amount of the Company's total consumption reduction requirements from the low-income sector<sup>36</sup>; (v) include a variety of measures that are provided equitably to all customer classes<sup>37</sup>; and (vi) contain at least one comprehensive program for residential and non-residential rate classes.<sup>38</sup>

## **IV. PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN**

### **A. OVERVIEW OF THE PLAN**

25. The Company's Phase V Plan includes a portfolio of energy efficiency programs, which is designed to achieve the specific reduction targets during the Phase V Period as established

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<sup>31</sup> Phase V Implementation Order at 234-5.

<sup>32</sup> Phase V Implementation Order at 34.

<sup>33</sup> 66 Pa.C.S. § 2806.1(b)(1)(i)(H); Phase V Implementation Order at 244-45.

<sup>34</sup> See 66 Pa.C.S. § 2806.1(a)(11); Phase V Implementation Order at 54; 73.

<sup>35</sup> See 66 Pa.C.S. § 2806.1(b)(1)(i)(G).

<sup>36</sup> See 66 Pa.C.S. § 2806.1(a)(5); Phase V Implementation Order at 68-69.

<sup>37</sup> See 66 Pa.C.S. § 2806.1 (a)(5); Phase V Implementation Order at 198.

<sup>38</sup> See Phase V Implementation Order at 52.

by the Commission in its Phase V Implementation Order. Like the Predecessor Companies' Phase I, II, III, and IV Plans, the proposed Phase V Plan includes a portfolio of EE&C programs targeted to a variety of customer segments, including: (i) residential (with programs specifically targeted to the low-income sector); (ii) small commercial and industrial ("C&I"); and (iii) large C&I.

26. The Phase V Plan is generally an extension of the programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. Also, like the Phase II, Phase III and Phase IV Plans, the Phase V Plan continues the use of incentive level ranges.

27. Under this approach, the Company has the ability to adjust rebate levels within the range as market conditions warrant, provided that these adjustments do not increase program costs beyond approved budgets.

28. Sections 1.2 and 3.1 of the Phase V Plan describe how the Company's plan development team ("EE&C Team") designed the Company's Phase V Plan. Generally, the EE&C Team reviewed the existing programs and measures in the Predecessor Companies' Phase IV Plans and other potential program offerings that it identified through review of other utilities and affiliates, industry review, input from stakeholders, the Company's energy efficiency consultant, and vendors, and a review of both the PA TRM and the Energy Efficiency and Peak Demand Reduction Market Potential Study ("EEMPS") and the Demand Response Potential Study ("DRPS", and together with the EEMPS, the "MPS").<sup>39</sup>

29. Potential program offerings were assessed based on: (i) experience gained through implementation of the Phase IV Plans and prior plans; (ii) performance of the programs and

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<sup>39</sup> See *Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report* dated February 7, 2024, available at <https://www.puc.pa.gov/pcdocs/1867286.pdf>. Also see *EEPDR Phase V Demand Response Potential Study* dated February 2025, available at : <https://www.puc.pa.gov/pcdocs/1867287.pdf>. Both documents released on February 24, 2025 via Secretarial Letter at Docket No. M-2025-3052827.

measures offered in the Predecessor Companies' Phase IV Plans; (iii) information related to the design and performance of programs and measures being offered by other FirstEnergy Corp. affiliates and other utilities both within and outside of Pennsylvania; and (iv) input from stakeholders, vendors as well as the Company's energy efficiency consultant (collectively, "Assessment Input"). Based on this Assessment Input, the Company developed participation level estimates and corresponding program and measure savings and costs.

30. Based on information known at the time of filing, the Company's Phase V Plan is designed to:

- Achieve the consumption reduction and peak demand reduction targets within the allowable budget;
- Achieve the consumption reduction target from the low-income sector from programs solely directed at low-income customers or low-income verified participants in multifamily housing programs;
- Meet the budget requirement that at least 50% of EE&C Plan budgets are for incentives;
- Include at least one comprehensive program for residential and at least one comprehensive program for non-residential customer classes;
- Offer a well-reasoned and balanced set of measures that are tailored to usage and with the potential for savings and reductions for each customer class; and
- Coordinate with other conservation programs and leverage these external programs and funding to complement the Act 129 programs and encourage further participation within the existing budget limitation.

31. The Company's Phase V Plan describes how the Company will achieve the required reductions in energy consumption and coincident peak demand and explains how quality assurance and performance will be measured, verified, and evaluated.

32. The Phase V Plan includes estimated costs to develop and implement programs and measures. Consistent with the Phase V Implementation Order and pursuant to 66 Pa.C.S. § 1307,

tariff rider cost recovery mechanisms are proposed to ensure full and current recovery of the costs of the Proposed Plan. The Company's budget showing total planned expenditures by program<sup>40</sup> and customer class<sup>41</sup> are also included in the Proposed Plan.

33. Program results will be determined consistent with the 2026 TRM, and the projected savings and costs generated and evaluated through the Company's Phase V Plan are based on the requirements and guidance set forth in the 2026 TRC Test Order. The results of the TRC test, as applied to the Phase V Plan, are presented in Appendix B, Table 14 of the Company's Proposed Plan. As seen therein, the proposed Phase V Plan passes the TRC test.

## **B. DESCRIPTION OF THE PROPOSED PLAN**

34. The Company has designed a suite of programs for all major customer segments. The programs offered by the Company in Phase V are generally an expansion of the successful elements currently included in the Phase IV Plans, which were approved by the Commission. These programs (which are described in greater detail in Sections 3.2, 3.3 and 3.4 of the Company's Proposed Plan and summarized in FE PA Statement No. 1) are as follows:

### Residential Programs:

- Energy Solutions Program
- Low-Income Energy Efficiency Program

### Small and Large Commercial and Industrial Programs:

- C&I Energy Solutions Program - Small
- C&I Energy Solutions Program - Large

35. Each of the above programs includes numerous program components, all of which are also described in detail in Sections 3.2, 3.3 and 3.4 of the Company's Phase V Plan.

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<sup>40</sup> See Appendix B, Table 10 of the Phase V Plan.

<sup>41</sup> See Appendix B, Table 7 of the Phase V Plan.

**C. PHASE V ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDERS**

36. Through this Petition, the Company is also seeking approval to establish its Phase V EE&C-C Rider. These cost recovery mechanisms are consistent with 66 Pa.C.S. § 1307 and are designed to recover the costs associated with developing and implementing the Phase V Plan. The Company's proposed *pro forma* tariff supplement for the Phase V EE&C-C Rider is attached to FE PA Statement No. 2 and summarized in Section 7 of the Phase V Plan.

37. The Phase V EE&C-C Rider is designed to recover from customers on a full and current basis all reasonable and prudent costs, including administrative costs, incurred in the development, provision, and management of the Phase V Plan.<sup>42</sup>

38. The Phase V EE&C-C Rider proposed by the Company will ensure that approved measures are financed by the customer class that receives the direct energy and conservation benefit of the measures.<sup>43</sup> Further, the Company's Proposed Plan includes first-year cost estimates for implementation of all measures, along with proposed rates to be charged through the Phase V EE&C-C Rider during the first program year (i.e., June 1, 2026 through May 31, 2031) of the Phase V Period.

39. The total costs of the Company's Phase V Plan to be recovered will not exceed the spending limitations established by the Commission in its Phase V Implementation Order.<sup>44</sup>

40. Estimates of the Company's costs relating to the Phase V Plan are set forth in the Proposed Plan. The reasonable and prudent costs include expense items relating to all program elements as well as all related administrative costs. The budget in the Phase V Plan includes costs

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<sup>42</sup> 66 Pa.C.S. § 2806.1(k)

<sup>43</sup> 66 Pa.C.S. § 2806.1(b)(1)(i)(F).

<sup>44</sup> See Phase V Implementation Order at 34.

for the on-going administration and operation of the Proposed Plan and programs, as well as the costs incurred to design, create, and obtain Commission approval for the Phase V Plan.

41. The Phase V EE&C-C Rider also contains a provision to allow for a reconciliation adjustment to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period.

42. The rates included in the Phase V EE&C-C Rider are expressed and billed as a price per kilowatt-hour (“kWh”), except for the industrial customer class that is expressed on an individual customer’s Peak Load Contribution kilowatt (“kW PLC”) basis and will be billed on that basis throughout the Phase V Period. Some of the highlights of the Phase V EE&C-C Rider include:

- The Phase V EE&C-C rates will be calculated at the consolidated FE PA level and stated separately for each customer class according to the provisions of the Phase V EE&C-C Rider;
- The Phase V EE&C-C Rider will be effective for services rendered on or after June 1, 2026, through the end of the Phase V Period on May 31, 2031;
- The Phase V EE&C-C Rider will include a reconciliation process that will calculate annual over-or under-collection by rate class; and
- On an annual basis, to be effective June 1 of each year starting June 1, 2026, the Company will file by May 1st of the same year certain information regarding reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs.

43. Following Commission approval, the Company requests that the Commission authorize the Company to implement its *pro forma* Phase V EE&C-C Rider such that it becomes effective on June 1, 2026.

#### **D. IMPLEMENTATION**

44. The Company is committed to designing and implementing robust processes and systems that focus on program quality control and customer satisfaction. Because the programs

included in the Phase V Plan are, in essence, extensions of the Phase IV programs, the Company will leverage the existing program implementation processes that were developed and proven effective during prior phases of the Commission's EE&C Program. This approach not only minimizes implementation costs, but it also avoids start-up issues that normally occur with new processes and procedures.

45. As with the prior EE&C Plans, the Company will continue overall administration and oversight of the Phase V Plan but will utilize third party conservation service providers ("CSPs") to perform various program implementation and support duties. Specific activities that the Company will oversee include: (i) the Phase V Plan implementation and performance; (ii) the execution of marketing campaigns; (iii) quality assurance/quality control activities; (iv) tracking and reporting activities; and (v) management of CSPs.

46. The Company will utilize multiple CSPs to provide many program-related services, including assistance with program implementation, marketing, and evaluation, mMeasurement, and verification ("EM&V"). Some of these CSPs will be responsible for either the transition of existing Phase IV programs to similar Phase V programs, or the startup of new Phase V program offerings and measures. Responsibilities related to current Phase IV programs transitioning to Phase V will include, at a minimum, the reevaluation of staffing levels, staffing and promotional materials, program processes, and the updating of the same. Responsibilities related to new Phase V programs will include, at a minimum, the identification of appropriate staffing skills and levels and the hiring of the same, and the development of website(s), promotional strategies, and program processes ensuring quality and other controls supporting successful program implementation.

47. When selecting the CSPs, the Company will adhere to the vendor selection and contracting requirements as set forth in the Commission's Phase V Implementation Order and will

select through its Commission-approved competitive bidding process all CSPs that provide consultation, design, administration, and management or advisory services to the Company. Every CSP contract will be submitted to the Commission staff for review and will be contingent upon Commission approval of both the contract and the applicable program(s) that is the subject of the contract.

48. The Company's Request for Proposal ("RFP") for EM&V services for its Phase V Plan was issued on September 10, 2025. The responses were reviewed and selection was made based upon the firm possessing substantial qualifications in energy efficiency and demand response evaluation, measurement and verification. The selected bidder has worked previously with the Company in Pennsylvania and its affiliates in other jurisdictions and has demonstrated its experience and expertise in its field, under Act 129 in Pennsylvania and in the industry.

49. With exception of its Tracking and Reporting system vendor, the Company plans to complete its competitive bidding process to select its PA CSP(s) for the Phase V Plan in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026.

50. All RFPs will be distributed to all qualified CSPs registered on the Commission's website, and the Company will continue to make an effort to acquire bids from minority or other special category businesses consistent with the Commission's Policy Statements at 52 Pa. Code §§ 69.804, 69.807 and 69.80.

51. The Company will not begin offering incentives and rebates to customers until Commission approval of its proposed Phase V Plan and will ensure that the rebates apply to only those measures installed and commercially operable on or before May 31, 2031.

**E. PROCEDURAL TIMELINE**

52. In accordance with Act 129 and the Commission’s Phase V Implementation Order,<sup>45</sup> the Company anticipates the following approximate procedural timeline to address the Proposed Plan:

FE PA Phase V Plan Filed	November 26, 2025
Plan published in <i>PA Bulletin</i> and on Commission website	December 13, 2025
Answers and Petitions to Intervene	December 23, 2025
Prehearing Conference	January 6, 2026
Public Comments	January 12, 2026
Evidentiary Hearing conducted by Administrative Law Judge	65 days after filing of Phase V Plan or January 30, 2026
Main Briefs due	10 days after the Evidentiary Hearing or February 9, 2026
Reply Briefs/Voluntary Revisions to Phase V Plan (if applicable)	10 days after Main Briefs are filed or February 19, 2026
Commission Order approving Phase V Plan and cost recovery tariff filing	120 days after filing of Plan or March 2026
Implementation of Phase V Plan	June 1, 2026

**F. PUBLIC INTEREST**

53. The Proposed Plan is: (i) in the public interest; (ii) in compliance with the requirements of Act 129; and (iii) in compliance with all of the Commission’s applicable Act 129 Orders, including the Commission’s Phase V Implementation Order, the 2026 TRC Test Order, and the 2026 TRM.

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<sup>45</sup> Phase V Final Implementation at 198.

54. The Company's Proposed Plan provides a suite of programs that are targeted to every customer segment in the Company's service territory. The programs provide customers with multiple levels of information ranging from common information about saving energy in general to customized information about services that will help them make energy efficiency changes in their own homes and facilities. Moreover, these programs are a part of a comprehensive statewide initiative designed to help achieve energy consumption reductions required by Act 129 and the Commission's Phase V Implementation Order within the cost cap established by Act 129.

**V. CONCLUSION**

**WHEREFORE**, the Company respectfully requests that the Commission issue an order: (i) approving the Company's Phase V Energy Efficiency and Conservation Plan; and (ii) authorizing the Company to implement its Phase V Energy Efficiency and Conservation Charge Rider by filing tariff supplements, to be effective for service rendered on and after June 1, 2026.

Respectfully submitted,

*Shane P. Simon*

Dated: November 26, 2025

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**FirstEnergy Pennsylvania Electric  
Company**

Docket No. M-2025-3057327

**Phase V Energy Efficiency & Conservation Plan**

**(For the Period June 1, 2026 through May 31, 2031)**

**November 26, 2025**

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<b>ACC</b>	Avoided Cost Calculator
<b>AEPS</b>	Alternative Energy Portfolio Standard
<b>AHU</b>	Air Handling Unit
<b>ASHRAE</b>	American Society of Heating, Refrigerating, and Air Conditioning Engineers
<b>BOC</b>	Building Operations Certification
<b>BPI</b>	Building Professional Institute
<b>BTM</b>	Behind the Meter
<b>C&amp;I</b>	Commercial and Industrial
<b>CBO</b>	Community Based Organizations
<b>CEE</b>	Consortium for Energy Efficiency
<b>CIAC</b>	Contribution in Aid of Construction
<b>CSP</b>	Conservation Service Provider
<b>DCED</b>	Department of Community and Economic Development
<b>DR</b>	Demand Response
<b>DEP</b>	Pennsylvania Department of Environmental Protection
<b>DLS</b>	Daily Load Shifting
<b>EDC</b>	Electric Distribution Company
<b>EE</b>	Energy Efficiency
<b>EE&amp;C</b>	Energy Efficiency and Conservation
<b>EM&amp;V</b>	Evaluation, Measurement, and Verification
<b>EPA</b>	Environmental Protection Agency
<b>EPRI</b>	Electric Power Research Institute
<b>FPIG</b>	Federal Poverty Income Guideline
<b>FTM</b>	Front of the Meter
<b>FTP</b>	File Transfer Protocol
<b>GNI</b>	Government, Non-Profit, Institutional
<b>GRT</b>	Gross Receipts Tax
<b>HBA</b>	Home Builder Associations
<b>HER</b>	Home Energy Report
<b>HERS</b>	Home Energy Rating System
<b>HVAC</b>	Heating, Ventilating, and Air Conditioning
<b>IT</b>	Information Technology
<b>KW</b>	Kilowatt
<b>KWH</b>	Kilowatt-hour
<b>LCI</b>	Large Commercial & Industrial
<b>LED</b>	Light-Emitting Diode
<b>LI</b>	Low-Income
<b>LIURP</b>	Low-Income Usage Reduction Program
<b>M&amp;V</b>	Measurement and Verification

<b>MPS</b>	Market Potential Study
<b>MW</b>	Megawatt
<b>MWH</b>	Megawatt-hour
<b>NGDC</b>	Natural Gas Distribution Company
<b>NPV</b>	Net Present Value
<b>NTG</b>	Net-to-Gross
<b>PA PUC</b>	Pennsylvania Public Utility Commission
<b>PHFA</b>	Pennsylvania Housing Financing Agency
<b>POS</b>	Point of Sale
<b>PDR</b>	Peak Demand Reduction
<b>PJM</b>	PJM Interconnection LLC
<b>PLC</b>	Peak Load Contribution
<b>PUC</b>	Public Utility Commission
<b>QA/QC</b>	Quality Assurance/Quality Control
<b>RAD</b>	Responsible Appliance Disposal
<b>RCX</b>	Retro-Commissioning
<b>RESNET</b>	Residential Energy Services Network
<b>RFP</b>	Request for Proposal
<b>RTU</b>	Roof Top Unit
<b>SAP</b>	System Applications and Products, is FirstEnergy’s Enterprise Resource Planning (ERP) software
<b>SCI</b>	Small Commercial & Industrial
<b>SWE</b>	Statewide Evaluator
<b>T&amp;R</b>	Tracking and Reporting
<b>TRC</b>	Total Resource Cost
<b>TRM</b>	Technical Reference Manual
<b>VCX</b>	Virtual Commissioning
<b>XML</b>	Extensible Markup Language

**Mapping of Program Years to Dates**

<b>Program Year</b>	<b>Start Date</b>	<b>End Date</b>
PY18	June 1, 2026	May 31, 2027
PY19	June 1, 2027	May 31, 2028
PY20	June 1, 2028	May 31, 2029
PY21	June 1, 2029	May 31, 2030
PY22	June 1, 2030	May 31, 2031

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## **1. OVERVIEW OF PLAN**

### ***Introduction***

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”), through its Energy Efficiency plan development team (“EE&C Team”), has developed this Energy Efficiency and Conservation Plan (“Phase V Plan” or “EE&C Plan” or “Plan”) for the period June 1, 2026 through May 31, 2031 (“Phase V Period”) in accordance with Act 129 of 2008<sup>1</sup> (“Act 129”) and the Commission’s Phase V Implementation Order, issued on June 18, 2025 at Docket No. M-2025-3052826 (“Phase V Implementation Order”). As detailed below, the Company’s Phase V Plan is based on both the 2026 Total Resource Cost (“TRC”) Test Final Order (“PA TRC Order”)<sup>2</sup> and the 2026 Technical Reference Manual (“PA TRM”) and is designed to meet all requirements as set forth in the Phase V Implementation Order.

### ***Historic Background***

On October 15, 2008, then Governor Rendell signed Act 129 into law. Act 129 imposed new requirements on Pennsylvania’s Electric Distribution Companies (“EDCs”) in the areas of energy efficiency and conservation, smart meters, procurement and alternative energy sources. Among other things, Act 129 required every EDC with at least 100,000 customers to adopt and implement a plan, approved by the Commission, to reduce energy demand and consumption within its service territory during the period June 1, 2010 through May 31, 2013<sup>3</sup> (“Phase I”).

Act 129 also authorized the Commission to evaluate whether it was cost beneficial to continue the EE&C program beyond Phase I.<sup>4</sup> The Commission concluded in its August 3, 2012 Order at Docket Nos. M-2012-2289411 and M-2008-2069887<sup>5</sup> (“Phase II Implementation Order”) that further energy efficiency programs would be cost effective and established Phase II of the EE&C program, requiring EDCs to adopt and implement cost effective plans to reduce energy consumption throughout the Commonwealth for the period June 1, 2013 through May 31, 2016 (“Phase II Period”). FirstEnergy Corp.’s four Pennsylvania operating companies, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively “Predecessor Companies”), submitted plans to comply with the 2012 Implementation Order, which were approved by the Commission (“Phase II Plans”).<sup>6</sup>

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<sup>1</sup> 66 Pa.C.S. §2806.1 *et seq.*

<sup>2</sup> 2026 Total Resource Cost Test Final Order, Docket No. M-2024-3048998 (Order entered November 7, 2024).

<sup>3</sup> 66 Pa.C.S. § 2806.1.

<sup>4</sup> 66 Pa.C.S. § 2806.1(c) (3).

<sup>5</sup> See *Energy Efficiency and Conservation Program Implementation Order*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order Entered August 3, 2012).

<sup>6</sup> See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Consolidation of Proceedings and Approval of its Act 129 Phase II Energy Efficiency and Conservation Plans*, Docket Nos. M-2012-2334387, M-2012-2334392, M-2012-2334395 and M-2012-2334398 (Opinion and Order entered March 14, 2013)).

In accordance with Act 129, the Commission determined in its June 19, 2015 Order at Docket Nos. M-2014-2424864<sup>7</sup> (“Phase III Implementation Order”) that further energy efficiency and demand reduction programs would be cost effective and established Phase III of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth for the period June 1, 2016 through May 31, 2021 (“Phase III Period”). The Predecessor Companies submitted plans to comply with the Phase III Implementation Order, which were approved by the Commission (“Phase III Plans”).<sup>8</sup>

Also in accordance with Act 129, the Commission determined in its June 18, 2020 Order at Docket No. M-2020-3015228<sup>9</sup> (“Phase IV Implementation Order”) that additional energy efficiency programs would be cost effective and established Phase IV of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth for the period June 1, 2021 through May 31, 2026 (“Phase IV Period”). The Predecessor Companies submitted plans to comply with the Phase IV Implementation Order, which were approved by the Commission and are currently being implemented (“Phase IV Plans”).<sup>10</sup>

The Commission concluded in the Phase V Implementation Order<sup>11</sup> that additional energy efficiency and demand reduction programs would be cost effective and established Phase V of the EE&C program, requiring EDCs to adopt and implement cost-effective plans to reduce energy consumption and demand throughout the Commonwealth. The Commission further acknowledged the consolidation of the Predecessor Companies (Met-Ed, Penelec, Penn Power and West Penn into Rate Districts of a single EDC, FE PA, and aggregated them to reflect a single EDC.<sup>12</sup> Pursuant to the Phase V Implementation Order, the Company submits this Phase V Plan.<sup>13</sup>

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<sup>7</sup> See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2014-2424864 (Order entered June 19, 2015).

<sup>8</sup> See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Consolidation of Proceedings and Approval of Act 129 Phase III Energy Efficiency and Conservation Plans*; Docket Nos. M-2015-2514767, M-2015-2514768, M-2015-2514769, and M-2015-2514772 (Order entered March 10, 2016).

<sup>9</sup> See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2020-3015228 (Order entered June 18, 2020).

<sup>10</sup> See *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Consolidation of Proceedings and Approval of Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket Nos. M-2020-3020820, M-2020-3020821, M-2020-3020822, and M-2020-3020823 (Opinion and Order entered March 25, 2021).

<sup>11</sup> See *Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2025-3052826 (Order entered June 18, 2025).

<sup>12</sup> Phase V Implementation Order at 13-14.

<sup>13</sup> On January 1, 2024, FirstEnergy Corp.’s Pennsylvania operating companies (i.e., Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) merged into

***1.1 Summary description of plan, plan objectives, and overall strategy to achieve energy efficiency and conservation goals.***

*Objectives:*

In developing the Phase V Plan, the EE&C Team set forth to develop a plan that meets all requirements as established in Act 129 and the Phase V Implementation Order, including:

- Achieving the consumption reduction and peak demand reduction targets within the allowable budget;
- Achieving the consumption reduction target from the low-income sector from programs solely directed at low-income customers or low-income verified participants in multifamily housing programs;
- Meeting the budget requirement that at least 50% of EE&C Plan budgets are for incentives;
- Including at least one comprehensive program for residential and at least one comprehensive program for non-residential customer classes;
- Offering a well-reasoned and balanced set of measures that are tailored to usage and with the potential for savings and reductions for each customer class; and
- Coordinating with other conservation programs and leveraging these external programs and funding to complement the Act 129 programs and encourage further participation within the existing budget constraint.

*Description of the Plan and Strategy for Success:*

Keeping in mind these key objectives, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. To meet the requirement that savings counted towards the low-income savings carve-out come from specific low-income programs or low-income verified participants in multifamily housing programs, the Phase V Plan includes both a low-income program that specifically targets certain measures and services to this sector as well as multifamily housing offerings that will additionally serve low-income customers. The Phase V Plan includes a broad portfolio of programs and measures, including a comprehensive program for both the residential and the non-residential customer sectors. The Phase V Plan also incorporates both near-term and longer-term energy saving opportunities for all customers and includes multiple prescriptive and custom measures, direct install, and comprehensive whole home/whole building solutions. Collectively, the proposed programs across all sectors incorporate customer engagement and education and cover major energy-consuming devices in the home, building, or business, thus providing a broad portfolio of measures giving the opportunity for all customer classes to participate and benefit from one or more program offerings. Furthermore, the proposed programs promote and support comprehensive whole

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FirstEnergy Pennsylvania Electric Company. Due to the merger transaction, the affected operating companies' tariffs were consolidated into a single tariff, with each former operating company's rates becoming its own rate district.

home/whole building/solutions across all customer classes, targeting deeper savings and comprehensive retrofits.

The Phase V Plan was developed based on experience gained through the completion of the Phase I through III Plans and the current implementation of the Phase IV Plans, factoring in: (i) performance to date of not only the Predecessor Companies' programs, but also the performance of similar programs of both affiliated and non-affiliated utilities; (ii) feedback and suggestions received from the Company's energy efficiency consultant, vendors, and contractors; and (iii) input from stakeholders. The Phase V Plan continues to rely on experienced outsourced Conservation Service Providers ("CSPs"), leverages prior experiences, and includes a mix of expanded and new measures or services that take advantage of leveraging opportunities, volume cost efficiencies, and a variety of delivery channels that will support successful and efficient program operations and customer participation.

The program designs presented in this Phase V Plan are organized into the following customer sectors: (1) Residential; (2) Residential Low-Income; (3) Small Commercial and Industrial ("SCI"); and (4) Large Commercial and Industrial ("LCI").

**Residential Sector** – Residential energy efficiency program offerings were designed to address both educational and initial cost barriers and to tap a variety of delivery channels and vendors to support customer engagement, education, and participation. The residential offerings include targeted program components that engage customers and serve as a portal for other program offerings because they serve a dual purpose by providing customers with energy efficiency education as well as information regarding other program services and opportunities upon which they can act. The residential offerings incorporate strategies to assist customers in changing their behaviors and include incentives to address the initial cost barrier to promote the participation of all residential customers. The residential offerings also include components that provide opportunities for prescriptive equipment and direct install so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase efficiency, as well as components that promote and provide opportunities for customers interested in whole home/comprehensive solutions that encourage customers to consider a holistic approach to energy efficiency.

Supplementing the savings achieved from EE&C measures, daily load-shifting ("DLS") and peak demand reduction ("PDR") program opportunities were designed to deliver peak reductions during daily peak hours for both the summer and winter periods using a variety of approaches and technologies that support broader customer engagement and participation. The residential DLS & PDR offerings include components that target both behavioral and connected devices (e.g., connected thermostats, battery storage, electric vehicles, etc.), with both daily load-shifting and peak demand reduction opportunities. The demand response program offering for connected devices also includes incentives to promote the enrollment and participation of customers.

**Low-Income Sub-Sector** – Within the residential sector there is a special sub-sector of low-income customers. The low-income program offerings outlined in this Phase V Plan will serve a dual purpose of contributing to Act 129 goal attainment and minimizing the percentage of household income that is devoted to energy costs. Basic, enhanced, and comprehensive services and education will be offered in the low-income sub-sector to help these households improve their energy efficiency and control energy spending.

Like its Residential Sector program counterparts, the low-income sub-sector program offerings are designed with a progression from general to specific to make EE&C program opportunities and services available to all low-income customers. The low-income offerings include a program component that will provide customized home energy reports and on-line audits that provide low-income customers with energy efficiency education, recommendations, and information regarding other services upon which they can act. Additional low-income program offerings include measures to conduct outreach, help identify new low-income customers, achieve additional energy savings opportunities, and promote energy efficiency in low-income homes. The Company also plans to achieve additional new and incremental electric energy savings through coordination with the Company's existing comprehensive Low-Income Usage Reduction Program ("LIURP"), known as the WARM program, by tapping the considerable expertise and existing infrastructure of LIURP contractors comprised of both Community Based Organizations ("CBOs") and private contractors. The LIURP program has offered comprehensive energy efficiency services to eligible Pennsylvania households for years. This aspect of the Phase V Plan enhances and accelerates the deployment of services to LIURP-eligible or treated households by providing additional measures and services to achieve deeper savings in addition to the LIURP services or by serving additional homes. The Company may supplement the delivery system as deemed necessary by adding additional subcontractors.

**Small and Large, Commercial & Industrial Sector** – The Commercial and Industrial energy efficiency program offerings were designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all customers. Commercial businesses and industrial customers are also addressed through program components that provide opportunities including prescriptive rebates, custom measures, building tune-up, and whole building/comprehensive solutions. Program offerings ensure access for small customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. And the program offerings also include structured energy efficiency and energy management opportunities that encourage customers to consider a holistic approach to Energy Efficiency for customers who are interested and able to participate in whole building/comprehensive solutions.

The Commercial & Industrial DLS and PDR program opportunities were designed to supplement the peak load reductions that result from EE&C measures with additional peak load reductions during daily peak hours for both the summer and winter periods utilizing a

variety of approaches and technologies to support broader customer engagement and participation. The offerings include components that target both connected devices and custom opportunities for both. The demand response program offerings also include incentives to promote the enrollment, participation and/or performance of customers.

Front of the Meter (“FTM”) measures are included in the Residential, SCI and LCI sectors of the Phase V Plan to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system and reduce demand during peak hours, and help to mitigate growing resource adequacy concerns in the State.

FE PA Table 1 below describes each of the programs that are included in the Phase V Plan. More detailed descriptions of the programs are provided in Section 3.

**FE PA Table 1: Program Summary Descriptions**

<b>FE PA Table 1: Program Summary Descriptions</b>	
<b>Proposed Program</b>	<b>Program Description</b>
<b>Residential</b>	
Residential Energy Solutions Program	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.
<b>Residential Low Income</b>	
Low Income Energy Efficiency Program	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.
<b>Small Commercial &amp; Industrial</b>	
C&I Energy Solutions Program - Small	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.
<b>Large Commercial &amp; Industrial</b>	
C&I Energy Solutions Program - Large	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.

FE PA Table 2 below provides the delivery channels that are currently anticipated for the programs included in the Phase V Plan. As each program is implemented, the Company

will consider and may revise the delivery channels to enhance the performance of a given program component.

**FE PA Table 2: Program Delivery Channels**

<b>FE PA Table 2: Program Delivery Channels</b>					
<b>Program</b>	<b>Program Component</b>	<b>Rebate</b>	<b>Kits</b>	<b>Up/Mid-Stream</b>	<b>Direct Install</b>
<b>Residential Programs</b>					
Residential Energy Solutions Program	Products	X			
	HVAC & Solar	X			
	Comprehensive Audits	X			
	Multi Family - Res				X
	Behavioral				
	New Homes	X			
	DLS & DR - Res	X			
FTM-Res					
<b>Residential Low Income Programs</b>					
Low Income Energy Efficiency Program	Weatherization		X		X
	LI - Products	X			
	LI - HVAC	X			
	LI - Audits	X			
	LI - Behavioral				
	LI - New Homes	X			
LI - Multifamily - Res					X
<b>Small Commercial &amp; Industrial Programs</b>					
C&I Energy Solutions Program - Small	Multi Family - SCI				X
	Prescriptive - SCI	X		X	
	Custom - SCI	X			
	Energy Management - SCI	X			X
	DLS & DR - SCI	X			
	FTM-SCI				
<b>Large Commercial &amp; Industrial Programs</b>					
C&I Energy Solutions Program - Large	Multi Family - LCI				X
	Prescriptive - LCI	X		X	
	Custom - LCI	X			X
	Energy Management - LCI	X			
	DLS & DR - LCI	X			
	FTM-LCI				

Like the Phase III and IV Plans, the Phase V Plan continues the use of incentive level ranges. Under this approach, the Company has the ability to adjust rebate levels within the range as market conditions warrant, provided that these adjustments do not increase program costs beyond the approved budget. Based on these ranges, the Company can timely adjust incentives for the measures or services. This will aid the Company either avoid overpaying for measures, or if it is determined that an incentive is not sufficient, increase incentives to enhance market response without missing potential opportunities. This allows the Company to quickly react to changing market conditions, thus optimizing its ability and efforts to cost-effectively achieve its goals.

Appendix B, Table 8 lists the planned incentive level ranges associated with each of the measures included in the Phase V Plan. For some measures, Company pre-approval may

be required, and there may be limits on the number of units that will be rebated to any one customer or through any one program to support program operations, budget management, and verification of existing equipment. More detail is provided in the individual program descriptions in Section 3.

The total proposed cost of the Phase V Plan is \$390,319,523 as reported in Appendix B, Table 7 and Table 13. These costs will be recovered through the Company's Phase V EE&C-C Rider, which is summarized in Section 7 and is subject to Commission approval. The successful implementation of the Company's Phase V Plan is projected to be cost-effective at the portfolio level under the PA TRC test, with a benefit-cost ratio of 1.1. Additional details are provided in Appendix B, Tables 1, 14, and 15.

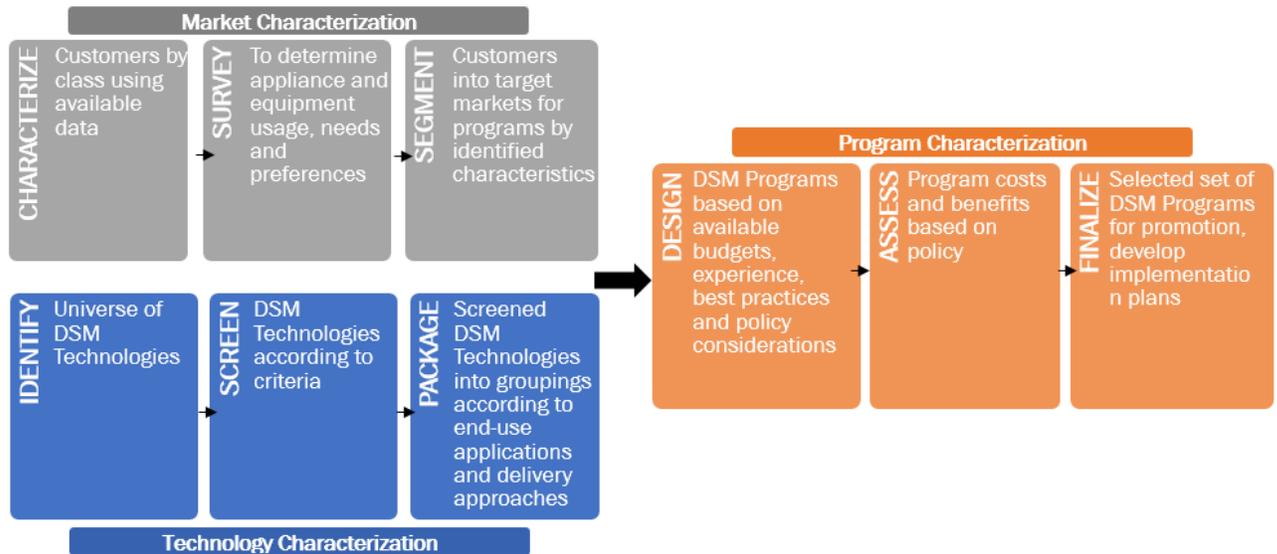
The Company believes it has developed a successful strategy to achieve its Phase V goals. This strategy includes offering a broad range of energy efficiency and demand response program opportunities through a variety of delivery channels, continued use of outsourced vendors with expertise in program implementation services, including managing program operations as well as marketing, customer enrollment, program and trade alley engagement, application and rebate processing, Evaluation, Measurement, and Verification ("EM&V") and implementation of the tracking and reporting system. This network of contractors reports to a core team within the FirstEnergy Energy Efficiency group, who will provide administration and oversight of this Phase V Plan. The Company will closely monitor programs for performance and, if needed, make any necessary adjustment to improve performance, including a shift of emphasis from lesser to higher performing programs and adjusting rebate levels based on market conditions and performance. This strategy was initially established during Phase I of Act 129 and has since continued and proven to be successful.

**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 during both the development and implementation of the EE&C Plan.***

**Process**

FE PA Figure 1, below, illustrates the process undertaken by the EE&C Team to develop the Phase V Plan:

**FE PA Figure 1: FirstEnergy EE&C Plan Development Process**



When developing the Phase V Plan, the EE&C Team reviewed the programs and measures included in the Predecessor Companies’ Phase IV Plans and other potential program offerings that it identified through review of other utilities and affiliates, industry review, input from stakeholders, the Company’s energy efficiency consultant, and vendors, and a review of both the PA TRM and the Energy Efficiency and Peak Demand Reduction Market Potential Study (“EEMPS”) and the Demand Response Potential Study (“DRPS”), collectively referred to as the “MPS”<sup>14</sup> Potential program offerings were assessed based on: (i) experience gained through implementation of the Phase IV Plans and prior plans; (ii) performance of the programs and measures offered in the Predecessor Companies’ Phase IV Plans; (iii) information related to the design and performance of programs and measures being offered by other FirstEnergy affiliates and other utilities both within and outside of Pennsylvania; and (iv) input from stakeholders, vendors as well as the Company’s energy efficiency consultant (collectively, “Assessment Input”). Based on this Assessment Input, the EE&C Team developed participation level estimates and corresponding program and measure savings and costs.

The EE&C Team used an iterative process to refine and complete the modeling, which included the review of the projected results for each sector, program component and measure with the Company’s energy efficiency consultant and implementation team. This review included assessing the reasonableness of the projected results based on potential in the market, potential customer participation and savings, and estimated costs. Estimated program participation values were informed by program implementation experience through the Phase IV Plans, the implementation of affiliate programs in other jurisdictions,

<sup>14</sup> See *Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report* dated February 7, 2024, Available at <https://www.puc.pa.gov/pcdocs/1867286.pdf>. Also see *EEPDR Phase V Demand Response Potential Study* dated February 2025, available at : <https://www.puc.pa.gov/pcdocs/1867287.pdf>. Both documents released on February 24, 2025 via Secretarial Letter at Docket No. M-2025-3052827.

the experience of the Company's energy efficiency consultant and vendors, and the MPS. Potential program measure savings were predominantly based upon the values and formulae included in the PA TRM, actual program and evaluation results to date, individual customer project results, and other states' TRMs that were established to support energy efficiency programs in those jurisdictions.

The Company's approach to developing the Phase V Plan balanced and considered several key sources of information, including:

- Pennsylvania-specific information including the performance of the Company's current programs, the MPS, the Statewide Evaluator ("SWE") Database and the PA TRM;
- CSPs' expertise in delivering programs and program performance;
- Industry experience from market potential studies, the Company's energy efficiency consultant, evaluation results, and TRMs from other states;
- External stakeholder and vendor experience and input captured in meetings and other discussions; and
- Customer attitudes and preferences based on program performance in Pennsylvania and other jurisdictions.

There are both portfolio-based and program component/measure-specific assumptions that must be made when modeling the programs included in this Phase V Plan. To support the modeling effort, the Company relied on the incentives and costs of various program elements based on both the Company's experience with like programs and input from the Company's EE&C consultant and vendors based on industry experience throughout the country as well as input from the EE&C Team. Customer participation levels and other program component/measure specific assumptions are set forth in Appendix B, Tables 8 and 9, and Appendix C, FE PA Table C-2. For purposes of cost effectiveness testing, the Company developed its avoided cost inputs based on the methodology prescribed by the Commission in the PA TRC Order, utilized the SWE's Avoided Cost Calculator ("ACC") tool and followed additional guidance provided by the SWE. Cost effectiveness testing is more fully described in Section 8.

The Phase V Plan is based on an assumption that the Commission will timely approve CSP contracts and the Phase V Plan itself in March 2026 to support CSP set-up, start-up, and other activities to ready programs for implementation beginning June 1, 2026. There are numerous other sources of uncertainty associated with the Phase V Plan assumptions. As with any plan that relies on forecasts, there are inherent risks associated with the assumptions used to develop participation rates, savings calculations, and cost of programs, among others. Several economic conditions (inflation rates, tariffs, product availability, etc.) may directly affect customers' ability and/or willingness to participate in programs and the cost of those programs. Further, the Company raised uncertainties with the MPS associated with the projected savings and costs assumed for customer participation, savings from several EE technologies (e.g. solar, CHP, C&I lighting), and lack of industry experience with daily load-shifting programs and winter demand response as expressed in

its comments to the Commission's Tentative Implementation Order.<sup>15</sup> These raise uncertainties with customers' willingness to participate across a performance period covering over 400 hours per year and with customer and technology performance and load impacts over the performance period. More stringent standards and building codes during the Phase V Period would also affect customer participation in programs, savings results, and costs.

As the Phase V Plan was developed, the Company sought and obtained feedback on the proposed EE&C programs from stakeholders through a variety of methods. Stakeholder meetings discussing the Phase V Plan's development and program design were held on July 30th, 2025, and September 11th, 2025. The Company also met with individual interested stakeholders during development of the Phase V Plan to further obtain and discuss their input. During the Phase V Period, the Company plans to continue to conduct stakeholder meetings each year, where the Company will review the performance, progress, and operation of the programs with stakeholders for collaborative discussion and feedback. The Company will also meet with stakeholders on an as-needed, as requested, or on-going basis to discuss any Plan or program aspects. Section 4.1.6 provides a detailed description of this process. Please also refer to Section 1.7, which details how the Company will seek stakeholder input to better reach customers and program allies throughout the plan implementation. Section 1.8 describes the Company's request for periodic feedback regarding data management, quality assurance, and evaluation processes. Additional program specific information regarding stakeholder input is addressed in Section 3.

**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).<sup>5</sup> Introduce Table 2 with a high-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.***

The Company's Phase V goals are shown in FE PA Table 3 below,<sup>16</sup> along with the expenditure level representing the annual spending cap established by Act 129 and is consistent with the budget limits identified in Table 24 of the Final Implementation Order at 232.

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<sup>15</sup> See Comments of FirstEnergy Pennsylvania Electric Company to the Tentative Implementation Order Regarding Phase V of the Act 129 Energy Efficiency and Conservation Program, Docket No. M-2025-3052826 (April 7, 2025).

<sup>16</sup> In addition to the tables required by the Commission (which are designated as "PUC Tables" and provided in Appendix B to the Phase V Plan), the Company developed additional tables that have been included as additional support.

**FE PA Table 3: Phase V Order Targets**

<b>FE PA Table 3: Phase V Order Targets</b>				
<b>EDC</b>	<b>MWh Savings</b>	<b>Low-Income MWh Savings</b>	<b>Demand Reduction MW Savings</b>	<b>Budget (\$M)</b>
FE PA	1,097,605	86,913	191	\$ 390.30

The successful implementation of the Phase V Plan is projected to be cost-effective at the portfolio level as required. Overall, the Phase V Plan is projected to generate Total Discounted Net Lifetime Benefits under the TRC Test of \$109.79 million with a benefit cost ratio of 1.1. Please refer to Appendix B, Table 1 for additional forecasted cost-effectiveness results for the Phase V Plan by program.

Appendix B, Table 2 shows the annual MWh savings, both on an annual incremental basis as well as the lifetime MWh, for the Phase V Period. This data is presented by customer sector. Note that while this table includes information on estimated carryover savings from Phase IV, as required by the Implementation Order, the Phase V Plan is designed to meet the Phase V goals without the use of any carryover. Appendix B, Table 2 also shows that the Phase V Plan is designed to achieve at least 15% of the consumption reduction targets in each program year, and that it is forecasted to achieve 1,119,031 MWh of total savings, exceeding the Phase V goal of 1,097,605 MWh.

Appendix B, Table 2a shows the breakdown of incremental annual savings and annual spending by FE PA’s Rate Districts.

Appendix B, Table 3 shows sector specific demand reductions, broken down by coincident peak demand contributions from the EE&C programs and the PDR programs. Note that the accounting of these reductions is consistent with the methodology outlined in the Phase V Implementation Order.<sup>17</sup> Appendix B, Table 3 shows the Phase V Plan is designed to achieve at least 15% of the demand reduction targets in each program year and achieves a total of 193.0 MW demand reduction, exceeding the Phase V goal of 191.0 MW. Note that the Phase V Plan has also been designed to meet the Phase V goals without the use of any carryover.

Appendix B, Table 4 provides a summary of seasonal demand savings identifying peak demand reductions by winter and summer contributions, from the residential and non-residential sectors. The table shows the coincident peak demand reductions from the EE and the DLS program components separately. The Phase V Plan is designed to achieve a minimum of 75% of the target in each season as required by the Implementation Order. Note that the total projected summer and winter demand reductions are projected to be 222.4 MW and 163.7 MW respectively, with the average of 193.0 MW exceeding the target of 191.0 MW.

<sup>17</sup> PA Implementation Order at 147 through 157.

***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.***

The Company plans to issue RFPs for implementation of the programs in the 4th quarter of 2025 and to complete its competitive bidding process, select and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set-up, marketing development, and start-up activities supporting the seamless transition from the Phase IV to Phase V programs with implementation of the Phase V program components beginning June 1, 2026. The Company plans for all program components to be implemented at the beginning of PY18 and continuing through PY22, subject to any program modifications or other adjustments that are made throughout the Phase V Period. See Sections 4.1.2, 4.1.4 and 6.4 for more information regarding potential program modifications and adjustments.

The Company's goal is to maintain the momentum created through programs included in the Phase IV Plan and to leverage the synergies created through implementation of those programs for the Phase V Plan. The Phase V Plan assumes approval of this Plan and CSP contracts in a time frame that allows the Company to seamlessly transition the program components and measures from the Phase IV Plan to the Phase V Plan, noting that: (i) Phase IV transactions will be managed to conclusion concurrent with the introduction of Phase V programs; and (ii) any applications completed for projects installed and commercially operable prior to May 31, 2026, will be included in the Company's documentation supporting the participation towards and compliance with its Phase IV targets.

The Company will use multiple CSPs to transition and implement the various programs identified in the Phase V Plan. These CSPs will be responsible for the design of the transition and start-up plan of the Phase V program offerings and measures that will be performed in an organized and efficient manner and that strives to maintain and strengthen constructive relationships with the Phase V Plan and program management, customers, program allies, and contractors.

The transition and start-up planning includes program set-up activities and will commence following Company selection of the CSP(s) for Phase V. This set-up/start-up planning will outline a process to develop the systems and procedures needed to implement and operate the various program components for the Company. Please reference Section 4.1.5 and Section 4.3 for more detail on the implementation schedule, status of CSP solicitations and the transition and start-up plans for programs from Phase IV to Phase V.

The CSPs' transition and start-up will include communication and coordination with Company personnel and will meet with the Company and its evaluation and tracking system contractors as necessary and appropriate to properly integrate the applicable program components into the Company's overall comprehensive Phase V Plan. The start-up period will include milestone objectives and targets along the timeline to completion of program startup. Consistent with the Phase V Implementation Order, the Company will

not begin implementation of the Phase V programs prior to Commission approval of the program and CSP contracts.

**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.***

As indicated in Appendix B, Table 2 and Table 4, the Phase V Plan is designed to achieve at least 15% of the consumption reduction and peak demand reduction targets in each program year. The Phase V Plan includes a broad range of measures and services across all customer sectors in order to provide customers' greater opportunities for energy savings solutions that best fit their needs supporting customer participation in the program offerings. The Company plans to issue RFPs for implementation of the programs in the 4th quarter of 2025 and to complete its competitive bidding process, select and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development, and start-up activities supporting implementation of all program components beginning June 1, 2026, to accelerate the program ramp-up period for customer participation normally experienced during the first year of the phase term. In addition, the design of the Phase V Plan and programs, along with the Company's active oversight and inclusion of incentive ranges rather than fixed incentive levels, provides the Company with the awareness and flexibility to timely react to program performance and changing market conditions to best support the ongoing performance of the Phase V Plan towards achievement of the Phase V goals. Please refer to Section 4.1.4 for a more detailed discussion of the plans for monitoring progress and implementing any required intra-course adjustments.

**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.<sup>18</sup> 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)***

The Company plans to meet its portfolio MW compliance target using a combination of coincident peak demand from its energy efficiency programs as well as verified demand reductions from daily load-shifting and event-based PDR programs. These programs will result in reductions during peak demand hours for both winter and summer peak demand periods. Program CSPs will deploy a combination of daily load-shifting and event-based strategies including behavioral, connected devices, and custom demand response initiatives. In addition to the strategies discussed in Section 1.5 above, targeting a variety of program strategies, technologies, and approaches through experienced CSP(s) helps the Company to mitigate uncertainties with the daily load-shifting design and inclusion of winter demand response for Phase V and provides the required flexibility to make

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<sup>18</sup> Alternative windows must still include four performance hours per day.

adjustments over the term of Phase V to meet the Company's goals. See Appendix B, Table 4 that shows a breakdown of these components by customer sector for estimated summer and winter PDR achievements for the Phase V term.

The Company is not proposing alternative performance windows for compliance with the demand reduction targets.

***1.7 Summary description of the EDC implementation strategy to manage EE&C programs and engage customers and trade allies.***

As discussed above, the Company will contract with CSPs with expertise in providing specific program components and services, including operations and marketing, customer enrollment, and program, subcontractor and trade alley engagement among other things. This network of CSPs reports to the implementation team within the EE&C Team, which provides continuous ongoing oversight of program delivery, including outreach and marketing campaigns, and customer and program alley engagement. Program components and services are actively monitored for performance, and, if needed, adjustments are made to improve results. On a monthly basis, the Company leverages tracking and reporting processes to closely monitor the progress of each program toward its goals individually and for the portfolio collectively, identifying performance issues, gaps, and opportunities for improvement. See Section 4.1.4 for more information.

The Company will also leverage its relationships with various parties through the stakeholder process, seeking input on how to better reach customers and program allies alike throughout implementation of the programs. See Sections 1.2 and 4.1.6 for more information on the Company's stakeholder process and Sections 3.2 through 3.4 for further discussion on how trade allies are integrated throughout the implementation process for each of the programs.

***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 and plans for secure data sharing with other program administrators.***

The Company has established effective quality control processes and procedures that it currently utilizes to manage the integrity of its programs offered through the Phase IV Plan. The Company remains committed to designing and implementing robust processes and systems to achieve the energy savings and demand reduction goals established in Act 129 and, where appropriate, will continue to utilize or improve upon those processes already in place.

Sections 5 and 6 present plans regarding data management, quality assurance, and evaluation processes for the Phase V Plan. The Company is committed to working with the SWE to support its efforts evaluating the programs. The Company will conduct both impact and process evaluations to gauge program performance, assess progress toward the achievement of goals, and identify issues requiring intra-course correction. All programs will benefit from periodic feedback from stakeholders and customer satisfaction surveys.

In addition to making implementation adjustments to programs as identified through these feedback channels, the Company will propose any program changes it deems necessary in its annual reporting to the Commission or, alternatively, it will propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Order on Act 129 Energy Efficiency and Conservation Program (entered June 10, 2011 in Docket No. M-2008-2069887) ("Minor Plan Change Order") and as affirmed in the Commission's Phase V Implementation Order at 202.

The Company may gather customer-specific data during the operation of the Phase V Programs and may provide it to its CSPs, the Commission or its contractors, or other parties to support the implementation and EM&V of the Company's programs. The Company is committed to protecting confidential customer data that is shared and any customer-specific data will only be shared after the execution of Non-Disclosure Agreements and Company review and approval of the Commission's and/or third-party's cyber and data security protocols. The Company will enforce privacy and data handling policies and procedures for the Phase V Programs that are consistent with FE PA's customer data security protections, the Final Implementation Order, and any applicable Commission regulations and statutory obligations. Please refer to Tracking and Reporting, Section 5.2.5 for more information regarding secure data sharing.

**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.***

By Order entered on December 7, 2023, at Docket No. A-2023-3038771 *et al.*,<sup>19</sup> the Commission approved the consolidation of Met-Ed, Penelec, Penn Power, and West Penn Power into Rate Districts within FE PA. For Phase V, the Company proposes to use a consolidated EE&C Charge Phase V Rider ("Phase V EE&C-C Rider") with rates that are expressed as a price per kilowatt-hour ("kWh") for the residential, commercial, and street lighting classes and will be billed accordingly. The industrial class will be billed based upon the individual customer's Peak Load Contribution ("PLC") kW. The Phase V EE&C-C Rider rates will be calculated at the FE PA level, with all Rate Districts being charged at the same rate for each customer class that has been allocated EE&C program costs. The revenues collected through these rates will be reconciled to actual EE&C program costs. The Company proposes that the Phase V EE&C-C Rider rates reflecting the programs and budgets of this Phase V Plan become effective for service rendered on or after June 1, 2026, and continue through May 31, 2031. In addition to recovery and reconciliation of EE&C program costs, the cost of the SWE will be included in the Revenue Requirement, pursuant to the Phase V Implementation Order. The amount of revenues that the Phase V EE&C-C Rider rates can recover associated with the EE&C program costs (excluding the SWE) are

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<sup>19</sup> See *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid- Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company, et al.*, Docket Nos. A-2023-3038771, *et al.* (Final Order entered December 7, 2023).

capped by Act 129's 2% spending limit. The Company will submit to the Commission by May 1st of each year a reconciliation of the Phase V EE&C-C Rider.

## **2. ENERGY-EFFICIENCY PORTFOLIO/PROGRAM SUMMARY TABLES AND CHARTS**

### **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).***

Please refer to Appendix B, Table 6, for the quantitative Residential, Residential Low-Income, Commercial/Industrial Small, and Commercial/Industrial Large Portfolio Summaries.

### **2.2 *Plan data: Costs, Cost-effectiveness, and Savings by program, sector, and portfolio (see Tables 1-6).***

Please see Appendix B, Tables 1-6 for the Costs, Cost-effectiveness and Savings by program, sector and portfolio.

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

Please reference Appendix B, Table 7 for the Budget and Parity Analysis summary of the portfolio.

## **3. PROGRAM DESCRIPTIONS**

### **3.1 *Discussion of criteria and process used for selection of programs:***

The Company selected and designed the programs outlined in its EE&C Plan to comply with the Phase V Implementation Order requirements, including:

- Achieving the consumption reduction and demand reduction targets within the allowable budgets;
- Achieving the consumption reduction carve-out from the low-income sector from programs solely directed at low-income customers or low-income verified participants in multifamily housing programs;
- Meeting the budget requirement that at least 50% of all spending is allocated to incentives, and less than 50% is allocated to non-incentive cost categories;
- Including at least one comprehensive program for residential and at least one comprehensive program for non-residential customer classes;

- Offering a well-reasoned and balanced set of measures that are tailored to usage and to the potential for savings and reductions for each customer class; and
- Leveraging external programs and funding to complement the Act 129 programs and encourage further participation within the existing budget constraint.

In setting out to achieve these requirements, the Company pursued the following themes:

- Leverage proven program offerings of the Company and its affiliates in other jurisdictions;
- Align and coordinate program designs, measures, and services with its affiliates where appropriate;
- Incorporate additional program measures or services from other peer utilities or based on the expertise and input from the Company, its affiliates, or its consultant, vendors, and stakeholders;
- Incorporate new program components or measures that are considered promising to target new customer segments, applications or end uses, increase participation or savings, or promote new program concepts or technologies; and
- Establish a program framework that is adaptable and scalable to help the Company meet its energy savings and peak demand reduction targets.

The EE&C Team strove to develop a program framework that not only would meet the Company's targets and requirements for Phase V but also would avoid potential market disruption or confusion from changing program structures between plan cycles. The Company sought to leverage its experience and successes as well as that of its affiliates in other jurisdictions, while seeking opportunities to improve program offerings. The Company endeavored to design a varied portfolio of programs that will be flexible enough to meet an assortment of customer needs, drive customer participation, provide an opportunity for all customers to participate in the programs, and enable the Company to meet its goals. The Company also worked to develop consistent program offerings with its affiliates in other states to leverage economies of scale and target cost savings for its customers.

The Company consolidated its EE&C development efforts for Phase V in alignment with the FIO to achieve cost efficiencies and offer a consistent set of EE&C programs. The EE&C Team also considered program measures and services provided by the Company's affiliates in other jurisdictions and reviewed other existing and potential new program offerings to develop a broad and comprehensive program portfolio. As a result, the EE&C Team created a portfolio of potential program measures and services that draws upon the program offerings of the Company's affiliates and other utilities, other industry programs and measures and incorporates stakeholder, consultant, and vendor input.

The program selection process included the following activities, with several activities encompassing the program development timeline and being performed coincidentally or iteratively:

- The EE&C Team reviewed potential program offerings based on identification by, or feedback from: (i) stakeholders and vendors; (ii) FirstEnergy’s energy efficiency implementation team; and (iii) evaluation contractor and energy efficiency consultant. The team also reviewed other industry sources, the PA TRM, and the PA MPS, along with the programs and measures currently being offered through the Existing Plan and by its affiliates and other utilities.
- The potential program measures and services underwent a screening process carried out by the EE&C Team, which included, among other things, consideration of the anticipated participation, implementation requirements, market applicability, savings and cost impacts. Program measures were grouped by: (i) sectors, such as residential and C&I; (ii) end uses, such as appliances and HVAC; and (iii) program types, such as home performance, and efficient products. Potential program components and measures were reviewed with the Company’s stakeholders, implementation team, and its energy efficiency consultant.
- Program cost characteristics were developed, including, for example, incentive levels; marketing and vendor costs; incremental measure costs; and the availability of other benefits. The value of benefits was developed from savings estimates or formulas that were included in the PA TRM and the SWE Database for those measures covered, historic actual results, and from other industry sources, primarily including TRMs from other states.
- The economic modeling was completed on an iterative basis, and the savings, cost, and PA TRC values were determined. Once all programs were designed and modeled, the Phase V Plan as a whole was evaluated to balance results and costs to ensure reasonableness and compliance in a cost-effective manner. The results from the PA MPS were also used to refine the program designs and assumptions. The projections and results were reviewed with the Company’s implementation team and energy efficiency consultant, incorporating, when appropriate, suggestions for refinement. The PA TRC results for each of the programs included in this plan can be found in Appendix B, Table 14.

Program designs were then finalized based on consideration of each programs’ component and measure contributions to meeting the Commission’s and Company’s requirements and objectives for the Phase V Plan.

**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).**

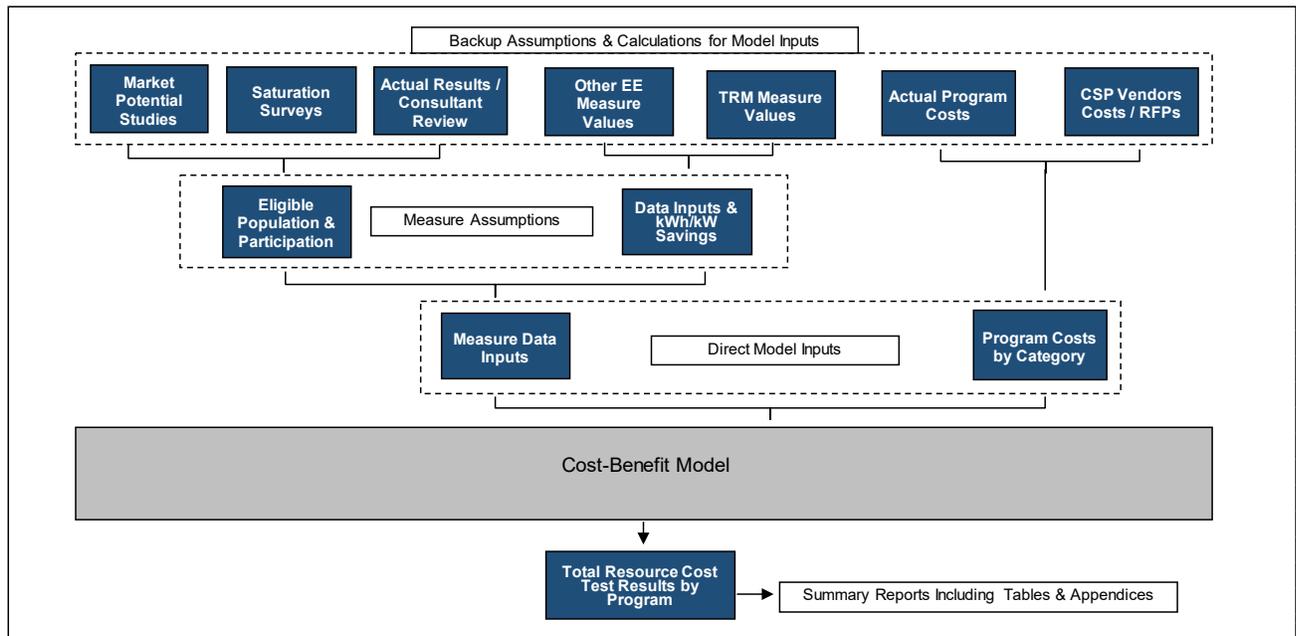
The portfolio design criteria and objectives are discussed in Section 3.1 above. General metrics that define success for each program are associated with the number of participants, kWh savings, kW reductions, dollars spent and cost-effectiveness. See Appendices B and D for the projected metrics associated with the Company’s EE&C Plan and programs.

**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).*

Figure 2 presents a schematic diagram of the analyses the EE&C Team used to develop the EE&C Plan, based on available information, experience of the Company and its affiliates and input from the Company’s consultant and stakeholders.

**FE PA Figure 2: Model Process Diagram**



The Company utilized a comprehensive bottom-up approach in designing the programs and selecting measures for inclusion in the Phase V Plan. Under this approach, the EE&C Team identified potential measures from extensive sources including but not limited to the Electric Power Research Institute (“EPRI”), ENERGY STAR, ESource, other utilities, other jurisdictions, and input from vendors, the Company’s EE&C consultant, CSPs and stakeholders. The EE&C Team established measure eligibility in consideration of the PA TRM, industry ratings such as ENERGY STAR, the Consortium for Energy Efficiency (“CEE”) and other efficiency ratings.

The Company primarily utilized the PA TRM to quantify the energy and demand savings, the “measure life” and other assumptions of the measures included in the Phase V Plan. The PA TRM has been updated for Phase V based on actual data where available, and with input of stakeholders with extensive experience in EE&C programs. In limited cases where the PA TRM did not cover a proposed measure, the Company utilized estimates based on other TRMs and sources as listed in Appendix C, FE PA Table C-2. The Company also utilized these TRMs, the SWE Database or Company calculation, as the source of the incremental costs of measures included in the Phase V Plan. The incentive values are based

on targeting a portion of the incremental cost of the energy efficient equipment versus equipment meeting current standards, with consideration of the current programs, similar programs offered in other jurisdictions, equipment cost and customer payback. For program modeling, the most recent realization rates were incorporated as established by evaluation for the current programs or similar program offerings in other jurisdictions.

The EE&C Team developed the projected participation rates for the proposed portfolio of programs and measures through a multiple step process that considered several factors as discussed in Section 1.2. Iterative refinements included assessing the reasonableness of the projected results based on factors such as, but not limited to, number of customers, estimated costs and savings. Final refinement considered logical and intuitive feasibility about the program and measure assumptions and adjustments were made as necessary, rebalancing the portfolio as appropriate to meet all requirements in accordance with the Final Implementation Order.

**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.**

Sections 3.2, 3.3, and 3.4 present individual program descriptions. The Residential Energy Solutions Program includes measures for geothermal heat pumps and solar equipment. Similarly, the C&I Energy Solutions Programs, Small and Large, includes measures for geothermal heat pumps, combined heat and power (“CHP”), solar and other energy efficiency, and renewable projects through its Prescriptive and Custom measures. Both Residential and C&I Energy Solutions Programs include load shifting and peak demand reduction measures. See Appendix B, Table 8 for the eligible measures, incentives, and rebate amounts.

**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)**

The Phase V Plan includes measures for combined heat and power projects and custom projects which may involve fuel switching from electricity to fossil fuel. The Company will follow all applicable protocols defined in the TRM, evaluation guidance and TRC Test Order to arrive at verified savings and cost-effectiveness for these projects. The minimum standard required for program eligibility is based on positive net energy savings for gas and electric energy in MMBtu's and meeting other program requirements (e.g. usage, size and cost-effectiveness).

**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.**

The Phase V Plan includes energy efficient heat pump and heat pump water heaters across all customer sectors, including Residential, Low-Income, Multi-family (classified as Residential, SCI and LCI), SCI and LCI. Customers who implement these technologies under the Home Electrification and Appliances Rebate (“HEAR”) program may qualify for the Company’s program incentives, should they meet the program and incentive eligibility requirements as defined by the Company’s Plan and programs, and in accordance with the PA TRM. As discussed in more detail in Section 4.2.2, the Company’s program implementation CSPs will provide program and customer education and marketing materials to promote other conservation programs such as HEAR and the braided incentive opportunities for qualifying measures, in conjunction with its programs. Such education and marketing materials will communicate the efficiency requirements, and the Company also anticipates providing aligned incentives or incentive tiers for applicable measures to align with applicable non-Act 129 program eligibility requirements to further support braiding funding.

**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 and disclose all non-Act 129 funding sources the EDC plans to leverage for FTM measure installation. Note that the contribution of FTM measures is limited to ten percent of total plan savings. (2025 IO at 78)**

FTM measures are included in the Residential, SCI, and LCI sectors of the Phase V Plan. The primary objective of the FTM components is to promote and achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and help mitigate growing resource adequacy concerns in the State. While the Phase V Plan was designed to achieve the Company’s goals with no energy savings or demand reductions from FTM measures, the Company intends to identify and promote energy efficiency and demand reductions through Company and other project developer initiatives implemented during the course of Phase V supporting achieving energy savings and system load relief, including but not limited to the Company’s Long Term Infrastructure Improvement Plan(s) (“LTIIIP”), its Operation and Maintenance (“O&M”) plans, and other Company or other project developer initiatives.

Under the FTM program component, the Company will engage and coordinate with these FTM initiatives to target energy savings and peak load reductions from the corresponding improvements. The Phase V Plan budget includes the costs associated with the Company’s EE&C department identifying, promoting, and coordinating with the implementation of applicable Company and other project developer initiatives. The Company will limit the

contribution of FTM measures to ten percent of the total Plan savings in accordance with the Phase V Implementation Order.

See Sections 3.2, 3.4, and 3.5 for more information on these initiatives.

**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)**

The Company considers measures and/or combination of measures or projects, including whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions such as but not limited to weatherization, HVAC, custom retrofit projects and energy management initiatives to be comprehensive. The Company’s Residential, Low-Income and Commercial and Industrial Energy Solutions programs are comprehensive programs that targets long-lasting energy savings through comprehensive and whole home whole building solutions. See Appendix B, Table 8 for a complete list of measure offerings in the Phase V Plan that are considered to be comprehensive.

**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)**

The Company has included Behavioral program components in its Residential Energy Solutions Program to target achieving behavioral energy efficiency and coincident peak demand reductions. The Company plans to provide ongoing communication and education on its Time of Use (“TOU”) rates and the customer’s energy usage through the Behavioral program components. These communications will promote, educate and coach customers on their participation in TOU rates to help customers save money and drive persistent peak demand reductions.

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

The table below summarizes the residential programs included in the Phase V Plan, along with a description of each program:

**FE PA Table 4: Residential Program & Descriptions**

<b>FE PA Table 4: Residential Programs &amp; Descriptions</b>	
<b>Proposed Phase V Program</b>	<b>Program Description</b>
<b>Residential Programs</b>	
Residential Energy Solutions Program	<p>The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.</p>
<b>Residential Low-Income Programs</b>	
Low Income Energy Efficiency Program	<p>This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.</p>

Below are the program descriptions for the Residential sector included in the Phase V Plan:

**Program Name and Program years during which program will be implemented**

Residential Energy Solutions Program

**Program years during which program will be implemented-**

June 2026 - May 2031

**Objective(s)**

The primary objective of the program is to educate customers on energy efficiency to promote adoption of energy efficiency and conservation mindsets and measures, to have customers adopt energy savings behaviors, to promote the purchase and installation of energy efficient products, to remove older inefficient operating appliances from customer homes (to prevent them from being maintained as a second unit or transferred to another customer), to encourage customers to retrofit existing technologies with more efficient ones, to encourage residential developers, builders, and contractors to build energy efficient new homes, and to promote other energy efficiency opportunities to customers that conserve and save energy in their homes.

This program includes a FTM component. The primary objective of the FTM component of this program is to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and can help mitigate growing resource adequacy concerns in the State.

This program also includes a DLS and PDR component. The objective of the DLS & PDR program component is to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. This component includes a combination of event based and daily load shifting strategies including but not limited to behavioral daily load shifting, behavioral demand response, connected device load shifting and demand response and custom demand response tailored to customer opportunities.

**Target market – including market size to help frame participation estimates (e.g., number of households, electric sales etc.)**

For the EE&C Program Components, the target market generally includes all residential customers of the Company that have program eligible applications or meet other program prerequisites. More specifically, the Company has 1.8 million residential customers and the target market for this program ranges from the Behavioral component which typically applies to a large percentage of the customer population to comprehensive measures offerings that, due to their measure life, generally apply to a smaller subset of the total customer base.

For the Daily Load-Shifting and Peak Demand Reduction Component, the target market are customers with behavioral opportunities or qualifying connected devices. Similar to the EE&C program components, the behavioral components apply to a larger portion of the population while

the connected device component requires program eligible equipment (e.g. customers with smart thermostat controlled electric HVAC, batteries, EV's) that applies to smaller subsets based on the saturation of these devices.

The Company developed participation projections in consideration of many factors (e.g. historical performance, input from its Consultant, implementation team and other stakeholders, etc.) as discussed in Section 1.2 which inherently incorporates the target market for each of the program components and measures. See Appendix B, Table 9 for a list of participation assumptions by measure.

**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**

### **Program description**

The Residential Energy Solutions program is an umbrella program that engages customers through multiple program components to provide energy efficiency and energy usage education and awareness. The program is designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels and also provides a means to encourage customers to take steps toward energy-efficiency in their homes as well as to install comprehensive measures and whole home solutions through promoting or providing access to efficient measures, recommendations, and/or incentives. The program provides the following program components to customers:

### **Products:**

- **Product Rebates:** This subcomponent promotes the purchase and installation of efficient residential products. The component will provide incentives for energy efficient appliances, as well as other energy efficient products. These incentives will be offered through a variety of channels including downstream rebates to customers, reduced point of sale costs, an instant rebate through a dedicated website, and midstream or upstream incentives and support for manufacturers, distributors, and retailers that sell qualifying energy efficient products. This program component will provide marketing support and education to customers, retailers, and other program allies on qualifying energy efficient products.
- **Appliance Recycling:** This subcomponent provides an incentive, pick-up, and recycle service to customers for turning in qualifying, inefficient, operating appliances. Qualifying appliances will be picked up at the customer's residence or other drop-off locations and recycled in a compliance with the U.S. Environmental Protection Agency's ("EPA") Responsible Appliance Disposal ("RAD") program criteria. In addition, periodic events may be offered at centralized drop-off locations where customers can drop off smaller

qualified inefficient operating appliances such as, but not limited to, dehumidifiers and room air conditioners.

- **Agricultural:** The Agricultural subcomponent provides prescriptive and custom-based incentives for efficient agricultural equipment. This program component will support and/or provide downstream approaches and may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors and retailers that sell qualifying energy efficient agricultural products. Incentives will be offered for individual measures and retrofit projects.

### **HVAC and Solar:**

- This component promotes the purchase and installation of qualifying energy efficient HVAC and solar photovoltaic (“PV”) equipment at residential homes. This component provides incentives to customers through a variety of channels which may include downstream rebates, reduced point of sale costs, midstream/upstream incentives and support for contractors, distributors, manufacturers, and/or retailers that sell and/or maintain qualifying energy efficient HVAC products and solar PV equipment. The program component also provides promotional support such as point-of-sale materials, training, and sponsorship of and participation in promotional events to highlight the benefits of the purchase, installation, and/or maintenance of energy efficient HVAC products and solar PV equipment.

### **Behavioral:**

- The Behavioral component educates customers regarding their home energy usage and provides recommendations to implement and adopt energy efficiency and conservation measures to reduce their energy usage and peak demand. This component provides customized home energy reports about each customer’s energy usage, as well as analysis regarding their usage over time, with specific tips and recommendations that promote energy efficiency and conservation and peak demand reduction opportunities and additional program offerings available to them. The reports help customers understand how their energy consumption compares to similarly sized and equipped homes; understand how their energy use changes over time and across seasons; and develop goals and strategies to reduce their energy use and load during peak periods. This program component also offers an online audit tool that similarly provides recommendations for home energy efficiency and conservation opportunities and information regarding other programs that may benefit the customer. The online audit tool converts the customers’ input of their energy usage characteristics into information the customers can understand and act upon, such as the cost of heating and cooling their homes, a usage comparison graph, and tips on how to save energy.

### **Comprehensive Audit:**

- The Comprehensive Audits component provides a customer with a comprehensive audit with direct installation of measures performed by Building Professional Institute (“BPI”) Certified auditors. The audit includes a diagnostic test of the home’s air infiltration, plus a

customized report that provides recommendations for home energy efficiency improvements such as but not limited to insulation, air sealing and duct sealing. The program component provides financial incentives towards the installation of qualified comprehensive measures, including but not limited to HVAC and solar PV.

**Multifamily:**

- The Multifamily component provides energy efficiency education to multifamily building owners and building tenants while completing energy assessments, installing standard energy savings measures, and recommending energy efficiency improvements. This program component will provide financial incentives towards the installation of qualified comprehensive energy savings opportunities, including prescriptive equipment replacement and custom retrofit projects, including but not limited to, insulation, air sealing, duct sealing, heat pumps, heat pump water heaters, and residential appliances.

**New Homes:**

- The New Homes component provides incentives to builders for achieving energy efficiency savings and targets through a combination of building shell and installed measures, including appliance and equipment upgrades. To qualify for this component, the builder must construct the home to meet the energy efficiency requirements established by the ENERGY STAR program or build at a higher efficiency level than the currently adopted building code.

**Front-Of-The-Meter (“FTM”):**

- Through implementation of upgraded designs, equipment and operation of the Company’s energy delivery system, the FTM component will deliver system energy savings and peak load reductions. Company and project developer initiatives supporting such system load relief include but are not limited to the Company’s LTIP, its O&M plans, and other Company or project developer initiatives. Under the FTM program component, the Company will coordinate with these FTM initiatives and operations to target energy savings and peak load reductions from the corresponding improvements.

Potential improvements that can provide energy savings and peak load reductions include but are not limited to: replacement of and upgrades to energy delivery equipment, voltage optimization (e.g., Conservation Voltage Reduction (“CVR”)), efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar PV projects that are not associated with an existing retail meter.

**Daily Load Shifting (“DLS”) and Peak Demand Reduction (“PDR”):** The Residential DLS & PDR program component is comprised of two program subcomponents - Connected Devices and Behavioral. Each subcomponent is designed to deliver load reductions on a daily and peak day event basis.

- Connected Devices: Participating customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods. This subcomponent includes customers’ smart thermostats for control of heating, ventilation and air conditioning

equipment, managed charging of electric vehicles, battery storage or other customer equipment to reduce load of connected devices during peak load periods. This subcomponent will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance.

- **Behavioral:** The Behavioral subcomponent will encourage residential customers to reduce load during peak load hours on a daily and/or peak day event basis during the PA Act 129 summer and winter peak load periods through messaging and education. Messaging and education may include bill alerts, Time-of-Use (TOU) education associated with their energy usage, and TOU rate and EV coaching so that customers with electric vehicles can better understand the value of switching to TOU rates. Customers will be able to opt-out of the program component at any time.

**If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.**

The Company considers the Residential Energy Solutions Program to be a comprehensive program. The program provides measures and/or combination of measures or projects, including whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions. More specifically, the program promotes and provides comprehensive measures to residential customers, including both an assortment of individual comprehensive measures as well as whole house treatments. The program includes home audits with additional incentives for comprehensive home retrofits as well as incentives for efficient new home construction. These home retrofit and new construction measures engage builders, developers, contractors, and program allies in providing comprehensive measures and projects across the residential sector.

Multiple measures included in this program have long-lasting expected useful lives and that result in deep savings are considered to be comprehensive, and include program measures such as HVAC equipment (e.g. heat pumps, air conditioners), appliances (e.g. heat pump water heaters) new construction, weatherization, solar PV, etc. Several other program measures provide opportunities for prescriptive equipment, and direct install so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase the efficiency and operation of their home, and program components also provide opportunities for customers interested in whole home/comprehensive solutions. See Appendix B, Table 8 for a list of measures that are identified as comprehensive.

**Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.**

With oversight from the Company, the CSP(s) hired by the Company to implement the Residential Energy Solutions Program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and also other Act 129 programs where applicable. The program components will be cross-marketed, where practical, in conjunction with the other Residential Energy Solutions Program component offerings as

additional savings and incentive opportunities that are available or as a specific recommendation for energy savings opportunities to customers. For example, in the case of the Behavior Component, the customer home energy reports are configured with marketing modules that promote additional residential program offerings.

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding program and measure eligibility, incentives, and other program details to promote and market program opportunities to customers. As part of these activities, time will be spent detailing the various program components as well as other applicable Act 129 programs that may provide additional savings and increased participation opportunities for the Company's customers.

**Implementation strategy (including expected changes that may occur in different program years)**

The Company will perform overall administration and oversight and will contract with implementation CSP(s) who will directly administer and manage delivery of the program components. Implementation activities include, but are not limited to, marketing the program through multiple channels, providing customer education and awareness of the program components or their participation, validating customer eligibility, processing incentives, conducting outreach to and securing partnerships with retailers, wholesalers, distributors, manufacturers and trade. Customer engagement, sales channels, and program component strategies may include:

- Post Purchase (Downstream) Rebate applications will be available online and/or in stores to submit either electronically or in hard copy with proof-of-purchase for qualifying equipment.
- Point of Sale Rebates: Prescriptive rebates will be made available at the point of sale for selected products. Point of sale rebates are paid to a retailer or manufacturer who apply the rebate to reduce the retail price paid by the residential customer in the retail store.
- Appliance Recycling: Incentives will be provided to customers for recycling qualifying, inefficient, operating appliances. Offering an incentive for the drop-off or pick-up and removal of an appliance prevents the appliance from being maintained as a second unit or being transferred to another customer. Customers can schedule an appointment by phone or online, or with participation at a drop-off location.
- Midstream or Upstream Rebates: Midstream and/or upstream rebate channels may be offered for select equipment to encourage purchase of energy efficient products. The Company will work with retail partners (such as Home Depot, Lowe's, etc.), distributors, and/or manufacturers to assure that measures are available throughout their footprint. Midstream or upstream rebates encourage market transformation and wider availability of efficient equipment.
- Behavioral: The CSP will conduct the energy usage analysis and develop and deliver customized home energy reports to customers by mail and/or email. The home energy reports will provide customers with meaningful comparisons regarding their energy usage relative to a peer group, based on home location, size, and other criteria. The reports deliver

information in a simple way, providing customers with the necessary information to take appropriate actions to reduce their energy use, along with marketing modules that promote additional residential offerings. Customers will also have access to online functionality provided under the program component that customers can easily utilize to see additional tips on how to save energy and review their historical usage. For the online audit, the Company plans to utilize its enterprise-wide Online Audit tool.

- **Comprehensive Audit:** The CSP will be responsible for the implementation of the program, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP will engage trade allies such as insulation, weatherization, heating and cooling contractors who will be recruited to partner in this program component in addition to BPI Certified auditors. The CSP will utilize the trade allies' network to further promote comprehensive retrofits and incentives.
- **Multifamily:** The CSP will be responsible for the implementation of the program, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP will engage trade allies, such as insulation, weatherization, heating, and cooling contractors, who will be recruited to partner in this program component in addition to professional or BPI Certified auditors. The CSP will utilize the trade allies' network to further promote comprehensive retrofits and incentives.
- **New Construction:** The CSP will be responsible for marketing activities, such as educational materials, promotional brochures, and presentations, to target and conduct outreach to home builders to inform them of the program offering, components, and benefits and to achieve program buy-in and their participation. This program supports implementation of builder or contractor-installed energy efficient appliances, HVAC, and other eligible systems and equipment in new residential homes, as well as measures addressing building shell and other energy consuming features.
- **Trade Allies:** The Company will establish a network of trade allies to promote certain measures of the program component to the customer where applicable. The trade ally network will consist of qualified installation contractors and other trade service professionals. Trade allies will be able to leverage the program and offer customers rebates through their normal course of business.
- **Front-Of-The-Meter:** The Company will coordinate with its engineering, operations, and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.
- **Daily Load-Shifting and Peak Demand Reduction:** The Company plans to contract with experienced CSP(s) to implement the various components supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program component. The Company will perform overall administration and oversight of the program.

By developing relationships with both program and trade allies, the program will develop a broad reach across the marketplace and solicit feedback to ensure incentives and measures are impacting the market as designed. The Company's implementation CSP(s) will work with program and trade allies supporting their participation and installation of qualified energy efficient products. Targeted program and trade allies may include:

- Efficient equipment retailers, distributors, and manufacturers
- HVAC, appliance, and solar contractors and installers
- General contractors, plumbers, electricians, and other trade service professionals

The Company anticipates federal standard changes may become effective during the Phase V Period and if so, will need to adjust its program implementation, marketing and other program processes in conjunction with these changes as they become effective following the PA TRM or other evaluation guidance. Please refer to Section 6.6 for more information regarding changes to federal standards and how these are considered in the Company's Plan.

Appliance Recycling will be delivered through an implementation CSP that specializes in proper appliance recycling. The CSP will be responsible for marketing, scheduling appointments, picking up / recycling of qualified working appliances, coordinating pickup of smaller qualified inefficient operating appliances at centralized drop-off locations, processing rebates, and handling customer inquiries. The CSP will also market, schedule, staff, and manage the pick-up and recycling of qualified working appliances at special events. Each unit collected is disposed of in an environmentally responsible way, in compliance with EPA's RAD criteria. The Company will perform overall administration and oversight of the component.

For the FTM program component, the Company will coordinate with its engineering, operations and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.

For the DLS and PDR program component, the Company plans to contract with experienced CSP(s) to implement the various subcomponents supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program. The Company will perform overall administration and oversight of the program.

Leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. The CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to relevant program components. The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to the Inflation Reduction Act ("IRA") of 2022 IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. Please reference Section 4.4 for additional information.

### **Program issues and risks and risk management strategy**

The risks associated with this program are primarily obtaining sufficient customers to participate in the various program components. Well-established and innovative outreach and marketing techniques will be used to promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company's budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from certain end uses (e.g. Solar) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other lower-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to the program components include:

- **Initial Cost of Energy Efficient Products and or Home Retrofits:** Relative to the market baseline, energy efficient products often carry a higher upfront cost but a lower lifetime operating cost, and home retrofits are more expensive and more involved than purchasing efficient equipment. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to also lead to higher upfronts costs for efficient equipment. Therefore, customers may not appreciate the lifetime operating cost advantage of energy efficient products and, consequently, a higher upfront cost is a barrier to purchasing energy efficient products. Home retrofits often require more participant investment, time and commitment, and thus this additional investment and commitment is a barrier. To address these barriers, the company is working to ensure incentives align with incremental costs to help reduce the initial cost of equipment and retrofits.
- **Customer Awareness and Engagement:** Residential customers may not be aware of the benefits of installing energy efficient opportunities and products for their home, and/or lack the time and resources to pursue energy efficient products when replacing existing equipment. To address this barrier, the Company will educate customers on the benefits of installing energy efficient products through targeted marketing, ensure that incentives are easily accessible, and encourage market transformation and stocking of energy efficient products through midstream incentives. Educational materials will focus on the lower operating costs and the savings customers may obtain from making the choice to purchase eligible high efficiency products. Through outreach efforts, the Company will seek to partner with retail and wholesale entities to promote program offerings, to coordinate with other conservation programs, and also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of available incentives. The Company will cross-promote programs to spread awareness of the range of energy efficiency opportunities and incentives proposed in this Plan.

- **Sufficient Stocking and Availability of Energy Efficient Products:** The Company will look for opportunities to develop and promote a midstream component for specific products to encourage high levels of participation by incenting midstream market actors and/or directly discounting the cost of the energy efficient products at the time of sale. In addition, stocking and availability of energy efficient products may be challenged in relation to supply chain disruptions resulting from potential policy decisions related to newly imposed tariffs.
- **Trade Ally Awareness and Training:** To meet certain program component participation goals, sufficient contractors must be available to undertake the work. The Company will work with the implementation CSP(s) to address this barrier by trying to engage and recruit more program and trade allies to participate in select program components.
- **Daily Load-Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty with customer participation and program component performance in the DLS program design and for winter demand response. More specifically, it is unknown how customers and the program components will perform in daily load-shifting across over 400 hours per year and in the winter period, both of which are new to PA and across the industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

Additional risks include the measurement and verification of the peak load reduction impacts given new methodologies and protocols for daily load-shifting. The CSP(s) for the program components will be required to monitor progress for participation and impacts, and to provide contingency associated with customer non-response, opt-outs or lower verified impacts. The CSP will also be required to provide reporting to the Company detailing its performance and to promptly react to any deficiencies.

The Company and the implementation CSP(s) will monitor program participation and performance through feedback channels to assess, where applicable, the effectiveness of program design, delivery methods, outreach efforts, incentive levels, marketing/advertising, program and trade ally suggestions, or other improvement opportunities to overcome barriers to program success. Please refer to Section 4.1.2 for more information on potential risks and the Company's anticipated risk mitigation strategies.

### **Anticipated costs to participating customers**

Customers will have to pay the balance of energy-efficient equipment, products, and installation costs not covered by the rebate. Please review Appendix B, Table 7 for the incremental cost and incentive range for each measure in this program.

There are no incremental costs to customers associated with FTM EE&C measures included in this program. For DLS and PDR program components, there are no known anticipated costs for customers to participate, as this component primarily targets behavioral or operational changes and utilization of existing customer equipment for participation.

### **Ramp up strategy**

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program components being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. Kindly reference discussion in Section 1.4 and 4.1.5 for more details on ramp up.

For the DLS and PDR program component, since demand response programs were not offered in Phase IV and daily load shifting and winter demand response are new concepts for Act 129, it is anticipated that it will take four to six-months to start-and ramp up the DR program offerings. Because of this ramp up period, the Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026. This supports the CSP obtaining customer enrollments such that the Load Shifting and Peak Demand Reduction program component can begin implementation June 1, 2026. Refer to the discussion in Section 1.4 for more details on ramp up.

### **Marketing strategy**

EE&C Program Components:

In general, the Company's implementation CSP(s) will develop and administer the marketing plan for each program component. Both multi-pronged direct and indirect marketing campaigns will be implemented to promote the program components. Customers will be provided broad-based energy efficiency awareness campaigns, including but not limited to, web-based engagement and information, digital advertising, social media, hard-copy materials, and the Company's website to promote awareness, as well as tie-ins with other programs. In addition, the Company may utilize school and community based educational and promotional offerings to raise awareness of energy saving opportunities, including giveaways, handouts, and takeaways.

Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the program components where applicable. A combination of strategies and approaches will be used to train and support retailers, distributors, and other program allies such as media advertising, outreach community forums, events, and direct outreach to customers. Further, the program components will be cross marketed, where practical, in conjunction with the online audit, residential audit, and home energy report offerings.

The CSP(s) for the Comprehensive Audit and Multifamily program components will also market and promote comprehensive retrofits to customers, including the cost-saving benefits, information on typical payback timeframes and rebates. In addition, each participant will be provided applications and marketing materials for other applicable program offerings at the time of the audit. The CSP(s) will attempt to follow up with participants to measure satisfaction with the program component in general and with delivery personnel. The CSP(s) will also identify customers who did not complete additional retrofit measures to understand the barriers to moving forward with comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program delivery. The marketing strategy for the Multifamily program component will focus on informing property owners, managers, associations, tenant groups, municipalities, and community organizations about the availability and benefits of the component and how to participate.

The CSP for the New Homes program component will target home builders, Home Energy Rating System (“HERS”) raters, and eligible customers to inform them of the program offering and the associated benefits through education via discussions, newsletters, and e-mails to the building community and through the Company’s website. The CSP will actively recruit participants through existing builder and rater partners, other utility programs, local home builder associations (“HBAs”), green building programs, and other allies who have established relationships within the residential construction community.

EE&C Program Component Marketing activities may include:

- Point of purchase displays and materials and special “instant sales events” or limited time offers.
- Targeted outreach through direct mailings and presentations to inform customers, builders, developers, property owners, property managers, apartment associations, tenant groups, municipalities, and community organizations about the benefits of the program offerings and participation processes.
- Brochures that describe the benefits and features of the program components as well as the enrollment and participation processes. The brochures will be available for various public awareness events (community events, presentations, seminars, etc.).
- Bill inserts, bill messages, email, direct mail, social media platforms, billboards, and pop-up stores.
- Company website content providing program component information resources, contact information, online application forms and links to other relevant service and information resources.

- Customer representatives trained to promote the program components to customers.
- Energy assessments of properties that may include the direct installation of standard energy savings measures or giveaways to engage, educate, and promote participation by the customer, building owner, or facility manager in the other program component offerings, thereby targeting deeper savings.
- School and community-based engagement events, energy efficiency awareness programs, promotional initiatives, and energy saving giveaways.

Daily Load-Shifting and Peak Demand Reduction Program Component:

The marketing of this component will be provided by the CSP(s) under the direction of Company personnel. Marketing activities will inform customers of the component offerings and the benefits of participation. For the DLS and PPDR component of the program, the Company or the CSP may also recruit device manufacturers, providers, and other program allies throughout implementation to promote and achieve customer participation. The Company or the CSP may also market and/or cross market the component offerings to customers in conjunction with or through other Company EE&C program component offerings (e.g. smart thermostat rebates).

**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**

Please refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the Phase V Period, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications that are available from participating retailers, the program website, or participating contractors;
- Online rebate forms or instant rebates through a dedicated website;
- Midstream/upstream incentives provided through participating distributors and/or retail outlets; and

- For DLS and PDR subcomponents - Initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year.

In instances where incentives are not immediately available, the Company will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the right to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual reports.

For the FTM program component, eligible measures include energy delivery system upgrades, installation of equipment (e.g., solar or energy storage equipment) on the energy delivery system, or enhanced system operations that achieve energy savings and peak load reductions. There are no incentives associated with FTM EE&C measures included in the Company's Plan.

### **The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC**

For EE&C component offerings, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon program performance, customer response and market conditions over the Phase V Plan period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultant, or CSPs, stakeholder input, and industry benchmarking. Incentives will vary depending on factors including but not limited to the specific program component, end-use and measure, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace.

For the DLS and PDR component of this program, the proposed level of incentives is primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company.

### **Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days**

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be postmarked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all project measures installed meets

Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

### **Key schedule milestones**

As discussed under the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- November 26, 2025: Phase V Plan filed with the PA PUC
- 4Q2025: RFP issued for program implementation CSP(s)
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program to begin implementation, 2026

### **Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide Evaluator (SWE)**

The Company's CSP for EM&V services will be required to perform evaluation, measurement, and verification of the program in accordance with the state's Evaluation Framework. Anticipated activities for this program may include:

#### **Products:**

- Verify that qualified products have been sold by participating retailers, contractors, distributors, or manufacturers seeking payment of incentives by auditing a sample of their claims.
- Verify that new, more efficient products have been installed or projects completed through review of documentation provided by participating retailers, contractors, distributors, or manufacturers, as well as individual participant rebate applications.

#### **Appliance Recycling:**

- Verify that the planned number of targeted appliances are collected and properly recycled and that the calculations of kWh and kW savings from appliance retirement are accurate and compliant with applicable requirements including those contained in the TRM.

#### **Behavioral:**

- Program impacts will be measured through billing analysis with a randomized control trial approach in accordance with the PA Evaluation Framework. The EM&V Contractor will perform participation uplift adjustments and avoided decay calculations in accordance with the PA TRM and SWE guidance.

#### **Comprehensive Audit and Multifamily:**

- Verify that the planned number of each type of audit is performed on time and within budget. A sample of audits will be reviewed to check that their actual costs do not exceed the contract cost and that customers are satisfied with the service.

- Verify that existing EE&C opportunities are properly quantified to enable accurate tracking and documentation of energy efficiency and demand reduction.
- For installed measures and retrofit projects, verify that the installed measures and comprehensive diagnostics are performed as supported on program applications.

**New Homes:**

- Select a representative sample of homes for comprehensive measurement and verification, including reviewing both the baseline and as-built home properties as documented in a RESNET accredited building simulation program.
- Verify the models and their associated impacts for sampled homes through on-site data collection. Gather as-built data through independent on-site visits and review of data gathered during quality assurance / quality control visits.

**Front-Of-The-Meter:**

- For the FTM component of this program, the Company, in coordination with its EM&V CSP, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions in accordance with applicable evaluation guidance and will include the results in its subsequent semi-annual reports. This will include a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.

**DLS and PDR:**

- The connected device subcomponent of the DLS and PDR program component will utilize AMI and/or device data analytics to evaluate the usage reduction during peak load events. For the residential behavioral subcomponent, as with other behavior programs, eligible participating customers and control groups will be randomly selected to support performance evaluation. Hourly data of the behavioral participant and control group(s) will be evaluated to support normative comparisons and calculation of load reductions. The connected device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate.

The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes, and technology.

**Administrative requirements- include internal and external staffing levels expressed on a full-time equivalent (FTE) basis**

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. Please refer to Sections 4.2.1 through 4.2.3 of the EE&C Plan for more

details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

See Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$1.3M, which represents approximately 7 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

**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**

Please reference Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

For the FTM component of this program, FTM measures are limited to ten percent of the EE&C plan portfolio MWh and MW savings in accordance with the Commission's Implementation Order. While no energy savings, demand reductions or project funding were included in the projections, the Company intends to identify Company and project developer initiatives implemented during the course of Phase V supporting energy savings and system load relief. See Section 3.1.6 for additional information.

**Estimated participation – include tables with key assumptions of estimated participation. See Table 9.**

Please see Appendix B, 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)**

Kindly refer to Appendix B, Table 10.

For the FTM component of this program, the program budget includes administrative, tracking and reporting and evaluation costs provided by the Company's EE&C staff and or its implementation CPSs

To timely and efficiently respond to market conditions and sustain program operations and momentum, support increased customer participation and benefits, and the Company's ability and efforts to achieve its goals, the Company reserves the right to reallocate up to 10% of the total

Program budget between sectors and programs. The Company will include discussion and tables detailing any reallocation of program budgets as part of its semi-annual reports.

**Estimated percentage of sector budget attributed to program**

Please see Appendix B, Table 6, Appendix B, Tables 10 and 12.

**Cost-effectiveness- include gross and net TRC and net-to-gross (“NTG”) ratio for each program. For gross tables, net-to-gross ratio (“NTGR”) should be “1.0.” See Table 14, Gross and Net versions. (2025 IO at 217-221)**

Details are set forth in Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. Please also see Appendix B, Table 7 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

**Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.**

Other utility programs were not benchmarked for the purposes of EE&C program design or program participation assumptions. Please see Sections 1.2, 3.1, and 3.2 for information used to inform the program design and program participation assumptions.

**Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved population**

The Residential Energy Solutions program was designed to target customers living in all forms of housing - from renters to single family homeowners to multifamily dwellings. The program includes direct or targeted components that engages customers in each of the various housing segments, including residential, low-income and multifamily, and new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing customers with energy efficiency education as well as information regarding other program services and opportunities upon which they can act. For Phase V, the Company also plans to participate in community-based events and marketing activities to help program services reach historically underserved populations and provide these customers among different housing and ownership types additional outreach, education and awareness regarding program opportunities for improving energy efficiency in their home.

In addition, to further drive participation and energy savings to all residential customers, the Company plans to collaborate, coordinate and work with other conservation programs to promote and leverage braided funding opportunities to residential customers installing qualifying energy efficiency projects. Programs such as IRA Home Efficiency Rebates (“IRA HER”) and the Home Electrification and Appliance Rebate (“IRA HEAR”) are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. The Company will

collaborate with the DEP and other state-administered and third-party programs to promote and leverage these additional incentive opportunities to provide program services to eligible customers.

### **Other information deemed appropriate**

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. For the Phase V Plan, the Company is consolidating the former Energy Efficient Homes and Energy Efficient Products program, now called the Residential Energy Solutions program, to better support leveraging cross program promotions and offerings to customers and achieve additional participation and energy savings. In addition, the following summarizes other key changes to this program:

#### Products:

- Updated incentive amounts for recycling, appliance rebate, and other products
- Added recycling measures for Low Volume Refrigerators (Mini Fridge) and Coolers
- Projected anticipated code changes for Refrigerators, Freezers, Clothes Dryers and Heat Pump Water Heaters
- Added new measures for Linear LED Fixtures, Coolers, Clothes Washer/Dryer Combo, LED Nightlights and Holiday Lights
- Removed Water Coolers and Ceiling Fans
- Removed Consumer Electronics
- Added Agriculture measures (as extension of offering to Small C&I Customers)

#### HVAC and Solar Component

- Updated incentive amounts
- Removed Circulating Pumps, HVAC Quality Install, and Ductless Mini-Split A/C
- Added Window Heat Pumps, and Resistance Electric Heat to Heat Pump, Duct Minisplit Heat Pump, and PTHP measures

#### Behavioral

- No changes from Phase IV

#### Multifamily – Res

- Updated incentive amounts

#### New Homes - Res

- Updated incentive amounts

#### Comprehensive Audits

- Updated incentive amounts
- Added discrete measures for Solar PV, Heat Pumps, Central Air Conditioners and Heat Pump Water Heaters.

- Transitioned EE Kits and School Education to outreach and marketing.

Daily Load-Shifting and Peak Demand Reduction

- New Component offering

Front of Meter (FTM) Program

- New Component offering

**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.***

**Program Name and Program years during which program will be implemented**

Low-Income Energy Efficiency Program

**Program years during which program will be implemented**

June 2026 - May 2031

**Objective(s)**

The primary objectives of this program are to help low-income households improve their energy efficiency and control energy spending through a variety of program offerings that: (i) provide energy efficiency and conservation and energy usage education; (ii) promote adoption of energy saving behaviors; (iii) provide or install basic to comprehensive, prescriptive energy efficiency, and comprehensive whole home measures; (iv) encourage customers to turn in inefficient appliances, retrofit existing end-use equipment with more efficient ones, or implement new efficient end-use equipment; and (v) achieve the construction of energy efficient new low-income homes.

**Target Market- including market size to help frame participation estimates (e.g., number of households, electric sales etc.).**

The target market for this program is customers who are income-qualified up to 150% of the Federal Poverty Income Guideline (“FPIG”). The Company has approximately 1.8 million residential customers, of which a subset are income qualified up to 150% of the FPIG but are not fully known by the Company. The target market for the various program components among this subset of residential customers varies broadly based on multiple factors such as the customers’ historical energy usage, the saturation of eligible measures within these households, LIURP program participation or eligibility and others. As more fully addressed in Section 1.2, the Company developed participation projections in consideration of many factors (e.g. historical performance, input from its Consultant, implementation team and other stakeholders, etc.) which inherently incorporates the target market for each of the program components and measures. See Appendix B, Table 9 for a list of participation assumptions by measure.

**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**

### **Program description**

The Low-Income Energy Efficiency Program is an umbrella program that includes multiple program components, delivery channels, and vendors to support broad customer engagement, education, and participation to achieve energy savings in low-income households. The program includes direct or targeted offerings that both engage customers by providing them with energy efficiency education as well as information regarding other available program services and opportunities. The program offerings incorporate strategies to change behaviors and provide prescriptive measures, direct install measures, and whole home/comprehensive solutions at no-cost as well as enhanced incentives for select measures that collectively address the initial cost barrier to achieve participation by low-income customers. The program also targets multifamily buildings and the construction of new energy efficient low-income housing. This program includes the following EE&C components:

#### **Products:**

- This component promotes the purchase and installation of select efficient residential products, and to turn in and recycle qualifying, inefficient, operating appliances, with enhanced incentives for income-qualified customers. Qualifying appliances for turn in and recycling will be picked up at the customer's residence or at drop-off locations and recycled in a compliance with the EPA's RAD program criteria.

#### **HVAC:**

- This component provides the opportunity to incentivize the installation of qualifying energy efficient space and water heating heat pump equipment in coordination with other state or federal conservation programs.

#### **Braided Funding Audits:**

- This component provides the opportunity to co-fund audits or technical studies as part of an incentive towards an overall project including installation of qualifying measures in coordination with other state or federal conservations programs in which audit services are provided (e.g., DEP's IRA programs) for participation.

#### **Behavioral:**

- The Behavioral program component educates income-qualified customers regarding their home energy usage and provides customized recommendations to help low-income households improve their energy efficiency and control energy spending. The CSP will use data analytics to identify and target participation among low-income customers and will provide customized Low-Income Home Energy Reports promoting low to no-cost recommendations, high bill usage alerts, TOU education and coaching and other program opportunities available to them. The reports will help customers to understand how their energy consumption compares to similarly sized and equipped homes; understand how

their energy use changes over time and across seasons; and identify opportunities to reduce their energy use. This component also offers an online audit tool that similarly provides recommendations for home energy efficiency and conservation opportunities and additional program opportunities available to them. The online audit tool converts the customers' input of their energy usage characteristics into information the customers can understand and act upon, such as the cost of heating and cooling their homes, a usage comparison graph, and tips on how to save energy.

**Multifamily:**

- The Multifamily program component provides energy efficiency education to multifamily building owners and tenants through energy assessments that examine major end uses including appliances, lighting, and HVAC systems, including building systems and building shell, and provides recommendations for energy efficiency improvements. The program component provides direct installation of measures and financial incentives towards the installation of building and common area energy savings opportunities including prescriptive equipment replacement and custom retrofit projects, including but not limited to, insulation, air sealing, duct sealing, heat pumps, heat pump water heaters and appliances. Workshops providing energy education to tenants may also be conducted to target additional participation or energy savings opportunities.

**New Homes:**

- The New Homes program component provides incentives to builders of income-qualified housing for achieving energy efficiency savings and targets through a combination of building shell and appliance and equipment upgrades. To qualify for this program, the builder must construct the home to meet the energy efficiency requirements established by the ENERGY STAR program or to a higher efficiency level than the current adopted building code.

**Weatherization:**

- The Weatherization component includes WARM Plus, WARM Extra Measures, Low-Income Outreach & Assessment and LIURP Lookback, as follows:
  - Warm Plus, is an expansion of the existing comprehensive Low-Income Usage Reduction Program (LIURP), also known as the WARM program. The WARM Plus program serves additional homes with education, comprehensive weatherization services and HVAC, water heating and/or appliance replacements or other efficiency upgrades, including but not limited to, insulation, air sealing, duct sealing, heat pumps, residential heat pump water heaters and residential appliances and other products.
  - WARM Extra Measures provides the installation of electric energy savings measures incremental to those provided to customers participating in LIURP or other conservation programs, including but not limited to, heat pumps, heat pump water heaters and appliances and other products.
  - Low-Income Outreach and Assessment leverages community outreach and engagement activities to help identify and recruit customers to participate in Act 129 and low-income programs. Customers will be encouraged to enroll in programs

such as the FirstEnergy Pennsylvania Customer Assistance Program “PCAP” and to identify and promote participation in LIURP or other program opportunities. Welcome kits or other give aways may be provided to help engage, market, educate and promote customer participation, including promotional or educational materials and low-cost energy efficiency measures. Customers may also be offered a no-cost in-home energy assessment with direct installation of no/low-cost energy efficiency measures to help engage, market, educate and recruit increased customer participation in broader Act 129 and LIURP program services. This may also be offered to previous LIURP customers who usage has not changed or increased to provide education to help customers improve their energy efficiency.

- LIURP Look Back targets customers who previously participated in LIURP programs, within the LIURP blackout period, for additional opportunities for energy savings to complement the prior LIURP retrofit projects. Potential opportunities include but are not limited to educational materials and installation of heat pump water heaters.

**If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.**

The Company considers the Residential Low-Income Energy Efficiency Program to be comprehensive. The program provides measures and/or combination of measures or projects, including whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions. More specifically, the program promotes and provides comprehensive measures to income-eligible customers including both an assortment of individual comprehensive measures as well as whole house treatments. The program also includes direct installation of comprehensive measures and whole home retrofits as well as incentives for efficient new home construction. The direct installation, home retrofit and new construction measures engages builders, developers, contractors, and program allies in providing comprehensive measures and projects across the low-income sector. Multiple measures included in this program have long-lasting expected useful lives and that result in deep savings are considered to be comprehensive, and include program measures such as HVAC equipment (e.g. heat pumps), appliances (e.g. heat pump water heaters), etc.. Several other program measures provide opportunities for whole home/comprehensive solutions such as direct installation, new construction and weatherization. Please see Appendix B, Table 8 for a list of measures that are identified as comprehensive.

**Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.**

With oversight from the Company, the CSP(s) hired by the Company to implement the Low-Income Energy Efficiency Program components, through ongoing educational, marketing and outreach activities, will coordinate and encourage participation in the other components of the program or other Act 129 programs where applicable. The program components will be cross-marketed, where practical, in conjunction with the other Low-Income Energy Efficiency Program component offerings to promote additional participation, savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers. For example, in

the case of the Behavioral Component, the home energy reports will include marketing that targets and promotes additional program offerings.

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars and training regarding eligibility, incentives, and other program details to help them promote and market program opportunities with customers. As part of these activities, time will be spent detailing the various program components as well as applicable other Act 129 programs that may provide additional savings and increased participation opportunities for the Company's customers, including income-qualified opportunities.

**Implementation strategy (including expected changes that may occur in different program years)**

The Company will oversee and administer the overall Phase V Plan and will contract with implementation CSP(s) who will directly administer and manage delivery of the program and provide program services. Implementation activities will include, where applicable, efforts to raise awareness, outreach, enrollment, and fulfillment of program delivery, validating customer eligibility, providing program services, processing incentives, and conducting outreach to and securing partnerships with trade allies to ensure customers are able to easily participate in the program. The implementation CSP(s) will be responsible for the ongoing implementation of the program component(s), including staffing, development and maintenance of website(s), promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. Specific implementation strategies associated with program components may also include but are not limited to the following:

- Braided Funding: The program includes the opportunity to collaborate and coordinate with other conservation programs for measures including but not limited to qualifying energy efficient space and water heating heat pump equipment. The program implementation CSP(s) will be required to collaborate and coordinate with other state or federal programs (e.g. IRA HEAR) and other utility programs or providers (e.g. Natural Gas Distribution Companies "NGDCs", Water Companies) and the corresponding program administrators to seek to leverage these braided funding opportunities to increase participation and energy savings under this program.
- Behavioral: The implementation CSP will conduct the energy usage analysis and develop and deliver customized Low-Income Home Energy Reports to income-qualified customers by mail and/or email. For the online audit, the Company plans to utilize its enterprise-wide Online Audit tool.
- Multifamily: The implementation CSP will engage trade allies and subcontractors, such as insulation, weatherization, heating, and cooling contractors who will be recruited to partner in this component in addition to BPI Certified auditors. The implementation CSP will utilize the trade allies' network and subcontractors to promote further comprehensive retrofits recommended under this program component. In addition, the implementation CSP for this program component will manage and coordinate implementation of both residential and commercial multifamily program components to avoid duplicating efforts for projects and will strive to coordinate with available and applicable national and state housing programs.

- **New Homes:** To identify potential projects, the Company will work with the Pennsylvania Housing Financing Agency (PHFA) or other entities. The implementation CSP will target and conduct outreach to home builders to inform them of the program offering, components, and benefits and to achieve program buy-in and their participation.
- **Weatherization:** The implementation CSP(s) will conduct community outreach and engagement activities to identify and promote income eligible customer participation in the program and other low-income programs. The CSP(s) will also recruit professional or BPI Certified subcontractors and/or trade allies to participate in the program, including CBOs and/or additional vendors, to perform customer and community outreach and engagement activities, energy audits and installation services. The Company will work with the CSP(s) to ensure efficient program referrals and/or leveraging contractors and coordination providing services with the Company's LIURP and PCAP programs, NGDCs or other providers, the Department of Community and Economic Development ("DCED") Weatherization Assistance Program, and/or other conservation programs.

As detailed above for Braided Funding, leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. The CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to relevant program components. The goal will be to collaborate and coordinate with other program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in the delivery of the Act 129 programs. Please reference Section 4.4 for additional information.

### **Program issues and risks and risk management strategy**

The risks associated with this program are primarily identifying income-qualified customers and getting enough customers to participate in some of the program components. Well-established and innovative outreach and marketing techniques will be used to help identify income-qualified customers and promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company's budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from certain end uses (e.g. Solar) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other low-cost measures that may or may not be available. The Company will actively monitor the program

component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to this program include:

- **Customer Awareness and Engagement:** Low-income customers may not be fully aware of energy efficiency opportunities for their or home, and many customers, in general, are unaware of the “whole house” approach to energy-efficiency. The Company will work to address this by:
  - Targeted outreach and community engagement activities
  - Providing customers energy efficiency and energy usage education and specific tips and recommendations that promote energy efficiency and conservation opportunities and available program services;
  - Highlighting the training and BPI certification that contractors must have;
  - Identifying how the shell measure improvements can improve their comfort within the home;
  - Reinforcing that the installation of equipment and shell measures may increase the value of their home;
  - Collaborating and coordinating with Company’s LIURP and PCAP programs, DCED Weatherization Assistance Program, NGDCs or other providers, and other conservation programs to raise awareness of Act 129 programs and services.
- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront cost but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Low-income customers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, select measures are provided at no additional cost and enhanced incentives are provided on other select measures to reduce the initial cost to income-qualified customers.
- **Cost of Home Retrofits:** Low-income customers may not have the financial ability to invest in home retrofits. The Company addresses this barrier by providing direct install measures and whole home/comprehensive solutions at no-cost to promote and achieve participation by low-income customers.
- **Subcontractor and Trade Ally Awareness and Training:** To meet certain program component participation goals, sufficient auditors and contractors must be available to undertake the work. The Company will work with its implementation CSP(s) to address this barrier by trying to engage and recruit more qualified program allies and trade allies to participate in select program components.

Additionally, health and safety issues may restrict providing certain program services to customers. The Company will work with their universal service program administrators to develop

and maintain a list of available housing rehabilitation providers that the implementation CSP will provide to households when these issues cannot be remediated through the Company's programs (Please see section 4.4.4 for additional information regarding health and safety referrals and coordination).

The Company will seek to manage barriers to program success through a commitment to actively monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, and marketing/advertising, and improvement opportunities. The Company and/or the implementation CSPs will monitor participation and performance to assess, where applicable, the effectiveness of program services, outreach efforts, incentive levels, delivery methods, and both program ally and trade ally availability, so that they can provide suggestions on how to assure that the program is continually providing customers with their needs. Kindly refer to Section 4.1.2 for more information on potential risks and the Company's anticipated risk mitigation strategies.

### **Anticipated costs to participating customers**

All program components except Product rebates and Multifamily, are provided at no additional cost to income-qualified customers. Customers and/or landlords will have to pay the balance of equipment and installation costs not covered by the rebate/incentives for the Products and Multifamily program components. Reference Appendix B, Table 7 for the incremental cost and incentive range for each measure in the program components.

### **Ramp up strategy**

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program measures being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. Please reference the discussion in Section 1.4 and 4.1.5 for more details on ramp up.

### **Marketing strategy**

Marketing and outreach activities will target income-eligible customers to inform them of the program. The marketing strategy will include, but is not limited to, marketing activities coordinated with other Act 129 programs, LIURP and other state low-income programs such as the PCAP, Department of Public Welfare, PHFA, DCED WAP, NGDC or other providers, state Inflation Reduction Act program administrators, and other conservation programs and CBO initiatives.

In general, the Company's implementation CSP(s) will develop and administer the marketing plan for each program component under management by the Company. Marketing activities will target income-eligible customers to inform them of the program, its components, and the associated benefits as needed to meet program goals through channels such as but not limited to Company's

bill inserts, Company's website, direct mail campaigns, radio, newspaper and internet advertising, signs, posters, postcards, giveaways, and/or special promotional events, senior citizen and low-income information fairs and community presentations. The Behavioral component will also serve as a portal to educate the customer on other program opportunities available to them. In addition, certain program components will also implement cross marketing that will be used in conjunction with other low-income program components to promote additional participation.

The marketing strategy for the Multifamily low-income component will focus on informing property owners, managers, associations, tenant groups, municipalities, and community organizations about the availability and benefits of the program and how to participate. For Phase V this strategy will also include collaboration with State IRA administrators focused on distribution of IRA funds to Multi-family low-income homes through the IRA HEAR and IRA HER programs and other conservation programs. By cross collaborative marketing, the Company will look to increase participation in Act 129 programs. The CSP for the Multifamily component will also market and promote comprehensive retrofits to customers, including the cost-saving benefits, information on typical payback time frames and direct installation measures and cost-share rebates to better prepare the customer for the decisions and financial investments associated with and to promote the customer completing comprehensive retrofit projects. In addition, each participant will be given applications and marketing materials for other applicable program offerings at the time of the audit. The CSP will also attempt to follow up with participants, either through a telephone call or customer satisfaction survey to measure satisfaction with the component in general and with delivery personnel. The CSP will also identify customers who did not complete additional retrofit measures to provide additional guidance or to understand the barriers to completing comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program delivery.

The CSP for the New Homes program component will target home builders, HERS raters, and eligible customers to inform them of the program changes, the new measures, its components, and the associated benefits through education via discussions, newsletters, and e-mails to the building community, and the Company's website. The CSP will actively recruit participants through existing builder and rater partners, other utility programs, local HBAs, green building programs, and other allies who have established relationships within the residential construction community.

Key elements of the marketing strategy for the low-income program may include:

- Brochures that describe the benefits and features of the program, including application forms and processes. The brochures will be available for various public awareness events (community events, presentations, seminars etc.).
- Bill inserts, bill messages, email, direct mail, social media platforms, billboards, and pop-up stores.
- Company website content providing program information resources, contact information, online application forms, and links to other relevant services and information resources.
- Customer representatives trained to promote the program to their customers.
- Presence at conferences and public events used to increase general awareness of the program and distribute program promotional materials.

- Targeted outreach through direct mailings, energy efficiency kits and presentations to inform customers, builders, developers, property owners, property managers, apartment associations, tenant groups, municipalities and community organizations about the benefits of the low-income program offerings and participation processes.
- Printed collateral highlighting the benefits and features of the program components as well as the enrollment and participation processes.
- Website content providing program component information resources and contact information.
- In-person visits by program representatives to qualified customers.
- Energy assessments of properties may include the direct installation of standard energy savings measures to engage, educate, and promote participation by the customer, building owner, or facility manager in the other program component offerings, thereby targeting deeper savings.
- School or community-based engagement events, energy efficiency awareness programs, promotional initiatives, and energy efficiency measure giveaways.
- Increase focus on Company Act 129 program benefits through collaboration, coordination, and training of other income qualified service providers including but not limited to Company's LIURP and PCAP programs, DCED Weatherization Assistance Program, NGDC programs or other providers, and other conservation programs.

**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**

Please refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the term of this Phase V Plan, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements. Section 6.6 includes a broader discussion on incorporating future changes to codes and standards.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications available from participating retailers, the program website or directly from participating contractors;

- Online rebate forms or instant rebates provided through a dedicated website; and
- Midstream incentives provided through participating distributors or retail outlets

**The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC**

Most of the program measures are provided at no cost to income-qualified customers with the program paying the entire measure cost for participants. For the Products and Multifamily program components, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the “Up to” incentive amounts, based upon customer response and market conditions over the Phase V Plan period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with program component performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultant, CSP, or stakeholder input, and industry benchmarking. Incentives will vary depending on factors, including, but not limited to, the specific program component, end-use and measure, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace.

**Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days**

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be postmarked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all project measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

**Key schedule milestones**

As set forth in the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- November 26, 2025: Phase V Plan filed with the PA PUC
- 4Q2025: RFP issued for program implementation CSP(s)
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program implementation begins

**Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission’s statewide EE&C Plan Evaluator (SWE)**

The Company’s CSP for EM&V services will be required to perform evaluation, measurement and verification of the program in accordance with the state’s Evaluation Framework. Activities for this program may include activities such as but not limited to:

Products and HVAC:

- Verify that qualified equipment and products have been sold by participating retailers, contractors, distributors, or manufacturers seeking payment of incentives by auditing a sample of their claims.
- Verify that new, more efficient products have been installed through review of documentation provided by participating retailers, contractors, distributors, third party administrators (e.g., IRA HEAR plan administrators), or manufacturers, as well as individual participant rebate applications.
- For appliance recycling measures, verify that the planned number of targeted appliances are collected and properly recycled and that the calculations of kWh and kW savings from appliance retirement are accurate and compliant with applicable requirements including those contained in the TRM.

Behavioral:

- Program impacts will be measured through billing analysis with a randomized control trial approach in accordance to the PA Evaluation Framework. The EM&V Contractor will perform participation uplift adjustments and avoided decay calculations in accordance with the PA TRM.

Multifamily and Weatherization:

- Verify that the planned number of each type of audit is performed on time and within budget. A sample of audits will be reviewed to check that their actual costs do not exceed the contract cost, and that customers are satisfied with the service.
- Conduct surveys and check sample calculations of projected savings for accuracy and for compliance with the PA TRM guidelines.
- Verify that existing EE&C opportunities are properly quantified to enable accurate tracking and documentation of energy efficiency and demand reduction.
- For installed measures and retrofit projects, verify that the installed measures and comprehensive diagnostics are performed as supported on program applications.

New Homes:

- Select a representative sample of homes for comprehensive measurement and verification, including reviewing both the baseline and as-built home properties as documented in a RESNET accredited building simulation program.
- Verify the models and their associated impacts for sampled homes through on-site data collection: Gather as-built data through independent on-site visits and review of data gathered during quality assurance / quality control visits.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that energy savings and demand reduction are being realized as projected. A tracking and reporting system will be used for such monitoring. If EE&C program indicators show that projected EE&C targets are not likely to be achieved on schedule or within budget, the Company will take appropriate corrective actions such as changing marketing and/or incentive levels.

The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes, and technology.

**Administrative requirements- include internal and external staffing levels expressed on a full-time equivalent (FTE) basis**

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. Reference Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

Please refer to Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$0.4M, which represents approximately 2 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

**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**

See Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

**Estimated participation – include tables with key assumptions of estimated participation. See Table 9.**

These details are set forth in Appendix B, 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)**

See Appendix B, Table 9 and 10.

**Estimated percentage of sector budget attributed to program**

Please refer to Appendix B, Table 6, Appendix B, Table 10 and 12.

**Cost-effectiveness- include gross and net TRC and NTGR for each program. For gross tables, NTGR should be “1.0.” See Table 14, Gross and Net versions. (2025 IO at 217-221)**

See Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. See Appendix B, Table 8 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

**Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.**

Other utility programs were not benchmarked for the purposes of program design or program participation assumptions.

**Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations**

Residential Low Income program components were designed to target customers living in all forms of housing - from renters to single family homeowners to multifamily dwellings. The residential programs include direct or targeted programs that engage customers across all housing segments, including residential, low-income and multifamily, as well as new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing customers with energy efficiency education as well as information regarding other program services and opportunities upon which they can act. Additionally, the Company plans to participate in community-based events and other marketing initiatives to conduct outreach and engage customers to provide education and promotional opportunities aimed at identifying and reaching additional customers and achieving participation in the program components across all house types by income-eligible customers.

The Residential Low-Income program has been designed to promote the participation of all income qualified residential customers. The program includes direct or targeted offerings that both engage customers by providing them with energy efficiency education as well as information regarding other available program services and opportunities. The program offerings incorporate strategies to change behaviors and provide prescriptive measures, direct install measures, and whole home/comprehensive solutions at no-cost as well as enhanced incentives for select measures that collectively address the initial cost barrier to achieve participation. The program also targets multifamily buildings and the construction of new energy efficient low-income housing.

For Phase V, to further drive participation and energy savings by all low-income customers, the Company plans to collaborate and pursue coordination with other conservation programs to target and provide additional braided funding opportunities to low income customers installing qualified energy efficiency projects. Programs such as IRA HER and the IRA HEAR are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. The Company plans to work with the DEP and other state administered and third-party conservation programs to pursue providing customers with these and additional incentive opportunities that are available to help low-income households improve their energy efficiency and control energy spending. See Section 4.4 for more information on Coordination with Other State Conservation Programs.

**Other information deemed appropriate**

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. The following summarizes key changes to this program for Phase V:

Products:

- Updated incentive amounts for recycling, appliance rebates and other products
- Added recycling measures for Low Volume Refrigerators (Mini Fridge) and Coolers
- Added new measures for Linear LED Fixtures, Coolers, Clothes Washer/Dryer Combo, LED Nightlights and Holiday Lights
- Removed measures for Water Coolers and Variable Speed Pool Pumps

HVAC:

- Added new program component and measures for IRA HEAR Program Measures
  - Heat Pump
  - Heat Pump Water Heater

Braided Funding Audit:

- Added new program component and measure for co-funding audits
  - Example – ASHRAE Level 2 audits to support IRA HER Program

Weatherization:

- Added new measure for Customer Engagement including community outreach, in home assessments and/or welcome kits/giveaways
- Added new measure for LIURP Look Back

EE Kits:

- Removed program component and measure, may be provided for marketing and outreach

School Education:

- Removed program component and measure, may be provided for marketing and outreach
- ***Details on how the plan will meet the proportionate number of measures requirement.***

The Commission requires that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG in proportion to that sector's share of the total energy usage in the EDC's service territory. The Phase V Implementation Order (at 54 and 55) specifies 9.3% as FirstEnergy's proportionate number of measures equivalent to the low-income sector's share of usage. As discussed in more detail in Section 9.1.3, the Phase V Plan includes a total of 183 measures and 48 measures that are provided directly or targeted to Low-Income customers which represents 26% of the total, significantly greater than the target percentage.

- **Confirmation that all low-income compliance savings will come from specific low-income programs or low-income verified participants in multifamily housing programs.**

Confirmed. The Phase V Plan includes a comprehensive suite of program components within the Low-Income Program that are specific for the low-income sector and are collectively designed to achieve the consumption reduction requirements.

- **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.**

Consistent with the FIO at page 85, this plan is designed to meet the required savings targets without Phase IV carryover. As of the Company’s most recent Annual Report<sup>20</sup>, the Company has no applicable low-income carryover savings from Phase IV.

**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)**

The table below summarizes the Small C&I program included in the Phase V Plan, along with a detailed description:

**FE PA Table 5: New Small C/I Programs**

FE PA Table 5: Small C/I Programs & Descriptions	
Proposed Phase V Program	Program Description
<b>Small Commercial &amp; Industrial Programs</b>	
C&I Energy Solutions Program - Small	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.

<sup>20</sup> ACT 129 Phase IV Semi & Annual Reports - PA PY16 Annual Report

Below is further information for the Commercial/Industrial Small sector included in the Phase V Plan:

**Program Name and Program years during which program will be implemented**

C&I Energy Solutions Program – Small

**Program years during which program will be implemented**

June 2026 - May 2031

**Objective(s)**

A primary objective of this program is to provide a solution for smaller commercial and industrial customers, including GNI customers, who are “harder to reach” and/or are interested in becoming more energy efficient. Smaller business customers may have more barriers to participation because they lack the technical expertise, time, or capital to research and apply for incentives or implement EE&C measures offered under traditional prescriptive or custom program offerings. The program overcomes these barriers by providing customer engagement with educational and efficiency measures in addition to prescriptive, calculated, or performance-based incentives or midstream or upstream incentives or buydowns and providing support to manufacturers, distributors, contractors, and retailers that sell energy efficient products. Another objective of the program is to promote the installation of energy efficient equipment and to increase the efficiency of processes, buildings, building operations, and systems among small business customers.

This program includes a FTM component. The primary objective of the FTM component of this program is to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and can help mitigate growing resource adequacy concerns in the State.

This program also includes a DLS and PDR component. The objective of the DLS and PDR program component is to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. This component includes a combination of event based and daily load shifting strategies including but not limited to connected device load shifting and custom demand response tailored to customer opportunities.

**Target market – including market size to help frame participation estimates (e.g. number of households, electric sales etc.).**

For the EE&C Program Components, the target market generally includes all small commercial and industrial customers, including GNI customers, of the Company that have program eligible applications or meet other program prerequisites. More specifically, the Company has approximately 260,000 small commercial and industrial customers, and the target market for this program ranges from the Prescriptive component which typically applies to a large percentage or broad range of the customer population to the Energy Management component that promotes

eligible measures tailored to the customer's business type or industry, which will generally apply to a small subset of the overall customer base.

For the DLS and PDR Component, the target market includes all small commercial and industrial customers of the Company in the Company's service territories with qualifying connected devices or customers with custom DLS and PDR opportunities during daily summer and winter peak hours.

The Company developed participation projections in consideration of many factors (e.g., historical performance, input from its Consultant, implementation team and other stakeholders, etc.) as discussed in section 1.2, which inherently incorporates the target market for each program's components and measures. Please see Appendix B, Table 9 for a list of participation assumptions by measure.

**If the program is an umbrella program 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**

### **Program Description**

The C&I Energy Solutions – Small Program is an umbrella program that engages small C&I customers through multiple program components to provide energy efficiency and energy usage education and awareness. The program is designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels and provide financial support through prescriptive or performance-based incentives to the small commercial and industrial customers, including GNI customers, who implement qualifying high efficiency equipment, retrofit specialized processes and applications to higher efficiency processes and applications, retro-commissioning, or high efficiency building shell or system improvements. Prescriptive and performance incentives are intended to reduce the customer's capital investment for qualifying high efficiency equipment, processes, and systems. The SCI Program includes the Multifamily, Prescriptive, Custom, Energy Management, FTM and DLS and PDR program components, and are described as follows:

**Multifamily:** The Multifamily program component provides customer engagement with energy efficiency education through energy assessments and the installation of standard energy savings measures and provides or promotes energy savings opportunities including prescriptive equipment replacement and custom retrofit projects, in both common areas and tenant spaces. In addition, the Multifamily component will target low-income/affordable housing properties with enhanced incentives and measures. Customers will begin participation in the Multifamily component with an energy assessment and installation of standard energy savings measures. The assessment will identify and recommend additional energy savings opportunities that are specific to each customer and building and could include incentives for prescriptive equipment replacement or custom retrofit opportunities.

**Prescriptive and Custom:** The Prescriptive and Custom program components will promote the installation of high-efficiency equipment by the Company's small commercial and industrial customers, including GNI customers, either via the installation of prescriptive or custom measures or projects. The Prescriptive program component provides prescriptive-based incentives to small businesses, including GNI, customers to purchase and install energy efficient equipment and appliances. This program component also provides prescriptive-based incentives to small commercial and industrial customers, including GNI customers, to purchase and install energy efficient equipment that are residential type appliances that reside within a small commercial and industrial customer's facility (e.g., break rooms, small kitchens, etc.) as well as the removal and recycling of qualifying inefficient, operating appliances. (Periodic events may be offered at centralized drop-off locations where customers can drop off smaller qualified inefficient operating appliances such as, but not limited to, dehumidifiers and room air conditioners.)

Prescriptive incentives will be offered for individual applications and retrofit projects employing standard efficient technologies where the anticipated energy savings are relatively consistent. These measures will incentivize energy efficient lighting, heating, and cooling equipment, agricultural and food service equipment, and residential grade appliances among other efficiency measures. The Prescriptive program component will support and/or provide downstream approaches and may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors, and retailers that sell select energy efficient products. Type and value of incentive provided will vary and will include electric technologies that improve energy efficiency. Up-front rebates will be offered to reduce first-cost barriers.

Prescriptive measures are designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels. Prescriptive rebates are designed to: Provide incentives to facility owners and operators for the installation of high efficiency equipment, and controls. Promote the marketing of high efficiency measures by trade allies such as electrical contractors, mechanical contractors, and their distributors to increase market demand. Ensure that the participation process is clear and simple. Prescriptive incentives will increase adoption of energy efficient equipment by harnessing the Company's unique customer relationships to positively impact the sales process surrounding efficient equipment, from education and awareness with customers to engagement with trade ally contractors and equipment distributors for the high efficiency equipment.

The Custom program component includes custom measures that promote electric efficiency opportunities for small commercial and industrial customers, including GNI customers, that are non-standard and not captured by prescriptive equipment. Calculated or performance-based incentives will be provided to customers for upgrading less efficient specialized processes and applications (e.g., variable frequency drives, motors, compressed air, equipment replacement, CHP, solar photovoltaic (solar PV), industrial process changes, data centers, etc.) to high efficiency specialized processes and applications. This program component also provides incentives for customers to install specialized building shell or improvements for new construction or renovation projects. Calculated or performance-based incentives are designed to reduce the customer's capital investment for qualifying energy efficient measures.

Typical custom measures that are eligible for incentives are either less common measures or efficient opportunities in specialized applications that may include manufacturing or industry-specific processes, or non-traditional use cases. In many cases, custom efficiency projects are more complex than prescriptive equipment replacement.

Potential participants in both the Prescriptive and Custom program components are recommended to submit an application for pre-approval to confirm project eligibility and reserve funding. The Company and/or their CSP will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program component requirements, terms and conditions, and general information. In addition, the Company and/or its CSP will provide applications in web ready formats to ensure participants have easy access to the forms. The pre-approval process provides for the review of the customer's proposed project to confirm measure eligibility and incentive budget availability. This also supports the Company's program and program component management because it communicates projects that are in the pipeline. If accepted and pre-approved by the Company, a timeline is established for project completion to qualify for a rebate. The typical lead time for completing a project is 90 to 120 days but can be longer depending on the complexity of the project. Large projects, or subsets of projects, may be required to undergo pre-and post-inspection to validate project energy savings.

**Energy Management:** The Energy Management program component targets energy savings for existing small commercial and industrial facilities by providing a holistic approach to improving building energy performance through the maintenance, retrofit, tune-up, and retro-commissioning services for existing buildings and through the implementation of energy savings strategies that improve the overall operation and energy performance of buildings and building systems. This program component complements the Prescriptive and Custom components, which focus on capital equipment replacement or process improvement investments by improving the energy performance of a building by maintaining, retrofitting, adjusting, and optimizing the systems within the building and the implementation of complementary energy savings measures. The program component also provides paths to track the ongoing building energy performance by using retro-commissioning, which ensures continued energy performance. By implementing these measures, customers also receive ancillary benefits, including improved occupant comfort, lower maintenance costs, and extended equipment life.

This program's subcomponents include strategies or implementation efforts that focus on specific energy efficiency measures and management practices that can be categorized as follows:

- **Building Tune-Up:** Provides a path for customers to implement a Building Tune-Up that will focus on implementation of measures that improve energy performance and savings in commercial and industrial facilities. Services focus on maintenance, calibration and adjustments to building systems and controls, diagnostic testing and installation of other measures that enhance overall building energy efficiency. The following Building Tune-Up program measures include, but are not limited to:
  - HVAC Tune-Up, including Refrigeration charge correction (if needed), cleaning evaporator and condenser coils, filter changes, verification of

- proper operation of fans and motors, and minor repairs to refrigerant lines and coils.
- Calibration of building systems and controls, including energy management systems, lighting, and HVAC.
  - Diagnostic and function tests of applicable major systems and equipment.
  - Comprehensive application/installation of equipment or building measures such as:
    - HVAC controls to optimize Roof Top Units (“RTU”)/Air Handling Units (“AHU”).
    - Refrigeration controls to optimize refrigeration equipment.
    - Lighting upgrades, including the application of lighting controls and optimization of installations.
    - Chiller system controls to optimize chiller performance.
    - Building shell and weatherization measures
    - Electrification measures
    - Other program eligible energy saving measures identified through a building assessment (e.g. HVAC, refrigeration, food-service equipment, appliance replacement/recycling, EMS/BAS) .
  - Building Operations Training for qualified personnel to obtain Building Operations Certification (“BOC”) through a certified training program or other training programs related to the efficient design, operations, and maintenance of buildings.
  - **Retro-Commissioning (“RCx”)**: Provides a comprehensive assessment of a customer’s commercial/industrial building by using a prescribed planning process that includes a building audit, development of an action plan for the building, and development of a Measurement and Verification (“M&V”) plan to ensure the optimum on-going performance of the building and building systems. A comprehensive assessment of a commercial/industrial building using a prescribed planning and implementation process, including:
    - Audit Phase – Customer confirms intent to participate in program and registers with the Company or the third-party implementation contractor. Customer and/or the customer’s consultant completes the required level of an American Society of Heating, Refrigerating, and Air Conditioning Engineers (“ASHRAE”) audit based on the complexity of the facility and develops a retro-commissioning implementation plan, including project timelines and plan to implement audit identified operation and maintenance measures. There may be opportunities to complete this Phase without a full ASHRAE level audit.
    - Setup Phase – Contracted services to implement the plan are verified, long-term monitoring and reporting is developed and initiated, and project plan is implemented by customer.
    - M&V Phase – Savings verification and rebate payment from implementation of the plan are completed.

Typical Retro-Commissioning program measures include but are not limited to:

- Optimizing chiller and boiler operations to better match building load conditions, reducing ventilation in over-ventilated areas.
- Fixing ventilation dampers that are open when they should be closed or vice versa.
- Decreasing supply air pressure setpoint and system rebalancing.
- Align zone temperature setpoints to match the building's actual operating schedule.

Monitoring-Based Commissioning (“MBCx”): Monitoring-Based Commissioning (“MBCx”) offers monitoring software paired with a building’s energy management system to identify energy savings opportunities and optimize building performance and EE. Contracted services will alert the customer when equipment is not operating as expected using fault parameters and will work with the customer to correct ongoing issues and make improvements wherever possible. Planning and implementation typically include, but is not limited to:

- Assessment and qualification of a building energy management system. Assess utility bills and facility to recognize potential for energy savings.
- Customer agrees to have contracted services utilize eligible software with diagnostics and other functionality through a monitoring service contract.
- MBCx is designed to:
  - Maximize potential incentives with a deeper dive into a building’s overall performance
  - Monitor and identify cost savings opportunities
  - Benefit from a continuous process to improve comfort and optimize energy usage
  - Maximize the operational efficiency of buildings

Virtual Commissioning (“VCx”): As an alternative to performing an on-site audit to develop a retro-commissioning plan, or as an additional complementary measure, VCx provides eligible customers with an analysis of their building’s energy performance. This analysis uses meter usage/other data and building modeling to identify and recommend energy efficiency measures and operational changes to improve a building’s overall energy performance. The process starts with benchmarking, peer comparison metrics (aids in determining energy performance to identify facilities that are underperforming) and then moves to site facility assessments; site facility assessments may be 100% virtual or may include on site work depending on customer needs and identified measures. The analysis will foster participation in the Company’s other programs by identifying and encouraging customers to implement other energy efficiency improvements. This offering can also use continuous engagement, monitoring, and periodic reviews of the customer’s energy usage to ensure that implemented measures or changes have been successfully completed. The use of building analysis using remote analysis techniques will also help hard to reach small business customers to participate in the programs because of limited or constrained access to customers’ facilities.

- Strategic Energy Management (SEM) / Virtual SEM - Strategic Energy Management (“SEM”) subcomponent is designed to optimize energy consumption for small C&I customers through long term management of existing systems and processes (including behavior), as well as tracking and benchmarking performance to identify and evaluate energy optimization efforts. Long term SEM efforts are typically focused on developing and executing an energy management strategy. This strategy is formulated through a series of site and/or remote visits and interviews with building owners and staff to specifically develop a Strategic Energy Management Plan (“SEMP”) for the customer’s facility. The SEMP will be reviewed with the customer by the Company and/or its CSP on a scheduled basis. This plan may include:
  - Revisions or improvements to an existing Building Automation System (“BAS”) or the addition and initiation of the use of a BAS to monitor and control the buildings components and systems. The implementation or improvements to a BAS or the review of an existing BAS, can include the proper training for building operators to achieve maximum efficiency.
  - Development of a maintenance plan for existing building mechanical/electrical equipment and or systems to identify best practices in building performance and an interactive monitoring of system components by both staff and sponsoring utilities.
  - Ongoing engagement to track energy usage and performance, assist with planning energy efficiency projects, and interact with facility personnel to adopt energy efficiency strategies and behaviors.
  - Utilizing other Program components/subcomponents, including: Prescriptive/Custom measures, Building Tune-Up, RCx, and VCx.
  - Using building modeling and benchmarking to compare customer’s usage and performance to cohort of similar facilities and VCx to track energy usage and performance over time.
  - Application of whole building energy modeling tools that can model buildings for both operational and capital improvements.
  - Scheduling of attendance of customer personnel to attend educational workshops, webinars, and group/individual training sessions with cohorts of facility managers (e.g., Building Operations Training)
  - Recommendation/Coordination for additional funding sources and financing options
  - Building Operations Training Provides incentives and/or training for qualified personnel, contractors, consultants, and customer building operation personnel, to participate in nationally recognized training and workforce development, which may include O&M training and certification programs related to the efficient design, operations, and maintenance of buildings, such as BOC through a certified training program.

Customers can participate by application to the program or may be contacted directly by program personnel. Customers can participate individually or in a cohort with other customers in the same industry. The cohort would allow customers to share best practices amongst each other as each customer goes through the SEM program

lifecycle. A customer would still be treated as an individual with a unique project within the cohort. The program will retrieve customer demographics and obtain customer agreement for the services to be provided and facilitate ongoing customer engagement. The Company's CSP will develop application forms for this program that will guide applicants through eligibility guidelines, terms and conditions, and general program information requirements. In addition, the program will provide applications in web-ready formats to ensure participants and potential customers have easy access to the forms.

Supplemental program services include providing additional customer engagement, advisory, energy analysis and technical consulting services to help identify, promote, develop and implement projects under this program component, including but not limited to:

- Perform a Level 1 or 2 ASHRAE Audit of commercial or industrial facility or complete an engineering study that evaluates alternatives for the design of a system or process for a commercial building or industrial facility.
- Benchmarking of customer buildings and facilities
- Tracking customer EE&C metrics e.g. Lifetime/Lifecycle energy savings, Peak Demand savings

**Front-Of-The-Meter ("FTM"):** Through implementation of upgraded designs, equipment and operation of the Company's energy delivery system, the FTM component will deliver system energy savings and peak load reductions. Company and project developer initiatives supporting such system load relief include but are not limited to the Company's LTIP, its O&M plans, and other Company or project developer initiatives. Under the FTM program component, the Company will coordinate with these FTM initiatives and operations to target energy savings and peak load reductions from the corresponding improvements.

Potential improvements that can provide energy savings and peak load reductions include but are not limited to: replacement of and upgrades to energy delivery equipment, voltage optimization (e.g., Conservation Voltage Reduction ("CVR")), efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar PV projects that are not associated with an existing retail meter.

**Daily Load Shifting ("DLS") and Peak Demand Reduction ("PDR"):** The C&I DLS and PDR program component is comprised of two program subcomponents - Connected Devices and Custom. Each subcomponent is designed to deliver load reductions on a daily and/or peak day event basis.

- Connected Devices: Participating C&I customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods. This subcomponent includes customers' smart thermostats for control of heating, ventilation and air conditioning equipment, managed charging of electric vehicles, and battery storage or other potential customer equipment to reduce load of connected devices during peak load periods. This subcomponent will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance.

- Custom: The Custom subcomponent targets Commercial and Industrial customers to reduce load during peak load hours on a daily, scheduled, or event basis during the PA Act 129 summer and winter peak load periods through behavioral messaging, operations or process changes, equipment adjustments, controls or other specialized approaches adopted by the customer.

**If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.**

The Commercial and Industrial Programs were designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all customers. Commercial businesses and industrial customers are also addressed through programs that provide opportunities including prescriptive rebates, custom measures, building tune-up, and whole building/comprehensive solutions. The programs include specific opportunities that ensure access for small commercial and industrial customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. And the programs include opportunities that encourage customers to consider a holistic approach to Energy Efficiency for customers who are interested and able to participate in whole building/comprehensive solutions.

**Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.**

With oversight from the Company, the CSP(s) hired by the Company to implement the Energy Solutions program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and other Act 129 programs where applicable. The program components will be marketed, where practical, in conjunction with the other Energy Solutions Program offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers.

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers. As part of these activities, time will be spent detailing the various program components as well as applicable to other Act 129 programs to the various participating program allies, contractors and customers.

**Implementation Strategy (including expected changes that may occur in different program years)**

The Company will outsource the implementation of this program to CSP(s) who will be responsible to administer, promote, and provide the program to customers, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP(s) will be responsible for administration, marketing,

outreach, fulfilling program services, application processing and documentation regarding purchased products and completed projects, and processing incentives and rebates, where applicable. The Company will review the application processes with its Phase V CSP(s) to identify and make improvements, as warranted, and will require the program CSP(s) to consider innovative outreach activities to engage customers, program allies, and trade allies throughout the implementation of the program.

The Company will perform overall administration and oversight of the program. The Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026.

Program information and links to program applications will be made available at the Company's program website. Completed applications to the program components will be processed online or returned via email, where applicable. For Phase V, pre-approved projects that are not completed prior to the conclusion of Phase IV, will be processed as part of the same Phase V program without re-application, consistent with the Company's review and eligibility requirements. The Company will consider other methods for providing rebates and other rebate application processes based on market considerations and opportunities that are identified during program implementation.

The Prescriptive and Custom program components will offer an on-line application portal for customers to submit rebates for energy efficient products or projects and may also develop a midstream approach, work with retailers, contractors, distributors, and/or manufacturers for midstream or upstream incentives or point of purchase buydowns for select measures. The CSP(s) will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program requirements, terms and conditions, and general information. In addition, the CSP(s) will provide applications in web ready formats to ensure participants have easy access to the forms. Additionally, the CSP(s) will provide support and assistance to retailers or distributors to support identification and promotion of qualifying energy efficient products. The CSP(s) will also provide technical support to customers on the application of energy efficiency measures and technologies included in these program components.

Additionally, for a number of appliances that will be offered incentives through the Company's prescriptive component, the Company expects federal standard changes to happen mid cycle and therefore will impact savings in a downward manner once these changes take place. The Company will work with its evaluator and the SWE to determine specific adoption of timing and savings impacts for the change.

The CSP for the Multifamily program component will provide targeted marketing to both multifamily customers and program allies to ensure awareness of the program and enhance customer participation. The CSP may also contract with qualified auditor(s) to provide the component services to customers, who will conduct marketing and the direct installation and retrofit aspects of this program component.

The CSP for the Energy Management program component will conduct the implementation aspects of this component to customers. Marketing will target specific customer types and program allies to ensure awareness of the component and its subcomponents and enhance customer participation. Additional targeted marketing will be completed to promote this program component and enhance participation among hard-to-reach small business customers. The CSP will also conduct the services provided through this program component and its subcomponents.

Customers can participate in the Multifamily and Energy Management program components by submitting an application or will be contacted directly by the CSP and/or auditors. The CSP will retrieve customer demographics and obtain customer agreement for the services to be provided and handle on-going customer engagement. Incentives for efficiency measures implemented will be issued after the measures are purchased or completed and required documentation is submitted.

For the FTM program component, the Company will coordinate with its engineering, operations and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.

For the DLS and PDR program component, the Company plans to contract with experienced CSP(s) to implement the various subcomponents supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program. The Company will perform overall administration and oversight of the program. For the Custom subcomponent of DLS and PDR, the Company may also contract with customers directly or with PJM Curtailment Service Providers (“PJM CSPs”). Further, the Company anticipates adjusting implementation of the various subcomponents throughout the term of Phase V to improve performance based on actual results. Such changes may include but are not limited to adjusting enrollments, marketing, customer engagement, program approaches or terms and incentives.

Leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. To promote and leverage these programs and braided funding from multiple sources to customers as they are available and applicable to relevant program components, the CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns. The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. See Section 4.4 for additional information.

With regards to Alternative Energy Portfolio Standards (“AEPS”), the Company plans to promote the availability and support registrations for C&I participants of its Act 129 programs with eligible energy efficiency projects. The Company plans to collaborate and coordinate with the PA DEP

and its AEPS program administrator to promote and facilitate the registrations. See Section 4.4.3 for more information.

### **Program issues and risks and risk management strategy**

The risks associated with this program are primarily obtaining sufficient customers to participate in the various program components. Well-established and innovative outreach and marketing techniques will be used to promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company's budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from several end uses (e.g. Solar, C&I Lighting and CHP) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other low-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to the program components include:

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Conversely, the business or economic climate may require customer incremental costs or contributions to be reduced in order to encourage participation. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels including midstream and downstream.
- **Customer Awareness and Engagement:** Smaller businesses and GNI customers may have limited resources and time to consider, pursue, or prioritize energy efficiency and may have efficiency needs not well aligned with traditional EE&C programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation. In addition to limited resources and time, other small customers may not be aware of the benefits of installing efficient equipment or completing other energy efficiency improvements. To address awareness and educational barriers, the Company will educate small customers on the program opportunities and the benefits of installing efficient equipment or completing other efficiency improvement through targeted marketing and outreach, providing program

services, ensuring that incentives are easily accessible, and encouraging market transformation and stocking of efficient equipment through midstream incentives. The Company will also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of the program opportunities and available incentives.

- **Business/Operational Constraints:** Facilities often have unique operational constraints that act as a barrier to implement energy-efficiency projects and the maintenance of equipment. This barrier will be addressed by ensuring the program component operates cooperatively with participants, provides technical assistance and support, provides maintenance services, and offers timely incentives.
- **Sufficient Stocking and Availability of Efficient Products:** To support a robust marketplace for efficient equipment, the Company may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of and/or for marking down the cost of the efficient equipment at the point of sale.
- **Daily Load Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty of customer participation and program component performance with daily load shifting and demand response during summer and winter demand peak periods. More specifically, it is unknown how customers and the program components will perform in daily load shifting across over 400 hours per year and in the winter period, both of which are new to PA and across the industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across the 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

Further risks include the measurement and verification of the peak load reduction impacts given new methodologies and protocols for daily load shifting. The CSP(s) for the program subcomponents will be required to monitor progress for participation and impacts, and to provide contingency associated with customer non-response or opt-outs. The CSP will also be required to provide reporting to the Company detailing its performance and to promptly react to any deficiencies.

The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, marketing/advertising, and improvement opportunities. The Company and/or the implementation CSPs will monitor participation and performance to assess, where applicable, the effectiveness of program services, outreach efforts, incentive levels, delivery methods, and feedback from both program and trade allies, so that they can provide suggestions on how to assure

that the program is continually providing customers with their needs. See Section 4.1.2 for more information on potential risks and the Company's anticipated risk mitigation strategies.

### **Anticipated costs to participating customers**

Customers will have to pay the balance of the energy efficient product, project and/or installation cost not covered by the rebate. See Appendix B, Table 8 for the incremental cost and incentive range for each measure in this program.

Note: There are no costs to customers for FTM EE&C measures included in this program. For Load Shifting and Peak Demand Reduction program component, there are no known anticipated costs for customers to participate. This program component primarily targets behavioral or operational changes and utilization of existing customer equipment for participation.

### **Ramp up strategy**

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program components being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. See discussion in Section 1.4 and 4.1.5 for more details on ramp up.

For the DLS and PDR program component, since demand response programs were not offered in Phase IV and daily load shifting and winter demand response are new concepts for Act 129, it is anticipated that it will take four to six-months to start-and ramp up the DR program offerings. Because of this ramp up period, the Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026. This supports the CSP obtaining customer enrollments such that the Load Shifting and Peak Demand Reduction program component can begin implementation June 1, 2026. See discussion in Section 1.4 for more details on ramp up.

### **Marketing strategy**

EE&C Program Components:

The Company will implement an aggressive, sector-based marketing campaign for the duration of the new Plan. Marketing will be used to target specific customer sectors to ensure awareness of the program components and enhance participation.

Marketing activities of the Prescriptive, Custom, and Energy Management program components will target eligible customers and program allies to inform them of the program, its components, and the associated benefits through direct mail, website, trade shows, the business customer

newsletter, and key account managers. The Company will also work with distributors and contractors to market eligible higher efficiency equipment than required by federal standards.

Additionally, the expanding list of program allies will continue to be cultivated, as they are vital to the growth in customer participation. The Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers.

The CSP(s) for the Prescriptive, Custom, and Energy Management program components will target various market sectors (i.e., education, medical/health care, manufacturing, retail, food service) to enhance participation and promote a cross-section of measures applicable to each market. The Energy Management component will also outreach to building maintenance and operations personnel to promote the program component including the Building Tune-Up, Retro-commissioning, and Strategic Energy Management measures to enhance the energy performance of their facilities.

Since prescriptive retrofits are generally one-for-one replacements, measure-specific marketing will be developed for new measures or enhanced for continuing measures. These will be delivered to sectors most likely to utilize specific technology. Fact sheets, mailings, post cards, e-blasts, and on-location seminars will all be used to promote specific measures. Custom marketing efforts require a consistent and directed outreach to program allies, the Company's managed accounts and government accounts whose processes are compatible with the Custom program component requirements. The CSP(s) will be required to develop and implement a diligent direct and indirect marketing plan to identify and target customers to connect them to appropriate measures using e-blasts, webinars, on-site seminars, and large customer newsletters, among other marketing and outreach initiatives. Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the program component where applicable.

Further, in order to attract multiple measure participation, the CSP will outreach via sectors (e.g., medical facilities for lighting, HVAC, custom processes, and CHP), as well as to program allies such as architects, engineers, and professional associations (e.g., the United States Green Business Council ("USGBC")). Targeted advertisements in industry/trade publications will also be required to bring awareness to the opportunities and savings available through the Prescriptive, Custom, and Energy Management program components. Furthermore, specialized marketing, engagement, and engineering assistance will be utilized to enhance program participation by utilizing CSP personnel to assist with specialized equipment applications, whole building type solutions and studies, and other technical assistance related to energy efficiency opportunities under these components recognizing the increasing complexity of new lighting, HVAC, controls, energy management, and other technologies to foster component participation.

The program components will be marketed, where practical, in conjunction with the other Energy Solutions for Business program offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers.

The CSP for the Multifamily program component will develop and administer the marketing plan for this component, which will be marketed to non-residential metered multifamily property owners, property managers, and residents, including income-qualified occupants and owners of multifamily buildings. The program component will be marketed to customers and program allies through the program component website. The program component will also use targeted outreach such as direct calls, direct mail, email, or other targeted outreach campaigns. Web-based information and online applications may be utilized. In addition, each participant will be given marketing materials for other applicable program offerings at the time of the audit. The CSP will attempt to follow up with participants to measure satisfaction with the program component in general and with delivery personnel. The CSP will also identify customers who did not complete additional retrofit measures to understand the barriers to moving forward with comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program design.

**Daily Load Shifting and Peak Demand Reduction Program Component:**

The marketing of this component will be provided by the CSP(s) under the direction of Company personnel. Marketing activities will target customers to inform them of the component offerings and the benefits of participation. For the DLS and PDR component of the program, the Company or the CSP may also recruit device manufacturers, providers, and other program allies throughout implementation to promote and achieve customer participation. The Company or the CSP may also market and/or cross market the component offerings to customers in conjunction with or through other Company program offerings (e.g. smart thermostat rebates).

**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**

Refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the term of this Phase V Plan, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications that are available from participating retailers, the program website, or participating contractors;
- Online rebate forms or instant rebates through a dedicated website;
- Midstream/upstream incentives provided through participating distributors and/or retail outlets; and
- For DLS and PDR subcomponents - Initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year.

In instances where incentives are not immediate, the Company will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the right to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual report.

For the FTM program component, eligible measures include installation energy system upgrades, installation of equipment (e.g., solar or energy storage equipment) on the energy delivery system, or enhanced system operations that achieve energy savings and peak load reductions. There are no incentives associated with FTM EE&C measures included in the Company's Plan.

### **The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC**

For EE&C component offerings, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon customer response and market conditions over the Phase V Period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with program component performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultants, or CSPs, stakeholder input, and industry benchmarking. Incentives will vary depending on factors, including, but not limited to, the specific program component, end-use and measure, the incremental cost of efficient technology, and the product maturity in the marketplace.

For the DLS and PDR component of this program, the proposed level of incentives was primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company.

**Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days**

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be post marked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

**Key schedule milestones**

As detailed under the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- October 24, 2025: RFP issued for program implementation CSP(s)
- November 26, 2025: Phase V Plan filed with the PA PUC
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program implementation begins

**Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document estimated savings by the Commission's statewide evaluator (SWE)**

The Company's CSP for EM&V services will be required to perform evaluation, measurement, and verification of the program in accordance with the state's Evaluation Framework. Anticipated activities for this program may include:

For the pre-installation phase, for a sample of participants, the Company will verify that existing inefficient equipment (e.g., HVAC, lighting, food services equipment plug loads and controls) is installed and working on customers' premises. The Company will also determine current total energy consumption and demand using billing/meter information and will check sample calculations of projected savings and assumptions (e.g., EFLH) for accuracy and for compliance with the PA TRM guidelines. Pre-approval providing the opportunity for pre-installation inspections may be required for certain measures and projects.

For the post-installation phase, the Company will verify through verification inspections that new, more efficient equipment has been installed and will document, store, and send measure data to the SWE using specified data transmission protocols, processes, and technology.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that energy savings and demand reduction are being realized as projected. A tracking and reporting system will be used for such monitoring. If EE&C program indicators show that projected EE&C targets are not likely to be achieved on schedule and within budget, the Company will take appropriate corrective actions, which may include adjusting incentives.

For the FTM component of this program, the Company, in coordination with its Independent EM&V Contractor, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions and will include the results in its subsequent semi-annual reports. This will include a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.

For the DLS and PDR component, the Connected Device subcomponent will utilize AMI, and/or device data analytics to evaluate the usage reduction during peak load events. The Custom Demand Response and Connected Device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate.

The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes and technology.

**Administrative requirements- include internal and external staffing levels on a full-time equivalent (FTE) basis**

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. See Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

See Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$1.0M, which represents approximately 5 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

**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**

Please refer to Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

For the FTM component of this program, FTM measures are limited to ten percent of the EE&C plan portfolio of MWh and MW savings in accordance with the Commission's Implementation Order. While no energy savings, demand reductions or allocation of funding were included in the projections, the Company intends to identify Company and project developer initiatives

implemented during Phase V supporting energy savings and system load relief. See 3.1.6 for additional information.

**Estimated participation – include tables with key assumptions of estimated participation. See Table 9.**

See Appendix B, 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)**

Please reference Appendix B, Table 10.

For the FTM component of this program, the program budget includes administrative, tracking and reporting and evaluation costs provided by the Company's EE&C staff and or its implementation CSPs

To timely and efficiently respond to market conditions and sustain program operations and momentum, support increased customer participation and benefits, and the Company's ability and efforts to achieve its goals, the Company reserves the right to reallocate up to 10% of the total Program budget between sectors and programs. The Company will include discussion and tables detailing any reallocation of program budgets as part of its semi-annual reports.

**Estimated percentage of sector budget attributed to program**

See Appendix B, Table 6, Appendix B, Table 10 and 12.

**Cost-effectiveness- include gross and net TRC and NTG ratio for each program. For gross tables, NTGR should be "1.0." See Table 14, Gross and Net versions (2025 IO at 217-221)**

See Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. See Appendix B, Table 8 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

**Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.**

Other utility programs were not benchmarked for the purposes of EE&C program design or program participation assumptions. See Sections 1.2, 3.1 and 3.2 for information used to inform the program design and program participation assumptions.

**Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations.**

Small C&I Sector (“SCI”) program was designed to target small business customers including multifamily dwellings. The multifamily program component includes residential type incentive offerings directed or targeted at non-residential metered multifamily property owners, property managers and residents, including income qualified and new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing commercial property owners, property managers, and residents with energy efficiency education as well as information regarding other program services and opportunities upon which they can act.

SCI multifamily programs incorporate strategies to change behaviors and include incentives to address the initial cost barrier to promote the participation of multifamily customers. The programs provide opportunities for direct install and prescriptive incentives so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase efficiency.

SCI multifamily retrofit and new construction measures engage property owners, builders, developers, contractors, and program allies in providing comprehensive measures for this component.

For Phase V, to further drive participation and energy savings to all forms of small business customers, including multifamily owners and residents, the Company plans to collaborate with third party program administrators to identify and assist customers in participating in braided funding opportunities for qualifying energy efficiency projects. Programs such as IRA HER and IRA HEAR are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. See Section 4.4 for additional information on braided funding program component.

### **Other information deemed appropriate**

The Prescriptive component includes streetlighting measures that leverage the Company’s approved streetlight tariffs (including LED streetlights). The incentive provided under this program component will be applied to the streetlight project with such payment going to fund removal costs or being treated as a contribution in aid of construction (“CIAC”) and, therefore, reducing the capital cost associated with the installation.

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies’ Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. The following summarizes key changes to this program for Phase V:

**Prescriptive and Custom**– Consolidated under one program but otherwise a continuation of the programs and program components from the Phase IV Plan with the following key changes:

#### Appliance Recycling SCI Program Component:

- Updated incentive amounts
- Added new measures for LV Refrigerators (Mini Fridge) and Coolers

#### Appliance Rebate SCI Program Component:

- Updated incentive amounts

- Consolidated multiple tiers for Clothes Washers into one measure for clothes washers
- Anticipated code changes will be adopted in their respective year and result in separate measures across the program timeline. (Refrigerators, Freezers, Clothes Dryers and Heat Pump Water Heaters)
- Removed Measures – Water Coolers

Consumer Electrics Component – Removed

Food Service Component

- Updated Incentive Amounts
- Removed Measures – ENERGYSTAR Beverage Vending Machine, Coffee Brewer
- New Measure – Refrig/Freezer Special Doors (low/no anti-sweat)

Prescriptive Component

- Updated Incentive Amounts
- Removed Measures – Linear Fluorescent
- New Measures – Reach in Refrig/Freezer Occupancy Sensor, Midstream Lighting Controls

Custom Component

- Updated Incentive Amounts
- Consolidated Under Customer Component – Process Improvement, Motors, Equipment Servers, HVAC/Chiller/Controls, VFDs
- Added measures for CHP and Solar focus

Agriculture Component

- Updated Incentive Amounts
- Removed Measure – Dairy Refrigeration Tune Up

**Energy Management** - continuation of the programs and program components from the Phase IV Plan with the following key changes:

Strategic Energy Management Program Component

- Updated incentive amounts
- Expanded customer engagement through targeted outreach, energy audits, advisory, consultation and technical support services

**Daily Load Shifting and Peak Demand Reduction** – New Component

- Added a new Load Shifting and Peak Demand Reduction –initially targets control of connected devices and custom demand response measures for C&I customers. The program will be set up to begin implementation starting summer 2026.

**Front of Meter (FTM) Program** – New Component

- Through implementation of the Company’s LTIP, O&M plans, and other Company or project developer initiatives, improvements to the Company’s energy delivery systems and installation of equipment (e.g., solar photovoltaic and battery energy storage systems) will

be designed and implemented that deliver energy savings and peak load reductions for customers and the delivery system.

**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).**

The table below summarizes the Large C&I program included in the Phase V Plan, along with a detailed description:

**FE PA Table 6: New Large C/I Programs**

FE PA Table 6: Large C/I Programs & Descriptions	
Proposed Phase V Program	Program Description
Large Commercial & Industrial Programs	
C&I Energy Solutions Program - Large	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.

Below is further information for the Commercial/Industrial Large sector included in the Phase V Plan:

**Program Name and Program years during which program will be implemented**

C&I Energy Solutions Program - Large

**Program years during which program will be implemented**

June 2026 - May 2031

**Objective(s)**

A primary objective of this program is to promote the installation of energy efficient equipment and to increase the efficiency of processes, buildings, building operations, and systems among large commercial and industrial customers, including GNI customers. The program provides customer engagement with educational and efficiency measures in addition to prescriptive,

calculated, or performance-based incentives or midstream or upstream incentives or buydowns and provides support to manufacturers, distributors, contractors, and retailers that sell energy efficient products. Another objective of the program is to promote the installation of energy efficient equipment and to increase the efficiency of processes, buildings, building operations, and systems among small business customers.

This program includes a FTM component - The primary objective of the FTM component of this program is to achieve energy savings and peak load reductions through FTM EE&C measures which enhance the efficiency of the energy delivery system, reduce demand during peak hours, and can help mitigate growing resource adequacy concerns in the State.

This program also includes a DLS and PDR component. The objective of the DLS and PDR program component is to supplement the coincident peak load reductions that result from EE&C programs with additional peak load reductions during daily peak hours for both the summer and winter periods. This component includes a combination of event based and daily load shifting strategies including but not limited to connected device load shifting and custom demand response tailored to customer opportunities.

**Target market – including market size to help frame participation estimates (e.g. number of households, electric sales etc.).**

For the EE&C Program Components, the target market generally includes all large commercial and industrial customers, including GNI customers, of the Company that have program eligible applications or meet other program prerequisites. More specifically, the Company has approximately 16,000 large commercial and industrial customers, and the target market for this program ranges from the Prescriptive component which typically applies to a large percentage or broad range of the customer population to the Energy Management component that promotes eligible measures tailored to the customer’s business type or industry, which will generally apply to a small subset of the overall customer base.

For the DLS and PDR Component, the target market includes all large commercial and industrial customers of the Company in the Company’s service territories with qualifying connected devices or customers with custom DLS and PDR opportunities during daily summer and winter peak hours.

The Company developed participation projections in consideration of many factors (e.g., historical performance, input from its Consultant, implementation team and other stakeholders, etc.) as discussed in section 1.2, which inherently incorporates the target market for each program’s components and measures. See Appendix B, Table 9 for a list of participation assumptions by measure. estimates considering but not limited to Phase IV past program performance, anticipated

**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.**

## **Program description**

The C&I Energy Solutions – Large Program is an umbrella program that engages large C&I customers through multiple program components to provide energy efficiency and energy usage education and awareness. The program is designed to provide easy and cost-effective access to energy efficient measures through customers’ preferred channels and provide financial support through prescriptive or performance-based incentives to the large commercial and industrial customers, including GNI customers, who implement qualifying high efficiency equipment, retrofit specialized processes and applications to higher efficiency processes and applications, retro-commissioning, or high efficiency building shell or system improvements. Prescriptive and performance incentives are intended to reduce the customer’s capital investment for qualifying high efficiency equipment, processes, and systems. The LCI Program includes the Multifamily, Prescriptive, Custom, Energy Management, FTM, and DLS and PDR program components, and are described as follows:

**Multifamily:** The Multifamily program component provides customer engagement with energy efficiency education through energy assessments and the installation of standard energy savings measures and provides or promotes energy savings opportunities, including prescriptive equipment replacement and custom retrofit projects, in both common areas and tenant spaces. In addition, the Multifamily component will target low- income/affordable housing properties with enhanced incentives and measures. Customers will begin participation in the Multifamily component with an energy assessment and installation of standard energy savings measures. The assessment will identify and recommend additional energy savings opportunities that are specific to each customer and building and could include incentives for prescriptive equipment replacement or custom retrofit opportunities.

**Prescriptive and Custom:** The Prescriptive and Custom program components will promote the installation of high-efficiency equipment by the Company’ large commercial and industrial customers, including GNI customers, either via the installation of prescriptive or custom measures or projects. The Prescriptive program component provides prescriptive-based incentives to large businesses, including GNI customers, to purchase and install energy efficient equipment and appliances. This program component also provides prescriptive-based incentives to large commercial and industrial customers, including GNI customers, to purchase and install energy efficient equipment that are residential type appliances that reside within a large commercial and industrial customer’s facility (e.g., break rooms, small kitchens, etc.) as well as the removal and recycling of qualifying inefficient, operating appliances. (Periodic events may be offered at centralized drop-off locations where customers can drop off smaller qualified inefficient operating appliances such as, but not limited to, dehumidifiers and room air conditioners.)

Prescriptive incentives will be offered for individual applications and retrofit projects employing standard efficient technologies where the anticipated energy savings are relatively consistent. These measures will incentivize energy efficient lighting, heating and cooling equipment, agricultural and food service equipment, and residential grade

appliances among other efficiency measures. The Prescriptive program component will support and/or provide downstream approaches and may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors, and retailers that sell select energy efficient products. Type and value of incentive provided will vary and will include electric technologies that improve energy efficiency. Up-front rebates will be offered to reduce first cost barriers.

Prescriptive measures are designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels. Prescriptive rebates are designed to: Provide incentives to facility owners and operators for the installation of high efficiency equipment and controls. Promote the marketing of high efficiency measures by trade allies, such as electrical contractors, mechanical contractors, and their distributors, to increase market demand. Ensure that the participation process is clear and simple. Prescriptive incentives will increase adoption of energy efficient equipment by harnessing the Company' unique customer relationships to positively impact the sales process surrounding efficient equipment, from education and awareness with customers to engagement with trade ally contractors and equipment distributors for the high efficiency equipment.

The Custom program component includes custom measures that promote electric efficient opportunities for large commercial and industrial customers, including GNI customers, that are non-standard and not captured by prescriptive equipment. Calculated or performance-based incentives will be provided to customers for upgrading less efficient specialized processes and applications (e.g., variable frequency drives, motors, compressed air, equipment replacement, CHP, photovoltaic (solar PV), industrial process changes, data centers, etc.) to high efficiency specialized processes and applications. This program component also provides incentives for customers to install specialized building shell or improvements for new construction or renovation projects. Calculated or performance-based incentives are designed to reduce the customer's capital investment for qualifying energy efficient measures.

Typical custom measures that are eligible for incentives are either less common measures or efficiency opportunities in specialized applications that may include manufacturing or industry-specific processes, or non-traditional use cases. In many cases, custom efficiency projects are more complex than prescriptive equipment replacement.

Potential participants in both the Prescriptive and Custom program components are recommended to submit an application for pre-approval to confirm project eligibility and reserve funding. The Company and/or their CSP will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program component requirements, terms and conditions, and general information. In addition, the Company and/or its CSP will provide applications in web ready formats to ensure participants have easy access to the forms. The pre-approval process provides for the review of the customer's proposed project to confirm measure eligibility and incentive budget availability. This also supports Company's program and program component management because it communicates projects that are in the pipeline. If accepted and pre-approved by the Company, a timeline is established for project completion to qualify for a rebate.

The typical lead time for completing a project is 90 to 120 days but can be longer depending on the complexity of the project. Large projects, or subsets of projects, may be required to undergo pre-and post-inspection to validate project energy savings.

**Energy Management:** The Energy Management program component targets energy savings for existing large commercial and industrial facilities by providing a holistic approach to improving building energy performance through the maintenance and retro-commissioning services for existing buildings and through the implementation of energy savings strategies that improve the overall operation and energy performance of buildings and building systems. This program component complements the Prescriptive and Custom components, which focus on capital equipment replacement or process improvement investments by improving the energy performance of a building by retrofitting, maintaining, adjusting, and optimizing the systems within the building and the implementation of complementary energy savings measures. The program component also provides paths to track the ongoing building energy performance by using retro-commissioning which ensures continued energy performance. By implementing these measures, customers also receive ancillary benefits, including improved occupant comfort, lower maintenance costs, and extended equipment life.

This program component includes strategies or implementation efforts that focus on specific energy efficiency measures and management practices that can be categorized as follows:

- **Retro-Commissioning (RCx):** Provides a comprehensive assessment of a customer's commercial/industrial building by using a prescribed planning process that includes a building audit, development of an action plan for the building, and development of a Measurement and Verification (M&V) plan to ensure the optimum on-going performance of the building and building systems. A comprehensive assessment of a commercial/industrial building using a prescribed planning and implementation process, including:
  - Audit Phase – Customer confirms intent to participate in program and registers with the Company or the third-party implementation contractor. Customer and/or the customer's consultant completes the required level of an American Society of Heating, Refrigerating, and ASHRAE audit based on the complexity of the facility and develops a retro-commissioning implementation plan, including project timelines and plan to implement audit identified operation and maintenance measures. There may be opportunities to complete this Phase without a full ASHRAE level audit.
  - Setup Phase – Contracted services to implement the plan are verified, long-term monitoring and reporting is developed and initiated, and project plan is implemented by customer.
  - Measurement and Verification (M&V) Phase – Savings verification and rebate payment from implementation of the plan are completed.

Typical Retro-Commissioning measures include, but are not limited to:

- Optimizing chiller and boiler operations to better match building load conditions reducing ventilation in over-ventilated areas.

- Fixing ventilation dampers that are open when they should be closed or vice versa.
- Decreasing supply air pressure setpoint and system rebalancing.
- Aligning zone temperature setpoints to match the building's actual operating schedule.

Monitoring-Based Commissioning (“MBCx”): Monitoring-Based Commissioning (“MBCx”) offers monitoring software paired with a building's energy management system to identify energy savings opportunities and optimize building performance and EE. Contracted services will alert the customer when equipment is not operating as expected using fault parameters and will work with the customer to correct ongoing issues and make improvements wherever possible. Planning and implementation typically includes, but is not limited to:

- Assessment and qualification of a building energy management system. Assess utility bills and facility to recognize potential for energy savings.
- Customer agrees to have contracted services utilize eligible software with diagnostics and other functionality through a monitoring service contract.
- MBCx is designed to:
  - Maximize potential incentives with a deeper dive into a building's overall performance
  - Monitor and identify cost savings opportunities
  - Benefit from a continuous process to improve comfort and optimize energy usage
  - Maximize the operational efficiency of buildings

Virtual Commissioning (“VCx”): As an alternative to performing an on-site audit to develop a retro-commissioning plan, or as an additional complementary measure, VCx provides eligible customers with an analysis of their building's energy performance. This analysis uses meter usage/other data and building modeling to identify and recommend energy efficiency measures and operational changes to improve a building's overall energy performance. The process starts with benchmarking, peer comparison metrics (aids in determining energy performance to identify facilities that are underperforming) and then moves to facility assessments; site facility assessments may be 100% virtual or include onsite work depending on customer needs and identified measures. The analysis will foster participation in the Company's other programs by identifying and encouraging customers to implement other energy efficiency improvements. This offering can also use continuous engagement, monitoring, and periodic reviews of the customer's energy usage to ensure that implemented measures or changes have been successfully completed. The use of building analysis using remote analysis techniques will also help customers to participate in the programs because of limited or constrained access to customers' facilities.

- Strategic Energy Management (SEM) / Virtual SEM - Strategic Energy Management (“SEM”) subcomponent is designed to optimize energy consumption for small C&I customers through long term management of existing systems and processes (including behavior), as well as tracking and benchmarking performance to identify and evaluate

energy optimization efforts. Long term SEM efforts are typically focused on developing and executing an energy management strategy. This strategy is formulated through a series of site and/or remote visits and interviews with building owners and staff to specifically develop a Strategic Energy Management Plan (“SEMP”) for the customer’s facility. The SEMP will be reviewed with the customer by the Company and/or its CSP on a scheduled basis. This plan may include:

- Revisions or improvements to an existing Building Automation System (“BAS”) or the addition and initiation of the use of a BAS to monitor and control the buildings components and systems. The implementation or improvements to a BAS or the review of an existing BAS, can include the proper training for building operators to achieve maximum efficiency.
- Development of a maintenance plan for existing building mechanical/electrical equipment and or systems to identify best practices in building performance and an interactive monitoring of system equipment by both staff and sponsoring utilities.
- Ongoing engagement to track energy usage and performance, assist with planning energy efficiency projects, and interact with facility personnel to adopt energy efficiency strategies and behaviors.
- Utilizing other Program offerings, including: Prescriptive/Custom measures, RCx, and VCx.
- Using building modeling and benchmarking to compare customer’s usage and performance to cohort of similar facilities and VCx to track energy usage and performance over time.
- Application of whole building energy modeling tools that can model buildings for both operational and capital improvements.
- Scheduling of attendance of customer personnel to attend educational workshops, webinars, and group/individual training sessions with cohorts of facility managers (e.g., Building Operations Training)
- Recommendation/Coordination for additional funding sources and financing options
- Building Operations Training Provides incentives and/or training for qualified personnel, contractors, consultants, and customer building operation personnel, to participate in nationally recognized training and workforce development, which may include O&M training and certification programs related to the efficient design, operations, and maintenance of buildings, such as BOC through a certified training program.

Customers can participate by application to the program or may be contacted directly by program personnel. Customers can participate individually or in a cohort with other customers in the same industry. The cohort would allow customers to share best practices amongst each other as each customer goes through the SEM program lifecycle. A customer would still be treated as an individual unique project within the cohort. The program will retrieve customer demographics and obtain customer agreement for the services to be provided and facilitate ongoing customer engagement. The Company’s CSP will develop application forms for this program that will guide applicants through eligibility guidelines, terms and conditions, and general program information requirements. In addition, the

program will provide applications in web-ready formats to ensure participants and potential customers have easy access to the forms.

Supplemental program services include providing additional customer engagement, advisory, energy analysis and technical consulting services to help identify, promote, develop and implement projects under this program component, including but not limited to:

- Perform a Level 1 or 2 ASHRAE Audit of commercial or industrial facility or complete an engineering study that evaluates alternatives for the design of a system or process for a commercial building or industrial facility.
- Benchmarking of customer buildings and facilities
- Tracking customer EE&C metrics e.g., Lifetime/Lifecycle energy savings, Peak Demand savings

**Front-Of-The-Meter (“FTM”):** Through implementation of upgraded designs, equipment and operation of the Company’s energy delivery system, the FTM component will deliver system energy savings and peak load reductions. Company and project developer initiatives supporting such system load relief include but are not limited to the Company’s LTIP, its O&M plans, and other Company or project developer initiatives. Under the FTM program component, the Company will coordinate with these FTM initiatives and operations to target energy savings and peak load reductions from the corresponding improvements.

Potential improvements that can provide energy savings and peak load reductions include but are not limited to: replacement of and upgrades to energy delivery equipment, voltage optimization (e.g., Conservation Voltage Reduction (“CVR”)), efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar photovoltaic projects that are not associated with an existing retail meter.

**Daily Load Shifting (“DLS”) and Peak Demand Reduction (“PDR”):** The C&I DLS and PDR program component is comprised of two program subcomponents - Connected Devices and Custom. Each subcomponent is designed to deliver load reductions on a daily and/or peak day event basis.

- Connected Devices: Participating customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods. This subcomponent includes customers’ smart thermostats for control of heating, ventilation and air conditioning equipment, managed charging of electric vehicles, and battery storage or other potential customer equipment to reduce load of connected devices during peak load periods. This subcomponent will allow customers to override the control of their connected devices and does not include any financial penalties for non-performance.
- Custom: The Custom subcomponent targets Commercial and Industrial customers to reduce load during peak load hours on a daily, scheduled, or event basis during the PA Act 129 summer and winter peak load periods through behavioral messaging, operations or

process changes, equipment adjustments, controls or other specialized approaches adopted by the customer.

**If the program is considered comprehensive, discuss the programmatic elements that led to the comprehensive designation.**

The Commercial and Industrial Programs were designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all customers. Commercial businesses and industrial customers are also addressed through programs that provide opportunities including prescriptive rebates, custom measures, building tune-up, and whole building/comprehensive solutions. The programs include specific opportunities that ensure access for large customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. And the programs include opportunities that encourage customers to consider a holistic approach to Energy Efficiency for customers who are interested and able to participate in whole building/comprehensive solutions.

**Describe how participation in other Act 129 programs (or components of the same umbrella program) will be coordinated and encouraged.**

With oversight from the Company, the CSP(s) hired by the Company to implement the C&I Energy Solutions program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and also other Act 129 programs where applicable. The program components will be marketed, where practical, in conjunction with the other C&I Energy Solutions program component offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers

In addition, the Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers. As part of these activities, time will be spent detailing the various program components as well as applicable other Act 129 programs to the various participating program allies, contractors and customers.

**Implementation strategy (including expected changes that may occur in different program years)**

The Company will outsource the implementation of this program to CSP(s) who will be responsible to administer, promote, and provide the program to customers, including staffing, promotional strategies, and processes ensuring quality and other controls supporting successful program implementation. The CSP(s) will be responsible for administration, marketing, outreach, fulfilling program services, application processing, and documentation regarding purchased products and completed projects, and processing incentives and rebates, where applicable. The Company will review the application processes with its Phase V CSP(s) to

identify and make improvements, as warranted, and will require the program CSP(s) to consider innovative outreach activities to engage customers, program allies, and trade allies throughout the implementation of the program.

The Company will perform overall administration and oversight of the program. The Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program-components beginning June 1, 2026.

Program information and links to program applications will be made available at the Company's program website. Completed applications to the program components will be processed online or returned via email, where applicable. For Phase V, pre-approved projects that are not completed prior to the conclusion of Phase IV will be processed as part of the same Phase V program without re-application, consistent with the Company's review and eligibility requirements. The Company will consider other methods for providing rebates and other rebate application processes based on market considerations and opportunities that are identified during program implementation.

The Prescriptive and Custom program components will offer an on-line application portal for customers to submit rebates for energy efficient products or projects and may also develop a midstream approach, work with retailers, contractors, distributors and/or manufacturers for midstream or upstream incentives or point of purchase buydowns for select measures. The CSP(s) will develop electronic rebate application forms that will guide applicants through eligibility guidelines, program requirements, terms and conditions, and general information. In addition, the CSP(s) will provide applications in web ready formats to ensure participants have easy access to the forms. Additionally, the CSP(s) will provide support and assistance to retailers or distributors to support identification and promotion of qualifying energy efficient products. The CSP(s) will also provide technical support to customers on the application of the energy efficiency measures and technologies included in these program components.

Additionally, for a number of appliances that will be offered incentives through the Company's prescriptive component, the Company expects federal standard changes to happen mid cycle and therefore will impact savings in a downward manner once these changes take place. The Company will work with its evaluator and the SWE to determine specific adoption of timing and savings impacts for the change.

The CSP for the Multifamily program component will provide targeted marketing to both multifamily customers and program allies to ensure awareness of the program and enhance customer participation. The CSP may also contract with qualified auditor(s) to provide the component services to customers, who will conduct marketing and the direct installation and retrofit aspects of this program component.

The CSP for the Energy Management program component will conduct implementation aspects

of this component to customers. Marketing will target specific customer types and program allies to ensure awareness of the component and its subcomponents and enhance customer participation. Additional targeted marketing will be completed to promote this program component and enhance participation among hard to reach large business customers. The CSP will also conduct the services provided through this program component and its subcomponents.

Customers can participate in the Multifamily and Energy Management program components by submitting an application or will be contacted directly by the CSP and/or auditors.- The CSP will retrieve customer demographics and obtain customer agreement for the services to be provided and handle on-going customer engagement. Incentives for efficiency measures implemented will be issued after the measures are purchased or completed and required documentation is submitted.

For the FTM program component, the Company will coordinate with its engineering, operations and field services teams to identify and target FTM measures for energy savings and peak load reductions on an on-going basis during Phase V.

For the DLS and PDR program component, the Company plans to contract with experienced CSP(s) to implement the various subcomponents supporting successful program implementation. The CSP(s) will be responsible for marketing, outreach, enrollment, education and fulfillment aspects of the program. The Company will perform overall administration and oversight of the program.

For the Custom subcomponent of DLS and PDR, the Company may also contract with customers directly or with PJM Curtailment Service Providers (“PJM CSPs”). Further, the Company anticipates adjusting implementation of the various subcomponents throughout the term of Phase V to improve performance based on actual results. Such changes may include but are not limited to adjusting enrollments, marketing, customer engagement, program approaches or terms and incentives.

Leveraging other conservation programs and funding may help heighten awareness of the programs, encourage participation and improve the economic viability of customer projects and the overall participation and savings achieved in the Act 129 programs. To promote and leverage these programs and braided funding from multiple sources to customers as they are available and applicable to relevant program components, the CSP(s) will be required to pursue collaboration and coordination with these programs to provide educational and marketing campaigns. The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging their participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. Please reference Section 4.4 for additional information.

With regards to Alternative Energy Portfolio Standards (“AEPS”), the Company plans to promote the availability and support registrations for C&I participants of its Act 129 programs with eligible energy efficiency projects. The Company plans to collaborate and coordinate with the PA DEP and its AEPS program administrator to promote and facilitate the registrations. See Section 4.4.3 for more information.

### **Program issues and risks and risk management strategy**

The risks associated with this program are primarily obtaining sufficient customers to participate in the various program components. Well-established and innovative outreach and marketing techniques will be used to promote participation in this program. Additional risks include changing market and economic conditions, such as associated with the potential impact of tariffs, changing government policies and the ability to successfully coordinate with and leverage other conservation programs and braided funding opportunities that may impact the ability of the Company to meet its targets within the acquisition costs assumed in the Final Implementation Order and the Company’s budget. Compounding these general market and economic risks and their potential impact on the Company is that the Program design directly targets participation and savings from several end uses (e.g. Solar, C&I Lighting and CHP) in alignment with the MPS projections, and that any underperformance will require the Company to achieve greater savings from other low-cost measures that may or may not be available. The Company will actively monitor the program component performance and adjust program component targets, marketing, outreach, budgets and/or incentives where applicable to mitigate these risks.

Anticipated key barriers that may pose a risk to the program components include:

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Conversely, the business or economic climate may require customer costs or contributions to be reduced in order to encourage participation. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels, including at midstream and downstream.
- **Customer Awareness and Engagement:** Businesses and GNI customers may have limited resources and time to consider, pursue, or prioritize energy efficiency and may have efficiency needs not well aligned with traditional EE&C programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation. In addition to limited resources and time, other large customers may not be aware of the benefits of installing efficient equipment or completing other energy efficiency improvements. To

address awareness and educational barriers, the Company will educate customers on the program opportunities and the benefits of installing efficient equipment or completing other efficiency improvement through targeted marketing and outreach, providing program services, ensuring that incentives are easily accessible, and encouraging market transformation and stocking of efficient equipment through midstream incentives. The Company will also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of the program opportunities and available incentives.

- **Business/Operational Constraints:** Facilities often have unique operational constraints that act as a barrier to implement energy-efficiency projects and the maintenance of equipment. This barrier will be addressed by ensuring the program component operates cooperatively with participants, provides technical assistance and support, provides maintenance services, and offers timely incentives.
- **Sufficient Stocking and Availability of Efficient Products:** To support a robust marketplace for efficient equipment, the Company may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of and/or for marking down the cost of the efficient equipment at the point of sale.
- **Dailey Load Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty of customer participation and program component performance with daily load shifting and demand response during summer and winter demand peak periods. More specifically, it is unknown how customers and the program components will perform in daily load shifting across over 400 hours per year and in the winter period, both of which are new to PA and across industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across the 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

Further risks include the measurement and verification of the peak load reduction impacts given new methodologies and protocols for daily load shifting. The CSP(s) for the program subcomponents will be required to monitor progress for participation and impacts, and to provide contingency associated with customer non-response or opt-outs. The CSP will also be required to provide reporting to the Company detailing its performance and to promptly react to any deficiencies.

The Company will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, marketing/advertising, and improvement opportunities. The Company and/or

the implementation CSPs will monitor participation and performance to assess, where applicable, the effectiveness of program services, outreach efforts, incentive levels, delivery methods, and feedback from both program and trade allies, so that they can provide suggestions on how to assure that the program is continually providing customers with their needs.

### **Anticipated costs to participating customers**

Customers will have to pay the balance of the energy efficient product, project and/or installation costs not covered by the rebate. See Appendix B, Table 8 for the incremental cost and incentive range for each measure in this program.

Note: There are no costs to customers for FTM EE&C measures included in this program. For Load Shifting and Peak Demand Reduction program component, there are no known anticipated costs for customers to participate. This program component primarily targets behavioral or operational changes and utilization of existing customer equipment for participation.

### **Ramp up strategy**

The Company anticipates a seamless transition and implementation upon Commission approval of the program and CSP contract(s). The Company anticipates all EE&C program components to begin implementation on June 1, 2026. For the existing program components being offered in the new Plan, there will be some ramp-up period needed to transition to the new Plan with the implementation vendors. For new and expanded program measures, it is anticipated that it will take approximately three- to six-months to fully start-up new or expanded program measures after program approval. Please refer to Section 1.4 and 4.1.5 for more details on ramp up.

For the DLS and PDR program component, since demand response programs were not offered in Phase IV and daily load shifting and winter demand response are new concepts for Act 129, it is anticipated that it will take four to six-months to start-and ramp up the DR program offerings. Because of this ramp up period, the Company plans to complete its competitive bidding process to select its CSP(s) for implementation of this program in the 4th quarter of 2025 and to submit the CSP contracts to the Commission for approval in the 1st quarter of 2026. This supports the CSP finalizing staffing, program planning, set up, marketing development and start-up activities supporting implementation of all program components beginning June 1, 2026. This supports the CSP obtaining customer enrollments such that the Load Shifting and Peak Demand Reduction program component can begin implementation June 1, 2026. See discussion in Section 1.4 for more details on ramp up.

### **Marketing strategy**

EE&C Program Components:

The Company will implement an aggressive, sector-based marketing campaign for the duration of the new Plan. Marketing will be used to target specific customer sectors to ensure awareness of the program components and enhance participation.

Marketing activities of the Prescriptive, Custom, and Energy Management program components will target eligible customers and program allies to inform them of the program, its components, and the associated benefits through direct mail, website, trade shows, the business customer newsletter, and key account managers. The Company will also work with distributors and contractors to market eligible higher efficiency equipment than required by federal standards.

Additionally, the expanding list of program allies will continue to be cultivated, as they are vital to the growth in customer participation. The Company regularly communicates with their program allies and participating contractors and provides educational type seminars regarding eligibility, incentives, and other program details to promote and market the program to customers.

The CSP(s) for the Prescriptive, Custom and Energy Management program components will target various market sectors (i.e., education, medical/health care, manufacturing, retail, food service) to enhance participation and promote a cross-section of measures applicable to each market. The Energy Management component will also outreach to building maintenance and operations personnel to promote the component including the Retro-commissioning and Strategic Energy Management measures to enhance the energy performance of their facilities.

Since prescriptive retrofits are generally one-for-one replacements, measure-specific marketing will be developed for new measures or enhanced for continuing measures. These will be delivered to sectors most likely to utilize the specific technology. Fact sheets, mailings, post cards, e-blasts, and on-location seminars will all be used to promote specific measures. Custom marketing efforts require a consistent and directed outreach to program allies, the Company's managed accounts and government accounts whose processes are compatible with the Custom program components requirements. The CSP will be required to develop and implement a diligent direct and indirect marketing plan to identify and target customers to connect them to appropriate measures using e-blasts, webinars, on-site seminars, and large customer newsletters, among other marketing and outreach initiatives. Retailers, wholesalers, distributors, manufacturers, and trade allies will be contacted directly and/or through trade associations to develop networks and promote involvement in the program component where applicable.

Further, in order to attract multiple measure participation, the CSP will conduct outreach via sectors (e.g., medical facilities for lighting, HVAC, custom processes, and CHP) and to program allies, such as architects, engineers and professional associations (e.g., the USGBC). Targeted advertisements in industry/trade publications will also be required to bring awareness to the opportunities and savings available through the Prescriptive, Custom, and Energy Management program components. Furthermore, specialized marketing, engagement, and engineering assistance will be utilized to enhance program participation by utilizing CSP personnel to assist with specialized equipment applications, whole building type solutions and studies, and other technical assistance related to energy efficiency opportunities under these components recognizing the increasing complexity of new lighting, HVAC, controls, energy management and other technologies to foster component participation.

The program components will be marketed, where practical, in conjunction with the other Energy Solutions for Business program offerings as additional savings and incentive opportunities that are available or as a specific recommendation for energy savings to customers.

The CSP for the Multifamily program component will develop and administer the marketing plan for this component, which will be marketed to non-residential metered multifamily property owners, property managers, and residents, including income-qualified occupants and owners of multifamily buildings. The program component will be marketed to customers and program allies through the component website. The program component will also use targeted outreach, such as direct calls, direct mail, email, or other targeted outreach campaigns. Web-based information and online applications may be utilized. In addition, each participant will be given marketing materials for other applicable program offerings at the time of the audit.

The CSPs will attempt to follow up with participants, to measure satisfaction with the program component in general and with delivery personnel. The CSPs will also identify customers who did not complete additional retrofit measures to understand the barriers to moving forward with comprehensive projects. The follow-up will be considered on an ongoing basis to improve future marketing strategies and program design.

Daily Load Shifting and Peak Demand Reduction Program Component:

The marketing of this component will be provided by the CSP(s) under the direction of Company personnel. Marketing activities will target customers to inform them of the component offerings and the benefits of participation. For the DLS and PDR component of the program, the Company or the CSP may also recruit device manufacturers, providers, and other program allies throughout implementation to promote and achieve customer participation. The Company or the CSP may also market and/or cross market the component offerings to customers in conjunction with or through other Company program offerings (e.g. smart thermostat rebates).

**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**

Refer to Appendix B, Table 8 for the eligible measures, eligibility, and incentive strategy for this program.

The minimum qualifying efficiency ratings for select program measures are based on meeting either ENERGY STAR® requirements or other requirements that exceed the current Federal Standard. The Company has adopted new Federal Standards and revised eligibility requirements for certain applicable measures. This program has been designed based on applying established efficient conditions per the PA TRM or other sources, which rely on ENERGY STAR®, CEE, or other standards and specifications for certain applicable measures. Given the potential of changing standards and specifications for the eligible products under the program during the term of this Phase V Plan, the Company may implement tier level or incentive changes for certain applicable measures in conjunction with future specification changes to maintain program continuity and implement timely on-going energy efficiency improvements.

Incentives for select program measures will be available in several ways and are adapted to the retail partner or program needs and market response. Strategies may include:

- Mail-in applications that are available from participating retailers, the program website, or participating contractors;
- Online rebate forms or instant rebates through a dedicated website;
- Midstream/upstream incentives provided through participating distributors and/or retail outlets; and
- For DLS and PDR subcomponents - Initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year.

In instances where incentives are not immediate, the Company will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements, such as necessary field inspections (if required).

To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the right to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual reports.

For the FTM program component, eligible measures include energy delivery upgrades, installation of equipment (e.g., solar or energy storage equipment) on the energy delivery system, or enhanced system operations that achieve energy savings and peak load reductions. There are no incentives associated with FTM EE&C measures included in the Company's Plan.

### **The basis for proposed level of incentives and the sharing of incremental measure costs between participants and the EDC**

For EE&C component offerings, the Company proposes to provide a range of incentives depending on the program component and measure type, subject to changes within the "Up to" incentive amounts, based upon customer response and market conditions over the Phase V Period. The Company strives to balance the sharing of incremental measure costs between the Company and participants with program performance and progress to goals. The Company will set and adjust incentives based on many factors, including, but not limited to, their experience, the experience of their affiliates, consultants, or CSPs, stakeholder input, and industry benchmarking. Incentives will vary depending on factors, including, but not limited to, the specific program component, end-use and measure, the incremental cost of the efficient technology, and the product maturity in the marketplace.

For the DLS and PDR components of this program, the proposed level of incentives was primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The

component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company.

**Maximum deadline for rebates including clear and reasonable rationale for any timeframe longer than 180 days**

A standard deadline of 180 days from the date of project completion, defined as all measures being installed, fully operational and otherwise completed, will be requested for program applications, and be post marked by June 7, 2031. The Company may allow an extended period for customers when the evaluation, reporting and reconciliation timing of all measures installed meets Phase V requirements to support customer participation (e.g. customer business processes, finalizing project applications, documentation, or other information, etc.).

**Key schedule milestones**

As discussed under the Ramp Up Strategy above, and in Sections 1.4 and 4.1.5, the Company anticipates a seamless transition and implementation of the Phase V Plan beginning June 1, 2026. Key milestones associated with this includes:

- October 24, 2025: RFP issued for program implementation CSP(s)
- November 26, 2025: Phase V Plan filed with the PA PUC
- 1Q2026: CSP(s) selected and proposed CSP contracts submitted to PA PUC for approval
- March 2026: PA PUC Rules on the Phase V Plan
- June 1, 2026: Program implementation begins

**Assumed Evaluation, Measurement, and Verification (EM&V) requirements required to document savings by the Commission's statewide evaluator (SWE)**

The Company's CSP for EM&V services will be required to perform evaluation, measurement, and verification of the program in accordance with the state's Evaluation Framework. Anticipated activities for this program may include:

For the pre-installation phase, for a sample of participants, the Company will verify that existing inefficient equipment (e.g., HVAC, lighting, food services equipment and plug loads and controls) are installed and working on customers' premises. The Company will also determine current total energy consumption and demand using billing/meter information and will check sample calculations of projected savings and assumptions (e.g., EFLH) for accuracy and for compliance with the PA TRM guidelines. Pre-approval providing the opportunity for pre-installation inspections may be required for certain measures and projects.

For the post-installation phase, the Company will verify through verification inspections that new, more efficient equipment has been installed. They will document, store, and provide measure data to the SWE using specified data transmission protocols, processes, and technology.

As part of the monitoring process, the Company plans to use selected indicators to verify periodically that energy savings and demand reduction are being realized as projected. A tracking and reporting system will be used for such monitoring. If EE&C program indicators show that

projected EE&C targets are not likely to be achieved on schedule and within budget, the Company will take appropriate corrective actions, which may include adjustments to incentives.

For the FTM component of this program, the Company, in coordination with its Independent EM&V Contractor, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions and will include the results in its subsequent semi-annual reports. This will include: a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.

For the DLS and PDR component, the Connected Device subcomponent will utilize AMI and/or device data analytics to evaluate the usage reduction during peak load events. The Custom Demand Response and Connected Device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments. As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate. The Company will document, store, and send measure data to the SWE, as requested, using specified data transmission protocols, processes and technology.

**Administrative requirements- include internal and external staffing levels expressed on a full-time equivalent (FTE) basis**

The Company will use a combination of internal and external resources to manage and implement the program. The Company will monitor and adjust the allocation of resources to balance the needs of each program. Please see Sections 4.2.1 through 4.2.3 of the EE&C Plan for more details regarding the Company's EE&C Department organizational structure responsible to oversee and administer the Phase V Plan and Sections 4.3.1 through 4.3.3 for the Company's plans to contract with CSP(s) to perform EE&C functions including program implementation.

See Appendix B, Table 10 for the Program Budget by cost element. This table projects an average annual administrative budget of approximately \$0.8M, which represents approximately 4 FTEs. At the time of this filing, the Company has not contracted with its implementation CSPs and is unable to explicitly quantify external staffing. However, Appendix B, Table 10 also provides the Company's projected budget for CSP Delivery costs, which includes staffing among other CSP costs associated with implementation of the program components.

**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**

Please refer to Appendix B, Table 9, Appendix C, FE PA Table C-1, and Appendix C, FE PA Table C-2.

For the FTM component of this program, FTM measures are limited to ten percent of the EE&C plan portfolio MWh and MW savings in accordance with the Commission's Implementation Order. While no energy savings, demand reductions or allocation of funding were included in the

projections, the Company intends to identify Company and project developer initiatives implemented during the course of Phase V supporting energy savings and system load relief. See 3.1.6 for additional information.

**Estimated participation – include tables with key assumptions of estimated participation. See Table 9.**

See Appendix B, 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)**

Please refer to Appendix B, Table 10.

For the FTM component of this program, the program budget includes administrative, tracking and reporting and evaluation costs provided by the Company's EE&C staff and or its implementation CSPs

To timely and efficiently respond to market conditions and sustain program operations and momentum, support increased customer participation and benefits, and the Company's ability and efforts to achieve its goals, the Company reserves the right to reallocate up to 10% of the total Program budget between sectors and programs. The Company will include discussion and tables detailing any reallocation of program budgets as part of its semi-annual reports.

**Estimated percentage of sector budget attributed to program**

This information is set forth in Appendix B, Table 6, and Appendix B, Table 10 and 12.

**Cost-effectiveness – include gross and net TRC and NTGR for each program. For gross tables, NTGR should be “1.0”. See Table 14, Gross and Net versions. (2025 IO at 217-221)**

See Appendix B, Table 14 for PA TRC ratios for this program on both a gross and net basis and the net-to-gross ratios assumed for each program. See Appendix B, Table 7 and Appendix C, FE PA Table C-2 for the measure life and net-to-gross ratios assumed for each program measure. See Section 8.0 for information regarding the avoided cost calculations and inputs.

**Summarize the results of any benchmarking efforts against other utility programs that were used to inform program design or program participation assumptions.**

Other utility programs were not benchmarked for the purposes of EE&C program design or program participation assumptions. Please see Sections 1.2, 3.1 and 3.2 for information used to inform the program design and program participation assumptions.

**Describe how the EDC will target and engage different housing and ownership types such as multifamily dwellings and renters and ensure that program services reach historically underserved populations.**

LCI Programs were designed to target large business customers including multifamily dwellings. The multifamily program component includes residential type incentive offerings directed or targeted at non-residential metered multifamily property owners, property managers and residents, including income qualified and new construction, and serve as a portal for other program offerings because they serve a dual purpose of providing commercial property owners, property managers, and residents with energy efficiency education as well as information regarding other program services and opportunities upon which they can act.

LCI multifamily programs incorporate strategies to change behaviors and include incentives to address the initial cost barrier to promote the participation of multifamily customers. The programs provide opportunities for direct install and prescriptive incentives so that customers who are unable or unwilling to undertake whole home/comprehensive solutions are still able to increase efficiency.

LCI multifamily retrofit and new construction measures engage property owners, builders, developers, contractors, and program allies in providing comprehensive measures for this component.

For Phase V, to further drive participation and energy savings to all forms of large business customers, including multifamily owners and residents, the Company plans to collaborate with third party program administrators to identify and assist customers in participating in braided funding opportunities for qualifying energy efficiency projects. Programs such as IRA HER and IRA HEAR are being administered by the PA DEP and with eligibility for renters and homeowners based on area median income. Kindly refer to Section 4.4 for additional information on braided funding program component.

#### **Other information deemed appropriate**

As discussed earlier, the Phase V Plan is generally an extension of the successful programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures. The following summarizes key changes to this program for Phase V:

**Prescriptive and Custom**— Consolidated under one program but otherwise a continuation of the programs and program components from the Phase IV Plan with the following key changes:

#### **Appliance Recycling Program Component:**

- Updated incentive amounts
- Added new measures for LV Refrigerators (Mini Fridge) and Coolers

#### **Appliance Rebate Program Component:**

- Updated incentive amounts
- Consolidated multiple tiers for Clothes Washers into one measure for clothes washers

- Anticipated code changes will be adopted in their respective year and result in separate measures across the program timeline. (Refrigerators, Freezers, Clothes Dryers and Heat Pump Water Heaters)
- Removed Measures – Water Coolers

Consumer Electrics Component – Removed

Food Service Component

- Updated Incentive Amounts
- Removed Measures – ENERGYSTAR Beverage Vending Machine, Coffee Brewer
- New Measure – Refrig/Freezer Special Doors (low/no anti-sweat)

Prescriptive Component

- Updated Incentive Amounts
- Removed Measures – Linear Fluorescent
- New Measures – Reach in Refrig/Freezer Occupancy Sensor, Midstream Lighting Controls

Custom Component

- Updated Incentive Amounts
- Consolidated Under Customer Component – Process Improvement, Motors, Equipment Servers, HVAC/Chiller/Controls, VFDs
- Added measures for CHP and Solar focus

**Energy Management** - continuation of the programs and program components from the Phase IV Plan with the following key changes:

Building Tune-Up -LCI – Removed, focus shifted to custom building improvements

Strategic Energy Management Program Component

- Updated incentive amounts
- Expanded customer engagement through targeted outreach, energy audits, advisory, consultation and technical support services

**Daily Load Shifting and Peak Demand Reduction – New Component**

- Added a new Load Shifting and Peak Demand Reduction –initially targets control of connected devices and custom demand response measures for C&I customers. The program will be set up to begin implementation starting summer 2026.

**Front of Meter (FTM) Program – New Component**

- Through implementation of the Company's LTIIP, O&M plans, and other Company or project developer initiatives, improvements to the Company's energy delivery systems and installation of equipment (e.g., solar photovoltaic and battery energy storage systems) will be designed and implemented that deliver energy savings and peak load reductions for customers and the delivery system.

**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.**

The Phase V Plan also continues to target and provide program services for governmental, non-profit and institutional (“GNI”) customers through the Energy Solutions programs. The Energy Solutions, Small and Large programs include components and measures aimed at serving GNI customers, including direct install, single and multiple prescriptive measures, custom projects, and Energy Management services. As in Phase IV, special efforts will be made to target the GNI customers for participation in these programs in recognition of their unique decision making and financing processes for making capital improvements to facilities. Marketing and outreach will specifically target GNI entities within the Company’s service territory depending upon the program offering. These efforts will include the leveraging of existing Company relationships and employing experienced vendors who have expertise in working with GNI accounts.

**4. PROGRAM MANAGEMENT AND IMPLEMENTATION STRATEGIES**

**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.**

The Company will provide administration and oversight of this Phase V Plan and will utilize experienced third-party vendors to perform various program implementation, delivery, and support activities as described in Section 3. Specific activities that the Company will oversee include: (i) Plan development; (ii) the execution of outreach and marketing campaigns; (iii) quality assurance/quality control activities; (iv) Plan and program performance; and (v) tracking and reporting activities. The Company will utilize third-party vendors to provide program implementation services, including but not limited to managing and providing program operations and services as well as marketing, customer outreach and enrollment, program and trade alley engagement, application and rebate processing, EM&V, and implementation of the tracking and reporting system. The following are examples of third-party vendors that the Company anticipates using for program implementation services, either directly or indirectly:

- Qualified vendor(s) that are registered in Pennsylvania as a Conservation Service Provider.
- Equipment distributors, retailers and/or manufacturers who would promote the eligible products.
- Qualified contractors, auditors and inspectors.
- Program allies who have attended training.

***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***

There are various risks associated with the implementation of this Phase V Plan, the more significant of which are described below:

- Performance Risk is the risk that, due to design or implementation assumptions, the program does not deliver expected savings.

While modeling assumptions yielded results that support program success within budget, the Company notes the conditions under which these programs will be implemented during the Phase V Period may change. Below is a list of some of the more material risks the Company will face:

- Changing economic conditions over the life of the Phase V Plan cause concern that customers may not support the pace of participation and investment estimated and may slow the pace of mass market penetration. As an example, the full implications and current uncertainty surrounding the federal policy on tariff implementation both on the current Phase IV Plan and into the Phase V Plan are unclear. Price increases, higher inflation rates and other impacts on the market will certainly impact customers willingness or ability to participate and may disproportionately affect lower income customers.
- Newly introduced program measures included in this Plan will not have a historical basis for participation rates or experience. As a result, participation and installation rates may be lower than estimated, especially in the early years. This is particularly true for the daily load-shifting programs relative to the peak load reduction targets.
- Targeted participation rates and energy/demand savings may not be achieved due to a variety of factors, such as changing technology and standards, market trends, or incentives that are not high enough to encourage the desired energy efficiency participation and investment posing a risk to the Company's compliance both as to targets and cost effectiveness. The ability to make mid-stream adjustments on a timely basis to program measures or incentives is of paramount importance for the Company to meet its targets and allows the Company to proactively address evolving technology and market trends.

The Company has taken steps to identify and manage risks as well as to prepare for contingencies that may be necessary during the Phase V Period. Those steps are as follows:

- The Company will continue open discussion with stakeholders, seeking input from them as circumstances dictate.
- The Company will continue to consult with its CSPs to modify program implementation strategies and suggest program design or implementation changes as indicated by participation and savings results.

- The Company will continue to perform EM&V of its programs in order to ensure that all programs are reasonable in terms of dollars spent, participation rates achieved, and kWh and kW savings realized.
- The Company will continue its participation in any proceedings, rulemakings, and working groups involving issues that may affect compliance, including, as examples, those related to the PA TRM and adjustments thereto, and unforeseen changes in the economy and/or Federal and state laws that may occur during the five-year Phase V Period.
- The Company designed the demand response offerings to include a variety of program strategies, technologies and approaches through experienced CSP(s) helps the Company to mitigate uncertainties with the daily load-shifting design established for Phase V and provides the required flexibility to make adjustments over the term of Phase V to meet the Company's goals.
- The Company plans for the ability to reallocate up to 10% of the total Program budget between sectors and programs to timely and efficiently respond to market conditions and sustain program operations and momentum, support achieving customer participation and benefits, and the Company's ability and efforts to achieve its goals. The Company will include discussion detailing any reallocation of program budgets as part of its semi-annual reports.
- To timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company plans for the ability to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as but not limited to TRM changes, Guidance Memos, Interim Measure Protocols, process or impact evaluations, cost-effectiveness, etc. The Company will include discussion detailing any such measure changes in its semi-annual reports.
- The Company has developed its incentive strategy in a way that allows timely response to market trends. By employing incentive ranges as opposed to fixed amounts, the Company has the ability to timely adjust incentive levels within the approved range to maximize program participation with appropriate incentive levels.
- The Company will continue to address issues and remain committed to resolve: (i) important programmatic change requirements; (ii) potential additions that are found to be necessary and/or desirable as the Company collects and assess key program performance metrics over the course of each program's deployment and operation; and (iii) unforeseen events that may arise over the Phase V period.

Given the significant investment required to meet the energy and demand savings goals, the Company believes that it is both prudent and necessary to have a robust evaluation process in place from the date of each program's inception, as well as the capability to make those changes that are either indicated by the program evaluations and/or economic or market conditions as they change over time.

- Technology Risk is the risk that program technologies fail to deliver the savings expected.

This Plan incorporates most of the program measures and services included in the Phase IV Plan. Therefore, this risk is minimized because of the known historic results for the majority of the technologies and the market potential for future savings through these programs. However, this risk is heightened for those new or existing measures that have been modified since being implemented under the Phase IV Plan. The Company has attempted to manage this risk by leveraging measures included in the PA TRM and relying on its expert consultant, experience with similar measures used by affiliates in other jurisdictions, input from its experienced CSPs and industry research. Further, this Plan incorporates a comprehensive suite of programs that will have an immediate impact on energy use and, in the long run, should help transform the market into one where customers seek energy efficient options on a regular basis. As with the Performance Risk, the Company will continue to participate in any proceedings, rulemakings, and working groups that address issues that may have an impact on compliance with the Phase V goals.

- Market Risk is the risk that customers, or other key market players, such as retailers and contractors, are not aware of available programs, choose not to participate in a program, or cannot afford investments in energy efficiency measures that support achievement of targets.

Market risk will be assessed through program tracking and periodic surveys to gauge awareness of the programs and, for those not participating, barriers to participation. Market risk will also be assessed through periodic process evaluations. This will enable the Company to identify issues related to market risk and implement mid-course corrections to enable the programs to stay on track. The Company's use of flexible incentive ranges, rather than fixed incentives, is a valuable tool that allows for such corrections in a timely manner. The Company will continue to evaluate various approaches to building and enhancing awareness through communications in order to minimize market risk. The Company plans to further raise customers' awareness of the benefits of energy efficiency and conservation, as well as the availability of its programs offered through this Plan, through wide-reaching educational campaigns and targeted outreach. In addition, the Company intends to utilize the relationships they have with interested parties through the stakeholder process, as well as contacts within various target markets, providing the latter with educational tools as well. Further, each program implementation CSP will also support and supplement such efforts with program specific marketing activities.

- Evaluation Risk is the risk that independent EM&V will, based on different measurement methodologies and assumptions, result in different levels of savings than those estimated in this Plan. The Company minimizes this risk through ongoing work with its EM&V consultant, insights gained through affiliate experiences in other jurisdictions, and by utilizing the PA TRM and other industry guidelines to estimate

program savings. The Company and its EM&V consultant will also work with the SWE in an effort to perform EM&V activities consistent with Commission direction in a sufficiently robust manner to reliably capture all applicable program-related savings.

- **Regulatory Risk** is the risk that the rules governing compliance, recognition of savings estimates, reporting, or management of program budgets may change in a manner that will impair the Company's ability to meet the requirements set forth in the Phase V Implementation Order. The Company will minimize this risk through active participation in regulatory proceedings, rulemakings, and working groups, through their ongoing work with Commission Staff, the SWE, and its EM&V consultant, and by following regulatory guidance. The Company also will notify the Commission if it believes changes to its goals are necessary.

**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.**

In the selection process for the CSPs for the Phase V programs, the Company will consider the CSP's staffing plan and capabilities to ensure sufficient human resources and contractors are dedicated or available to successfully implement the Company's Plan. Throughout implementation of this Plan, the Company will actively oversee program implementation and performance, including assessment of any human resource or contractor resource constraints and will address any associated constraints with the CSP such as working with them to augment staffing or contractors as needed or seeking additional CSPs to supplement the workforce required to successfully implement the programs.

**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.**

On a monthly basis, the Company leverages its tracking and reporting processes to closely monitor the progress of each program component toward its goals individually and for the portfolio collectively, identifying performance issues, gaps, and opportunities for improvement. Review meetings are performed at least monthly. In addition, evaluation activities will also inform how well the programs are moving toward the achievement of goals and provide additional basis upon which any recommendations for adjustments to programs are made. The majority of the evaluation work will be done by the expert EM&V consultant hired by the Company.

Below is a description of the Company's contingency plans should any of the following issues arise:

**What if the savings do not materialize?** If it is found that one or more program components are not meeting expectations, the Company may take one or more of the following actions:

- Shift the focus of underperforming program components or measures to other program components or measures that have a higher adoption rate. The Company's Phase V Plan provides a large number of measures that are rolled up into programs which provides flexibility to shift emphasis to leverage successful measures as needed to achieve program energy savings goals.
- Shift the focus or expand program measures to include new measures that may not have been well known, tested, accepted by the market, or readily available in the market at the time this Plan was designed and submitted for approval. The Company will continue to monitor the market for new measures for potential inclusion throughout the duration of the Phase V Plan.
- Adjust program delivery processes utilized in order to enhance market penetration. Options here may include: (i) having vendors add field staff to handle more inquiries or shorten response times; (ii) eliminating or adjusting project requirements if bottlenecks appear to be stalling progress; (iii) streamline or improve efficiency of implementation processes; or (iv) implementing other program implementation adjustments such as any improvements identified by process evaluations.
- Investigate issues that program allies or customers have with programs and, if deemed appropriate, modify delivery based upon the results.
- Shift program delivery or add or expand delivery channels to more aggressively promote measures.
- In extreme cases, replace non-performing program components or measures with other program components or measures that show the potential for greater success.
- Shift resources to higher performing program components. This Plan assumes customer participation based on current experience of the Company and its consultant, which, in turn, is based on, among other things, customer participation in existing programs. To the extent actual customer participation significantly differs from these assumptions, the Phase V Plan's resources may need to be rebalanced among program components or sectors to ensure that the Phase V Plan's overall objectives are met.
- Adjust rebate levels on a temporary (e.g., limited time offer or special promotion) or long-term basis to affect market response.

***What mid-course corrections could be implemented?*** In addition to the steps discussed above, the Company believes that certain program components may be able to be ramped up through enhanced marketing efforts to drive projected kWh and kW impacts to offset underperforming program components. This may require a re-balancing of program goals and budgets. Notwithstanding, the Company's active oversight of the Phase V Plan and its program tracking and reporting processes will provide guidance for making such mid-course decisions and adjustments. The Company has human resources and infrastructure in place for analysis of such information and the development and resolution of recommendations arising from such analysis.

***How will the appropriate mid-course corrections be identified?*** On a monthly basis, the Company conducts an internal evaluation as part of its active oversight of the Phase V Plan that reviews the progress of each program from both an energy savings and budget perspective that provides early warning for potential performance issues requiring correction. In addition, the Company will use process evaluations to determine progress and to help identify any necessary corrective actions. Process evaluations will be performed using a combination of participant satisfaction and key customer perception surveys - all performed using statistically significant samples along with a kWh and kW impact/cost analysis in which each program's performance is compared with Plan expectations.

**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.***

The Company's EM&V Request for Proposal "RFP" was issued on September 10, 2025. The Company has selected a successful bidder and submitted the proposed CSP contract for EM&V services for the Phase V Plan to the Commission for approval as discussed in Section 4.3.2. The Company has also issued a RFP for program implementation CSP(s) for its Commercial and Industrial programs on October 24, 2025 and plans to issue a RFP for program implementation CSP(s) for its Residential programs in the 4th quarter of 2025. The Company plans to complete its competitive bidding process for the Phase V Plan, select the CSPs and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026.<sup>21</sup> This supports the CSP finalizing staffing, program planning, set-up, marketing development and start-up activities supporting the seamless transition from the Phase IV to Phase V programs with implementation of the Phase V program components beginning June 1, 2026. The Company's Supply Chain group will be involved in the competitive bidding process to select the CSP(s) for the Phase V programs. The Company plans for all program components to be implemented at the beginning of PY18 and continuing through PY22, subject to any program modifications or other adjustments that are made throughout the Phase V Period. Please see Sections 4.1.2, 4.1.4 and 6.4 for more information regarding potential program modifications and adjustments.

The Company's goal is to maintain the momentum created through programs included in the Phase IV Plan and to leverage in the Phase V Plan the synergies created through implementation of those programs. To the extent possible, the Company's Phase V Plan assumes approval of this Plan and CSP contracts in a time frame that allows a seamless transition of programs and measures from the Phase IV Plan to the Phase V Plan, noting that: (i) Phase IV transactions will be managed to conclusion concurrent with the introduction of Phase V programs; and (ii) any applications completed prior to May 31, 2026, will be included in the Company's documentation supporting the participation

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<sup>21</sup> Secretarial Letter issued September 8, 2025 approving the Act 129 Conservation Service Provider ("CSP") Contracts RFP Procedure for FirstEnergy's Phase V EE&C Plan, filed with the Commission on August 25, 2025 pursuant to the Act 129 Phase V Energy Efficiency and Conservation Program Final Implementation Order at Docket No. M-2025-3052826.

towards and compliance with its Phase IV targets. The Company's implementation strategy for this Phase V Plan will rely on the use of CSP(s), partners, program allies, community-based organizations, and other entities engaged in energy efficiency to promote, communicate, deliver, and support the effective transition, deployment and implementation of the Phase V program measures and services and the suspension of any program measures and services not being continued from Phase IV.

Program implementation processes will be leveraged to the extent practical to support timely program transition from the Phase IV programs and implementation of the Phase V programs beginning June 1, 2026. The Company will use multiple CSPs to transition and implement the various programs identified in the Phase V Plan. These CSPs will be responsible for the design of the transition and start-up plan for the Phase V program offerings and measures that will be performed in an organized and efficient manner and that strives to maintain and strengthen constructive relationships with the Phase V Plan and program management, customers, program allies, and contractors.

The transition and start-up planning includes program set-up activities and will commence following Company selection of the CSP(s) for Phase V. This set-up/start-up planning will outline a process to develop the systems and procedures needed to implement and operate the various program components for the Company. The transition and start-up plan of the Phase V program offerings and measures will include, at a minimum, the identification of appropriate staffing skills and levels and the hiring of the same, the development of website(s), promotional strategies and plans, and processes ensuring quality and other controls supporting successful program transition and implementation. The transition and start-up plan will include, at a minimum:

- An organization chart and description of management roles and responsibilities;
- A description of program measures and services and dates of milestone objectives and program launch;
- A description of an implementation and operational plan for use by any subcontractor;
- A plan to facilitate or support program component tracking and reporting;
- A determination of the required information transfers between the CSPs, the Company, and the Company's other energy efficiency or tracking system contractors;
- A plan for creating, installing, and testing necessary data collection systems for program operation and evaluation;
- The establishment of a call center and the processes needed for the Company to transfer calls they receive related to the programs;
- The development of detailed processes for providing and managing rebate/incentive applications, rebate/incentive payment processes, other program services, reporting procedures, data collection and data recording processes, internal billing and related documentation to be sent to the Company for processing;

- The identification of potential CSPs and the development of processes for transactions between the two, including electronic payments between the Company and the CSPs;
- A marketing, promotion and communication plan, which includes a website strategy;
- The creation of a check processing system (if appropriate); and
- A summary of any other program specific preparations needed before the programs are launched.

The CSPs' transition and start-up will include communication and coordination with Company personnel so as to: (i) present a seamless transition for customers and program allies who either wish to participate or continue participation in programs during Phase V; (ii) maximize process efficiency and controls; and (iii) leverage the Company's relationships and communications with customers. During program transition and start-up, the CSPs will meet with the Company and its evaluation and tracking system contractors as necessary and appropriate to properly integrate the applicable program components into the Company's overall comprehensive Phase V Plan. The start-up period will include milestone objectives and targets along the timeline to completion of program startup.

Consistent with the Phase V Implementation Order, the Company will not begin implementation of the Phase V programs prior to Commission approval of the program and CSP contracts. The Company will initiate controls to ensure that the incentives and rebates offered under the Phase V programs apply to only those measures installed and commercially operable on or before May 31, 2031. Applications completed and processed for program measures installed and commercially operable on or before May 31, 2026, as well as CSP or administrative fees related to Phase IV, are considered Phase IV expenses and will be tracked and reported accordingly. Applications completed and processed after May 31, 2026 for program measures installed and commercially operable on or before May 31, 2031, as well as CSP or administrative fees related to Phase V, are considered Phase V expenses and will also be tracked and reported accordingly. Phase V costs will be accounted for separately from Phase IV costs. Details surrounding cost recovery are set forth in Section 1.9 and Section 7.

***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.***

During the development of this Plan, the Company sought and obtained feedback on the proposed EE&C programs from stakeholders through a variety of methods. Stakeholder meetings discussing the Phase V Plan's development, program design, and soliciting stakeholder input were held on July 30, 2025, and September 11, 2025. The Company also met with individual interested stakeholders during development of the Phase V Plan to obtain and further discuss their input. The Company also participated in numerous meetings with other interested parties, including its current and potential CSPs and vendors. The Company further involves stakeholders and stakeholder input on an on-going

basis through outreach to both program allies and customers to inform program design and implementation – a practice the Company intends to continue during the Phase V Period.

During the Phase V Period, the Company plans to continue conducting stakeholder meetings each year, where the Company will review the performance, progress, and operation of the programs with stakeholders for collaborative discussion and feedback. The Company will also meet with stakeholders on an as-needed, requested, or on-going basis to discuss any Plan or program aspects that warrants discussion.

During the Phase V Period, the Company plans to continue engaging local contractors, quality assurance vendors, and CBOs in Advisory Panel meetings a few times each year to obtain feedback on how the low-income and multifamily programs are operating in the field and if any updates to processes or procedures are recommended. The Company also plans to continue holding Annual Meetings with all Act 129 and LIURP contractors, quality assurance vendors, and CBOs to share ideas on the program and collaborate on how to better serve customers in local communities.

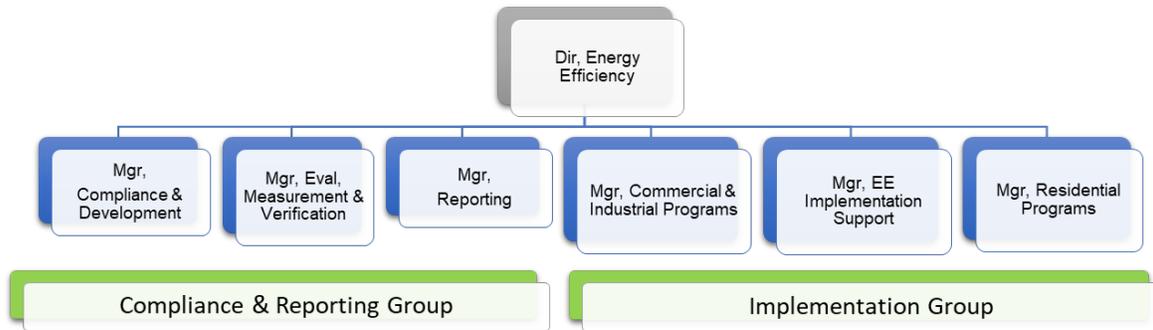
Multifamily stakeholder meetings will continue to be held during Phase V with parties such as the Pennsylvania Utility Law Project, PA Housing Alliance, National Housing Trust, National Resource Defense Council, Pennsylvania Housing Finance Agency, and others each year to obtain feedback and garner assistance from them on marketing opportunities to reach multifamily buildings owners and tenants.

***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.***

The Energy Efficiency Department is entrusted with ensuring that the Company complies with all statutory energy efficiency and demand reduction requirements and that the approved programs are successfully implemented. This group also has responsibility for similar activities for FirstEnergy's other utility subsidiaries in other states. The organization chart set forth below depicts the management team of this group and primary areas of responsibility as they currently exist.

**FE PA Figure 3: Organization Chart**



The Energy Efficiency Implementation group is organized based on program management responsibilities across customer classes. Key activities include planning and executing marketing and outreach campaigns and overseeing and managing the program implementation CSPs to ensure successful program implementation. The Energy Efficiency Compliance and Reporting group is organized based on support functions that are common to all programs, such as Plan development, program evaluation, measurement and verification, and compliance tracking and reporting. The Implementation and Compliance and Reporting groups also receive support from areas, such as but not limited to Rates and Regulatory Affairs, Legal, Customer Service, Customer Support, Information Technology (“IT”), and Communications.

**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.**

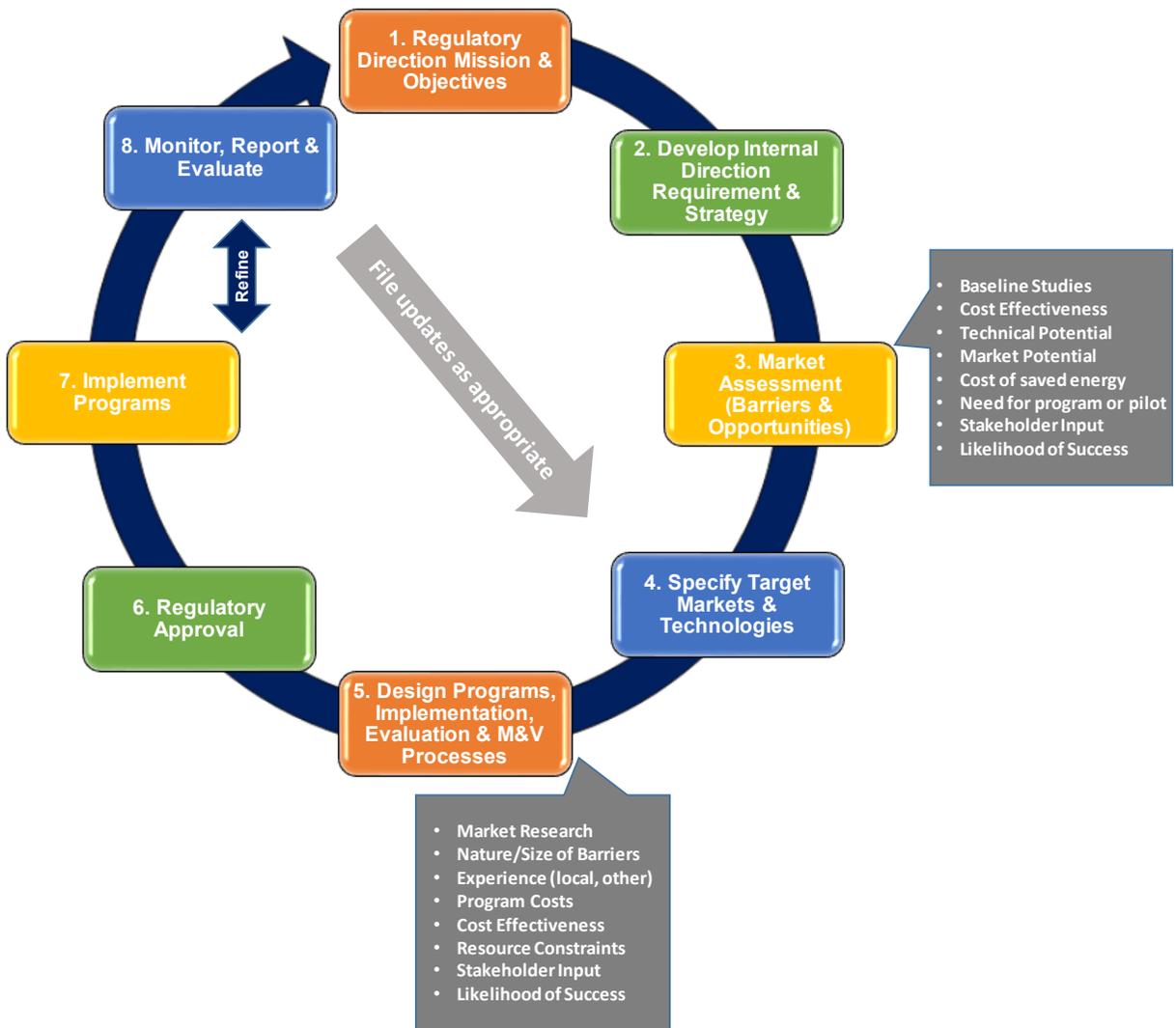
The Company will provide administrative, contract management, program implementation, and marketing oversight of the selected CSPs primarily through the Energy Efficient Department staff who are dedicated to this purpose. Not only will such monitoring be accomplished using the tracking and reporting system described in Section 5, but this dedicated staff will also provide:

- Guidance and direction to the CSPs, including review and revision of proposed implementation plans and proposed milestones, marketing campaigns and, additionally, engage with the contractor team daily when working through strategy, policy, or implementation activities or issues.
- Review and approval of CSP invoices to ensure program activities are according to contract, within investment, and on schedule.

- Review of CSP operational databases for accuracy, ensuring incorporation of data into the Company's comprehensive tracking database to be used for overall tracking and reporting.
- Review and update of measure saving estimates maintained by the CSPs.
- Oversight and coordination of evaluation, measurement, and verification contractors.
- Participation in outreach to community groups, program allies and trade associations.
- Provision of guidance and direction on new initiatives or strategies proposed by the CSPs.
- Communication with CSPs advising of other initiatives that may provide opportunities for cross-program promotion.
- Review and approval of printed materials and advertising plans.
- Evaluation of portfolio and program effectiveness and recommendations regarding modifications to programs and program delivery as needed.
- Performance of periodic review of program metrics and evolving program design.

In addition to the comprehensive oversight activities described above, the Company will follow the overall planning, implementation, monitoring, and evaluation framework identified below to help guide its programs and contractors:

FE PA Figure 4: High Level Overview of EM&V



The Company believes that this framework, in conjunction with agility, flexibility, and a well-trained staff, will assist in its efforts to achieve the targets established by Act 129 and the Phase V Implementation Order in an efficient and cost-effective manner.

**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.**

The model used for developing the EE&C programs involves a build-up of sector specific costs based on program fixed costs and variable costs based on measure-level projections, both of which are then aggregated to the program level. Common costs are estimated at the State level and then allocated to each program based on each program’s ratio of sector specific CSP Delivery Fees and Marketing costs.

Program cost elements are categorized into Incentives and Non-Incentives consistent with the Phase V Implementation Order and the Phase V Energy Efficiency and Conservation Plan Template, Table 10: Budget by Program,<sup>22</sup> including the following terms:

- **Incentives** – includes program specific costs for (1) rebates paid to customers, (2) upstream/midstream buydowns, (3) material cost of giveaways (e.g., kits), (4) program direct install labor and material cost provided to customers, and (5) Braided Funding Support Labor.
- **Non-Incentives** – includes both program specific and common costs associated with program design, (utility) administration, (CSP) delivery, marketing, EM&V, and other costs, as follows:
  - Program Design – includes common costs associated with the development of the Phase V Plan and programs, including costs incurred by the utility for employee labor, development, and research, design, and development related association fees.
  - Administration – includes common costs incurred by the utility for employee labor and expenses to oversee, administer and manage the portfolio, costs to develop and maintain a data collection, tracking, and reporting system, training and development, and costs to perform duties associated with activities such as regulatory reporting or meetings to support the Phase V Plan (e.g., Stakeholder meetings, technical utility staff meetings, program evaluation group meetings).
  - CSP Delivery Fees – includes program specific CSP administration costs associated with the set-up, implementation and ongoing management and delivery of programs, including staffing, contractors, websites(s), data collection and transfers, call centers, application and incentive processing, quality assurances, and control processes, and other program specific activities supporting successful program implementation.
  - Marketing – includes common utility costs and program specific CSP costs associated with marketing the plan and programs, providing general awareness and education, including costs associated with developing and providing marketing/promotional strategies, advertising space and other advertising costs, and materials.
  - EM&V – includes program specific CSP costs associated with the evaluation, measurement, and verification of the programs, including evaluation activities, surveys, M&V processes, data transfer responsibilities and participation in evaluation or other program related meetings.

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<sup>22</sup> See *Implementation of Act 129 of 2008 – Phase V Energy Efficiency and Conservation Plan Template*, Docket No. M-2025-3052826 (Secretarial Letter dated September 8, 2025).

- AEPS Registration Support – includes program specific CSP costs associated with coordinating with the Alternative Energy Portfolio Standards (“AEPS”) program administrator and supporting customer registration of eligible projects.
- Other – includes other common costs associated with the development, regulatory review and implementation of the Phase V Plan, including outside consulting and outside legal fees.

As discussed in Section 4.2.1, the Company has an Energy Efficiency Department that is dedicated to the oversight and administration of the Company’s EE&C Plan and for those of affiliate utilities. This group charges specific accounting established for the PA EE&C Plan for its time spent on the oversight and administration of the Act 129 programs, with these costs considered “Administration” costs for the Phase V Plan and programs.

### **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. Identify whether the EDC or its CSP(s) will use Community Based Organizations (CBOs) to deliver its Act 129 programs and describe the expected role(s) for CBOs within the broader CSP strategy.**

The Company will perform overall administration and oversight of the Phase V Plan and will contract with experienced CSP(s) to perform the EE&C plan functions. The Company also plans for the CSP(s) for its Low-Income Energy Efficiency Program to contract with CBOs for the delivery of certain program components including those coordinated with its LIURP. The Low-Income Program coordinates with the LIURP program to have the CSPs leverage CBOs for delivery of certain program measures (e.g. Warm Plus, Warm Extra Measures, etc.) in conjunction and coordination with the LIURP program delivery.

#### **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)**

The Company’s Request for Proposal “RFP” for EM&V services for its Phase V Plan was issued on September 10, 2025. A team within the Company’s EE&C department evaluated the response and the selection was made based upon the firm possessing substantial qualifications in energy efficiency and demand response evaluation, measurement and verification. The selected bidder, ADM Associates, Inc., has worked previously with the Company in Pennsylvania and its affiliates in other jurisdictions, and has demonstrated its experience and expertise in its field, under Act 129 in Pennsylvania and in the industry. The Company’s CSP contract is being filed contemporaneously with this Plan on a CONFIDENTIAL basis, including their qualifications and basis for selection.<sup>23</sup> No other CSPs have been selected at this time and other CSPs will be selected through the same

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<sup>23</sup> In accordance with Final Implementation Order at 227 and with Act 129 66 Pa. C.S. § 2806.1(b)(1)(i)(E).

approved RFP process, with exception of its Tracking and Reporting system vendor.<sup>24</sup> The contract for the Tracking and Reporting system will forgo the competitive bidding process, consistent with Commission directive,<sup>25</sup> as the Company plans to leverage its existing system, which contains historic data and contains established processes, interfaces and reports, and would require significant efforts and cost to change vendors.

The Company has and will continue to adhere to the requirements as set forth in the Phase V Implementation Order and will select all CSPs that provide consultation, design, administration and management, or advisory services to the Company through a competitive bidding process. The RFP(s) will be distributed to all qualified CSPs registered on the Commission's website, and the Company will try to acquire bids from minority or other special category businesses consistent with the Commission's Policy Statements at 52 Pa. Code §§ 69.804, 69.807 and 69.808.

**4.3.3 Describe all pending CSP solicitations for which the EDC plans to retain CSP services but has not selected the winning bidder.**

As discussed in Section 4.1.5, the Company has issued a RFP for program implementation CSP(s) for its Commercial and Industrial programs on October 24, 2025 and plans to issue a RFP for program implementation CSP(s) for its Residential programs in the 4th quarter of 2025. These RFPs include all program components, including EE&C, Behavioral, Multifamily, and Demand Response.

**4.4 Coordination with Other State Conservation Programs:**

**4.4.1 Describe how the EDC plans to collaborate with gas and water utility and 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)**

The Company recognizes that leveraging other conservation programs and the availability of outside funding may help to achieve its Act 129 objectives within budgetary limitations, as outside funding combined with Act 129 opportunities will elevate general awareness, improve customers' benefit-to-cost ratios, minimize the up-front investment required by customers, encourage additional participation, and thus accelerate conservation programming in the State.

The Company will seek to identify federal, state, and local funding opportunities ("braided funding"), including programs of gas and water utilities within the Company's service territory, and will pursue collaboration and coordination with these programs to provide

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<sup>24</sup> FIO at 226 "“EDC contracts pertaining to Act 129 activities such as tracking database services which do not cover implementation or EM&V may forgo the competitive bidding process with individual vendors if the cumulative value of contracts for that vendor's work does not amount to more than one percent of the EDC's Phase V budget.” The Phase V Plan budget for the T&R contract is less than 1% of the Phase V budget.

<sup>25</sup> IBID.

educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to the Phase V Plan offerings. As new opportunities become available, the Company in coordination with its respective CSPs intends to collaborate with these program administrators to provide education, marketing and cross-promotion, and other assistance or support helping customers to maximize such incentives and drive overall program participation.

Specific to IRA incentives, in conjunction with the DEP and other Pennsylvania utilities, the Company plans to identify opportunities where federally funded initiatives through the IRA may complement Act 129 offerings. These programs focus on low-income customers (although not limited to) and thus will reduce low-income participants' required investment (incremental costs). The Company plans to consider complementing its program offerings with the IRA program opportunities throughout implementation of the Phase V Plan as IRA funds are available, to leverage this available funding to further promote customer participation in its programs. The Company will work with the Pennsylvania DEP as they finalize and implement the IRA programs.

The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. As they are developed and made available, the Company and its contractors will also support customer participation in these complementary programs through education, information and awareness building campaigns and other collaborative opportunities that are identified throughout the Phase V Period.

***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)***

As discussed above in Section 4.4.1, the Company will actively seek to identify other available conservation programs and braided funding sources external to its Act 129 offerings, as identified in the Commission's TO, and other programs as they are available and applicable. Relevant external program opportunities and braided funding will be communicated through the Company CSPs, program website, and marketing materials, and program processes. Additionally educating the installation contractors and/or point-of-sale personnel regarding the various program opportunities and braided funding sources is also planned as often the contractors and retail outlets are the ones in direct contact with customers. The Company plans to collaborate with the other program and braided funding administrators to promote and support participation amongst the mutually beneficial programs that align with the Company's Phase V Plan program offerings in an aligned and

efficient manner. Please see FE PA Table 7 below that identifies examples of the types collaborative opportunities currently available as identified in the Phase V Final Implementation Order, at 158, and in TIO at 54.

**FE PA Table 7: External Funding**

FE PA Table 7: External Funding				
External Program	Administrator	Customer Segment	Descriptions of Eligible Technologies	Source
Alternative Energy Portfolio Standards Act Credits	PAPUC Alternative Energy Credit Program	Residential and Commercial	Solar (Tier I), Demand Side Management projects, and Distributed Generations (i.e. CHP) (Tier II)	<a href="#">Home - Pennsylvania Alternative Energy Portfolio Standard Program</a>
LIURP and LIHEAP	EDCs	Low Income Residential Customers	Customer education, Refrigerator/Freezer testing, Electric Water heater Inspections, Weatherization, Energy saving lightbulbs	<a href="#">WARM Program</a>
DEP IRA Programs HER and HEAR	DEP	Residential Customers with a focus on Low Income	Heat Pump Water Heaters, HP Space Heating and Cooling, Electric Stove, Cooktop, Range, Oven, HP Clothes Dryers/Washer Dryer Combo, Electric Load Service Center, Insulation, Air Sealing & Ventilation, Electric Wiring	<a href="#">Penn Energy Savers</a>
DEP Agricultural Energy Efficiency Rebate Program	DEP	Commercial Agricultural	State funding (grants, loans) for energy improvement projects (e.g. EE grain dryers), solar energy, LED lighting, clean fuel vehicles	<a href="#">Agriculture and Farming   Department of Environmental Protection   Commonwealth of Pennsylvania</a>
DEP's Healthy Electrified Commercial Kitchen Rebate Program	DEP	Non profits, higher education, K-12 schools	Variety of combustion free cooking equipment, as well as associated electrical upgrades	
DEP's Reducing Industrial Sector Emissions in PA (RISE PA)	DEP	Industrial Customers	Grants for small, medium and large scale decarbonization projects	
DEP's Solar for All Program	DEP	Low Income Customers	Solar Installations	<a href="https://www.pa.gov/agencies/dep/programs-and-services/energy-programs-office/financial-options/energy-accelerator-program/solar-for-all">https://www.pa.gov/agencies/dep/programs-and-services/energy-programs-office/financial-options/energy-accelerator-program/solar-for-all</a>

**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)**

In accordance with the AEPS Act, for Tier II Alternative Energy Credits (“AECs”) and for solar PV project Tier I credits, the Company plans to promote the availability of and support registrations for C&I participants of its Act 129 programs with applicable eligible energy-efficiency projects. The Company plans to collaborate and coordinate with the DEP and its AEPS program administrator to promote and facilitate the registrations, such as but not limited to, obtaining customers authorization to share and provide project information to the AEPS program administrator.

In more detail, the Company anticipates providing AEPS program information to customers from their eligible projects during its program processes to educate customers on the AEPS program and the potential AECs from eligible demand side management, energy efficiency measures and solar PV projects that are implemented. The Company plans to collaborate and coordinate with the AEPS Program Administrator to establish the promotional, educational, other information and support to be provided such as but not limited to obtaining customer authorization to share information to facilitate the registration of their eligible projects in accordance and alignment with the State’s AEPS program.

**4.4.4 Describe plans to address health and safety issues that arise in the delivery of Act 129 services. Identify whether any programs will provide health and safety measures or services. Discuss any plans to refer Act 129 participants that could not be treated due to health and safety issues to other program administrators.**

The Company plans to coordinate with and refer participants to its LIURP or other external programs for possible eligible remediation of health and safety issues that arise in the delivery of its low-income program offerings if applicable. In addition, while the Company did not explicitly budget for health and savings remediation due to budget constraints, the Company may include health and safety remediations, if necessary, subject to available program budgets and determination that the expenditures will produce justifying meaningful energy savings to the participant.

The Company will also track and report in its Annual Reports the number of homes deferred and referred due to health and safety issues.<sup>26</sup> and any additional requirements for tracking and reporting in accordance with the Commission’s FIO or other directives.

**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**

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<sup>26</sup> Phase V Final Implementation Order at 168

***program. The Phase V Implementation Order defines the leverage ratio as the amount of known external funding for Phase V EE&C***

The Company will track and report participation and funding from other external conservation programs by source, as well as calculate the leverage ratio for each program as defined in the TO<sup>27</sup> and the administrative costs associated with the Company's incremental administrative efforts to support the coordination with these programs and braiding of funds.

## **5. REPORTING AND TRACKING SYSTEMS**

### **5.1 *Indicate that the EDC will provide semiannual and annual reports as prescribed in the June 18, 2025, Implementation Order.***

The Company will comply with the Commission's reporting requirements as prescribed in the Phase V Implementation Order, including both the semiannual and annual reports. As discussed in Section 4.3.2, the Company plans to continue using the Phase IV T&R CSP and the current T&R System to provide the required reports as prescribed. The System provides the ability to monitor the progress of the various programs being offered, supporting the Company's oversight and administration of the programs, and to generate the reports as required by the Commission.

Standard reports will be updated for the new requirements as outlined in the Final Implementation Order and will be provided as necessary. The format and content will be consistent with that defined by the Commission and the SWE. The System also produces customized reports using a report writing tool. Summaries, dashboards, or other reporting formats will continue to be used by the Company to monitor program performance on an on-going basis.

### **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.***

The comprehensive T&R System will report and track activities and results associated with the Company's Phase V EE&C programs. The System has the ability to track a customer through program-specific statuses. The System provides standard status reports both for individual participants and at the program level. Additional enhancements will be made to the System as deemed necessary for Phase V and the additional Phase V Implementation Order requirements, including but not limited to additional reporting requirements for comprehensive program offerings, summer and winter PDR reporting requirements, and as deemed necessary for any future requirements. In addition, the Company will continue to

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<sup>27</sup> TO at 55.

utilize SAP<sup>28</sup> enterprise software for financial management and reporting of program costs, including administrative costs associated with braided funding.

**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.**

The T&R System is web-based, allowing for access from any internet connection. The System will exchange data with implementation CSP databases as necessary to gather data to upload key program metrics on a routine scheduled basis (e.g., daily, weekly or monthly) and will ensure data integrity through routine scheduled reconciliation processes. The Company will work with the implementation CSPs and the Company’s EM&V consultant on a regular basis to verify the accuracy of data transferred from implementation CSP databases to the T&R System. Not only will this reduce paperwork and minimize data entry, but it will support quality control and allow for easy access to track goal attainment and budget variances. The tracking and reporting system will store various data fields where appropriate, including but not limited to:

- Customer name
- Customer contact info
- Customer type
- Customer ID number
- Account number
- Premise number
- Project/Program name
- Contractor/Retailer
- Measure
- Service address
- Job status
- Completion date
- Install Date
- Measures implemented
- Rate Code
- kWh savings
- kW savings
- Incentive

**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.**

During the set-up period of each program, the Company’s implementation and evaluation teams will work with the implementation CSP to define the list of data fields that the CSP will send to the Company’s T&R System. This Data Mapping Document will include, at a minimum, all the vendor’s fields, the Company’s fields that they map to, and a definition of what that field is called in the vendor’s source system for all the required fields. The

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<sup>28</sup> SAP, which stands for System Applications and Products, is FirstEnergy’s Enterprise Resource Planning (ERP) software.

CSPs are required to pass this data through an XML interface and to format program participation data as defined by this interface.

A File Transfer Protocol (FTP) process will be established to exchange the data between the implementation CSP and Company's T&R System. During program start-up, a testing process including test files for the data exchange will be completed, and the test data will be validated by the implementation CSP, the Company's T&R System CSP, and the Company's Energy Efficiency Reporting team. Once technical testing is successful, an upload schedule is established, and data uploads will be scheduled on a minimum monthly basis but can be more frequent as determined by the Company to support successful program implementation.

Once production data exchanges begin with each implementation CSP, monthly validation occurs by the Company's Energy Efficiency Reporting team to ensure the data between the implementation CSP's system and Company's T&R System reconcile. Additional QA / QC validations occur for key required fields, missing document attachments where applicable, and kWh and kW reasonability. Any discrepancies that are identified between the implementation CSP's source system and Company's T&R System are reviewed and reconciled on an on-going basis between the implementation CSP and the Company's implementation, evaluation and/or reporting teams as necessary.

**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.***

The Company will comply with the Commission's reporting requirements as prescribed in the Phase V Implementation Order, including both the semiannual and annual reports. The Company will contract with the current CSP to leverage the current T&R System for Phase V to provide the required reports, as described in Section 4.3.2. The format and content will be consistent with that defined by the Commission and the SWE. The T&R System is web based, thus requiring an internet connection for access. The System is designed to allow for varying levels of security-controlled access, and access for others, such as Commission staff and the SWE, will be provided as required.

**5.2.5 *Describe the cybersecurity procedures the EDC will use to protect the personally identifiable information of program participants.***

The Company may gather customer-specific data during the operation of the Phase V Programs and may provide it to its CSPs, the Commission or its contractors, or other parties to support implementation and EM&V of the Company's programs. The Company will also submit non-customer-specific data to the Commission in compliance with reporting requirements, as established by the Commission. Any customer specific data will only be provided after the execution of Non-Disclosure Agreements and Company review and approval of the Commission's and/or third party's cyber and data security protocols. The Company will not share or use customer-specific data for non-utility specific Act 129 programs.

The Company will enforce privacy and data handling policies and procedures for the Phase V Programs that are consistent with FE PA's customer data security protections, the Final Implementation Order, and any applicable Commission regulations and statutory obligations. In the event of any breach of confidentiality by a CSP to deliver the Phase V programs or to evaluate the programs, the Company commits to enforcing the contractual confidentiality requirement. Any breach of security with respect to customers' personal information will be addressed in full compliance with all applicable Pennsylvania laws.

## **6. QUALITY ASSURANCE AND EVALUATION, MEASUREMENT AND VERIFICATION**

### **6.1 *Describe the overall approach to quality assurance and quality control.***

During the development of this Plan, the following includes specific steps that the Company took toward quality assurance and quality control:

- Use of qualified and experienced personnel, including the Company's expert consultant, to provide input to the design of the EE&C programs;
- Selection of EE&C measures compliant with the requirements of the PA TRM or otherwise proven in the industry;
- Use of multiple approaches and strategies, and proven technologies where available, to reach both the energy savings and demand reduction targets set for the Company;
- Communication with interested parties, vendors and other stakeholders on the program designs and objectives throughout the program development process; and
- Validation of EE&C program projections and assumptions with the Company's expert consultant and implementation team.

In preparation for the implementation phase of this Plan, the Company intends to contract with experienced implementation CSPs who will provide not only the experience to support successful program implementation but also processes that accurately document and verify participation data to support achieving verified energy savings and peak load reductions – all of which will be subject to audit and review by both the Company's EM&V contractor and the SWE. The Company will also perform, directly or through third-party evaluators, its own quality assurance and control processes, including but not limited to the review and evaluation of CSP systems, in order to ensure the accuracy and reliability of the reported data and savings. Such evaluations will have the following key characteristics:

- Both deemed and custom measures will be included in the evaluation universe;
- The statistically valid sample size may cover a subset or the entire population for a particular measure;
- The frequency and sample size of these evaluations will vary based on the significance of any findings; and
- The control points used in the evaluations will target specific risks associated with the design or implementation of EE&C measures.

**6.2 Describe procedures for measure and project installation verification, quality assurance and control, and savings documentation.**

EM&V efforts evolve over time and change as programs move from initial roll-out to full-scale implementation. The Company has engaged an experienced EM&V CSP who will develop and implement EM&V processes and procedures. While EM&V plans are written on a program-by-program basis, the Company intends to utilize synergies among programs to reduce redundant work. EM&V plans may be refined over time to include best practices and lessons learned – issues periodically reviewed by the Company and its EM&V CSP. The EM&V CSP will utilize the format required by the SWE for evaluation plans and will include the following topics:

**Introduction and Program Background**

Includes program description, measures covered, markets targeted, program implementation activities, applicable budgets, and expected program participation.

**Evaluation Objectives**

The overall objective for the impact evaluation is to quantify and validate the extent of energy saved and demand reduced as a result of a program. Process evaluation is viewed as providing the explanatory depth to improve program processes, better understand market barriers and opportunities, and support identification of opportunities for improving program implementation, including marketing and promotion, delivery, tracking, and verification. Thus, impact evaluation identifies how much of an impact a program has, while process evaluation tells you why. The Company intends to leverage results from both impact and process evaluations conducted throughout the Phase. Used in conjunction with one another, the results at a minimum will inform development of additional QA/QC initiatives, changes to implementation strategies or approaches, and/or improvements to savings documentation to ensure the success of the programs.

**Overall Evaluation Approach**

The Company will perform processes to meet standards specified in the Evaluation Framework and consistent with the PA TRM. Programs include documentation requirements supporting expected (“ex-ante”) impact estimates following protocols defined in the PA TRM. Samples of participant applications are selected for EM&V. After the statistically valid samples of projects are selected, and the implementation CSP provides documentation pertaining to the projects, the first step in the EM&V effort is to review the documentation. Documentation that is reviewed for all projects selected for the sample may include program forms, databases, reports, billing data, logger data, weather data, and any other potentially useful data. The Company will support metering studies independently or in coordination with other EDCs as appropriate.

Program-level gross ex post savings are calculated by applying achieved savings realization rates calculated for the analysis sample to program-level data for reported savings. Realization rates describe the relationship between verified savings and program

forecasted savings estimates. The realization rates are calculated as the ratio of the EM&V CSP's calculated measure savings to the ex-ante reported savings.

### **Sampling Plan**

#### Residential Programs

Statistically valid sampling of program participants (and in some cases non-participants) will vary among the programs according to participants, measures, and methods of installation. Where appropriate, the sample will be stratified by measure using proportional stratification. The advantage of a proportionally stratified random sample is that greater precision can be achieved than a simple random sample of the same size. Additionally, proportional stratification guards against an underrepresentation of any one particular measure. Sample stratification is particularly useful when there are clear differences in energy savings between each stratum, and when each stratum is relatively homogenous.

#### Commercial & Industrial Programs

EM&V sampling will occur in stages consistent with program implementation. Projects are added to the program tracking system as they are submitted and accumulate over time. As a result, sample selection is spread over the entire program year.

Stratified sampling is performed to account for skewed distributions of savings and to reduce the sample sizes required to satisfy the desired precision requirements. By developing strata such that the projects within each stratum are relatively homogeneous with respect to expected kWh savings, a smaller sample is required from each stratum in order to arrive at desired precision estimates. When performing sampling for a skewed population, stratified sampling methods are preferred because a group of projects with less variance in expected savings requires a relatively smaller sample size in order to reach a given precision and level of confidence.

Projects with high kWh and kW savings contribute significantly to the variance in expected savings and are included in the sample with certainty. The EM&V CSP will select a site-level ex ante kWh and kW threshold above which all projects at a site will be selected for the sample with certainty. The remaining projects will then be assigned to a kWh and/or kW stratum according to the level of the expected site-level kWh and kW savings and are chosen at random within each stratum.

### **6.3 *Describe the process for collecting and addressing participating customer, contractor, and trade ally feedback (e.g., suggestions and complaints).***

Process evaluations will be performed periodically to support program performance. Where applicable, the EM&V CSP may incorporate program manager interviews, participant (and in some cases non-participant) customer surveys, and trade ally surveys. Program manager interviews explore researchable issues and help inform the customer survey design. The interviews identify stated program goals and objectives, assess the effectiveness of the programs' operations relative to the defined program goals and objectives, capture program processes and flows, and explore potential ways to improve

implementation of the programs. Surveys are used to gather data on decision-making criteria and on the attitudes and behavior of decision-makers. Participants are questioned regarding their knowledge of the program, their level of interest in the program, and their reasons for participating, and market or process barriers that could be addressed in the program design or implementation plan.

Throughout the implementation phase of this plan, the Company will obtain additional direct input from various sources, including but not limited to the implementation CSPs, stakeholders and other EDCs for relevant developments, as well as the PUC and the SWE for insights into the evolution of the process.

**6.4 *Describe any planned market and process evaluations and how results will be used to improve programs.***

There is a feedback loop among program design and implementation, impact evaluation, and process evaluation. Program design, implementation, and evaluation are elements in a cyclical feedback process. Initial program design is informed by prior baseline and market potential studies. Ongoing impact evaluation quantifies whether a program is meeting its goals and may raise questions related to program processes and design. Process evaluation tells the story behind how the impact was achieved and points the way toward improving program impacts by providing insight into program operations. Thus, the three elements work together to create a better, more effective program.

The Company's EM&V CSP will conduct process evaluations to identify issues that may require correction, gauge progress toward goals, and measure customer, trade ally, and vendor knowledge and satisfaction with various program features. The evaluations will help identify possible ways to improve implementation of the programs, including potential market or process barriers that could be addressed in the program design or implementation plan.

**6.5 *Describe strategy for coordinating with the EDC EM&V contractor and the SWE.***

A representative from the Company's evaluation team, as well as the EM&V CSP, will attend formal evaluation and/or Program Evaluation Group meetings with the SWE to support development, ensure compliance with statewide EM&V directives, share ideas and suggestions regarding the approach being taken by the Company, and otherwise assist the Company in shaping and performing a prudent and effective evaluation strategy in collaboration and coordination with the SWE and other EDCs. Informal meetings and/or discussions with Company's representatives will also be arranged upon request of the SWE.

Additionally, the EM&V CSP will conduct evaluations on each program included in the Phase V Plan as approved, while coordinating efforts with the SWE to minimize duplication of work. Documentation required by the SWE to fulfill its responsibilities will be provided as requested.

The EM&V planning process will also include the SWE to incorporate where appropriate its advice and consent to enhance EM&V efforts. The EM&V CSP will facilitate ongoing

communications with the SWE and the Company's representatives to ensure a high practicable level of coordination, particularly for any EM&V field activities and other time-sensitive EM&V tasks and processes.

**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)**

During the planning process, the Company has identified several measures with anticipated efficiency standards upgrades within the Phase V Period. These measures include refrigerators, freezers, clothes dryers and heat pump water heaters. The modeling to calculate efficiency savings and demand reductions assumes current baseline standards until the anticipated date of the upgrade, at which time the modeling assumes the new efficiency standard as the baseline used in calculating savings. During the course of implementation, the Company's EM&V process will ensure that efficiency savings and demand reductions are calculated based on codes and standards consistent with the 2026 TRM and evaluation guidance.

**7. 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.**

The Company's Total Allowable Plan Costs pursuant to Act 129 are \$390,320,135. This amount reflects the annual amount determined by the Commission in the Phase V Implementation Order (Table 24 at page 232).

**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.**

Please refer to Section 4.2.3 for the budgeting process used to identify the funding for the Company's Phase V EE&C Plan programs and measures. See Section 7.4 for a complete description of the cost recovery mechanism proposed by the Company. The cost recovery mechanism will include all costs as described in Section 4.2.3, including administrative costs currently incurred by the Company in connection with the development of this Plan. The costs to design, create, and obtain Commission approval of the Company's Phase V EE&C Plan include consultant costs, outside legal fees, and other specific and common costs associated with the development and implementation of the Company's Plan consistent with Commission directives.

**7.3 Provide data tables (see Tables 10, 11, 12, 13 and 14).**

Tables 10, 11, and 12, 13 and 14 are provided in Appendix B.

**7.4 Provide and describe tariff 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.**

See Exhibit SRZ-1 and SRZ-2

**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.**

The Company's *pro forma* tariff supplement for its proposed cost recovery mechanism ("Phase V EE&C-C Rider") is included in FE PA Statement No. 2. Consistent with Act 129, the Company's tariff will contain a Section 1307 cost recovery mechanism for the recovery of all Phase V Energy Efficiency and Conservation program costs. There is also a provision in the rider to allow for a reconciliation adjustment to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period. This component will be shown as a separate E factor (E<sup>2</sup>) and will be in place through May 31, 2028.

Under the Company's proposal, the Phase V EE&C-C Rider would remain in effect during the Phase V Period (June 1, 2026 through May 31, 2031).<sup>29</sup> On an annual basis, to be effective June 1 of each year starting June 1, 2026, the Company will file by May 1st of the same year the following information:

- A reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs for the Phase V EE&C-C Reconciliation Period, as adjusted for removal of gross receipts tax. Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates for the period June 1, 2026 through May 31, 2027. Such reconciliations will be provided starting in Program Year 2 for rates to be effective June 1, 2027.
- Any adjustment to the forecasted Phase V EE&C-C revenues anticipated to be billed during April and May of the applicable program year, as adjusted for the removal of Gross Receipts Tax ("GRT"). Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates being proposed for the period June 1, 2026 through May 31, 2027. Such adjustments will be provided starting in Program Year 2 of Phase V.
- The Phase V EE&C budget estimate for the forthcoming Phase V EE&C-C Computational Period by rate class.
- A reconciliation adjustment for any remaining Phase IV EE&C costs that were not collected by the end of the Phase IV Period. This adjustment will only be included in

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<sup>29</sup> If the Commission concludes that additional cost-effective energy efficiency and/or demand reduction can be attained post Phase V, the Company anticipates recovering any Phase V costs not recovered by the end of Phase V through a Phase VI cost recovery mechanism. Should there be no Phase VI of the Commission's EE&C Program, the Company reserves the right herein to request through a separate filing approval from the Commission to extend the Phase V EE&C-C Rider beyond the end of Phase V in order to collect any remaining Phase V costs and/or to recover any remaining costs through another surcharge mechanism.

the initial EE&C-C rate that will become effective on June 1, 2026, and the subsequent EE&C-C rate that will be in effect for the period June 1, 2027 through May 31, 2028. The reconciliation process is described in Section 7.6 below.

The Company's proposed Phase V EE&C-C Rider include the corresponding rates to be charged during Program Year 1 of the Phase V Plan. The Company is requesting approval of both the rider and related rates as part of this proceeding. Worksheets demonstrating how these rates were determined are set forth in Exhibit SRZ-2, which is attached to the direct testimony of Stephanie R. Zieger (FE PA Statement No. 2).

As can be seen in the *pro forma* tariff supplement, the Phase V EE&C-C rates are expressed as a price per kWh for the residential, commercial and street lighting classes. The industrial class will be billed based upon the individual customer's Peak Load Contribution ("PLC") kW. The Phase V EE&C-C rates will be calculated and stated separately for the residential, commercial, street lighting, and industrial customer classes. The rate schedules that comprise the residential, commercial, street lighting, and industrial customer classes are identified on page 1 of the Company's Phase V EE&C-C Rider.

The Phase V EE&C-C rates to be billed to the residential, commercial, street lighting, and industrial classes consist of three principal components. The first is the  $EEC_C$  or "current cost" component; the second is the reconciliation component or "E" factor for Phase V costs; and the third is a second "E" Factor ( $E^2$ ) for collection of Phase IV related costs remaining to be collected after May 31, 2026.

The  $EEC_C$  component represents the recovery of estimated costs to be incurred during the Annual Computation Period or "Computational Period," in which the Phase V EE&C-C rates will be in effect for each customer class. As shown on the second and third pages of the Company's Phase V EE&C-C Rider tariff supplements, the  $EEC_C$  component is customer class specific. The costs included in each customer class's  $EEC_C$  rate are identified as  $EEC_{Exp1}$ ,  $EEC_{Exp2}$ , and  $EEC_{Exp3}$ .

- $EEC_{Exp1}$  represents customer class specific costs that will be associated with the customer class specific EE&C programs as approved by the Commission. These costs will also include an allocated portion of any common costs, such as administrative and marketing costs, that will be incurred by the Company.
- $EEC_{Exp2}$  represents the incremental administrative start-up costs incurred by the Company, allocated to each customer class, in connection with the development of the Company's Phase V EE&C Plan and related programs in response to the Commission's orders and guidance in its Phase V Implementation Order. These costs are incurred to design, create, and obtain Commission approval of the Company's Phase V EE&C Plan, and include, but are not limited to, consultant costs, outside legal fees, and other specific and common costs associated with the development and implementation of the Company's Phase V EE&C programs in compliance with Commission directives.

- $EEC_{Exp3}$  represents the costs allocated to each customer class for the funding of the Commission's statewide evaluator contract. These costs are not subject to the 2% spending cap imposed by Act 129.<sup>30</sup>

The E-factor component of the Company's residential, commercial, street lighting, and industrial class specific Phase V EE&C-C rates represents a reconciliation of actual Phase V EE&C program costs incurred by customer class to actual Phase V EE&C revenues billed by customer class on a monthly basis. This monthly reconciliation by specific customer class will result in either an over-collection of costs by customer class (revenues billed, excluding GRT, greater than actual costs) or an under-collection by customer class (revenues billed, excluding GRT, less than actual costs). The E-factor component will be applied on a customer class specific basis.

The second E-factor component ("E2") is a reconciliation adjustment that will be in effect through the determination of rates to be effective June 1, 2027, in order to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period. The remaining Phase IV Period costs will continue to be reconciled by customer class, at the Rate District level.

The Phase V EE&C-C Rider will include a reconciliation process that will calculate annual over-or under-collection by rate class.

All Plan costs (net-of-tax) and revenues included in the Company's EE&C revenues will be excluded from distribution base rate treatment and subject to Commission review and audit. Further, to the extent that the Company is reimbursed through the Phase V EE&C-C Rider for Company-owned property, such reimbursement will be treated as a contribution-in-aid-of-construction resulting in a net-of-tax reduction in amounts capitalized for those assets. As a result, these costs will be excluded from rate base in determining future distribution base rate case revenue requirements.

**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.***

Consistent with the Phase V Implementation Order and Act 129, the Company's proposed Phase V EE&C-C Rider will permit the Company to bill annual, levelized Phase V EE&C-C rates on a per kWh or kW basis, as applicable to all residential, commercial, street lighting, and industrial customers. Throughout the Phase I, II, III, and IV Periods, the Predecessor Companies have had in place a tracking and reporting system and related processes and procedures, all of which have proven to be effective in tracking program specific costs during these earlier phases of the Commission's EE&C Program. The Company will continue to utilize this system and related processes and procedures to track customer participation in each program, such that cost allocations are done in a manner that ensures that there are no cross subsidies. The rates will be calculated specifically for each customer class to recover the costs of this plan as approved by the Commission and

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<sup>30</sup> Phase V Implementation Order at 235.

in compliance with 66 Pa.C.S. § 1307. Coupled with the reconciliation provisions by customer class included in the Company's proposed Phase V EE&C-C Rider, the Phase V EE&C-C rates will provide full, equitable, and timely cost recovery of actual EE&C program costs incurred by the Company for each customer class's available EE&C programs as approved by the Commission in this proceeding.

**7.6 *Describe how Phase V costs will be accounted for separately from costs incurred in prior phases.***

Because the rider filings are generally filed with the Commission on May 1st of each year to be in effect on June 1st of that same year, the Phase IV costs will be reconciled in two distinct steps. The first step will reconcile the total actual recoverable Phase IV Plan expenditures incurred through March 31, 2026, to the actual Phase IV Plan revenues collected through March 31, 2026. Since the Phase IV Rider will end on May 31, 2026, the result of the Phase IV reconciliation through March 31, 2026, will appear as a separate line item in the Phase V EE&C-C Rider, which will go into effect on June 1, 2026. The second step will account for all actual Phase IV revenues and expenses that are realized after April 1, 2026, in a final reconciliation. The final over/under collection that results from this reconciliation will also be included as a separate line item in the Phase V EE&C-C rate calculation that will be effective on June 1, 2027.

**8. COST EFFECTIVENESS**

**8.1 *Provide in table format the values contained in the Outputs tab of the Avoided Cost Calculator. 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.***

The PA TRC Order included a companion Avoided Costs Calculator ("ACC") tool. The ACC was provided by the SWE to develop the avoided energy and capacity costs for the PA TRC test calculations. This calculator also includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standard ("AEPS") within the avoided energy cost calculations and avoided natural gas. The Company used the ACC to develop the Phase V forecasts of avoided costs used in the cost-effectiveness testing of the EE&C Plan and programs.<sup>31</sup>

In accordance with the PA TRC Order, the Company completed the ACC for each FE PA Rate District and aggregated the results for cost-effectiveness testing of the Company's Plan. See Exhibits ACC-Met Ed, ACC-Penelec, ACC-Penn Power, and ACC-West Penn for a complete ACC for each of the FE PA Rate District. Also see Exhibit ACC-FE PA for the weighted averaging calculation of the FE PA Rate Districts, as prescribed in the PA

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<sup>31</sup> Note that the SWE issued guidance memos with direction on updates to the ACC, (August 29, 2025 PA SWE Memo Use of the Avoided Cost Calc Q and A) and September 17, 2025 SWE Guidance Memo on TRC Order Avoided Cost Calculator." The Company included these updates to the ACC.

TRC Order at 100. ACC – FE PA also provides the weighted average FE PA avoided cost values consistent in format with the output tabs in the ACC, for both non low-income and low-income programs.

The sensitivities associated with the forecast of avoided cost depend largely on economic conditions, technological advancements, and policy decisions that could affect fundamental assumptions as prescribed in the Commission’s TRC Order. Factors such as inflation, customer demand, technological developments (e.g. as with renewable energy and storage solutions), economic downturn, etc., could have significant impacts on the actual avoided costs, particularly for avoided energy, avoided capacity, avoided AEPs costs, and DRIPE effects as assumed in the ACC model.

**8.2 *Confirm the use of a 3% real discount rate and a 5% nominal discount rate. (TRC Test Order at 15)***

The Company used a 3% real discount rate in its calculations pursuant to the PA TRC Order and a 5% nominal discount rate where appropriate.

**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)***

The projected savings generated and evaluated through this Plan are based upon the requirements and guidance of the PA TRM, the PA TRC Order, and other sources, which have been used in developing the key inputs to the analysis of the programs and measures proposed in this plan. See Appendix C, FE PA Table C-2 for the Measure Assumptions including other sources relied on in the Company’s modelling.

The PA TRC test considers the combined effects of this Plan on both participating and non-participating customers. The sum of costs incurred by both the Company and any participating customers were used to calculate the costs. The benefits calculated in the PA TRC test include the avoided costs of supplying electricity; including avoided electric energy, avoided generation, transmission, and distribution capacity costs, price suppression effects on both energy and generation capacity (DRIPE), fossil fuel and water savings, and operations and maintenance benefits as prescribed in the PA TRC Order.

Avoided costs are calculated using the ACC tool as set forth in the PA TRC Order. The calculator developed by the SWE executes the methodology to develop avoided energy supply costs, including AEPS compliance, avoided capacity costs including generation, transmission, and distribution, and avoided natural gas for the PA TRC calculations. The energy prices were calculated by the ACC using futures prices quoted by the Intercontinental Exchange (“ICE”) on August 21, 2025. Other inputs to the ACC were as provided or prescribed in the PA TRC Order.

Avoided operation and maintenance costs were included as a benefit where quantified in the PA SWE database. Additionally, any measures that produced “reasonably

quantifiable” savings in fossil fuel and water were also included as a benefit, as prescribed in the PA TRM and TRC Orders.

The Company used the line loss factors as provided in Table 1-5 of the PA TRM.

The Company escalated cost projections by the 2% inflation rate and included the application of any additional escalation as directed by the Commission in the PA TRC Order.

The total benefits were then calculated using the projected measure kWh and kW net verified savings multiplied by the assumed number of measure units and the avoided capacity and energy costs. The value of the benefits per year was then discounted by taking a Net Present Value (“NPV”) over the measure lifetime using 3% real discount rate (5% nominal discount rate).

On the costs side, the PA TRC test includes the costs of the various programs incurred by the Company and the participating customers, including program administration and overhead costs (i.e., treated as a PA TRC cost regardless of whether the labor, materials, and other fees are incurred by participating customers, EDC staff, a CSP, or evaluation contractor) and incremental customer costs. The cost of kits and shipping costs, as well as directly installed equipment and labor costs are treated as incentives, as directed by the PA TRC Order, at 74. Any administrative costs incurred to support the braiding of funds are classified as incentives as directed by the Final Implementation Order at 168.

Program costs are budgeted by year, but operation and maintenance costs are based on measure life and are discounted using NPV back to the program year installed.

The Company also included estimated NTG ratios and realization rates based on previous program evaluations, consultant input or other industry experience in planning and in performing cost-effectiveness calculations on a net basis as prescribed in the PA TRC Order. NTG ratios depend on assumptions for effects from free ridership, spillover and rebound effects. Estimates for these factors are difficult to quantify and can change over time. The SWE acknowledges this in its 2011 report: “NTGRs [Net to Gross ratios] based on spillover, free ridership factors, etc. can represent oversimplifications that are highly dependent upon scale, program implementation dynamics, and technology.”<sup>32</sup> Methods for measuring NTG ratios range from inexpensive surveys to more complex econometric modeling. Inherent issues with surveying such as biased and subjective responses, identifying correct respondents, etc., create uncertainty in the resulting values. While the econometric modeling may result in more accurate results, it is expensive, complex, and thus not typically performed on an annual basis. This leads to results that do not reflect any changes over time, such as economic or technological changes, participant cost, etc. The SWE further states that “[t]he challenge of interpreting the NTG studies and converting study results and observations into NTGR is a complex process riddled with

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<sup>32</sup> *Net Savings: An Overview, GDS Associates, Inc., Nexant & Mondre Energy, October 19, 2011*

uncertainty and subjective judgment.”<sup>33</sup> Therefore in the evaluation of any TRC results that incorporate NTG ratios, the speculative nature of the ratios should be recognized.

The results of the PA TRC test as described above are presented in Tables 1 & 14 located in Appendix B of this Plan and are expressed as both a net present value and a benefit-cost ratio and on both a net and gross basis.

**8.4 Provide TRC data tables on a gross and net TRC basis. See Tables 14, Gross and Net versions**

See Appendix B, Tables 14, for the PA TRC test results of the Company’s Plan and programs on both a gross and net TRC basis.

**9. PLAN COMPLIANCE INFORMATION AND OTHER KEY ISSUES**

**9.1 Plan Compliance Issues**

**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.**

As demonstrated throughout this Plan, a variety of program components and measures are being offered to each customer class, with at least one comprehensive program for the residential and non-residential customer classes. As discussed in detail in Section 1.1 the Phase V Plan includes a comprehensive portfolio of program offerings for the residential, small commercial and industrial, large commercial and industrial, and low-income sectors. The Phase V Plan includes program measures that will target all customer sectors to engage customers, provide energy efficiency education, and provide information regarding program services and opportunities upon which they can act. The Phase V Plan incorporates a variety of measures that offer a broad range of measures and services and incorporates both near-term and longer-term energy saving opportunities for customers, including single and prescriptive measures, multiple prescriptive and custom measures, direct install, and comprehensive whole building and energy management solutions. The residential, low-income and commercial and industrial programs are also designed to serve multifamily buildings. As a result, the Phase V Plan was designed to provide opportunities for all customer classes to participate in EE and PDR programs. And the Phase V Plan relies on experienced outsourced CSPs and leverages prior experiences and a variety of delivery channels that will support customer participation across all classes of customers.

Collectively, the proposed programs across all sectors cover all the major energy-consuming devices in the home, building, or business, thus increasing the opportunity for more customers to participate and benefit from one or more programs. Furthermore, the proposed programs promote and support comprehensive whole home/whole building/comprehensive solutions for both the residential and non-residential customer

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<sup>33</sup> *Net Savings: An Overview, GDS Associates, Inc., Nexant, & Mondre Energy, October 19, 2011.*

classes. Section 1, FE PA Table 1 presents a summary description of the programs by sector, and detailed descriptions and a listing of measures are provided in Section 3.

**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).***

The Phase V Plan has been developed to incorporate a comprehensive set of program components and measures and a variety of delivery channels that, based on known conditions, are designed to allow the Company to achieve the goals for energy and coincident demand reductions as set forth in the Phase V Implementation Order. The Phase V Plan also includes contracting with experienced CSPs and includes implementation flexibility including the ability to shift budgets between sectors and programs, adjust measures and adjust incentives within ranges, that combined with the Company's active oversight of the programs will allow it to make adjustments to timely react to changing market and economic conditions and other risks that arise over the Phase V Period. Taken collectively, the design of the Company's Plan improves the ability of the Company to achieve its goals within the Phase V budget. See Appendix B Tables 2 and 3 for the projected energy and demand reductions by each year and in total and Appendix B, Table 4 for Demand Savings by winter/summer, for the Phase V Plan.

**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).***

There are two low-income targets more fully described in the Phase V Implementation Order. The first requires the Company to obtain a minimum amount of its consumption reduction requirements from programs specifically targeted to the low-income sector or low-income participation in multifamily housing. The second low-income target requires that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG, in proportion to that sector's share of the total energy usage in the EDC's service territory.<sup>34</sup> FE PA Table 8 below provides the Low-Income targets established in the Phase V Implementation Order:

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<sup>34</sup> 66 Pa. C.S. § 2806.1(b)(1)(i)(G)

**FE PA Table 8: Phase IV Low-Income Savings Targets**

<b>FE PA Table 8: Phase V Low-Income Savings Targets</b>		
<b>EDC</b>	<b>Proportionate Number of Measures (%)</b>	<b>Low Income Savings Target (MWh)</b>
FE PA	9.33	86,913

As discussed in detail in Section 1.1 and 3.2.1, the Phase V Plan includes a comprehensive suite of program components and measures within the Low-Income Energy Efficiency Program and for low-income participation in multifamily housing that are collectively designed to achieve the consumption reduction requirements.

The Low-Income Energy Efficiency Program outlined in this Phase V Plan will serve a dual purpose of contributing to Act 129 goal attainment and minimizing the percentage of low-income household income that is devoted to energy costs. Basic, enhanced, and comprehensive services and education will be offered in the low-income portfolio to help low-income households to save energy and have more control over energy spending. The Low-Income Energy Efficiency Program includes a variety of program services, delivery channels, and vendors to support customer outreach and engagement, education, and participation to achieve energy savings in low-income households. The program includes direct or targeted offerings that engage customers and serve as a portal for other program offerings. The Company will also continue to coordinate the Low-Income Energy Efficiency Program with the Company’s existing LIURP. LIURP has offered comprehensive energy efficiency services to eligible Pennsylvania households for years. This aspect of the Phase V Plan continues to enhance and accelerate the deployment of services to LIURP-eligible households under the Company’s Phase V Plan.

Appendix B, Table 2 provides the projected savings from the Low-Income Energy Efficiency Program. Appendix C, FE PA Table 1 provides the projected savings from Multifamily program components of the Small and Large, C&I Energy Solutions programs that will both be collectively implemented with the residential Multifamily program components and targeted for low-income participation. The combined projections from the Low-Income Energy Efficiency Program and the Multifamily program components of the Small and Large, C&I Energy Solutions programs exceeds the consumption reduction requirements from the low-income sector.

The requirement that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG in proportion to that sector’s share of the total energy usage in the EDC’s service territory has been achieved by including measures that number at least proportional to low-income sector energy usage in the program targeted directly to low-income customers. Appendix B, Table 8 and FE PA Table 9 below lists a total of 48 measures that are provided directly or targeted to Low-Income customers through the Phase V Plan. The measures listed in Table 8 in Appendix B include a total of

135 additional non-low-income measures (without double counting measures offered in multiple sectors or measure tiers) resulting in a total of 183 measures, of which low-income represents 26%, significantly greater than the 9.33% target.

**FE PA Table 9: Residential Low-Income WARM Measures**

Available to Low-Income Customers
Air Sealing
Appliance Timers
Caulk
Central Air Conditioner
Clothes Washer
Dehumidifier
Door Repair or Replacement
Duct Insulation
Duct Sealing
Electric Baseboard Heater Replacement
Electric Clothes Dryer
Electric Dryer Venting Repair or Replacement
Electric Ductless Mini-Split Heat Pumps
Electric Furnace
Electric Heat Pumps
Electrical Repairs
Energy Education
Faucet Aerator – Energy Saving
Freezer Replacement
Health and Safety Measures
Heat Pump Water Heater
Heated Waterbed Mattress Replacement
HVAC System - Filter Replacement and Tune-Up
Insulation (attic, wall, floor, band joist, basement, crawl space)
LED Nightlight
LEDs
Pipe Insulation
Plumbing Repairs
Refrigerator Replacement
Roof Coating
Room Air Conditioner Cover
Room Air Conditioner Replacement
Room Thermometer
Sash locks
Shower Head – Energy Saving
Smart Power Strip
Storm Windows & Doors
Tank Temperature Set-Back
Thermostat Replacement and Repair
Thermostatic Shower Valves
Vapor Barrier
Vents (Roof, Gable, Soffit and Ridge)
Weather Stripping
Window Quilt / Tint

The Company has been harmonizing, coordinating, and leveraging its LIURP and Act 129 low-income offerings and funding, and it intends to continue those efforts during Phase V as follows:

- The Company's Act 129 low-income direct install programs fully harmonize with the LIURP by using the same website for both programs and conducting joint outreach and marketing; and
- The Company's LIURP contractors are engaged to complete additional projects or measures funded by the Act 129 low-income programs for income-qualifying homes. This allows both programs to coordinate funding sources and more comprehensively serve the low-income customers' homes than would have occurred if each program worked independently.

In addition, the Company's Act 129 low-income programs further harmonize and coordinate with the LIURP offerings by:

- Referring customers whose incomes are above 150% of FPIG (and do not qualify for Act 129 low-income programs) to LIURP;
- Referring customers to LIURP to leverage LIURP funding; and
- Referring customers who do not qualify for the LIURP program to the Company's Act 129 low-income programs for service.

Harmonizing, coordinating, and leveraging both Act 129 low-income and LIURP offerings and funding allow the Company to serve the needs of its unique income-qualifying customers comprehensively and efficiently.

In addition to coordination with the LIURP offerings, the Company also coordinates on the delivery of its low-income programs with other external programs. Some examples of this coordination include the following:

- Vendors who implement low-income programs are required to use commercially reasonable efforts to coordinate program services and installations with other conservation programs such as the PA State Weatherization Assistance Program, and NGDC located within the Company's service territory.
- A Company representative participates in a Pennsylvania Weatherization Advisory Council's Coordination Committee, in which barriers to coordination of all low-income programs have been identified and are being resolved by the group.
- The Company's program website allows efficient coordination through the on-line application process by obtaining the customer's NGDC information and the customer's sign off allowing the Company to share customer information. The customer information is then automatically sent to the appropriate NGDC in an e-mail at the same time the application is received by the Company.
- Existing relationships are leveraged with the overlapping NGDCs and have agreed upon joint procedures.

The Company believes that efforts to coordinate both with the LIURP and with external programs has been successful to date, and plans to continue these efforts.

**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 and list the key research questions and metrics that will be used to assess the viability of each pilot program.**

The Phase V Plan focuses on encouraging the accelerated adoption of commercially available technologies for achieving the energy efficiency and demand response requirements in a cost effective manner. See Table 8 in Appendix B for the measures included in the Phase V Plan and their eligibility requirements.

While the Phase V Plan includes no budgets for pilots or experimental equipment or devices, recognizing the five-year duration of Phase V, the EE&C Team plans to continue collaborating with the EPRI and may participate in research projects, demonstrations, and/or pilots on technological advancements in efficient measures that are eligible under the Phase V Plan, and within approved program budgets but at less than two percent of the total funds available to implement the plan. To ensure that the Company does not exceed this limitation, the EE&C Team will continuously monitor costs incurred for the implementation of various aspects of the Company's EE&C Plan and will ensure that no more than two percent of the funds available to implement the plan is spent on any such initiatives.

**9.1.5 Describe how the plan will be competitively neutral to all distribution customers even if they are receiving supply from an EGS.**

All programs are available to retail customers who receive distribution electric service from the Company regardless of that customer's source of generation service and, thus, will be offered on a non-discriminatory basis. Likewise, the Phase V EE&C-C tariff will collect the costs from like customers, thereby assuring the Phase V Plan is competitively neutral.

**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.**

The Company will work with participating distributors to incorporate into the application process documentation that the customer equipment being replaced 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.**

The Company's Phase V Plan is designed to: (i) elevate customers' awareness of energy efficiency opportunities so that they become more conscious of their choices involving energy usage; and (ii) establish ongoing energy saving habits through market transformation by first providing introductory products and educational materials and then moving customers from behavioral and basic measures to more sophisticated and comprehensive energy efficiency options. In addition, many measures installed as a result

of the Phase V Plan have lengthy lifetimes. The measures will save energy for years to come, bridging customers to even better and more efficient technologies as they become available over time. Thus, the EE&C Plan leads to long-term sustainable energy efficiency savings through the ongoing customer education and awareness and participation by customers.

***9.2.2 Describe, by sector, how the EDC will address consumer education for its programs.***

A concurrent marketing and educational campaign are essential to the success of these programs. The Company will continue to market its existing programs and measures to build awareness and interest in both the existing programs and the programs proposed under the Phase V Plan. Since the Phase V Plan leverages many of the programs currently being offered through the Phase IV Plan, and the response to many of the Phase IV programs has been positive, the Company plans to leverage and build upon the marketing and education strategy and its experience for Phase V.

Once the Commission approves the Phase V Plan, the Company will pursue educational and marketing efforts to build awareness and interest in the new or revised program offerings. Included in each program's budget is a marketing budget for promoting the offerings for each year of the Phase V Plan to ensure adequate outreach for achieving program goals. The Company's implementation CSPs will be required to develop and execute a marketing plan that will include a requirement that the CSP has educational expertise in social marketing and consumer behavior change. In addition, the Company assigns program managers to oversee the implementation of the program including customer communication and education efforts, in coordination with the Company's communications staff. This staff will be tasked with continually evaluating and, when appropriate, modifying the energy efficiency education messages and delivery strategies.

The Company and/or the implementation CSPs will develop educational materials to be distributed during customer interactions in specific programs. These materials may include promotional materials, equipment fact sheets, installation and maintenance guides, and other materials.

The Company's main program website, [energysavepa.com](http://energysavepa.com), contains information and tools to support customer energy-efficiency strategies, including information regarding existing programs. The Company will increase the information available on its website for the Phase V Plan by posting customer educational and marketing materials developed for its Phase V programs, components and measures.

***9.2.3 Describe how the EDC will provide the public with information about the results from the programs.***

The Company provides reports to the Commission as part of its regular reporting responsibilities, which are then posted on the Commission's website. These reports will also be posted on the Company's website for review by the public.

**10. APPENDICES**

***A. Approved CSP contract(s) or CSP contract terms and conditions.***

The Commission approved the Company's Act 129 Conservation Service Provider ("CSP") Contracts RFP Procedure for FirstEnergy's Phase V EE&C Plan, filed with the Commission on August 25, 2025 pursuant to the Act 129 Phase V Energy Efficiency and Conservation Program Final Implementation Order, by Secretarial Letter issued September 8, 2025 at Docket No. M-2025-3052826. The Company's proposed CSP contract for EM&V services for the Phase V Plan is being filed contemporaneously with this Plan as discussed in more detail in Section 4.3.2.

***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.***

**Appendix B:  
PUC Tables 1-15**

**Table 1: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan**

<b>Sector</b>	<b>Total Discounted Lifetime Costs (\$000)</b>	<b>Total Discounted Lifetime Benefits (\$000)<sup>3</sup></b>	<b>Present Value of Net<sup>1</sup> Benefits (\$000)</b>	<b>Benefit-Cost Ratio (TRC Ratio)</b>
<b>Market Rate Residential (exclusive of Low-Income)<sup>2</sup></b>	\$236,618	\$255,609	\$18,991	1.1
<b>Residential Low-Income</b>	\$69,638	\$80,373	\$10,735	1.2
<b>Small Commercial &amp; Industrial</b>	\$366,833	\$427,391	\$60,558	1.2
<b>Large Commercial &amp; Industrial</b>	\$381,610	\$401,116	\$19,507	1.1
<b>Total Portfolio</b>	<b>\$1,054,699</b>	<b>\$1,164,489</b>	<b>\$109,790</b>	<b>1.1</b>

<sup>1</sup> "Net" refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

<sup>2</sup> The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

<sup>3</sup> Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

Table 2: Summary of Portfolio Energy Savings

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh <sup>4</sup>	Lifetime MWh	1st-Year MWh	Lifetime MWh								
Baseline <sup>1</sup>	54,975,912		54,975,912		54,975,912		54,975,912		54,975,912		54,975,912	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	55,429	491,758	67,497	517,939	59,440	495,503	57,241	422,680	52,376	404,240	291,982	2,332,119
Residential Low-Income Sub-Sector – Projected Incremental Savings <sup>5</sup>	13,992	116,978	15,182	118,168	14,773	117,759	13,488	114,350	13,050	113,912	70,486	581,167
Small C&I Sector – Projected Incremental Savings	72,447	972,748	72,447	972,748	72,447	972,748	72,447	972,748	72,447	972,748	362,235	4,863,741
Large C&I Sector – Projected Incremental Savings	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	394,329	5,585,577
EE&C Plan Total – Projected Incremental Savings	220,734	2,698,599	233,992	2,725,970	225,526	2,703,125	222,041	2,626,893	216,739	2,608,015	1,119,031	13,362,603
EE&C Plan Total – Projected Cumulative Savings <sup>6</sup>	220,734	2,698,599	454,725	5,424,570	680,252	8,127,694	902,293	10,754,588	1,119,031	13,362,603	1,119,031	13,362,603
EE&C Plan Total – Percentage of Target to be Met <sup>2</sup>	20%		41%		62%		82%		102%		102%	
Estimated Phase IV Carryover Savings <sup>3</sup>											0	
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	220,734		233,992		225,526		222,041		216,739		1,119,031	
Cumulative Percent Reduction from Baseline	0.4%		0.8%		1.2%		1.6%		2.0%		2.0%	
Commission-Identified Goal											1,097,605	

1 As defined in the June 18, 2025 Implementation Order.

2 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

3 The Phase V Implementation Order limits energy carryover to 20% of an EDC's Phase V compliance target.

4 MWh saved are on a gross-verified basis.

5 Per the Phase V Implementation Order, the low-income savings target includes savings from programs solely directed at low-income customers or low-income-verified participants in multifamily housing programs. For the Company, this includes the Low-Income Energy Efficiency Program as well as the Multifamily component of the Commercial & Industrial Energy Solutions Programs, Small and Large, under which the Company projects savings of approximately 17,600 MWh from low-income customer participation, which combined with the Low Income Energy Efficiency Program exceeds its low-income savings target.

6 1st-Year MWh-Total for the EE&C Plan Total – Projected Cumulative Savings value is the result of a formula correction

**Table 2a: Summary of Portfolio Energy Savings and Spending (FirstEnergy ONLY)**

FirstEnergy Rate District <sup>2</sup>	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh <sup>1</sup>	Spend (\$1,000)	1st-Year MWh	Spend (\$1,000)								
<b>Met-Ed</b>	61,770	\$22,646	65,537	\$22,123	63,173	\$21,922	62,237	\$21,273	60,744	\$21,371	313,461	\$109,334
<b>Penelec</b>	55,720	\$20,428	58,690	\$19,812	56,228	\$19,512	55,096	\$18,832	53,575	\$18,848	279,310	\$97,432
<b>West Penn Power</b>	83,354	\$30,559	88,573	\$29,899	85,578	\$29,697	84,377	\$28,840	82,490	\$29,021	424,372	\$148,017
<b>Penn Power</b>	19,889	\$7,291	21,193	\$7,154	20,547	\$7,130	20,331	\$6,949	19,929	\$7,011	101,888	\$35,536
<b>FirstEnergy PA Total</b>	<b>220,734</b>	<b>\$80,924</b>	<b>233,992</b>	<b>\$78,988</b>	<b>225,526</b>	<b>\$78,262</b>	<b>222,041</b>	<b>\$75,894</b>	<b>216,739</b>	<b>\$76,251</b>	<b>1,119,031</b>	<b>\$390,320</b>

<sup>1</sup> MWh saved are on a gross-verified basis.

<sup>2</sup> Annual Rate District level energy savings and spending are based on the Company's Plan projections and allocated to the Rate District level based on its most recent sales forecast dated June 2025

**Table 3: Summary of Portfolio Demand Savings**

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW <sup>4</sup>	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
<b>Baseline<sup>1</sup></b>	9,515	9,515	9,515	9,515	9,515	9,515
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Annual Savings	10.2	12.2	11.3	10.0	8.4	52.1
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	3.1	3.1	3.2	3.0	2.8	15.1
Small C&I Sector – Projected Incremental Annual Savings	10.3	10.3	10.3	10.3	10.3	51.3
Large C&I Sector – Projected Incremental Annual Savings	10.7	10.7	10.7	10.7	10.7	53.5
<b>Coincident Demand Reduction From EE Subtotal</b>	<b>34.2</b>	<b>36.3</b>	<b>35.4</b>	<b>34.0</b>	<b>32.1</b>	<b>172.0</b>
Residential Load Shifting - Projected MW Savings	15.1	15.8	16.7	17.5	18.4	16.7
Small C&I Sector Load Shifting – Projected MW Savings	2.0	2.1	2.1	2.1	2.2	2.1
Large C&I Sector Load Shifting – Projected MW Savings	2.2	2.2	2.3	2.3	2.3	2.3
<b>Daily Load Shifting Subtotal</b>	<b>19.4</b>	<b>20.1</b>	<b>21.0</b>	<b>22.0</b>	<b>22.8</b>	<b>21.0</b>
<b>Cumulative Projected Compliance Savings<sup>2</sup></b>	<b>38.1</b>	<b>78.4</b>	<b>118.0</b>	<b>156.4</b>	<b>193.0</b>	<b>193.0</b>
<b>Cumulative EE&amp;C Plan Total – Percentage of Target to be Met<sup>3</sup></b>	20%	41%	62%	82%	101%	101%
<b>Estimated Phase IV Carryover Savings<sup>5</sup></b>						<b>0</b>
<b>Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings</b>	<b>38.1</b>	<b>78.4</b>	<b>118.0</b>	<b>156.4</b>	<b>193.0</b>	<b>193.0</b>
<b>Cumulative Percent Reduction from Baseline</b>	0.4%	0.8%	1.2%	1.6%	2.0%	2.0%
<b>Commission-Identified Goal<sup>1</sup></b>						<b>191.0</b>

<sup>1</sup> As defined in the June 18, 2025 Implementation Order.

<sup>2</sup> Cumulative totals reflect one-fifth of the expected MW savings from load shifting programs due to the average performance accounting method. EE program savings are additive across program years, while Load Shifting programs average across the Phase.

<sup>3</sup> The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

<sup>4</sup> MW saved are on a gross-verified basis.

<sup>5</sup> 50% of any excess Phase IV demand reduction can be claimed as carryover.

**Table 4: Summary of Seasonal Demand Savings**

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW <sup>1</sup>	Winter MW	Summer MW	Winter MW								
Coincident Reduction from EE - Residential	15.6	11.0	17.6	13.0	16.8	12.2	15.7	10.4	13.8	8.5	79.4	55.0
Coincident Reduction from EE - Non-Residential	25.1	16.9	25.1	16.9	25.1	16.9	25.1	16.9	25.1	16.9	125.3	84.3
Daily Load Shifting - Residential <sup>3</sup>	12.4	17.8	12.7	18.8	13.3	20.1	13.9	21.2	14.5	22.2	13.3	20.0
Daily Load Shifting - Non-Residential	4.2	4.3	4.2	4.4	4.3	4.4	4.3	4.5	4.4	4.5	4.3	4.4
<b>Total</b>											222.4	163.7
<b>Phase V Peak Demand Reduction Target</b>											191.0	
<b>Percentage of Goal In Season<sup>2</sup></b>											116%	86%

<sup>1</sup> MW saved are on a gross-verified basis, and MW are at the system-level.

<sup>2</sup> The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year. The cells with the percentage of goal in each season (M12 and N12) will appear green if this condition has been met.

<sup>3</sup> Daily load-shifting savings average across the phase, EE sums across the phase.

**Table 5: Summary of Portfolio Costs**

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%
Residential Market Rate	\$23,305	29%	\$23,384	30%	\$23,038	29%	\$20,692	27%	\$20,885	27%	\$111,305	28.5%
Residential Low-Income	\$10,618	13%	\$10,408	13%	\$10,458	13%	\$10,383	14%	\$10,287	13%	\$52,154	13.4%
Small C&I	\$22,916	28%	\$22,306	28%	\$22,320	29%	\$22,346	29%	\$22,366	29%	\$112,254	28.8%
Large C&I	\$19,272	24%	\$18,843	24%	\$18,846	24%	\$18,863	25%	\$18,871	25%	\$94,694	24.3%
Common Costs	\$4,814	6%	\$4,047	5%	\$3,601	5%	\$3,610	5%	\$3,843	5%	\$19,913	5.1%
<b>Total Portfolio Budget <sup>1</sup></b>	<b>\$80,924</b>	<b>100%</b>	<b>\$78,988</b>	<b>100%</b>	<b>\$78,262</b>	<b>100%</b>	<b>\$75,894</b>	<b>100%</b>	<b>\$76,251</b>	<b>100%</b>	<b>\$390,320</b>	<b>100%</b>
SWE Cost <sup>2</sup>	\$800		\$800		\$800		\$800		\$800		<b>\$4,000</b>	

<sup>1</sup> Cells with total percentages in row 11 will be green when the totals are above 99.9% and below 100.1%. All of these cells should be green once filled out to ensure correct cell values.

<sup>2</sup> Company Assumption Based on PH IV allocation of existing SWE contract

Table 6: Program Summaries

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) <sup>2</sup>		
<b>Market Rate Residential Programs (exclusive of Low-Income)</b>	Residential Energy Solutions Program	Residential	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	291,982	2,332,119	68.8	26%	36%	
								0%	0%	
									0%	0%
	<b>Totals for Residential Sector</b>					<b>291,982</b>	<b>2,332,119</b>	<b>68.8</b>	<b>26%</b>	<b>36%</b>
<b>Residential Low-Income Programs</b>	Low Income Energy Efficiency Program	Residential	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.	17	70,486	581,167	15.1	6%	8%	
								0%	0%	
									0%	0%
	<b>Totals for Low-Income Sector</b>					<b>70,486</b>	<b>581,167</b>	<b>15.1</b>	<b>6%</b>	<b>8%</b>

Table 6: Program Summaries

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) <sup>2</sup>		
Small C&I Programs	C&I Energy Solutions Program - Small	Small C&I <sup>3</sup>	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	362,235	4,863,741	53.4	32%	28%	
								0%	0%	
									0%	0%
	<b>Totals for Small C&amp;I Sector</b>					362,235	4,863,741	53.4	<b>32%</b>	<b>28%</b>
Large C&I Programs	C&I Energy Solutions Program - Large	Large C&I	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissioning and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	394,329	5,585,577	55.8	35%	29%	
								0%	0%	
									0%	0%
	<b>Totals for Large C&amp;I Sector</b>					394,329	5,585,577	55.8	<b>35%</b>	<b>29%</b>
<b>Totals for Plan<sup>1</sup></b>					<b>1,119,031</b>	<b>13,362,603</b>	<b>193.0</b>	<b>100%</b>	<b>100%</b>	

<sup>1</sup> Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

<sup>2</sup> If rows need to be added to accommodate more than 3 programs per sector, ensure total and percentage formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

<sup>3</sup> Includes projected participation of Low Income households living in Multifamily housing.

**Table 7: Budget and Parity Analysis Summary**

Customer Sector	Phase V EE&C Budget (inclusive of allocated common cost)	% of Total EDC EE&C Budget	% of EDC Total Annual Revenue <sup>1</sup>	% of EDC Total MWh Sales
Residential Sector <i>(exclusive of Low-Income )</i>	\$118,927,997	30%	76%	37%
Residential Low Income Sub-Sector	\$54,246,395	14%		
<b>Residential Subtotal</b>	<b>\$173,174,392</b>	<b>44%</b>	<b>76%</b>	<b>37%</b>
Small C&I Sector	\$118,074,265	30%	18%	21%
Large C&I Sector	\$99,070,866	25%	7%	42%
<b>Non-Residential Subtotal</b>	<b>\$217,145,131</b>	<b>56%</b>	<b>24%</b>	<b>63%</b>
<b>EDC TOTAL <sup>3</sup></b>	<b>\$390,319,523</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>EDC TOTAL as Share of Budget Ceiling</b>	<b>100.0%</b>			

% Budget by Customer Sector (populates when data is entered above)

- Residential Sector (exclusive of Low-Income)
- Residential Low Income Sub-Sector
- Small C&I Sector
- Large C&I Sector

% Revenue by Customer Sector

- Residential Subtotal
- Small C&I Sector
- Large C&I Sector

% MWh Sales by Customer Sector

- Residential Subtotal
- Small C&I Sector
- Large C&I Sector

**1** EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total revenue should be inclusive of collections on behalf of competitive generation suppliers.

**2** Budget amounts in this table should exclude SWE costs.

**3** Cells F10, G10 and H10 will be green when the totals are above 99.9% and below 100.1%. All cells should be green once filled out to ensure correct subtotals.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	Products	Freezer Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$60.00	5	\$100.00
Residential Energy Solutions Program	Products	Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$60.00	6	\$100.00
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$30.00	3	\$50.00
Residential Energy Solutions Program	Products	Dehumidifier Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$30.00	4	\$50.00
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	\$30.00	5	\$50.00
Residential Energy Solutions Program	Products	Cooler Recycling	1 Unit	No	No	PA TRM	\$30.00	5	\$50.00
Residential Energy Solutions Program	Products	Clothes Washer	1 Unit	No	No	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	1 Unit	No	No	ENERGY STAR or PA TRM	\$206.34	14	\$100.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	1 Unit	No	No	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	1 Unit	No	No	PA TRM	\$39.00	9	\$40.00
Residential Energy Solutions Program	Products	Room Air Conditioner	1 Unit	No	Yes	PA TRM	\$95.08	9	\$50.00
Residential Energy Solutions Program	Products	Dehumidifier	1 Unit	No	No	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	1 Unit	No	No	ENERGY STAR or PA TRM	\$218.07	10	\$400.00
Residential Energy Solutions Program	Products	Dishwasher	1 Unit	No	No	ENERGY STAR or PA TRM	\$79.45	10	\$75.00
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	1 Unit	No	No	ENERGY STAR or MA TRM	\$143.00	10	\$150.00
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncs	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	\$103.53	9	\$100.00
Residential Energy Solutions Program	Products	Cooler	1 Unit	No	No	ENERGY STAR or PA TRM	\$281.84	14	\$100.00
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	1 Unit	No	No	ENERGY STAR	\$242.06	14	\$200.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	Products	LED Linear	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	1 Unit	No	No	PA TRM	\$2.60	8	\$5.00
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	100 Light String	No	No	PA TRM	\$0.67	10	\$5.00
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	1 Unit	No	No	PA TRM	\$40.91	5	\$25.00
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	1 Unit	No	No	PA TRM	\$24.51	8	\$30.00
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Residential Energy Solutions Program	Products	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	\$20.80	7	\$0.20 per kWh and/or \$550 per kW saved
Residential Energy Solutions Program	Products	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	\$9,025.00	10	\$975.00
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	\$557.44	15	\$650.00
Residential Energy Solutions Program	Products	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	\$226.20	13	\$640.00
Residential Energy Solutions Program	Products	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	\$5,839.98	15	\$975.00
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	\$5,607.89	15	\$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	Products	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	\$552.98	10	\$350.00
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	\$6,716.86	15	\$1,500.00
Residential Energy Solutions Program	Products	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	\$13,745.19	5	\$0.20 per kWh and/or \$550 per kW saved
Residential Energy Solutions Program	Products	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
Residential Energy Solutions Program	Products	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	\$16.64	15	\$25.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$417.59	15	\$1,500.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$1,043.99	15	\$2,000.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$417.59	15	\$750.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$1,043.99	15	\$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	\$710.54	15	\$1,500.00
Residential Energy Solutions Program	HVAC & Solar	PTAC	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$521.99	15	\$500.00
Residential Energy Solutions Program	HVAC & Solar	PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$521.99	15	\$750.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	1- 3 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$18,664.80	15	\$7,500.00
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	1 Unit	No	No	PA TRM	\$196.11	5	\$150.00
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	\$103.53	9	\$100.00
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	1 - Unit	No	No	PA TRM	\$141.40	3	\$150.00
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	1-20 CFM unit	No	No	ENERGY STAR or PA TRM	\$52.42	15	\$25.00
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	1 - Unit	No	Yes	PA TRM	\$1,227.74	9	\$500.00
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$2,087.94	15	\$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	\$3,552.72	15	\$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$2,609.93	15	\$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Solar	1 kW DC Installed Capacity	No	No	PA TRM	\$1,910.63	15	\$500.00
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	1 - Audit w DI & Wgtd Retrofits	No	Yes	In-Home Audit w/ direct install measures. Also provides incentive for program measures meeting program, PA TRM or evaluation requirements.	\$2,929.17	5	Audit - Up to \$750 for the cost of the audit with direct install measures, plus up to \$2,500 for audit recommended measures and additional incentives
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	1 kW DC Installed Capacity	No	Yes	PA TRM	\$1,910.63	15	\$500.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	\$730.79	15	\$2,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	\$730.79	15	\$1,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	\$1,915.00	10	\$1,000.00
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Up to \$250 for the cost of an audit with direct install measures
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	Per HH	No	No	Residential customer meeting program requirements	\$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	Per HH	No	No	Residential customer meeting program requirements	\$0.00	2	NA

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	Per HH	No	No	Residential customer meeting program requirements	\$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	Per HH	No	No	Residential customer meeting program requirements	\$0.00	2	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	Per HH	No	No	Residential customer meeting program requirements	\$0.00	1	NA
Residential Energy Solutions Program	Behavioral	On-Line Audit	Per HH	No	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	\$0.00	1	NA
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	NC Townhouse and Duplex	No	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$2,000.00
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	NC Two on Two Cond Units	No	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	NC Single Family Detached	No	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	NC MultiFamily Low Rise	No	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	NC Mfg Housing	No	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	\$2,802.97	14	\$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	NC MultiFamily Low Rise	No	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	Vendor	No	No	Active residential customers with AMI, sufficient usage and usage history, and meets participation or other program requirements.	\$0.00	1	NA
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	Vendor	No	No	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$250.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Residential Energy Solutions Program	DLS & DR - Res	Storage	Vendor	No	No	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$1,000.00
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	Vendor	No	No	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$50.00
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS Summer	Vendor	No	No	Smart thermostats installed on electric cooling systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	NA
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS Winter	Vendor	No	No	Smart thermostats installed on electric heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	NA
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	\$0.00	-	\$0.00
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	1 Tenant Space	Yes	Yes	In-Home Audit w/ direct install measures or a welcome kit. Eligible to single family home customers.	\$172.50	13	NA
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	1-1.25 Ton Unit	Yes	Yes	Direct installation of heat pumps for water and space heating with in 5 years of being weatherized by LIURP	\$3,600.00	15	NA
Low Income Energy Efficiency Program	Weatherization	WARM Plus	Per HH	Yes	Yes	WARM Plus - Weatherization services provided to customers that qualify at or below 150% of the Federal Poverty Income Guidelines in coordination with the Low Income Usage Reduction program	\$1,275.00	13	NA
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	Per HH	Yes	Yes	WARM - Extra Measures - additional energy efficiency measures provided in coordination with the Low Income Usage Reduction program--measures above and beyond what that program provides. For customers who qualify at or below 150% of the Federal Poverty Income Guidelines	\$1,032.50	13	NA
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$60.00	5	\$125.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$60.00	6	\$125.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$30.00	3	\$75.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$30.00	4	\$75.00
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	\$30.00	5	\$75.00
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	1 Unit	Yes	No	PA TRM	\$30.00	5	\$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	1 Unit	-	-	PA TRM	\$39.00	9	\$40.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	1 Unit	-	-	PA TRM	\$95.08	9	\$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	1 Unit	-	-	ENERGY STAR or PA TRM	\$79.45	10	\$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	1 Unit	-	-	ENERGY STAR	\$242.06	14	\$200.00
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	Per 4' Unit	-	-	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mrktplace) - LI	1 Unit	Yes	No	PA TRM	\$2.60	8	\$5.00
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mrktplace) - LI	100 Light String	Yes	No	PA TRM	\$0.67	10	\$5.00
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	1 Unit	Yes	No	PA TRM	\$40.91	5	\$25.00
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	1 Unit	Yes	No	PA TRM	\$24.51	8	\$30.00
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mrktplace) - LI	Per 4' Unit	Yes	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$14.25	15	\$20.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	1- 2.75 ton unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	\$1,148.37	15	\$2,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	\$1,684.76	10	\$1,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	\$1,684.76	10	\$1,000.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	-	Yes	No	Audit meeting IRA - HER program requirements	\$0.00	-	\$1,500.00
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	Per HH	Yes	No	#N/A	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	Per HH	Yes	No	Residential customer meeting program requirements	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	Per HH	Yes	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	\$0.00	1	NA
Low Income Energy Efficiency Program	LI - New Homes	NC -Townhouse and duplex units - LI	NC Townhouse and Duplex	Yes	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$2,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	NC Two on Two Cond Units	Yes	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	NC Single Family Detached	Yes	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise LI	NC MultiFamily Low Rise	Yes	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	NC Mfg Housing	Yes	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	\$2,802.97	14	\$3,000.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	NC MultiFamily Low Rise	Yes	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	\$2,802.97	14	\$3,000.00
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - DI - Res - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Multi-Family Tenant Space Audit w/ direct install measures.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - DI - Res - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Prescriptive - Res - LI	1-50 gal unit	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Prescriptive - Res - LI	1 Unit	Yes	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Custom - Res - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Custom - Res - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Multi-Family Tenant Space Audit w/ direct install measures.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	1-50 gal unit	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	1 Unit	Yes	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Up to \$250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 <=5.4 Tn - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$2,087.94	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 >5.4 < 20 Tn - SCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	\$1,859.85	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 >=20 Tn - SCI	1-20 ton unit	No	N/A	ENERGY STAR or PA TRM	\$709.41	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$555.71	15	500/Ton

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$31,108.00	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP - SCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$710.54	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$168.79	15	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$139.92	15	\$750.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner - SCI	1-1 ton unit	No	N/A	PA TRM	\$95.08	9	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	\$75.97	11	\$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom SCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	\$66.31	15	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	1-5 Ton Unit	No	N/A	PA TRM or evaluation guidelines	\$437.79	3	\$300.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	1 Unit	No	N/A	PA TRM	\$395.48	5	\$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	\$52.67	8	\$0.60 Per Watt Controlled
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	Per sq-ft of building lighting controlle	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	\$0.68	8	\$0.60 Per Watt Controlled

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$206.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$68.67	15	\$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$412.44	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$466.23	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$430.37	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$197.25	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzer Light - SCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$58.68	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzer Occupancy Sensor - SCI	1 Unit	No	N/A	PA TRM	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$39,799.72	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	\$198,998.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$30.53	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$243.80	14	\$0.20 per kWh and/or \$550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$122.11	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frzn - Reach In Special Doors (low/No Anti Swt) - SCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	\$504.02	12	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$353.45	15	\$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$766.60	15	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	\$682.94	12	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	\$453.12	12	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	\$79.31	9	\$22.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls SCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	\$1,119.27	12	\$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	\$10.02	4	\$7.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$381.47	10	\$590 0-500 lbs \$980 501-1000 lbs \$1100 over 1000 lbs
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$234.30	5	\$125.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	1- unit	No	N/A	ENERGY STAR or PA TRM	\$2,537.60	12	\$150/pan
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,903.20	12	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,289.28	12	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	\$549.55	12	\$500 - full size \$375 - 3/4 size \$225 - 1/2 size
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,898.69	12	\$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	\$1,118.48	12	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,539.87	10	\$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	\$573.73	10	\$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	\$112.90	8	\$175.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	5	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	6	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	3	\$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	4	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	5	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	1 Unit	No	N/A	PA TRM	\$30.00	5	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	\$143.00	10	\$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	\$46.80	7	\$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	\$20.80	7	\$0.20 per kWh and/or \$550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	\$9,025.00	10	\$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	\$557.44	15	\$650.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	\$226.20	13	\$640.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	\$5,839.98	15	\$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	\$5,607.89	15	\$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	\$552.98	10	\$350.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	\$6,716.86	15	\$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	\$13,745.19	5	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	\$16.64	15	\$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Utility Owned(EMU))	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$197.25	15	\$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Customer Owned(MU))	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$197.25	15	\$100.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	\$46,284.92	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	1 kW DC Installed Capacity	No	N/A	PA TRM	\$1,928.12	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	\$4,529,325.97	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	\$149,387.80	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	\$29,997.08	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,225.00	1	\$1,500.00
C&I Energy Solutions Program - Small	Energy Management SCI	Building Tune Up - SCI	1 Project	No	N/A	Portfolio of measures and services that focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency, including the installation of energy efficiency measures.	\$37,782.88	13	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Energy Management SCI	Virtual/Meter Data Commissioning SCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	\$1,172.74	2	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Energy Management SCI	Retrocommissioning - SCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	\$5,863.72	3	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Small	Energy Management SCI	Building Operations Training - SCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	\$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE \$1000 per person.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Small	Energy Management SCI	Customer Concierge - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$3,500.00	1	NA
C&I Energy Solutions Program - Small	Energy Management SCI	Energy Consultation - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$1,225.00	1	NA
C&I Energy Solutions Program - Small	Energy Management SCI	Audits - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,225.00	1	\$1,500.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$250.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$1,000.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$50.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$0.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	Vendor	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements.	\$0.00	1	\$20,000.00
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	-	No	No	Purchase, installation, and implementation of equipment to improve the operation and efficiency of the Company's energy delivery system.	\$0.00	-	\$0.00
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$175.00	13	Up to \$250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$21,518.40	14	Up to 80% of the project cost

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	\$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 <=5.4 Tn - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$2,087.94	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 >5.4 < 20 Tn - LCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	\$1,859.85	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 >=20 Tn - LCI	1-20 ton unit	No	N/A	ENERGY STAR or PA TRM	\$709.41	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$555.71	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$31,108.00	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP - LCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	\$710.54	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$168.79	15	\$500.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	\$139.92	15	\$750.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner - LCI	1-1 ton unit	No	N/A	PA TRM	\$95.08	9	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	\$75.97	11	\$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom LCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	\$66.31	15	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	1-5 Ton Unit	No	N/A	Maintenance services applicable to C&I customers for documented tune-ups of packaged and split systems up to 20 Tons (following PA TRM guidelines.)	\$437.79	3	\$300.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	1 Unit	No	N/A	PA TRM	\$395.48	5	\$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	\$52.67	8	\$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	Per sq-ft of building lighting controller	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	\$0.68	8	\$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	1-4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$206.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$68.67	15	\$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$412.44	14	\$0.20 per kWh and/or \$550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$466.23	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$430.37	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$197.25	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzr Light - LCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$58.68	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzr Occupancy Sensor - LCI	1 Unit	No	N/A	PA TRM	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	\$39,799.72	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	\$198,998.58	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$30.53	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$243.80	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$122.11	14	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and fixture controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	\$52.67	8	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	\$504.02	12	\$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$353.45	15	\$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	\$766.60	15	\$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	\$682.94	12	\$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	\$453.12	12	\$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	\$79.31	9	\$22.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	\$1,119.27	12	\$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	\$10.02	4	\$7.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$381.47	10	\$590 0-500 lbs \$980 501-1000 lbs \$1100 over 1000 lbs
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$234.30	5	\$125.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	1- unit	No	N/A	ENERGY STAR or PA TRM	\$2,537.60	12	\$150/pan
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,903.20	12	\$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	\$1,289.28	12	\$500.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	\$549.55	12	\$500 - full size \$375 - 3/4 size \$225 - 1/2 size
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,898.69	12	\$1,500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	\$1,118.48	12	\$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	\$1,539.87	10	\$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	\$573.73	10	\$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	\$112.90	8	\$175.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	5	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$60.00	6	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	3	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	4	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	\$30.00	5	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	1 Unit	No	N/A	PA TRM	\$30.00	5	\$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	\$143.00	10	\$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$35.72	14	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$206.34	14	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	14	\$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	\$1,684.76	10	\$1,000.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	11	\$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	\$0.00	12	\$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	\$46.80	7	\$200.00
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	\$47,090.03	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	\$91,959.50	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	\$40,520.02	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	1 kW DC Installed Capacity	No	N/A	PA TRM	\$1,928.12	15	\$0.20 per kWh and/or \$550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	\$4,529,325.97	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems. Including a focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency	\$149,387.80	15	\$0.20 per kWh and/or \$550 per kW saved and/or Up to 80% of the project cost
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	\$29,997.08	15	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,225.00	1	\$1,500.00
C&I Energy Solutions Program - Large	Energy Management LCI	Virtual/Meter Data Commissioning LCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	\$1,172.74	2	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Energy Management LCI	Retrocommissioning - LCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	\$58,637.21	3	\$0.20 per kWh and/or \$550 per kW saved
C&I Energy Solutions Program - Large	Energy Management LCI	Building Operations Training - LCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	\$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE \$1000 per person.
C&I Energy Solutions Program - Large	Energy Management LCI	Customer Concierge - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$3,500.00	1	NA
C&I Energy Solutions Program - Large	Energy Management LCI	Energy Consultation - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	\$1,750.00	1	NA
C&I Energy Solutions Program - Large	Energy Management LCI	Audits - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	\$1,750.00	1	\$1,500.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$250.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	\$0.00	1	\$1,000.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) <sup>1</sup>	Comprehensive Measure (Yes/No) <sup>2,3</sup>	Eligibility Requirements <sup>4</sup>	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit) <sup>5</sup>
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	-	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements.	\$0.00	1	\$50,000.00
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	-	No	No	Purchase, installation, and implementation of equipment to improve the operation and efficiency of the Company's energy delivery system.	\$0.00	-	\$0.00

1 Indicate whether the measure counts towards the "proportionate number of measures" requirement.

2 Indicate whether the measure will be part of comprehensive measure reporting.

3 For Comprehensive Measures, see 'Table 8 Addendum' tab for a designation of measures by TRM number

4 Measure eligibility may change during the term of the plan to address market uncertainty and changes and or where supported by evaluation.

5 All values listed are "Up to Values". The Company may provide tiered, blocked, prescriptive, and/or performance-based incentives that are within the amounts listed based on varying measure characteristics, market conditions, or other factors.

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Freezer Recycling	2.4.3	Energy Savings (MWh) <sup>2</sup>	1,514.51	1,514.51	1,514.51	1,514.51	1,514.51	<b>7,572.56</b>
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.92</b>
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	<b>0.66</b>
		Projected Participation <sup>3</sup>	2,000	2,000	2,000	2,000	2,000	<b>10,000</b>
Refrigerator Recycling	2.4.3	Energy Savings (MWh)	3,786.81	3,786.81	3,786.81	3,786.81	3,786.81	<b>18,934.06</b>
		Summer Demand Reduction (MW)	0.56	0.56	0.56	0.56	0.56	<b>2.81</b>
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	<b>2.10</b>
		Projected Participation	5,000	5,000	5,000	5,000	5,000	<b>25,000</b>
Room Air Conditioner Recycling	2.2.8	Energy Savings (MWh)	765.21	765.21	765.21	765.21	765.21	<b>3,826.04</b>
		Summer Demand Reduction (MW)	2.08	2.08	2.08	2.08	2.08	<b>10.40</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	7,250	7,250	7,250	7,250	7,250	<b>36,250</b>
Dehumidifier Recycling	2.4.12	Energy Savings (MWh)	3,561.93	3,561.93	3,561.93	3,561.93	3,561.93	<b>17,809.63</b>
		Summer Demand Reduction (MW)	1.38	1.38	1.38	1.38	1.38	<b>6.88</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	7,250	7,250	7,250	7,250	7,250	<b>36,250</b>
LV Refrigerator Recycling	2.4.4	Energy Savings (MWh)	78.45	78.45	78.45	78.45	78.45	<b>392.25</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>
Cooler Recycling	2.4.6	Energy Savings (MWh)	5.20	5.20	5.20	5.20	5.20	<b>26.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	50	50	50	50	50	<b>250</b>
Clothes Washer	2.4.8	Energy Savings (MWh)	195.55	195.55	195.55	195.55	195.55	<b>977.76</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.16</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.16</b>
		Projected Participation	1,750	1,750	1,750	1,750	1,750	<b>8,750</b>
Refrigerator - PY18 to PY20	2.4.1	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	<b>112.72</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	500	500	500	0	0	<b>1,500</b>
Refrigerator - PY21 & PY22	2.4.1	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	<b>0.08</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	5	5	<b>10</b>
Freezer - PY18 to PY20	2.4.2	Energy Savings (MWh)	2.03	2.03	2.03	0.00	0.00	<b>6.09</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	50	50	50	0	0	<b>150</b>
Freezer - PY21 & PY22	2.4.2	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	<b>0.10</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	5	5	<b>10</b>
Clothes Dryer - PY18 & PY19	2.4.9	Energy Savings (MWh)	37.18	37.18	0.00	0.00	0.00	<b>74.36</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	500	500	0	0	0	<b>1,000</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Clothes Dryer - PY20 to PY22	2.4.9	Energy Savings (MWh)	0.00	0.00	16.68	16.68	16.68	<b>50.03</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	0	0	500	500	500	<b>1,500</b>
Air Purifier / Cleaner	2.4.14	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	<b>1,287.05</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.16</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.21</b>
		Projected Participation	1,500	1,500	1,500	1,500	1,500	<b>7,500</b>
Room Air Conditioner	2.2.7	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	<b>216.48</b>
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.40</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3,300	3,300	3,300	3,300	3,300	<b>16,500</b>
Dehumidifier	2.4.11	Energy Savings (MWh)	73.93	73.93	73.93	73.93	73.93	<b>369.66</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.08</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	500	500	500	500	500	<b>2,500</b>
Heat Pump Water Heater - PY18 to PY20	2.3.1	Energy Savings (MWh)	9,310.57	9,310.57	9,310.57	0.00	0.00	<b>27,931.70</b>
		Summer Demand Reduction (MW)	1.08	1.08	1.08	0.00	0.00	<b>3.23</b>
		Winter Demand Reduction (MW)	1.79	1.79	1.79	0.00	0.00	<b>5.38</b>
		Projected Participation	4,750	4,750	4,750	0	0	<b>14,250</b>
Heat Pump Water Heater - PY21 & PY22	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	11.55	11.55	<b>23.10</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	50	50	<b>100</b>
Pool Pump Variable Speed	2.8.1 & 2.8.2	Energy Savings (MWh)	5.50	5.50	5.50	5.50	5.50	<b>27.48</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	50	50	50	50	50	<b>250</b>
Dishwasher	2.4.10	Energy Savings (MWh)	98.34	98.34	98.34	98.34	98.34	<b>491.69</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.09</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.14</b>
		Projected Participation	2,000	2,000	2,000	2,000	2,000	<b>10,000</b>
EV Charging Cord - Level 2 - Res	MA TRM V11	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	<b>0.55</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
Smart Thermostat - AplnCs	2.2.12	Energy Savings (MWh)	1,686.00	1,686.00	1,686.00	1,686.00	1,686.00	<b>8,430.00</b>
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	<b>1.69</b>
		Winter Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	<b>0.71</b>
		Projected Participation	8,000	8,000	8,000	8,000	8,000	<b>40,000</b>
Cooler	2.4.5	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	<b>0.23</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
Clothes Washer/Dryer Combo	2.4.8 & 2.4.9	Energy Savings (MWh)	21.76	21.76	21.76	21.76	21.76	<b>108.82</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	150	150	150	150	150	<b>750</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>LED Linear</i>	2.1.1	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	<b>506.58</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.09</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.09</b>
		Projected Participation	5,000	5,000	5,000	5,000	5,000	<b>25,000</b>
<i>LED Nightlights (Mrktplace)</i>	2.1.3	Energy Savings (MWh)	107.14	107.14	107.14	107.14	107.14	<b>535.71</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	7,500	7,500	7,500	7,500	7,500	<b>37,500</b>
<i>Holiday Lights (Mrktplace)</i>	2.1.4	Energy Savings (MWh)	132.00	132.00	132.00	132.00	132.00	<b>660.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10,000	10,000	10,000	10,000	10,000	<b>50,000</b>
<i>Smart Strip Plug Outlet</i>	2.5.1	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	<b>1,559.26</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.20</b>
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.25</b>
		Projected Participation	2,750	2,750	2,750	2,750	2,750	<b>13,750</b>
<i>Residential Occupancy Sensor</i>	2.1.2	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	<b>101.62</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
<i>LED Linear (Mrktplace)</i>	2.1.1	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	<b>506.58</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.09</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.09</b>
		Projected Participation	5,000	5,000	5,000	5,000	5,000	<b>25,000</b>
<i>Agricultural Process Lighting</i>	3.1.7	Energy Savings (MWh)	0.04	0.04	0.04	0.04	0.04	<b>0.18</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Auto Milker Takeoff</i>	4.1.1	Energy Savings (MWh)	1.94	1.94	1.94	1.94	1.94	<b>9.69</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Dairy Scroll Compressor</i>	4.1.2	Energy Savings (MWh)	0.80	0.80	0.80	0.80	0.80	<b>3.99</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>HE Ventilation Fans</i>	4.1.3	Energy Savings (MWh)	3.28	3.28	3.28	3.28	3.28	<b>16.39</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Heat Reclaimer</i>	4.1.4	Energy Savings (MWh)	5.06	5.06	5.06	5.06	5.06	<b>25.28</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>High Volume Low Speed Fan</i>	4.1.5	Energy Savings (MWh)	43.00	43.00	43.00	43.00	43.00	<b>215.00</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Livestock Waterer</i>	4.1.6	Energy Savings (MWh)	1.00	1.00	1.00	1.00	1.00	<b>5.02</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Dairy Vac Pump VSD Control</i>	4.1.7	Energy Savings (MWh)	10.08	10.08	10.08	10.08	10.08	<b>50.38</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Low Pressure Irrigation</i>	4.1.8	Energy Savings (MWh)	12.98	12.98	12.98	12.98	12.98	<b>64.92</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.18</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Custom - Agricultural</i>	1.17	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Engine Block Heater Timer</i>	3.11.2	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	<b>3.69</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Heat Pump - Eff</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	141.64	141.64	141.64	141.64	141.64	<b>708.19</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.14</b>
		Projected Participation	250	250	250	250	250	<b>1,250</b>
<i>Heat Pump - Most Eff</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	36.68	36.68	36.68	36.68	36.68	<b>183.39</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	25	25	25	25	25	<b>125</b>
<i>Central Air Conditioner - Eff</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	88.91	88.91	88.91	88.91	88.91	<b>444.55</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.22</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	300	300	300	300	300	<b>1,500</b>
<i>Central Air Conditioner - Most Eff</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	5.96	5.96	5.96	5.96	5.96	<b>29.78</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Ductless Mini-Split Heat Pump</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	127.82	127.82	127.82	127.82	127.82	<b>639.09</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Projected Participation	125	125	125	125	125	<b>625</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
PTAC	2.2.1 & 2.2.2	Energy Savings (MWh)	8.67	8.67	8.67	8.67	8.67	43.34
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.02
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	50	50	50	50	50	250
PTHP	2.2.1 & 2.2.2	Energy Savings (MWh)	17.62	17.62	17.62	17.62	17.62	88.10
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	80	80	80	80	80	400
Heat Pump - Water & GeoT	2.2.1 & 2.2.2	Energy Savings (MWh)	83.39	83.39	83.39	83.39	83.39	416.93
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.13
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.16
		Projected Participation	55	55	55	55	55	275
Furnace Fan (Retrofit or New to ECM)	2.2.4	Energy Savings (MWh)	4.89	4.89	4.89	4.89	4.89	24.44
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	25	25	25	25	25	125
Smart Thermostat - HVAC	2.2.12	Energy Savings (MWh)	7.94	7.94	7.94	7.94	7.94	39.71
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	25	25	25	25	25	125
AC or HP Maintenance	2.2.6	Energy Savings (MWh)	101.99	101.99	101.99	101.99	101.99	509.96
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	0.22
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	800	800	800	800	800	4,000
HE Bathroom Fans	2.2.14	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	0.60
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Window Heat Pump	2.2.9	Energy Savings (MWh)	39.94	39.94	39.94	39.94	39.94	199.69
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.03
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	0.40
		Projected Participation	100	100	100	100	100	500
REH to Heat Pump	2.2.1 & 2.2.2	Energy Savings (MWh)	3,214.59	3,214.59	3,214.59	3,214.59	3,214.59	16,072.94
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	0.33
		Winter Demand Reduction (MW)	1.09	1.09	1.09	1.09	1.09	5.43
		Projected Participation	450	450	450	450	450	2,250
REH to DMS Heat Pump	2.2.1 & 2.2.2	Energy Savings (MWh)	2,367.20	2,367.20	2,367.20	2,367.20	2,367.20	11,835.98
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	0.26
		Winter Demand Reduction (MW)	0.92	0.92	0.92	0.92	0.92	4.58
		Projected Participation	600	600	600	600	600	3,000
REH to PTHP	2.2.1 & 2.2.2	Energy Savings (MWh)	89.89	89.89	89.89	89.89	89.89	449.47
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	0.14
		Projected Participation	25	25	25	25	25	125
Solar	2.8.3	Energy Savings (MWh)	10,107.92	10,107.92	10,107.92	10,107.92	10,107.92	50,539.60
		Summer Demand Reduction (MW)	2.62	2.62	2.62	2.62	2.62	13.08
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	1.74
		Projected Participation	8,000	8,000	8,000	8,000	8,000	40,000

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Comprehensive Audit</i>	<i>Actuals &amp; 2.6</i>	Energy Savings (MWh)	570.03	570.03	570.03	570.03	570.03	<b>2,850.13</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.89</b>
		Projected Participation	400	400	400	400	400	<b>2,000</b>
<i>Comp Audit - Solar</i>	2.8.3	Energy Savings (MWh)	25.27	25.27	25.27	25.27	25.27	<b>126.35</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	20	20	20	20	20	<b>100</b>
<i>Comp Audit - Heat Pump - Eff</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	56.66	56.66	56.66	56.66	56.66	<b>283.28</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Projected Participation	100	100	100	100	100	<b>500</b>
<i>Comp Audit - CAC - Eff</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	29.64	29.64	29.64	29.64	29.64	<b>148.18</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.07</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	100	100	100	100	100	<b>500</b>
<i>Comp Audit - HPWH</i>	2.3.1	Energy Savings (MWh)	23.10	23.10	23.10	23.10	23.10	<b>115.50</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	100	100	100	100	100	<b>500</b>
<i>MF - Tenant - DI - Res</i>	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	23.34	23.34	23.34	23.34	23.34	<b>116.72</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>
<i>MF - Common - DI - Res</i>	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	95.20	95.20	95.20	95.20	95.20	<b>476.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.07</b>
		Projected Participation	8	8	8	8	8	<b>40</b>
<i>MF - Tenant - Prescriptive - Res</i>	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>
<i>MF - Common - Prescriptive - Res</i>	2.4.8	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>
<i>MF - Tenant - Custom - Res</i>	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>
<i>MF - Common - Custom - Res</i>	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Behavioral Ph5 Yr 1</i>	CSP & 2.7.3	Energy Savings (MWh)	11,454.13	0.00	0.00	0.00	0.00	<b>11,454.13</b>
		Summer Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	<b>2.33</b>
		Winter Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	<b>2.33</b>
		Projected Participation	368,300	0	0	0	0	<b>368,300</b>
<i>Behavioral Ph5 Yr 2</i>	CSP & 2.7.3	Energy Savings (MWh)	0.00	23,522.19	0.00	0.00	0.00	<b>23,522.19</b>
		Summer Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	<b>4.31</b>
		Winter Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	<b>4.31</b>
		Projected Participation	0	426,900	0	0	0	<b>426,900</b>
<i>Behavioral Ph5 Yr 3</i>	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	15,485.94	0.00	0.00	<b>15,485.94</b>
		Summer Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	<b>3.42</b>
		Winter Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	<b>3.42</b>
		Projected Participation	0	0	341,100	0	0	<b>341,100</b>
<i>Behavioral Ph5 Yr 4</i>	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	0.00	22,625.28	0.00	<b>22,625.28</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	<b>3.58</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	<b>3.58</b>
		Projected Participation	0	0	0	392,800	0	<b>392,800</b>
<i>Behavioral Ph5 Yr 5</i>	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	0.00	0.00	17,760.60	<b>17,760.60</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.92	<b>1.92</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.92	<b>1.92</b>
		Projected Participation	0	0	0	0	379,500	<b>379,500</b>
<i>On-Line Audit</i>	CSP & 2.7.3	Energy Savings (MWh)	360.00	360.00	360.00	360.00	360.00	<b>1,800.00</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.13</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.11</b>
		Projected Participation	2,400	2,400	2,400	2,400	2,400	<b>12,000</b>
<i>NC -Townhouse and duplex units</i>	2.7.1	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	<b>923.03</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.19</b>
		Projected Participation	120	120	120	120	120	<b>600</b>
<i>NC - Two-on-Two condominium units</i>	2.7.1	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	<b>923.03</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.19</b>
		Projected Participation	120	120	120	120	120	<b>600</b>
<i>NC - Single-family detached units</i>	2.7.1	Energy Savings (MWh)	2,840.09	2,840.09	2,840.09	2,840.09	2,840.09	<b>14,200.43</b>
		Summer Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	<b>1.83</b>
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	<b>2.86</b>
		Projected Participation	1,200	1,200	1,200	1,200	1,200	<b>6,000</b>
<i>NC - Multi Family Low Rise</i>	2.7.1	Energy Savings (MWh)	397.61	397.61	397.61	397.61	397.61	<b>1,988.06</b>
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.26</b>
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.40</b>
		Projected Participation	280	280	280	280	280	<b>1,400</b>
<i>NC - Manufactured Housing</i>	2.7.1	Energy Savings (MWh)	304.84	304.84	304.84	304.84	304.84	<b>1,524.18</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.20</b>
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	<b>0.31</b>
		Projected Participation	184	184	184	184	184	<b>920</b>
<i>NC - Multi Family High Rise</i>	2.7.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Behavioral DLS &amp; DR</i>	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	35.79
		Winter Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	35.79
		Projected Participation	600,000	600,000	600,000	600,000	600,000	3,000,000
<i>Managed Charging</i>	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	3.34
		Winter Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	3.34
		Projected Participation	2,250	2,500	3,000	3,500	4,000	15,250
<i>Storage</i>	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	1.03	1.16	1.29	1.41	1.54	6.43
		Winter Demand Reduction (MW)	2.06	2.31	2.57	2.83	3.09	12.86
		Projected Participation	400	450	500	550	600	2,500
<i>Thermostat DR</i>	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	1.69	1.75	1.93	2.17	2.41	9.93
		Winter Demand Reduction (MW)	2.91	3.02	3.33	3.74	4.16	17.16
		Projected Participation	7,000	7,250	8,000	9,000	10,000	41,250
<i>Thermostat DLS-Summer</i>	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	1.99	2.08	2.25	2.42	2.51	11.24
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	11,500	12,000	13,000	14,000	14,500	65,000
<i>Thermostat DLS-Winter</i>	CSP & 2.9.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	5.22	5.80	6.38	6.67	6.96	31.03
		Projected Participation	9,000	10,000	11,000	11,500	12,000	53,500
<i>Front of Meter Measures - Res</i>	1.17	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
<i>Customer Engagement - LI</i>	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	837.95	837.95	837.95	837.95	837.95	4,189.77
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.54
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	0.67
		Projected Participation	8,000	8,000	8,000	8,000	8,000	40,000
<i>LIURP Lookback - LI</i>	2.2.1 & 2.2.2	Energy Savings (MWh)	359.57	359.57	359.57	359.57	359.57	1,797.87
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.05
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.57
		Projected Participation	100	100	100	100	100	500
<i>WARM Plus</i>	Res Vol 2	Energy Savings (MWh)	1,871.37	1,871.37	1,871.37	1,871.37	1,871.37	9,356.86
		Summer Demand Reduction (MW)	0.20	0.20	0.20	0.20	0.20	1.00
		Winter Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	1.84
		Projected Participation	1,500	1,500	1,500	1,500	1,500	7,500
<i>WARM Extra Measures</i>	Res Vol 2	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	5,000.00
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	0.55
		Winter Demand Reduction (MW)	0.22	0.22	0.22	0.22	0.22	1.09
		Projected Participation	1,000	1,000	1,000	1,000	1,000	5,000

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Freezer Recycling - LI	2.4.3	Energy Savings (MWh)	302.90	302.90	302.90	302.90	302.90	<b>1,514.51</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.18</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.13</b>
		Projected Participation	400	400	400	400	400	<b>2,000</b>
Refrigerator Recycling - LI	2.4.3	Energy Savings (MWh)	757.36	757.36	757.36	757.36	757.36	<b>3,786.81</b>
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	<b>0.56</b>
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.42</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
Room Air Conditioner Recycling - LI	2.2.8	Energy Savings (MWh)	395.80	395.80	395.80	395.80	395.80	<b>1,978.99</b>
		Summer Demand Reduction (MW)	1.08	1.08	1.08	1.08	1.08	<b>5.38</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3,750	3,750	3,750	3,750	3,750	<b>18,750</b>
Dehumidifier Recycling - LI	2.4.12	Energy Savings (MWh)	1,842.38	1,842.38	1,842.38	1,842.38	1,842.38	<b>9,211.88</b>
		Summer Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	<b>3.56</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3,750	3,750	3,750	3,750	3,750	<b>18,750</b>
LV Refrigerator Recycling - LI	2.4.4	Energy Savings (MWh)	11.77	11.77	11.77	11.77	11.77	<b>58.84</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	30	30	30	30	30	<b>150</b>
Cooler Recycling - LI	2.4.6	Energy Savings (MWh)	1.04	1.04	1.04	1.04	1.04	<b>5.20</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
Clothes Washer - LI	2.4.8	Energy Savings (MWh)	335.23	335.23	335.23	335.23	335.23	<b>1,676.16</b>
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.27</b>
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.27</b>
		Projected Participation	3,000	3,000	3,000	3,000	3,000	<b>15,000</b>
Refrigerator - PY18 to PY20 - LI	2.4.1	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	<b>112.72</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	500	500	500	0	0	<b>1,500</b>
Refrigerator - PY21 & PY22 - LI	2.4.1	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	<b>0.08</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	5	5	<b>10</b>
Freezer - PY18 to PY20 - LI	2.4.2	Energy Savings (MWh)	10.15	10.15	10.15	0.00	0.00	<b>30.45</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	250	250	250	0	0	<b>750</b>
Freezer - PY21 & PY22 - LI	2.4.2	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	<b>0.10</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	5	5	<b>10</b>
Clothes Dryer - PY18 & PY19 - LI	2.4.9	Energy Savings (MWh)	111.55	111.55	111.55	0.00	0.00	<b>334.64</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	<b>0.05</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	<b>0.05</b>
		Projected Participation	1,500	1,500	1,500	0	0	<b>4,500</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Clothes Dryer - PY20 to PY22 - LI</i>	2.4.9	Energy Savings (MWh)	0.00	0.00	0.00	0.17	0.17	<b>0.33</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	5	5	<b>10</b>
<i>Air Purifier / Cleaner - LI</i>	2.4.14	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	<b>1,287.05</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.16</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.21</b>
		Projected Participation	1,500	1,500	1,500	1,500	1,500	<b>7,500</b>
<i>Room Air Conditioner - LI</i>	2.2.7	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	<b>216.48</b>
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.40</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3,300	3,300	3,300	3,300	3,300	<b>16,500</b>
<i>Dehumidifier - LI</i>	2.4.11	Energy Savings (MWh)	8.87	8.87	8.87	8.87	8.87	<b>44.36</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	60	60	60	60	60	<b>300</b>
<i>Dishwasher - LI</i>	2.4.10	Energy Savings (MWh)	49.17	49.17	49.17	49.17	49.17	<b>245.85</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.07</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
<i>Clothes Washer/Dryer Combo - LI</i>	2.4.8 & 2.4.9	Energy Savings (MWh)	145.09	145.09	145.09	145.09	145.09	<b>725.47</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.11</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
<i>LED Linear - LI</i>	2.1.1	Energy Savings (MWh)	121.58	121.58	121.58	121.58	121.58	<b>607.90</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>
		Projected Participation	6,000	6,000	6,000	6,000	6,000	<b>30,000</b>
<i>LED Nightlights (Mrktplace) - LI</i>	2.1.3	Energy Savings (MWh)	42.86	42.86	42.86	42.86	42.86	<b>214.29</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3,000	3,000	3,000	3,000	3,000	<b>15,000</b>
<i>Holiday Lights (Mrktplace) - LI</i>	2.1.4	Energy Savings (MWh)	66.00	66.00	66.00	66.00	66.00	<b>330.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5,000	5,000	5,000	5,000	5,000	<b>25,000</b>
<i>Smart Strip Plug Outlet - LI</i>	2.5.1	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	<b>1,559.26</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.20</b>
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.25</b>
		Projected Participation	2,750	2,750	2,750	2,750	2,750	<b>13,750</b>
<i>Residential Occupancy Sensor - LI</i>	2.1.2	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	<b>101.62</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
<i>LED Linear (Mrktplace) - LI</i>	2.1.1	Energy Savings (MWh)	121.58	121.58	121.58	121.58	121.58	<b>607.90</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>
		Projected Participation	6,000	6,000	6,000	6,000	6,000	<b>30,000</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Heat Pump - HEAR	2.2.1 & 2.2.2	Energy Savings (MWh)	2.83	2.83	2.83	2.83	2.83	14.16
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	5	5	5	5	5	25
Heat Pump Water Heater - PY18 to PY20 - HEAR	2.3.1	Energy Savings (MWh)	9.80	9.80	9.80	0.00	0.00	29.40
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	0	0	15
Heat Pump Water Heater - PY21 & PY22 - HEAR	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	0.23	0.23	0.46
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	1	1	2
Audit / Technical Scoping Studies	0	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Behavioral Ph5 Yr 1 - LI	CSP & 2.7.3	Energy Savings (MWh)	2,872.00	0.00	0.00	0.00	0.00	2,872.00
		Summer Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	0.37
		Winter Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	0.37
		Projected Participation	43,800	0	0	0	0	43,800
Behavioral Ph5 Yr 2 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	4,062.00	0.00	0.00	0.00	4,062.00
		Summer Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	0.45
		Winter Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	0.45
		Projected Participation	0	43,300	0	0	0	43,300
Behavioral Ph5 Yr 3 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	3,653.00	0.00	0.00	3,653.00
		Summer Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	0.48
		Winter Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	0.48
		Projected Participation	0	0	49,800	0	0	49,800
Behavioral Ph5 Yr 4 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	0.00	2,536.00	0.00	2,536.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	0.34
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	0.34
		Projected Participation	0	0	0	48,900	0	48,900
Behavioral Ph5 Yr 5 - LI	CSP & 2.7.3	Energy Savings (MWh)	0.00	0.00	0.00	0.00	2,098.00	2,098.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.10	0.10
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.10	0.10
		Projected Participation	0	0	0	0	36,000	36,000
On-Line Audit - LI	CSP & 2.7.3	Energy Savings (MWh)	120.00	120.00	120.00	120.00	120.00	600.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.04
		Projected Participation	800	800	800	800	800	4,000
NC -Townhouse and duplex units - LI	2.7.1	Energy Savings (MWh)	7.69	7.69	7.69	7.69	7.69	38.46
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	5	5	5	5	5	25
NC - Two-on-Two condominium units - LI	2.7.1	Energy Savings (MWh)	4.62	4.62	4.62	4.62	4.62	23.08
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	3	3	3	3	3	15

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
NC - Single-family detached units - LI	2.7.1	Energy Savings (MWh)	4.73	4.73	4.73	4.73	4.73	<b>23.67</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
NC - Multi Family Low Rise - LI	2.7.1	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	<b>71.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
NC - Manufactured Housing - LI	2.7.1	Energy Savings (MWh)	49.70	49.70	49.70	49.70	49.70	<b>248.51</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Projected Participation	30	30	30	30	30	<b>150</b>
NC - Multi Family High Rise - LI	2.7.1	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	<b>7.10</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
MF - Tenant - DI - Res - LI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	496.05	496.05	496.05	496.05	496.05	<b>2,480.27</b>
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	<b>0.30</b>
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.39</b>
		Projected Participation	4,250	4,250	4,250	4,250	4,250	<b>21,250</b>
MF - Common - DI - Res - LI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	1,309.00	1,309.00	1,309.00	1,309.00	1,309.00	<b>6,545.00</b>
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.88</b>
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.91</b>
		Projected Participation	110	110	110	110	110	<b>550</b>
MF - Tenant - Prescriptive - Res - LI	2.3.1	Energy Savings (MWh)	25.41	25.41	25.41	25.41	25.41	<b>127.05</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	110	110	110	110	110	<b>550</b>
MF - Common - Prescriptive - Res - LI	2.4.8	Energy Savings (MWh)	12.29	12.29	12.29	12.29	12.29	<b>61.46</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	110	110	110	110	110	<b>550</b>
MF - Tenant - Custom - Res - LI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>
MF - Common - Custom - Res - LI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	0	0	0	0	0	<b>0</b>
MF - Tenant - DI - SCI - LI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	601.10	601.10	601.10	601.10	601.10	<b>3,005.50</b>
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	<b>0.36</b>
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	<b>0.46</b>
		Projected Participation	5,150	5,150	5,150	5,150	5,150	<b>25,750</b>
MF - Common - DI - SCI - LI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	2,499.00	2,499.00	2,499.00	2,499.00	2,499.00	<b>12,495.00</b>
		Summer Demand Reduction (MW)	0.33	0.33	0.33	0.33	0.33	<b>1.64</b>
		Winter Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	<b>1.71</b>
		Projected Participation	210	210	210	210	210	<b>1,050</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>MF - Tenant - Prescriptive - SCI - LI</i>	2.3.1	Energy Savings (MWh)	80.85	80.85	80.85	80.85	80.85	<b>404.25</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.08</b>
		Projected Participation	350	350	350	350	350	<b>1,750</b>
<i>MF - Common - Prescriptive - SCI - LI</i>	2.4.8	Energy Savings (MWh)	39.11	39.11	39.11	39.11	39.11	<b>195.55</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	350	350	350	350	350	<b>1,750</b>
<i>MF - Tenant - Custom - SCI - LI</i>	1.17 & 3.10	Energy Savings (MWh)	200.00	200.00	200.00	200.00	200.00	<b>1,000.00</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
<i>MF - Common - Custom - SCI - LI</i>	1.17 & 3.10	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>MF - Tenant - DI - SCI</i>	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	11.67	11.67	11.67	11.67	11.67	<b>58.36</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	100	100	100	100	100	<b>500</b>
<i>MF - Common - DI - SCI</i>	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	23.80	23.80	23.80	23.80	23.80	<b>119.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
<i>MF - Tenant - Prescriptive - SCI</i>	2.3.1	Energy Savings (MWh)	0.23	0.23	0.23	0.23	0.23	<b>1.16</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>MF - Common - Prescriptive - SCI</i>	2.4.8	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	<b>0.56</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>MF - Tenant - Custom - SCI</i>	1.17 & 3.10	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>MF - Common - Custom - SCI</i>	1.17 & 3.10	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Projected Participation	1	1	1	1	1	<b>5</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Air Conditioning - Level 1 &lt;=5.4 Tn - SCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	203.41	203.41	203.41	203.41	203.41	<b>1,017.04</b>
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	<b>0.51</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	756	756	756	756	756	<b>3,780</b>
<i>Air Conditioning - Level 1 &gt;5.4 &lt; 20 Tn - SCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	1,155.34	1,155.34	1,155.34	1,155.34	1,155.34	<b>5,776.68</b>
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	<b>2.89</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	820	820	820	820	820	<b>4,100</b>
<i>Air Conditioning - Level 1 &gt;=20 Tn - SCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	1,317.80	1,317.80	1,317.80	1,317.80	1,317.80	<b>6,589.02</b>
		Summer Demand Reduction (MW)	0.66	0.66	0.66	0.66	0.66	<b>3.30</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	820	820	820	820	820	<b>4,100</b>
<i>Heat Pump - Level 1 &lt;=5.4 Tn - SCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	209.85	209.85	209.85	209.85	209.85	<b>1,049.27</b>
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.22</b>
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.23</b>
		Projected Participation	315	315	315	315	315	<b>1,575</b>
<i>Heat Pump - Water &amp; GeoT - SCI</i>	3.2.4	Energy Savings (MWh)	48.00	48.00	48.00	48.00	48.00	<b>239.99</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Projected Participation	25	25	25	25	25	<b>125</b>
<i>Ductless Mini-Split HP - SCI</i>	3.2.5 & 3.2.6	Energy Savings (MWh)	111.65	111.65	111.65	111.65	111.65	<b>558.26</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.09</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.14</b>
		Projected Participation	315	315	315	315	315	<b>1,575</b>
<i>PTAC - SCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	104.69	104.69	104.69	104.69	104.69	<b>523.45</b>
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.26</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1,260	1,260	1,260	1,260	1,260	<b>6,300</b>
<i>PTHP - SCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	48.68	48.68	48.68	48.68	48.68	<b>243.39</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.07</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	315	315	315	315	315	<b>1,575</b>
<i>Room Air Conditioner - SCI</i>	3.2.9	Energy Savings (MWh)	1.50	1.50	1.50	1.50	1.50	<b>7.49</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	63	63	63	63	63	<b>315</b>
<i>Smart Thermostat - SCI</i>	3.2.18	Energy Savings (MWh)	7.14	7.14	7.14	7.14	7.14	<b>35.69</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	35	35	35	35	35	<b>175</b>
<i>HVAC - Custom - SCI</i>	3.2	Energy Savings (MWh)	700.00	700.00	700.00	700.00	700.00	<b>3,500.00</b>
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.38</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.19</b>
		Projected Participation	7	7	7	7	7	<b>35</b>
<i>Circulating Pump (Mid Strm) - SCI</i>	3.3.5	Energy Savings (MWh)	1.97	1.97	1.97	1.97	1.97	<b>9.86</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	7	7	7	7	7	<b>35</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>HVAC - Maintenance - SCI</i>	3.2.7 & 3.2.8	Energy Savings (MWh)	56.26	56.26	56.26	56.26	56.26	<b>281.31</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.11</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	190	190	190	190	190	<b>950</b>
<i>Furnace Fan (Retrofit or New to ECM) - SCI</i>	3.3.3	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	<b>7.08</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	7	7	7	7	7	<b>35</b>
<i>Lighting Control (Daylight &amp; Occupancy) - SCI</i>	3.1.3	Energy Savings (MWh)	423.89	423.89	423.89	423.89	423.89	<b>2,119.43</b>
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	<b>0.37</b>
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	<b>0.30</b>
		Projected Participation	4,000	4,000	4,000	4,000	4,000	<b>20,000</b>
<i>Lighting Control (Network) - SCI</i>	3.1.3	Energy Savings (MWh)	1,854.50	1,854.50	1,854.50	1,854.50	1,854.50	<b>9,272.49</b>
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	<b>1.61</b>
		Winter Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	<b>1.31</b>
		Projected Participation	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	<b>7,500,000</b>
<i>LED Linear - SCI</i>	3.1.1	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	<b>34,422.67</b>
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	<b>5.97</b>
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	<b>4.86</b>
		Projected Participation	40,000	40,000	40,000	40,000	40,000	<b>200,000</b>
<i>Exit Sign - SCI</i>	3.1.4	Energy Savings (MWh)	0.21	0.21	0.21	0.21	0.21	<b>1.05</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>LED Fixture External - SCI</i>	3.1.1	Energy Savings (MWh)	0.41	0.41	0.41	0.41	0.41	<b>2.07</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>LED Fixture Internal - SCI</i>	3.1.1	Energy Savings (MWh)	7,614.44	7,614.44	7,614.44	7,614.44	7,614.44	<b>38,072.20</b>
		Summer Demand Reduction (MW)	1.32	1.32	1.32	1.32	1.32	<b>6.60</b>
		Winter Demand Reduction (MW)	1.07	1.07	1.07	1.07	1.07	<b>5.37</b>
		Projected Participation	13,000	13,000	13,000	13,000	13,000	<b>65,000</b>
<i>LED Lamp Mogul Base - SCI</i>	3.1.1	Energy Savings (MWh)	315.39	315.39	315.39	315.39	315.39	<b>1,576.95</b>
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.27</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.22</b>
		Projected Participation	800	800	800	800	800	<b>4,000</b>
<i>Street &amp; Area Lighting (Customer Owned) - SCI</i>	3.1.1	Energy Savings (MWh)	1.26	1.26	1.26	1.26	1.26	<b>6.30</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>LED Reach in Refrig / Frzr Light - SCI</i>	3.1.5	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	<b>253.34</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>
<i>Reach in Refrig / Frzr Occupancy Sensor - SCI</i>	3.5.15	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	<b>76.32</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Lighting - Other - SCI</i>	3.1	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	<b>2,500.00</b>
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	<b>0.43</b>
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	<b>0.35</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Lighting - Custom - SCI</i>	1.17 & 3.1	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	<b>12,500.01</b>
		Summer Demand Reduction (MW)	0.43	0.43	0.43	0.43	0.43	<b>2.17</b>
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	<b>1.76</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Linear Lamp - MS - SCI</i>	3.1.6	Energy Savings (MWh)	2,578.84	2,578.84	2,578.84	2,578.84	2,578.84	<b>12,894.19</b>
		Summer Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	<b>2.84</b>
		Winter Demand Reduction (MW)	0.38	0.38	0.38	0.38	0.38	<b>1.91</b>
		Projected Participation	125,000	125,000	125,000	125,000	125,000	<b>625,000</b>
<i>High/Low Bay Lamp - MS - SCI</i>	3.1.6	Energy Savings (MWh)	6,004.55	6,004.55	6,004.55	6,004.55	6,004.55	<b>30,022.76</b>
		Summer Demand Reduction (MW)	1.32	1.32	1.32	1.32	1.32	<b>6.60</b>
		Winter Demand Reduction (MW)	0.89	0.89	0.89	0.89	0.89	<b>4.44</b>
		Projected Participation	20,500	20,500	20,500	20,500	20,500	<b>102,500</b>
<i>LED Fixture - MS - SCI</i>	3.1.6	Energy Savings (MWh)	1,526.67	1,526.67	1,526.67	1,526.67	1,526.67	<b>7,633.36</b>
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	<b>1.68</b>
		Winter Demand Reduction (MW)	0.23	0.23	0.23	0.23	0.23	<b>1.13</b>
		Projected Participation	18,500	18,500	18,500	18,500	18,500	<b>92,500</b>
<i>Lighting Controls - MS-SCI</i>	3.1.6	Energy Savings (MWh)	1,878.04	1,878.04	1,878.04	1,878.04	1,878.04	<b>9,390.18</b>
		Summer Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	<b>2.06</b>
		Winter Demand Reduction (MW)	0.28	0.28	0.28	0.28	0.28	<b>1.39</b>
		Projected Participation	31,350	31,350	31,350	31,350	31,350	<b>156,750</b>
<i>Ref/Frzd -Reach In Special Doors (low/No Anti Swt)- SCI</i>	3.5.11	Energy Savings (MWh)	4.12	4.12	4.12	4.12	4.12	<b>20.60</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	20	20	20	20	20	<b>100</b>
<i>ECM Evap Fan Motor - SCI</i>	3.5.2	Energy Savings (MWh)	212.62	212.62	212.62	212.62	212.62	<b>1,063.11</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.13</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.13</b>
		Projected Participation	150	150	150	150	150	<b>750</b>
<i>Evap Fan Controls - SCI</i>	3.5.3	Energy Savings (MWh)	61.32	61.32	61.32	61.32	61.32	<b>306.60</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	75	75	75	75	75	<b>375</b>
<i>Refrigerator - Reach In - SCI</i>	3.5.1	Energy Savings (MWh)	16.10	16.10	16.10	16.10	16.10	<b>80.48</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	30	30	30	30	30	<b>150</b>
<i>Freezer - Reach In - SCI</i>	3.5.1	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	<b>116.62</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Refrigerated Case Cover - SCI</i>	3.5.9, 3.5.14 & 3.5.15	Energy Savings (MWh)	158.60	158.60	158.60	158.60	158.60	<b>793.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2,000	2,000	2,000	2,000	2,000	<b>10,000</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Anti Sweat Heater Controls - SCI</i>	3.5.5	Energy Savings (MWh)	201.84	201.84	201.84	201.84	201.84	<b>1,009.22</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	300	300	300	300	300	<b>1,500</b>
<i>Strip Curtain - SCI</i>	3.5.8	Energy Savings (MWh)	1.48	1.48	1.48	1.48	1.48	<b>7.40</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	40	40	40	40	40	<b>200</b>
<i>Ice Machine - SCI</i>	3.7.1	Energy Savings (MWh)	8.55	8.55	8.55	8.55	8.55	<b>42.77</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	20	20	20	20	20	<b>100</b>
<i>Beverage Vending Machine - Controls - SCI</i>	3.7.2	Energy Savings (MWh)	18.75	18.75	18.75	18.75	18.75	<b>93.77</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	50	50	50	50	50	<b>250</b>
<i>Steam Cooker - SCI</i>	3.7.3	Energy Savings (MWh)	52.76	52.76	52.76	52.76	52.76	<b>263.82</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Fryer - SCI</i>	3.7.6	Energy Savings (MWh)	11.87	11.87	11.87	11.87	11.87	<b>59.37</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Griddle - SCI</i>	3.7.9	Energy Savings (MWh)	27.39	27.39	27.39	27.39	27.39	<b>136.97</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Hot Food Holding Cabinet - SCI</i>	3.7.7	Energy Savings (MWh)	5.45	5.45	5.45	5.45	5.45	<b>27.27</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Combination Oven - SCI</i>	3.7.4	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	<b>117.05</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Convection Oven - SCI</i>	3.7.5	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	<b>63.84</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Dishwasher - SCI</i>	3.7.8	Energy Savings (MWh)	37.65	37.65	37.65	37.65	37.65	<b>188.24</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Induction Cooktop - SCI</i>	3.7.10	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	<b>0.11</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Pre-Rinse Sprayer - SCI</i>	3.4.2	Energy Savings (MWh)	46.02	46.02	46.02	46.02	46.02	<b>230.08</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	25	25	25	25	25	<b>125</b>
<i>Freezer Recycling - SCI</i>	2.4.3	Energy Savings (MWh)	11.36	11.36	11.36	11.36	11.36	<b>56.79</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	15	15	15	15	15	<b>75</b>
<i>Refrigerator Recycling - SCI</i>	2.4.3	Energy Savings (MWh)	378.68	378.68	378.68	378.68	378.68	<b>1,893.41</b>
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	<b>0.28</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.21</b>
		Projected Participation	500	500	500	500	500	<b>2,500</b>
<i>Room Air Conditioner Recycling - SCI</i>	2.2.8	Energy Savings (MWh)	42.22	42.22	42.22	42.22	42.22	<b>211.09</b>
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	<b>0.56</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	400	400	400	400	400	<b>2,000</b>
<i>Dehumidifiers Recycling - SCI</i>	2.4.12	Energy Savings (MWh)	147.39	147.39	147.39	147.39	147.39	<b>736.95</b>
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	<b>0.28</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	300	300	300	300	300	<b>1,500</b>
<i>LV Refrigerator Recycling - SCI</i>	2.4.4	Energy Savings (MWh)	5.88	5.88	5.88	5.88	5.88	<b>29.42</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	15	15	15	15	15	<b>75</b>
<i>Cooler Recycling - SCI</i>	2.4.6	Energy Savings (MWh)	1.56	1.56	1.56	1.56	1.56	<b>7.80</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	15	15	15	15	15	<b>75</b>
<i>EV Charging Cord - Level 2 - SCI</i>	MA TRM V11	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	<b>3.32</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	30	30	30	30	30	<b>150</b>
<i>Clothes Washer - SCI</i>	2.4.8	Energy Savings (MWh)	1.12	1.12	1.12	1.12	1.12	<b>5.59</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Clothes Dryer - SCI</i>	2.4.9	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	<b>3.72</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Refrigerator - SCI</i>	2.4.1	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Water Heater - Heat Pump - SCI</i>	2.3.1	Energy Savings (MWh)	1.16	1.16	1.16	1.16	1.16	<b>5.78</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Freezer - SCI</i>	2.4.2	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Dehumidifier - SCI</i>	2.4.11	Energy Savings (MWh)	2.96	2.96	2.96	2.96	2.96	<b>14.79</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	20	20	20	20	20	<b>100</b>
<i>Uninterruptible Power Supply (UPS) - SCI</i>	3.11.4	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	<b>71.01</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Agricultural Process Lighting</i>	3.1.7	Energy Savings (MWh)	7.28	7.28	7.28	7.28	7.28	<b>36.42</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>
<i>Auto Milker Takeoff</i>	4.1.1	Energy Savings (MWh)	19.38	19.38	19.38	19.38	19.38	<b>96.90</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Dairy Scroll Compressor</i>	4.1.2	Energy Savings (MWh)	3.99	3.99	3.99	3.99	3.99	<b>19.93</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>HE Ventilation Fans</i>	4.1.3	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	<b>3.28</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Heat Reclaimer</i>	4.1.4	Energy Savings (MWh)	25.28	25.28	25.28	25.28	25.28	<b>126.38</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>High Volume Low Speed Fan</i>	4.1.5	Energy Savings (MWh)	86.00	86.00	86.00	86.00	86.00	<b>430.01</b>
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.23</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Livestock Waterer</i>	4.1.6	Energy Savings (MWh)	10.04	10.04	10.04	10.04	10.04	<b>50.20</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	10	10	10	10	10	<b>50</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Dairy Vac Pump VSD Control</i>	4.1.7	Energy Savings (MWh)	50.38	50.38	50.38	50.38	50.38	<b>251.91</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Low Pressure Irrigation</i>	4.1.8	Energy Savings (MWh)	64.92	64.92	64.92	64.92	64.92	<b>324.62</b>
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.91</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Custom - Agricultural</i>	1.17	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	<b>250.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	1	1	1	1	1	<b>3</b>
<i>Engine Block Heater Timer</i>	3.11.2	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	<b>1.84</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>3</b>
<i>Street Lighting (Tariff / Utility Owned(EMU))</i>	3.1.1	Energy Savings (MWh)	252.00	252.00	252.00	252.00	252.00	<b>1,260.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.16</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
<i>Street Lighting (Tariff / Customer Owned(MU))</i>	3.1.1	Energy Savings (MWh)	252.00	252.00	252.00	252.00	252.00	<b>1,260.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.16</b>
		Projected Participation	1,000	1,000	1,000	1,000	1,000	<b>5,000</b>
<i>Custom - SCI</i>	1.17	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	<b>5,000.00</b>
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	<b>0.44</b>
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	<b>0.24</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Custom - Compressed Air - SCI</i>	1.17 & 3.10	Energy Savings (MWh)	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	<b>10,000.00</b>
		Summer Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	<b>1.19</b>
		Winter Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	<b>1.19</b>
		Projected Participation	20	20	20	20	20	<b>100</b>
<i>Custom - Refrigeration - SCI</i>	1.17 & 3.5	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	<b>5,000.00</b>
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	<b>0.51</b>
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.41</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Custom - Solar - SCI</i>	1.17 & 3.11.6	Energy Savings (MWh)	2,302.25	2,302.25	2,302.25	2,302.25	2,302.25	<b>11,511.25</b>
		Summer Demand Reduction (MW)	0.61	0.61	0.61	0.61	0.61	<b>3.06</b>
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	<b>0.44</b>
		Projected Participation	2,000	2,000	2,000	2,000	2,000	<b>10,000</b>
<i>Custom - CHP - SCI</i>	1.17	Energy Savings (MWh)	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	<b>25,000.00</b>
		Summer Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	<b>2.99</b>
		Winter Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	<b>2.99</b>
		Projected Participation	1	1	1	1	1	<b>3</b>
<i>Custom - Bldg Improvements - SCI</i>	1.17 & Vol 2	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	<b>250.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>3</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Custom - New Construction - SCI</i>	1.17 & Vol 2	Energy Savings (MWh)	800.00	800.00	800.00	800.00	800.00	<b>4,000.00</b>
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	<b>0.49</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.10</b>
		Projected Participation	8	8	8	8	8	<b>40</b>
<i>Custom - Audit &amp; Education - SCI</i>	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Building Tune Up - SCI</i>	3.2.7,8,17,20&21, 3.4.3, 3.5.3,4,5,6,10,12&16, 3.6.2	Energy Savings (MWh)	14,518.19	14,518.19	14,518.19	14,518.19	14,518.19	<b>72,590.94</b>
		Summer Demand Reduction (MW)	2.04	2.04	2.04	2.04	2.04	<b>10.19</b>
		Winter Demand Reduction (MW)	1.67	1.67	1.67	1.67	1.67	<b>8.34</b>
		Projected Participation	280	280	280	280	280	<b>1,400</b>
<i>Virtual/Meter Data Commissioning - SCI</i>	1.17	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	<b>5,000.00</b>
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	<b>0.43</b>
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	<b>0.36</b>
		Projected Participation	100	100	100	100	100	<b>500</b>
<i>Retrocommissioning - SCI</i>	1.17	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	<b>250.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Building Operations Training - SCI</i>	3.11.5	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	<b>12,500.00</b>
		Summer Demand Reduction (MW)	0.36	0.36	0.36	0.36	0.36	<b>1.79</b>
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.89</b>
		Projected Participation	50	50	50	50	50	<b>250</b>
<i>Customer Concierge - SCI</i>	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Energy Consultation - SCI</i>	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Audits - SCI</i>	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Managed Charging</i>	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	<b>0.16</b>
		Winter Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	<b>0.16</b>
		Projected Participation	113	125	150	175	200	<b>763</b>
<i>Storage</i>	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	<b>0.32</b>
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	<b>0.64</b>
		Projected Participation	20	23	25	28	30	<b>126</b>
<i>Thermostat DR</i>	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.11	0.12	0.13	0.14	0.16	<b>0.66</b>
		Winter Demand Reduction (MW)	0.11	0.12	0.13	0.14	0.16	<b>0.66</b>
		Projected Participation	350	363	400	450	500	<b>2,063</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Thermostat DLS	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.20	0.21	0.23	0.24	0.25	1.14
		Winter Demand Reduction (MW)	0.20	0.21	0.23	0.24	0.25	1.14
		Projected Participation	575	600	650	700	725	3,250
Custom DLS & DR - SCI	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	8.05
		Winter Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	8.05
		Projected Participation	20	20	20	20	20	100
Front of Meter Measures - SCI	1.17	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Tenant - DI - LCI	Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	0.58
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5
MF - Common - DI - LCI	3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1	Energy Savings (MWh)	11.90	11.90	11.90	11.90	11.90	59.50
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Projected Participation	1	1	1	1	1	5
MF - Tenant - Prescriptive - LCI	2.3.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Prescriptive - LCI	2.4.8	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Tenant - Custom - LCI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
MF - Common - Custom - LCI	1.17 & 3.10	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	0	0	0	0	0	0
Air Conditioning - Level 1 <=5.4 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	2.69	2.69	2.69	2.69	2.69	13.45
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.01
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	28.18	28.18	28.18	28.18	28.18	140.89
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	0.07
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100
Air Conditioning - Level 1 >=20 Tn - LCI	3.2.1 & 3.2.2	Energy Savings (MWh)	32.14	32.14	32.14	32.14	32.14	160.71
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	0.08
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	20	20	20	20	20	100

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Heat Pump - Level 1 &lt;=5.4 Tn - LCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	5.33	5.33	5.33	5.33	5.33	<b>26.65</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	8	8	8	8	8	<b>40</b>
<i>Heat Pump - Water &amp; GeoT - LCI</i>	3.2.4	Energy Savings (MWh)	9.60	9.60	9.60	9.60	9.60	<b>48.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Ductless Mini-Split HP - LCI</i>	3.2.5 & 3.2.6	Energy Savings (MWh)	1.77	1.77	1.77	1.77	1.77	<b>8.86</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>PTAC - LCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	0.17	0.17	0.17	0.17	0.17	<b>0.83</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
<i>PTHP - LCI</i>	3.2.1 & 3.2.2	Energy Savings (MWh)	0.31	0.31	0.31	0.31	0.31	<b>1.55</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
<i>Room Air Conditioner- LCI</i>	3.2.9	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	<b>0.24</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
<i>Smart Thermostat - LCI</i>	3.2.18	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	<b>1.02</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>HVAC - Custom - LCI</i>	3.2	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Circulating Pump (Mid Strm) - LCI</i>	3.3.5	Energy Savings (MWh)	0.28	0.28	0.28	0.28	0.28	<b>1.41</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>HVAC - Maintenance - LCI</i>	3.2.7 & 3.2.8	Energy Savings (MWh)	0.59	0.59	0.59	0.59	0.59	<b>2.96</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
<i>Furnace Fan (Retrofit or New to ECM) - LCI</i>	3.3.3	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	<b>1.01</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Lighting Controls (Daylight &amp; Occupancy) - LCI</i>	3.1.3	Energy Savings (MWh)	529.86	529.86	529.86	529.86	529.86	<b>2,649.28</b>
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	<b>0.46</b>
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	<b>0.37</b>
		Projected Participation	5,000	5,000	5,000	5,000	5,000	<b>25,000</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Lighting Control (Network) - LCI</i>	3.1.3	Energy Savings (MWh)	3,090.83	3,090.83	3,090.83	3,090.83	3,090.83	<b>15,454.16</b>
		Summer Demand Reduction (MW)	0.54	0.54	0.54	0.54	0.54	<b>2.68</b>
		Winter Demand Reduction (MW)	0.44	0.44	0.44	0.44	0.44	<b>2.18</b>
		Projected Participation	2,500,000	2,500,000	2,500,000	2,500,000	2,500,000	<b>12,500,000</b>
<i>LED Linear - LCI</i>	3.1.1	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	<b>34,422.67</b>
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	<b>5.97</b>
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	<b>4.86</b>
		Projected Participation	40,000	40,000	40,000	40,000	40,000	<b>200,000</b>
<i>Exit Sign - LCI</i>	3.1.4	Energy Savings (MWh)	25.23	25.23	25.23	25.23	25.23	<b>126.14</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	120	120	120	120	120	<b>600</b>
<i>LED Fixture External - LCI</i>	3.1.1	Energy Savings (MWh)	3,315.68	3,315.68	3,315.68	3,315.68	3,315.68	<b>16,578.40</b>
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	<b>0.54</b>
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	<b>2.86</b>
		Projected Participation	8,000	8,000	8,000	8,000	8,000	<b>40,000</b>
<i>LED Fixture Internal - LCI</i>	3.1.1	Energy Savings (MWh)	7,028.71	7,028.71	7,028.71	7,028.71	7,028.71	<b>35,143.57</b>
		Summer Demand Reduction (MW)	1.22	1.22	1.22	1.22	1.22	<b>6.09</b>
		Winter Demand Reduction (MW)	0.99	0.99	0.99	0.99	0.99	<b>4.96</b>
		Projected Participation	12,000	12,000	12,000	12,000	12,000	<b>60,000</b>
<i>LED Lamp Mogul Base - LCI</i>	3.1.1	Energy Savings (MWh)	197.12	197.12	197.12	197.12	197.12	<b>985.60</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.17</b>
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.14</b>
		Projected Participation	500	500	500	500	500	<b>2,500</b>
<i>Street &amp; Area Lighting (Customer Owned) - LCI</i>	3.1.1	Energy Savings (MWh)	7.56	7.56	7.56	7.56	7.56	<b>37.80</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	30	30	30	30	30	<b>150</b>
<i>LED Reach in Refrig / Frzr Light - LCI</i>	3.1.5	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	<b>253.34</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>
<i>Reach in Refrig / Frzr Occupancy Sensor - LCI</i>	3.5.15	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	<b>76.32</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	200	200	200	200	200	<b>1,000</b>
<i>Lighting - Other - LCI</i>	3.1	Energy Savings (MWh)	600.00	600.00	600.00	600.00	600.00	<b>3,000.00</b>
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	<b>0.52</b>
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	<b>0.42</b>
		Projected Participation	6	6	6	6	6	<b>30</b>
<i>Lighting - Custom - LCI</i>	1.17 & 3.1	Energy Savings (MWh)	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	<b>15,000.01</b>
		Summer Demand Reduction (MW)	0.52	0.52	0.52	0.52	0.52	<b>2.60</b>
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	<b>2.12</b>
		Projected Participation	6	6	6	6	6	<b>30</b>
<i>Linear Lamp - MS - LCI</i>	3.1.6	Energy Savings (MWh)	1,444.15	1,444.15	1,444.15	1,444.15	1,444.15	<b>7,220.75</b>
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	<b>1.59</b>
		Winter Demand Reduction (MW)	0.21	0.21	0.21	0.21	0.21	<b>1.07</b>
		Projected Participation	70,000	70,000	70,000	70,000	70,000	<b>350,000</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>High/Low Bay Lamp - MS - LCI</i>	3.1.6	Energy Savings (MWh)	2,636.15	2,636.15	2,636.15	2,636.15	2,636.15	<b>13,180.73</b>
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	<b>2.90</b>
		Winter Demand Reduction (MW)	0.39	0.39	0.39	0.39	0.39	<b>1.95</b>
		Projected Participation	9,000	9,000	9,000	9,000	9,000	<b>45,000</b>
<i>LED Fixture - MS - LCI</i>	3.1.6	Energy Savings (MWh)	742.71	742.71	742.71	742.71	742.71	<b>3,713.53</b>
		Summer Demand Reduction (MW)	0.16	0.16	0.16	0.16	0.16	<b>0.82</b>
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	<b>0.55</b>
		Projected Participation	9,000	9,000	9,000	9,000	9,000	<b>45,000</b>
<i>Lighting Controls - MS-LCI</i>	3.1.6	Energy Savings (MWh)	1,198.11	1,198.11	1,198.11	1,198.11	1,198.11	<b>5,990.54</b>
		Summer Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	<b>1.32</b>
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	<b>0.89</b>
		Projected Participation	20,000	20,000	20,000	20,000	20,000	<b>100,000</b>
<i>Ref/Frzzr -Reach In Special Doors (low/No Anti Swt) - LCI</i>	3.5.11	Energy Savings (MWh)	2.06	2.06	2.06	2.06	2.06	<b>10.30</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>ECM Evap Fan Motor - LCI</i>	3.5.2	Energy Savings (MWh)	14.17	14.17	14.17	14.17	14.17	<b>70.87</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Evap Fan Controls - LCI</i>	3.5.3	Energy Savings (MWh)	8.18	8.18	8.18	8.18	8.18	<b>40.88</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Refrigerator - Reach In - LCI</i>	3.5.1	Energy Savings (MWh)	2.68	2.68	2.68	2.68	2.68	<b>13.41</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Freezer - Reach In - LCI</i>	3.5.1	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	<b>116.62</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
<i>Refrigerated Case Cover - LCI</i>	3.5.9, 3.5.14 & 3.5.15	Energy Savings (MWh)	3.96	3.96	3.96	3.96	3.96	<b>19.82</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	50	50	50	50	50	<b>250</b>
<i>Anti Sweat Heater Control - LCI</i>	3.5.5	Energy Savings (MWh)	3.36	3.36	3.36	3.36	3.36	<b>16.82</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Strip Curtain - LCI</i>	3.5.8	Energy Savings (MWh)	0.19	0.19	0.19	0.19	0.19	<b>0.93</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Ice Machine - LCI</i>	3.7.1	Energy Savings (MWh)	2.14	2.14	2.14	2.14	2.14	<b>10.69</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Beverage Vending Machine - Controls - LCI</i>	3.7.2	Energy Savings (MWh)	1.88	1.88	1.88	1.88	1.88	<b>9.38</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Steam Cooker - LCI</i>	3.7.3	Energy Savings (MWh)	26.38	26.38	26.38	26.38	26.38	<b>131.91</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.03</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Fryer - LCI</i>	3.7.6	Energy Savings (MWh)	5.94	5.94	5.94	5.94	5.94	<b>29.69</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Griddle - LCI</i>	3.7.9	Energy Savings (MWh)	13.70	13.70	13.70	13.70	13.70	<b>68.49</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Hot Food Holding Cabinet - LCI</i>	3.7.7	Energy Savings (MWh)	2.73	2.73	2.73	2.73	2.73	<b>13.63</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Combination Oven - LCI</i>	3.7.4	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	<b>117.05</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Convection Oven - LCI</i>	3.7.5	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	<b>63.84</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Dishwasher - LCI</i>	3.7.8	Energy Savings (MWh)	18.82	18.82	18.82	18.82	18.82	<b>94.12</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.01</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
<i>Induction Cooktop - LCI</i>	3.7.10	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	<b>0.11</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
<i>Pre-Rinse Sprayer - LCI</i>	3.4.2	Energy Savings (MWh)	92.03	92.03	92.03	92.03	92.03	<b>460.16</b>
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	<b>0.13</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.07</b>
		Projected Participation	50	50	50	50	50	<b>250</b>
<i>Freezer Recycling - LCI</i>	2.4.3	Energy Savings (MWh)	2.27	2.27	2.27	2.27	2.27	<b>11.36</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3	3	3	3	3	<b>15</b>
<i>Refrigerator Recycling - LCI</i>	2.4.3	Energy Savings (MWh)	104.14	104.14	104.14	104.14	104.14	<b>520.69</b>
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.08</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.06</b>
		Projected Participation	138	138	138	138	138	<b>688</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Room Air Conditioner Recycling - LCI	2.2.8	Energy Savings (MWh)	2.64	2.64	2.64	2.64	2.64	<b>13.19</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	25	25	25	25	25	<b>125</b>
Dehumidifiers Recycling - LCI	2.4.12	Energy Savings (MWh)	9.21	9.21	9.21	9.21	9.21	<b>46.06</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	19	19	19	19	19	<b>94</b>
LV Refrigerator Recycling - LCI	2.4.4	Energy Savings (MWh)	0.98	0.98	0.98	0.98	0.98	<b>4.90</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3	3	3	3	3	<b>13</b>
Cooler Recycling - LCI	2.4.6	Energy Savings (MWh)	0.26	0.26	0.26	0.26	0.26	<b>1.30</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	3	3	3	3	3	<b>13</b>
EV Charging Cord - Level2 - LCI	MA TRM V11	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	<b>0.11</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
Clothes Washer - LCI	2.4.8	Energy Savings (MWh)	0.56	0.56	0.56	0.56	0.56	<b>2.79</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
Clothes Dryer - LCI	2.4.9	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	<b>1.86</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
Refrigerator - LCI	2.4.1	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
Water Heater - Heat Pump - LCI	2.3.1	Energy Savings (MWh)	0.46	0.46	0.46	0.46	0.46	<b>2.31</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>
Freezer - LCI	2.4.2	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	<b>0.05</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
Dehumidifier - LCI	2.4.11	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	<b>3.70</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	5	5	5	5	5	<b>25</b>
Uninterruptible Power Supply (UPS) - LCI	3.11.4	Energy Savings (MWh)	5.68	5.68	5.68	5.68	5.68	<b>28.40</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	2	2	2	2	2	<b>10</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
Custom - LCI	1.17	Energy Savings (MWh)	11,200.00	11,200.00	11,200.00	11,200.00	11,200.00	<b>56,000.00</b>
		Summer Demand Reduction (MW)	1.17	1.17	1.17	1.17	1.17	<b>5.83</b>
		Winter Demand Reduction (MW)	1.05	1.05	1.05	1.05	1.05	<b>5.27</b>
		Projected Participation	112	112	112	112	112	<b>560</b>
Custom - Compressed Air - LCI	1.17 & 3.10	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	<b>7,000.00</b>
		Summer Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	<b>0.86</b>
		Winter Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	<b>0.86</b>
		Projected Participation	14	14	14	14	14	<b>70</b>
Custom - Refrigeration - LCI	1.17 & 3.5	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	<b>7,000.00</b>
		Summer Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	<b>0.71</b>
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	<b>0.57</b>
		Projected Participation	14	14	14	14	14	<b>70</b>
Custom - Solar - LCI	1.17	Energy Savings (MWh)	10,820.58	10,820.58	10,820.58	10,820.58	10,820.58	<b>54,102.88</b>
		Summer Demand Reduction (MW)	2.88	2.88	2.88	2.88	2.88	<b>14.39</b>
		Winter Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	<b>2.05</b>
		Projected Participation	9,400	9,400	9,400	9,400	9,400	<b>47,000</b>
Custom - CHP - LCI	1.17 & 3.11.6	Energy Savings (MWh)	15,000.00	15,000.00	15,000.00	15,000.00	15,000.00	<b>75,000.00</b>
		Summer Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	<b>8.97</b>
		Winter Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	<b>8.97</b>
		Projected Participation	2	2	2	2	2	<b>8</b>
Custom - Bldg Improvements - LCI	1.17 & Vol 2	Energy Savings (MWh)	6,000.00	6,000.00	6,000.00	6,000.00	6,000.00	<b>30,000.00</b>
		Summer Demand Reduction (MW)	0.90	0.90	0.90	0.90	0.90	<b>4.51</b>
		Winter Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	<b>3.54</b>
		Projected Participation	60	60	60	60	60	<b>300</b>
Custom - New Construction - LCI	1.17 & Vol 2	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	<b>5,000.00</b>
		Summer Demand Reduction (MW)	0.12	0.12	0.12	0.12	0.12	<b>0.61</b>
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	<b>0.12</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
Custom - Audit & Education - LCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
Virtual/Meter Data Commissioning - LCI	1.17	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
Retrocommissioning - LCI	1.17	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	<b>500.00</b>
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	<b>0.04</b>
		Projected Participation	1	1	1	1	1	<b>5</b>
Building Operations Training - LCI	3.11.5	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	<b>2,500.00</b>
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	<b>0.36</b>
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	<b>0.18</b>
		Projected Participation	10	10	10	10	10	<b>50</b>
Customer Concierge - LCI	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>
		Projected Participation	10	10	10	10	10	<b>50</b>

**Table 9: Estimated Savings and Participation**

Measure <sup>1</sup>	2026 TRM Measure Number <sup>5</sup>	Metric	PY18	PY19	PY20	PY21	PY22	Total <sup>4</sup>
<i>Energy Consultation - LCI</i>	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
<i>Audits - LCI</i>	NA	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	10	10	10	10	10	50
<i>Managed Charging</i>	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	0.07
		Projected Participation	45	50	60	70	80	305
<i>Storage</i>	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	0.32
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	0.64
		Projected Participation	20	23	25	28	30	126
<i>Custom DLS &amp; DR - LCI</i>	CSP & 3.12.1	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	10.73
		Winter Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	10.73
		Projected Participation	10	10	10	10	10	50
<i>Front of Meter Measures - LCI</i>	1.17	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.00
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	0.00
		Projected Participation	1	1	1	1	1	5

<sup>1</sup> Each measure should receive its own row in the table.

<sup>2</sup> Energy Savings and Demand Reduction should be aggregate (not per-unit) compliance values (not lifetime). Express MW impacts at the system-level (inclusive of line losses).

<sup>3</sup> Projected participation should use the same basis as the units shown in Table 8.

<sup>4</sup> If rows need to be added to accommodate more than 3 measures, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

<sup>5</sup> The Measure Number reflects the Company's primary planning assumptions, other sections of the applicable PA TRM or other Evaluation guidance (e.g. Interim Measure Protocols) may be used to support the Company's program reporting and evaluation results.

**Table 10: Budget by Program**

Program Name: <sup>1</sup>		Residential Energy Solutions Program					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
<b>Total Budget (\$000)</b>		<b>\$25,129</b>	<b>\$24,977</b>	<b>\$24,418</b>	<b>\$22,059</b>	<b>\$22,346</b>	<b>\$118,928</b>
<b>Incentives (\$000) <sup>2</sup></b>	Rebates	\$10,471	\$10,561	\$10,703	\$8,723	\$8,886	\$49,345
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$58	\$58	\$58	\$58	\$58	\$290
	Braided Funding Support Labor	\$415	\$380	\$380	\$291	\$291	\$1,758
	<b>Incentive Total</b>	<b>\$10,944</b>	<b>\$11,000</b>	<b>\$11,141</b>	<b>\$9,072</b>	<b>\$9,235</b>	<b>\$51,392</b>
<b>Non-Incentives (\$000)</b>	Program Design	\$403	\$172	\$168	\$166	\$166	\$1,075
	Administrative	\$1,326	\$1,420	\$1,211	\$1,201	\$1,294	\$6,453
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$10,458	\$10,471	\$10,009	\$9,796	\$9,816	\$50,551
	Marketing	\$1,235	\$1,250	\$1,239	\$1,234	\$1,236	\$6,194
	EM&V	\$668	\$664	\$649	\$589	\$597	\$3,167
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$95	\$0	\$0	\$0	\$0	\$95
	<b>Non-Incentive Total</b>	<b>\$14,185</b>	<b>\$13,978</b>	<b>\$13,276</b>	<b>\$12,986</b>	<b>\$13,110</b>	<b>\$67,536</b>
<b>Percent Incentives <sup>3</sup></b>		<b>44%</b>	<b>44%</b>	<b>46%</b>	<b>41%</b>	<b>41%</b>	<b>43%</b>

<sup>1</sup> Each program should receive its own table. For additional programs, copy this table and change program name.

<sup>2</sup> See 2026 TRC Order definitions of incentives.

<sup>3</sup> The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

**Table 10: Budget by Program**

Program Name: <sup>1</sup>		Low Income Energy Efficiency Program					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
<b>Total Budget (\$000)</b>		<b>\$11,128</b>	<b>\$10,826</b>	<b>\$10,840</b>	<b>\$10,767</b>	<b>\$10,684</b>	<b>\$54,246</b>
<b>Incentives (\$000) <sup>2</sup></b>	Rebates	\$875	\$875	\$875	\$818	\$818	\$4,261
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$200	\$200	\$200	\$200	\$200	\$1,000
	Direct Install Materials & Labor	\$5,524	\$5,524	\$5,524	\$5,524	\$5,524	\$27,620
	Braided Funding Support Labor	\$130	\$124	\$124	\$128	\$128	\$634
	<b>Incentive Total</b>	<b>\$6,729</b>	<b>\$6,723</b>	<b>\$6,723</b>	<b>\$6,670</b>	<b>\$6,670</b>	<b>\$33,514</b>
<b>Non-Incentives (\$000)</b>	Program Design	\$113	\$46	\$47	\$47	\$46	\$298
	Administrative	\$370	\$372	\$336	\$337	\$352	\$1,767
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,976	\$2,784	\$2,830	\$2,810	\$2,719	\$14,119
	Marketing	\$626	\$624	\$627	\$627	\$624	\$3,127
	EM&V	\$287	\$278	\$278	\$277	\$274	\$1,394
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$27	\$0	\$0	\$0	\$0	\$27
<b>Non-Incentive Total</b>	<b>\$4,399</b>	<b>\$4,103</b>	<b>\$4,118</b>	<b>\$4,098</b>	<b>\$4,014</b>	<b>\$20,732</b>	
<b>Percent Incentives <sup>3</sup></b>		60%	62%	62%	62%	62%	62%

<sup>1</sup> Each program should receive its own table. For additional programs, copy this table and change program name.

<sup>2</sup> See 2026 TRC Order definitions of incentives.

<sup>3</sup> The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

**Table 10: Budget by Program**

Program Name: <sup>1</sup>	C&I Energy Solutions Program - Small						
Cost Element	PY18	PY19	PY20	PY21	PY22	Phase V Total	
<b>Total Budget (\$000)</b>	<b>\$24,331</b>	<b>\$23,467</b>	<b>\$23,369</b>	<b>\$23,407</b>	<b>\$23,499</b>	<b>\$118,074</b>	
<b>Incentives (\$000) <sup>2</sup></b>	Rebates	\$4,880	\$4,884	\$4,892	\$4,900	\$4,908	\$24,464
	Upstream/Midstream Buydown	\$959	\$959	\$959	\$959	\$959	\$4,795
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$6,265	\$6,265	\$6,265	\$6,265	\$6,265	\$31,327
	Braided Funding Support Labor	\$336	\$309	\$309	\$314	\$314	\$1,581
	<b>Incentive Total</b>	<b>\$12,440</b>	<b>\$12,418</b>	<b>\$12,425</b>	<b>\$12,438</b>	<b>\$12,446</b>	<b>\$62,167</b>
<b>Non-Incentives (\$000)</b>	Program Design	\$312	\$125	\$127	\$128	\$129	\$822
	Administrative	\$1,030	\$1,036	\$922	\$933	\$1,004	\$4,925
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$8,219	\$7,691	\$7,698	\$7,707	\$7,713	\$39,028
	Marketing	\$928	\$921	\$925	\$928	\$929	\$4,632
	EM&V	\$1,247	\$1,202	\$1,197	\$1,199	\$1,204	\$6,049
	AEPS Registration Support	\$81	\$74	\$74	\$74	\$74	\$378
	Other (Describe)	\$73	\$0	\$0	\$0	\$0	\$73
<b>Non-Incentive Total</b>	<b>\$11,891</b>	<b>\$11,050</b>	<b>\$10,944</b>	<b>\$10,969</b>	<b>\$11,053</b>	<b>\$55,907</b>	
<b>Percent Incentives <sup>3</sup></b>	51%	53%	53%	53%	53%	53%	

<sup>1</sup> Each program should receive its own table. For additional programs, copy this table and change program name.

<sup>2</sup> See 2026 TRC Order definitions of incentives.

<sup>3</sup> The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

**Table 10: Budget by Program**

Program Name: <sup>1</sup>	C&I Energy Solutions Program - Large						
Cost Element	PY18	PY19	PY20	PY21	PY22	Phase V Total	
<b>Total Budget (\$000)</b>	<b>\$20,336</b>	<b>\$19,717</b>	<b>\$19,636</b>	<b>\$19,661</b>	<b>\$19,722</b>	<b>\$99,071</b>	
<b>Incentives (\$000) <sup>2</sup></b>	Rebates	\$10,548	\$10,552	\$10,555	\$10,559	\$10,562	\$52,775
	Upstream/Midstream Buydown	\$482	\$482	\$482	\$482	\$482	\$2,408
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$4	\$4	\$4	\$4	\$4	\$18
	Braided Funding Support Labor	\$290	\$279	\$279	\$288	\$288	\$1,424
	<b>Incentive Total</b>	<b>\$11,324</b>	<b>\$11,316</b>	<b>\$11,319</b>	<b>\$11,332</b>	<b>\$11,335</b>	<b>\$56,626</b>
<b>Non-Incentives (\$000)</b>	Program Design	\$234	\$94	\$96	\$96	\$97	\$616
	Administrative	\$774	\$780	\$694	\$702	\$755	\$3,705
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$6,046	\$5,664	\$5,665	\$5,666	\$5,667	\$28,706
	Marketing	\$742	\$737	\$740	\$742	\$743	\$3,705
	EM&V	\$1,042	\$1,010	\$1,006	\$1,007	\$1,010	\$5,076
	AEPS Registration Support	\$119	\$116	\$116	\$116	\$116	\$582
	Other (Describe)	\$55	\$0	\$0	\$0	\$0	\$55
<b>Non-Incentive Total</b>	<b>\$9,012</b>	<b>\$8,401</b>	<b>\$8,316</b>	<b>\$8,329</b>	<b>\$8,387</b>	<b>\$42,445</b>	
<b>Percent Incentives <sup>3</sup></b>	56%	57%	58%	58%	57%	57%	

<sup>1</sup> Each program should receive its own table. For additional programs, copy this table and change program name.

<sup>2</sup> See 2026 TRC Order definitions of incentives.

<sup>3</sup> The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

**Table 10: Budget by Program**

<b>Program Name:</b> <sup>1</sup>	<b>Total Portfolio</b>						
<b>Cost Element</b>		<b>PY18</b>	<b>PY19</b>	<b>PY20</b>	<b>PY21</b>	<b>PY22</b>	<b>Phase V Total</b>
<b>Total Budget (\$000)</b>		<b>\$80,924</b>	<b>\$78,988</b>	<b>\$78,262</b>	<b>\$75,894</b>	<b>\$76,251</b>	<b>\$390,320</b>
<b>Incentives (\$000)</b> <sup>2</sup>	Rebates	\$26,773	\$26,872	\$27,024	\$25,000	\$25,174	\$130,844
	Upstream/Midstream Buydown	\$1,441	\$1,441	\$1,441	\$1,441	\$1,441	\$7,204
	Kits	\$200	\$200	\$200	\$200	\$200	\$1,000
	Direct Install Materials & Labor	\$11,851	\$11,851	\$11,851	\$11,851	\$11,851	\$59,256
	Braided Funding Support Labor	\$1,171	\$1,092	\$1,092	\$1,020	\$1,020	\$5,396
	<b>Incentive Total</b>	<b>\$41,436</b>	<b>\$41,456</b>	<b>\$41,608</b>	<b>\$39,513</b>	<b>\$39,686</b>	<b>\$203,699</b>
<b>Non-Incentives (\$000)</b>	Program Design	\$1,063	\$438	\$438	\$438	\$438	\$2,813
	Administrative	\$3,501	\$3,609	\$3,163	\$3,172	\$3,405	\$16,850
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$27,700	\$26,609	\$26,202	\$25,978	\$25,915	\$132,404
	Marketing	\$3,532	\$3,532	\$3,532	\$3,532	\$3,532	\$17,658
	EM&V	\$3,243	\$3,154	\$3,131	\$3,072	\$3,086	\$15,686
	AEPS Registration Support	\$200	\$190	\$190	\$190	\$190	\$960
	Other (Describe)	\$250	\$0	\$0	\$0	\$0	\$250
<b>Non-Incentive Total</b>	<b>\$39,488</b>	<b>\$37,532</b>	<b>\$36,654</b>	<b>\$36,382</b>	<b>\$36,564</b>	<b>\$186,620</b>	
<b>Percent Incentives</b> <sup>3</sup>		51%	52%	53%	52%	52%	52%

<sup>1</sup> Each program should receive its own table. For additional programs, copy this table and change program name.

<sup>2</sup> See 2026 TRC Order definitions of incentives.

<sup>3</sup> The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

**Table 11: Summary of EE&C Costs by Sector and Program**

Sector	EE&C Program <sup>1</sup>	Cost Elements (\$) <sup>2</sup>									Total Cost	Expected Acquisition Cost <sup>3</sup> (\$/MWh)	Levelized Cost <sup>4</sup> (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other (Describe)				
Residential Portfolio (incl. Low-Income)	<i>Residential Energy Solutions Program</i>	\$51,392,196	\$0	\$0	\$0	\$50,551,043	\$6,194,040	\$3,167,406	\$0	\$0	\$111,304,686	\$381.20	\$0.11	\$2,136,622
	<i>Low Income Energy Efficiency Program</i>	\$33,514,241	\$0	\$0	\$0	\$14,118,698	\$3,127,209	\$1,393,805	\$0	\$0	\$52,153,953	\$739.92	\$0.14	\$3,453,208
											\$0			
	<b>Sector Total <sup>5</sup></b>	<b>\$84,906,437</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$64,669,742</b>	<b>\$9,321,249</b>	<b>\$4,561,211</b>	<b>\$0</b>	<b>\$0</b>	<b>\$163,458,639</b>	<b>\$1,121</b>	<b>\$0.25</b>	<b>\$5,589,830</b>
Small C&I	<i>C&amp;I Energy Solutions Program - Small</i>	\$62,166,820	\$0	\$0	\$0	\$39,028,150	\$4,631,768	\$6,049,346	\$377,812	\$0	\$112,253,896	\$309.89	\$0.08	\$2,189,029
											\$0			
											\$0			
	<b>Sector Total</b>	<b>\$62,166,820</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$39,028,150</b>	<b>\$4,631,768</b>	<b>\$6,049,346</b>	<b>\$377,812</b>	<b>\$0</b>	<b>\$112,253,896</b>	<b>\$310</b>	<b>\$0.08</b>	<b>\$2,189,029</b>
Large C&I	<i>C&amp;I Energy Solutions Program - Large</i>	\$56,625,824	\$0	\$0	\$0	\$28,706,131	\$3,704,512	\$5,075,737	\$582,283	\$0	\$94,694,487	\$240.14	\$0.07	\$1,769,779
											\$0			
											\$0			
	<b>Sector Total</b>	<b>\$56,625,824</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$28,706,131</b>	<b>\$3,704,512</b>	<b>\$5,075,737</b>	<b>\$582,283</b>	<b>\$0</b>	<b>\$94,694,487</b>	<b>\$240</b>	<b>\$0.07</b>	<b>\$1,769,779</b>

<sup>1</sup> List each EE&C program by name. Add rows as necessary, preserving formulas in totals rows.

<sup>2</sup> List all cost elements for each program that can be directly identified as relating exclusively to the specific customer sector addressed in this table. Any cost elements that are applicable to multiple sectors, or are common across all sectors, are to be listed in Table 11 (relating to Common Costs). Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

<sup>3</sup> The numerator in the acquisition cost calculation is the full EDC cost, free of any allocation. Acquisition costs are first-year.

<sup>4</sup> The levelized cost of energy is the gross TRC costs divided by the discounted lifetime MWh savings

<sup>5</sup> If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

**Table 12: Allocation of Common Costs to Applicable Customer Sector**

Common Cost Element <sup>1</sup>	Total Cost (\$)	Basis for Cost Allocation <sup>2</sup>	Sector Cost Allocation (\$)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Program Design	\$2,812,500	Ratio of each programs specific delivery and marketing costs	\$1,373,716	\$822,334	\$616,449
Administrative	\$16,850,000	Ratio of each programs specific delivery and marketing costs	\$8,220,551	\$4,924,560	\$3,704,889
Other (Describe)	\$250,000	Ratio of each programs specific delivery and marketing costs, including external legal	\$121,486	\$73,474	\$55,040
<b>Totals</b>	\$19,912,500		\$9,715,753	\$5,820,368	\$4,376,379
<b>SWE Cost <sup>3</sup></b>	\$4,000,000				

<sup>1</sup> List all identified cost elements that are determined to be applicable to multiple customer sectors, or are common across all sectors. Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

<sup>2</sup> Provide a brief explanation of the methodology used to allocate each common cost element to the applicable customer sectors.

<sup>3</sup> The Statewide Evaluator (SWE) costs are separate from the "2% rule" wherein EDCs have a budget ceiling that limits program spending to two percent of each EDC's 2006 annual revenue.

<sup>4</sup> If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

**Table 13: Summary of Portfolio EE&C Costs**

<b>Portfolio</b>	<b>Total Sector Portfolio-specific Costs <sup>1</sup></b>	<b>Total Common Costs <sup>2</sup></b>	<b>Total of All Costs</b>
Residential (Including Low-Income)	\$163,458,639	\$9,715,753	\$173,174,392
Small C&I	\$112,253,896	\$5,820,368	\$118,074,265
Large C&I	\$94,694,487	\$4,376,379	\$99,070,866
<b>Totals</b>	<b>\$370,407,023</b>	<b>\$19,912,500</b>	<b>\$390,319,523</b>

**1** Cost figures are automatically carried over from the Sector Total rows of Table 11.

**2** Cost figures are automatically carried over from the bottom row ("Totals") of Table 12. Does not include SWE cost.

**Table 14: TRC Benefits Table (Gross)**

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
	Program Year <sup>2</sup>	NTGR	Gross TRC <sup>1</sup>	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits <sup>4</sup>	Energy Benefits <sup>5</sup>	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Residential Energy Solutions Program</i>	<i>PY18</i>	<i>1.0</i>	<i>1.07</i>	\$9,927	\$24,298.43	\$14,185.18	\$48,411	\$17,801	\$31,913	\$2,468.00	-\$325	\$51,857
	<i>PY19</i>	<i>1.0</i>	<i>1.09</i>	\$9,894	\$26,630.17	\$13,977.57	\$50,502	\$17,715	\$34,916	\$2,517.52	-\$325	\$54,823
	<i>PY20</i>	<i>1.0</i>	<i>1.04</i>	\$9,884	\$28,172.73	\$13,276.37	\$51,333	\$17,679	\$33,592	\$2,580.37	-\$325	\$53,526
	<i>PY21</i>	<i>1.0</i>	<i>1.12</i>	\$7,663	\$22,475.46	\$12,986.48	\$43,125	\$16,602	\$29,457	\$2,648.99	-\$325	\$48,383
	<i>PY22</i>	<i>1.0</i>	<i>1.09</i>	\$7,663	\$22,475.46	\$13,110.20	\$43,248	\$16,337	\$28,281	\$2,726.36	-\$325	\$47,020
<i>Residential Energy Solutions Program Total</i>	<b>1.00</b>	<b>1.08</b>	<b>\$45,030</b>	<b>\$124,052</b>	<b>\$67,536</b>	<b>\$236,618</b>	<b>\$86,135</b>	<b>\$158,158</b>	<b>\$12,941</b>	<b>-\$1,624</b>	<b>\$255,609</b>	
<i>Low Income Energy Efficiency Program</i>	<i>PY18</i>	<i>1.0</i>	<i>1.09</i>	\$6,621	\$3,286.47	\$4,399.41	\$14,307	\$3,342	\$9,584	\$2,676.48	\$0	\$15,602
	<i>PY19</i>	<i>1.0</i>	<i>1.14</i>	\$6,617	\$3,289.95	\$4,103.23	\$14,011	\$3,291	\$9,905	\$2,729.91	\$0	\$15,926
	<i>PY20</i>	<i>1.0</i>	<i>1.16</i>	\$6,617	\$3,289.95	\$4,117.61	\$14,025	\$3,396	\$10,054	\$2,784.52	\$0	\$16,234
	<i>PY21</i>	<i>1.0</i>	<i>1.18</i>	\$6,576	\$3,016.18	\$4,097.57	\$13,690	\$3,402	\$9,948	\$2,840.36	\$0	\$16,190
	<i>PY22</i>	<i>1.0</i>	<i>1.21</i>	\$6,576	\$3,016.18	\$4,014.34	\$13,606	\$3,426	\$10,097	\$2,897.45	\$0	\$16,420
<i>Low Income Energy Efficiency Program Total</i>	<b>1.00</b>	<b>1.15</b>	<b>\$33,007</b>	<b>\$15,899</b>	<b>\$20,732</b>	<b>\$69,638</b>	<b>\$16,855</b>	<b>\$49,589</b>	<b>\$13,929</b>	<b>\$0</b>	<b>\$80,373</b>	
<i>C&amp;I Energy Solutions Program - Small</i>	<i>PY18</i>	<i>1.0</i>	<i>1.12</i>	\$12,155	\$49,412.03	\$11,810.23	\$73,377	\$24,664	\$59,555	(\$1,629.39)	-\$81	\$82,508
	<i>PY19</i>	<i>1.0</i>	<i>1.14</i>	\$12,125	\$50,020.27	\$10,975.47	\$73,120	\$24,503	\$60,736	(\$1,653.66)	-\$81	\$83,504
	<i>PY20</i>	<i>1.0</i>	<i>1.16</i>	\$12,125	\$50,405.88	\$10,870.04	\$73,401	\$25,160	\$61,927	(\$1,689.47)	-\$81	\$85,317
	<i>PY21</i>	<i>1.0</i>	<i>1.19</i>	\$12,130	\$50,401.01	\$10,894.90	\$73,426	\$25,786	\$63,172	(\$1,738.71)	-\$81	\$87,139
	<i>PY22</i>	<i>1.0</i>	<i>1.21</i>	\$12,130	\$50,401.01	\$10,979.00	\$73,510	\$26,382	\$64,423	(\$1,801.79)	-\$81	\$88,923
<i>C&amp;I Energy Solutions Program - Small Total</i>	<b>1.00</b>	<b>1.17</b>	<b>\$60,663</b>	<b>\$250,640</b>	<b>\$55,530</b>	<b>\$366,833</b>	<b>\$126,496</b>	<b>\$309,813</b>	<b>-\$8,513</b>	<b>-\$405</b>	<b>\$427,391</b>	
<i>C&amp;I Energy Solutions Program - Large</i>	<i>PY18</i>	<i>1.0</i>	<i>1.06</i>	\$10,769	\$53,918.02	\$8,892.79	\$73,580	\$16,449	\$66,046	(\$4,403.18)	-\$381	\$77,712
	<i>PY19</i>	<i>1.0</i>	<i>1.04</i>	\$10,755	\$56,650.42	\$8,285.37	\$75,691	\$15,918	\$67,388	(\$4,476.56)	-\$381	\$78,449
	<i>PY20</i>	<i>1.0</i>	<i>1.03</i>	\$10,755	\$58,462.82	\$8,200.54	\$77,419	\$16,248	\$68,742	(\$4,571.89)	-\$381	\$80,037
	<i>PY21</i>	<i>1.0</i>	<i>1.05</i>	\$10,763	\$58,454.57	\$8,213.02	\$77,431	\$16,585	\$70,153	(\$4,691.99)	-\$381	\$81,665
	<i>PY22</i>	<i>1.0</i>	<i>1.07</i>	\$10,763	\$58,454.57	\$8,271.04	\$77,489	\$16,928	\$71,546	(\$4,838.60)	-\$381	\$83,254
<i>C&amp;I Energy Solutions Program - Large Total</i>	<b>1.00</b>	<b>1.05</b>	<b>\$53,806</b>	<b>\$285,940</b>	<b>\$41,863</b>	<b>\$381,610</b>	<b>\$82,128</b>	<b>\$343,875</b>	<b>-\$22,982</b>	<b>-\$1,904</b>	<b>\$401,116</b>	
<b>Total<sup>6</sup></b>	<b>1.00</b>	<b>1.10</b>	<b>\$192,507</b>	<b>\$676,532</b>	<b>\$185,660</b>	<b>\$1,054,699</b>	<b>\$311,613</b>	<b>\$861,435</b>	<b>-\$4,625</b>	<b>-\$3,934</b>	<b>\$1,164,489</b>	

<sup>1</sup> The TRC ratio compares the present value of the TRC benefits to the present value of the TRC costs with both costs and benefits expressed in \$2026

<sup>2</sup> Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

<sup>3</sup> Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

<sup>4</sup> Capacity costs include generation, transmission, distribution, and capacity DRIPe.

<sup>5</sup> Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPe components.

<sup>6</sup> If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

**Table 14: TRC Benefits Table (Net)**

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)				
	Program Year <sup>2</sup>	NTGR	Net TRC <sup>1</sup>	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits <sup>4</sup>	Energy Benefits <sup>5</sup>	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Residential Energy Solutions Program</i>	<i>PY18</i>	<i>0.72</i>	<i>0.85</i>	<i>\$8,940</i>	<i>\$15,901</i>	<i>\$14,185</i>	<i>\$39,026</i>	<i>\$9,756</i>	<i>\$22,078</i>	<i>\$1,469.39</i>	<i>-\$300</i>	<i>\$33,004</i>
	<i>PY19</i>	<i>0.77</i>	<i>0.89</i>	<i>\$8,910</i>	<i>\$18,050</i>	<i>\$13,978</i>	<i>\$40,938</i>	<i>\$10,510</i>	<i>\$24,868</i>	<i>\$1,498.88</i>	<i>-\$300</i>	<i>\$36,578</i>
	<i>PY20</i>	<i>0.74</i>	<i>0.83</i>	<i>\$8,900</i>	<i>\$19,474</i>	<i>\$13,276</i>	<i>\$41,650</i>	<i>\$10,059</i>	<i>\$23,345</i>	<i>\$1,536.25</i>	<i>-\$300</i>	<i>\$34,640</i>
	<i>PY21</i>	<i>0.80</i>	<i>0.89</i>	<i>\$6,677</i>	<i>\$17,010</i>	<i>\$12,986</i>	<i>\$36,674</i>	<i>\$9,497</i>	<i>\$21,733</i>	<i>\$1,577.04</i>	<i>-\$300</i>	<i>\$32,507</i>
	<i>PY22</i>	<i>0.78</i>	<i>0.83</i>	<i>\$6,677</i>	<i>\$17,010</i>	<i>\$13,110</i>	<i>\$36,797</i>	<i>\$8,843</i>	<i>\$20,391</i>	<i>\$1,623.02</i>	<i>-\$300</i>	<i>\$30,558</i>
<i>Residential Energy Solutions Program Total</i>		<b>0.76</b>	<b>0.86</b>	<b>\$40,104</b>	<b>\$87,446</b>	<b>\$67,536</b>	<b>\$195,086</b>	<b>\$48,665</b>	<b>\$112,415</b>	<b>\$7,705</b>	<b>-\$1,498</b>	<b>\$167,286</b>
<i>Low Income Energy Efficiency Program</i>	<i>PY18</i>	<i>0.81</i>	<i>0.94</i>	<i>\$6,209</i>	<i>\$2,625</i>	<i>\$4,399</i>	<i>\$13,233</i>	<i>\$2,518</i>	<i>\$7,926</i>	<i>\$1,975</i>	<i>\$0</i>	<i>\$12,419</i>
	<i>PY19</i>	<i>0.82</i>	<i>0.98</i>	<i>\$6,205</i>	<i>\$2,629</i>	<i>\$4,103</i>	<i>\$12,937</i>	<i>\$2,484</i>	<i>\$8,216</i>	<i>\$2,014</i>	<i>\$0</i>	<i>\$12,714</i>
	<i>PY20</i>	<i>0.82</i>	<i>1.00</i>	<i>\$6,205</i>	<i>\$2,629</i>	<i>\$4,118</i>	<i>\$12,951</i>	<i>\$2,562</i>	<i>\$8,334</i>	<i>\$2,055</i>	<i>\$0</i>	<i>\$12,950</i>
	<i>PY21</i>	<i>0.81</i>	<i>1.01</i>	<i>\$6,164</i>	<i>\$2,483</i>	<i>\$4,098</i>	<i>\$12,745</i>	<i>\$2,565</i>	<i>\$8,270</i>	<i>\$2,096</i>	<i>\$0</i>	<i>\$12,931</i>
	<i>PY22</i>	<i>0.80</i>	<i>1.03</i>	<i>\$6,164</i>	<i>\$2,483</i>	<i>\$4,014</i>	<i>\$12,662</i>	<i>\$2,568</i>	<i>\$8,383</i>	<i>\$2,138</i>	<i>\$0</i>	<i>\$13,089</i>
<i>Low Income Energy Efficiency Program Total</i>		<b>0.81</b>	<b>0.99</b>	<b>\$30,947</b>	<b>\$12,849</b>	<b>\$20,732</b>	<b>\$64,528</b>	<b>\$12,697</b>	<b>\$41,129</b>	<b>\$10,277</b>	<b>\$0</b>	<b>\$64,103</b>
<i>C&amp;I Energy Solutions Program - Small</i>	<i>PY18</i>	<i>0.75</i>	<i>1.07</i>	<i>\$12,113</i>	<i>\$33,680</i>	<i>\$11,810</i>	<i>\$57,603</i>	<i>\$17,604</i>	<i>\$44,691</i>	<i>(\$861.33)</i>	<i>-\$50</i>	<i>\$61,384</i>
	<i>PY19</i>	<i>0.75</i>	<i>1.09</i>	<i>\$12,084</i>	<i>\$34,063</i>	<i>\$10,975</i>	<i>\$57,122</i>	<i>\$17,565</i>	<i>\$45,564</i>	<i>(\$873.23)</i>	<i>-\$50</i>	<i>\$62,206</i>
	<i>PY20</i>	<i>0.75</i>	<i>1.11</i>	<i>\$12,084</i>	<i>\$34,299</i>	<i>\$10,870</i>	<i>\$57,252</i>	<i>\$18,025</i>	<i>\$46,445</i>	<i>(\$892.43)</i>	<i>-\$50</i>	<i>\$63,529</i>
	<i>PY21</i>	<i>0.75</i>	<i>1.13</i>	<i>\$12,088</i>	<i>\$34,294</i>	<i>\$10,895</i>	<i>\$57,277</i>	<i>\$18,462</i>	<i>\$47,365</i>	<i>(\$920.15)</i>	<i>-\$50</i>	<i>\$64,858</i>
	<i>PY22</i>	<i>0.75</i>	<i>1.15</i>	<i>\$12,088</i>	<i>\$34,294</i>	<i>\$10,979</i>	<i>\$57,361</i>	<i>\$18,877</i>	<i>\$48,296</i>	<i>(\$956.64)</i>	<i>-\$50</i>	<i>\$66,167</i>
<i>C&amp;I Energy Solutions Program - Small Total</i>		<b>0.81</b>	<b>1.11</b>	<b>\$60,457</b>	<b>\$170,630</b>	<b>\$55,530</b>	<b>\$286,616</b>	<b>\$90,534</b>	<b>\$232,361</b>	<b>-\$4,504</b>	<b>-\$248</b>	<b>\$318,144</b>
<i>C&amp;I Energy Solutions Program - Large</i>	<i>PY18</i>	<i>0.67</i>	<i>0.97</i>	<i>\$10,759</i>	<i>\$33,852</i>	<i>\$8,893</i>	<i>\$53,504</i>	<i>\$10,665</i>	<i>\$44,225</i>	<i>(\$2,737)</i>	<i>-\$233</i>	<i>\$51,921</i>
	<i>PY19</i>	<i>0.67</i>	<i>0.96</i>	<i>\$10,747</i>	<i>\$35,525</i>	<i>\$8,285</i>	<i>\$54,557</i>	<i>\$10,402</i>	<i>\$45,117</i>	<i>(\$2,782)</i>	<i>-\$233</i>	<i>\$52,504</i>
	<i>PY20</i>	<i>0.67</i>	<i>0.96</i>	<i>\$10,747</i>	<i>\$36,633</i>	<i>\$8,201</i>	<i>\$55,580</i>	<i>\$10,617</i>	<i>\$46,017</i>	<i>(\$2,842)</i>	<i>-\$233</i>	<i>\$53,559</i>
	<i>PY21</i>	<i>0.67</i>	<i>0.98</i>	<i>\$10,755</i>	<i>\$36,624</i>	<i>\$8,213</i>	<i>\$55,592</i>	<i>\$10,836</i>	<i>\$46,954</i>	<i>(\$2,916)</i>	<i>-\$233</i>	<i>\$54,641</i>
	<i>PY22</i>	<i>0.67</i>	<i>1.00</i>	<i>\$10,755</i>	<i>\$36,624</i>	<i>\$8,271</i>	<i>\$55,650</i>	<i>\$11,059</i>	<i>\$47,883</i>	<i>(\$3,008)</i>	<i>-\$233</i>	<i>\$55,701</i>
<i>C&amp;I Energy Solutions Program - Large Total</i>		<b>0.67</b>	<b>0.98</b>	<b>\$53,762</b>	<b>\$179,258</b>	<b>\$41,863</b>	<b>\$274,883</b>	<b>\$53,578</b>	<b>\$230,195</b>	<b>-\$14,285</b>	<b>-\$1,163</b>	<b>\$268,326</b>
<b>Total<sup>6</sup></b>		<b>0.73</b>	<b>1.00</b>	<b>\$185,271</b>	<b>\$450,182</b>	<b>\$185,660</b>	<b>\$821,114</b>	<b>\$205,474</b>	<b>\$616,101</b>	<b>-\$807</b>	<b>-\$2,909</b>	<b>\$817,859</b>

<sup>1</sup> The TRC ratio compares the present value of the TRC benefits to the present value of the TRC costs with both costs and benefits expressed in \$2026

<sup>2</sup> Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

<sup>3</sup> Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

<sup>4</sup> Capacity costs include generation, transmission, distribution, and capacity DRIPe.

<sup>5</sup> Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPe components.

<sup>6</sup> If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

**Table 15: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan**

<b>Sector</b>	<b>Total Discounted Lifetime Costs (\$000)</b>	<b>Total Discounted Lifetime Benefits (\$000)<sup>3</sup></b>	<b>Present Value of Net<sup>1</sup> Benefits (\$000)</b>	<b>Benefit-Cost Ratio (TRC Ratio)</b>
<b>Market Rate EE (exclusive of Low-Income)<sup>2</sup></b>	\$689,445	\$802,029	\$112,585	1.2
<b>Low-Income</b>	\$106,490	\$107,716	\$1,226	1.0
<b>Solar PV</b>	\$184,356	\$147,860	-\$36,496	0.8
<b>CHP</b>	\$53,614	\$84,519	\$30,905	1.6
<b>Demand Response</b>	\$20,794	\$22,366	\$1,571	1.1
<b>Total Portfolio</b>	\$1,054,699	\$1,164,489	\$109,790	1.1

<sup>1</sup> “Net” refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

<sup>2</sup> The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

<sup>3</sup> Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

**Appendix C:  
Company Supplemental Information**

**Appendix C, FE PA Table 1: Program Savings by Program Year**

<i>FE PA</i>		<i>PY18</i>		
<b>Program</b>	<b>Program Component</b>	<b>kWh</b>	<b>kW (Summer)</b>	<b>kW (Winter)</b>
<i>Residential Energy Solutions Program</i>	<i>Products</i>	22,434,262	5,973.74	2,713.80
	<i>HVAC &amp; Solar</i>	16,445,153	2,906.70	2,549.76
	<i>Comprehensive Audits</i>	704,689	56.22	195.34
	<i>Multi Family - Res</i>	118,544	15.60	16.96
	<i>Behavioral</i>	11,814,130	2,358.56	2,353.31
	<i>New Homes</i>	3,911,744	503.52	788.51
	<i>DLS &amp; DR - Res</i>	-	12,353.16	17,839.69
	<i>FTM-Res</i>	-	-	-
	<b>Subtotal</b>	<b>55,428,522</b>	<b>24,167.49</b>	<b>26,457.37</b>
<i>Low Income Energy Efficiency Program</i>	<i>Weatherization</i>	4,068,902	428.04	834.86
	<i>LI - Products</i>	4,993,780	2,245.68	360.59
	<i>LI - HVAC</i>	12,633	1.54	2.45
	<i>LI - Audits</i>	-	-	-
	<i>LI - Behavioral</i>	2,992,000	379.78	378.03
	<i>LI - New Homes</i>	82,362	10.60	16.60
	<i>LI - Multifamily - Res</i>	1,842,756	240.55	267.51
	<b>Subtotal</b>	<b>13,992,433</b>	<b>3,306.20</b>	<b>1,860.04</b>
	<b>Residential Total</b>	<b>69,420,955</b>	<b>27,473.70</b>	<b>28,317.41</b>
<i>C&amp;I Energy Solutions Program - Small<sup>1</sup></i>	<i>Multi Family - SCI</i>	3,755,876	479.70	521.01
	<i>Prescriptive - SCI</i>	38,470,680	8,276.02	4,961.18
	<i>Custom - SCI</i>	12,152,250	1,737.79	1,072.00
	<i>Energy Management - SCI</i>	18,068,187	2,484.82	1,922.85
	<i>DLS &amp; DR - SCI</i>	-	1,997.97	2,048.40
	<i>FTM-SCI</i>	-	-	-
	<b>Subtotal</b>	<b>72,446,992</b>	<b>14,976</b>	<b>10,525</b>
	<b>Small Commercial &amp; Industrial Total</b>	<b>72,446,992</b>	<b>14,976.31</b>	<b>10,525.44</b>
<i>C&amp;I Energy Solutions Program - Large</i>	<i>Multi Family - LCI</i>	12,017	1.58	1.65
	<i>Prescriptive - LCI</i>	31,333,179	5,268.70	4,541.67
	<i>Custom - LCI</i>	46,820,575	7,175.16	4,275.01
	<i>Energy Management - LCI</i>	700,000	88.71	50.08
	<i>DLS &amp; DR - LCI</i>	-	2,206.33	2,256.77
	<i>FTM-LCI</i>	-	-	-
	<b>Subtotal</b>	<b>78,865,770</b>	<b>14,740.49</b>	<b>11,125.18</b>
	<b>Large Commercial &amp; Industrial Total</b>	<b>78,865,770</b>	<b>14,740.49</b>	<b>11,125.18</b>
	<b>Non-Residential Total</b>	<b>151,312,763</b>	<b>29,716.79</b>	<b>21,650.61</b>
	<b>Total</b>	<b>220,733,717</b>	<b>57,190.49</b>	<b>49,968.02</b>

<sup>1</sup> Includes projected participation of Low Income households living in Multifamily housing.

**Appendix C, FE PA Table 1: Program Savings by Program Year**

<i>FE PA</i>		<i>PY19</i>		
<b>Program</b>	<b>Program Component</b>	<b>kWh</b>	<b>kW (Summer)</b>	<b>kW (Winter)</b>
<i>Residential Energy Solutions Program</i>	<i>Products</i>	22,434,262	5,973.74	2,713.80
	<i>HVAC &amp; Solar</i>	16,445,153	2,906.70	2,549.76
	<i>Comprehensive Audits</i>	704,689	56.22	195.34
	<i>Multi Family - Res</i>	118,544	15.60	16.96
	<i>Behavioral</i>	23,882,190	4,335.15	4,329.90
	<i>New Homes</i>	3,911,744	503.52	788.51
	<i>DLS &amp; DR - Res</i>	-	12,683.14	18,835.65
	<i>FTM-Res</i>	-	-	-
	<b>Subtotal</b>	<b>67,496,582</b>	<b>26,474.07</b>	<b>29,429.92</b>
<i>Low Income Energy Efficiency Program</i>	<i>Weatherization</i>	4,068,902	428.04	834.86
	<i>LI - Products</i>	4,993,780	2,245.68	360.59
	<i>LI - HVAC</i>	12,633	1.54	2.45
	<i>LI - Audits</i>	-	-	-
	<i>LI - Behavioral</i>	4,182,000	459.67	457.92
	<i>LI - New Homes</i>	82,362	10.60	16.60
	<i>LI - Multifamily - Res</i>	1,842,756	240.55	267.51
	<b>Subtotal</b>	<b>15,182,433</b>	<b>3,386.10</b>	<b>1,939.93</b>
	<b>Residential Total</b>	<b>82,679,015</b>	<b>29,860.16</b>	<b>31,369.86</b>
<i>C&amp;I Energy Solutions Program - Small<sup>1</sup></i>	<i>Multi Family - SCI</i>	3,755,876	479.70	521.01
	<i>Prescriptive - SCI</i>	38,470,680	8,276.02	4,961.18
	<i>Custom - SCI</i>	12,152,250	1,737.79	1,072.00
	<i>Energy Management - SCI</i>	18,068,187	2,484.82	1,922.85
	<i>DLS &amp; DR - SCI</i>	-	2,021.04	2,079.03
	<i>FTM-SCI</i>	-	-	-
	<b>Subtotal</b>	<b>72,446,992</b>	<b>14,999</b>	<b>10,556</b>
	<b>Small Commercial &amp; Industrial Total</b>	<b>72,446,992</b>	<b>14,999.38</b>	<b>10,556.07</b>
<i>C&amp;I Energy Solutions Program - Large</i>	<i>Multi Family - LCI</i>	12,017	1.58	1.65
	<i>Prescriptive - LCI</i>	31,333,179	5,268.70	4,541.67
	<i>Custom - LCI</i>	46,820,575	7,175.16	4,275.01
	<i>Energy Management - LCI</i>	700,000	88.71	50.08
	<i>DLS &amp; DR - LCI</i>	-	2,214.97	2,272.97
	<i>FTM-LCI</i>	-	-	-
	<b>Subtotal</b>	<b>78,865,770</b>	<b>14,749.13</b>	<b>11,141.38</b>
	<b>Large Commercial &amp; Industrial Total</b>	<b>78,865,770</b>	<b>14,749.13</b>	<b>11,141.38</b>
	<b>Non-Residential Total</b>	<b>151,312,763</b>	<b>29,748.50</b>	<b>21,697.45</b>
	<b>Total</b>	<b>233,991,777</b>	<b>59,608.67</b>	<b>53,067.31</b>

<sup>1</sup> Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY20		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	22,413,755	5,970.72	2,710.77
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	15,845,940	3,444.26	3,439.01
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	13,274.70	20,094.28
	FTM-Res	-	-	-
	<b>Subtotal</b>	<b>59,439,824</b>	<b>26,171.71</b>	<b>29,794.63</b>
Low Income Energy Efficiency Program	Weatherization	4,068,902	428.04	834.86
	LI - Products	4,993,780	2,245.68	360.59
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	3,773,000	485.94	484.19
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	<b>Subtotal</b>			<b>147</b>
	<b>Residential Total</b>	<b>74,213,257</b>	<b>29,584.08</b>	<b>31,760.83</b>
C&I Energy Solutions Program - Small <sup>1</sup>	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,060.85	2,123.88
	FTM-SCI	-	-	-
	<b>Subtotal</b>	<b>72,446,992</b>	<b>15,039</b>	<b>10,601</b>
	<b>Small Commercial &amp; Industrial Total</b>	<b>72,446,992</b>	<b>15,039.18</b>	<b>10,600.92</b>
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,222.16	2,285.21
	FTM-LCI	-	-	-
	<b>Subtotal</b>	<b>78,865,770</b>	<b>14,756.32</b>	<b>11,153.61</b>
	<b>Large Commercial &amp; Industrial Total</b>	<b>78,865,770</b>	<b>14,756.32</b>	<b>11,153.61</b>
	<b>Non-Residential Total</b>	<b>151,312,763</b>	<b>29,795.50</b>	<b>21,754.53</b>
	<b>Total</b>	<b>225,526,020</b>	<b>59,379.58</b>	<b>53,515.37</b>

<sup>1</sup> Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY21		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	13,075,221	4,888.71	913.84
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	22,985,280	3,608.43	3,603.18
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	13,926.45	21,166.85
	FTM-Res	-	-	-
	<b>Subtotal</b>	<b>57,240,631</b>	<b>25,905.62</b>	<b>29,234.44</b>
Low Income Energy Efficiency Program	Weatherization	4,068,902	428.04	834.86
	LI - Products	4,834,764	2,222.18	338.86
	LI - HVAC	3,064	0.43	0.61
	LI - Audits	-	-	-
	LI - Behavioral	2,656,000	346.94	345.19
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	<b>Subtotal</b>	<b>13,487,848</b>	<b>3,248.76</b>	<b>1,803.63</b>
	<b>Residential Total</b>	<b>70,728,478</b>	<b>29,154.38</b>	<b>31,038.06</b>
C&I Energy Solutions Program - Small <sup>1</sup>	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,107.36	2,177.96
	FTM-SCI	-	-	-
	<b>Subtotal</b>	<b>72,446,992</b>	<b>15,086</b>	<b>10,655</b>
	<b>Small Commercial &amp; Industrial Total</b>	<b>72,446,992</b>	<b>15,085.70</b>	<b>10,655.00</b>
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,231.87	2,302.49
	FTM-LCI	-	-	-
	<b>Subtotal</b>	<b>78,865,770</b>	<b>14,766.03</b>	<b>11,170.89</b>
	<b>Large Commercial &amp; Industrial Total</b>	<b>78,865,770</b>	<b>14,766.03</b>	<b>11,170.89</b>
	<b>Non-Residential Total</b>	<b>151,312,763</b>	<b>29,851.73</b>	<b>21,825.89</b>
	<b>Total</b>	<b>222,041,241</b>	<b>59,006.11</b>	<b>52,863.96</b>

<sup>1</sup> Includes projected participation of Low Income households living in Multifamily housing.

**Appendix C, FE PA Table 1: Program Savings by Program Year**

<i>FE PA</i>		<i>PY22</i>		
<b>Program</b>	<b>Program Component</b>	<b>kWh</b>	<b>kW (Summer)</b>	<b>kW (Winter)</b>
<i>Residential Energy Solutions Program</i>	<i>Products</i>	13,075,221	4,888.71	913.84
	<i>HVAC &amp; Solar</i>	16,445,153	2,906.70	2,549.76
	<i>Comprehensive Audits</i>	704,689	56.22	195.34
	<i>Multi Family - Res</i>	118,544	15.60	16.96
	<i>Behavioral</i>	18,120,600	1,948.14	1,942.88
	<i>New Homes</i>	3,911,744	503.52	788.51
	<i>DLS &amp; DR - Res</i>	-	14,491.74	22,239.42
	<i>FTM-Res</i>	-	-	-
	<b>Subtotal</b>	<b>52,375,951</b>	<b>24,810.62</b>	<b>28,646.71</b>
<i>Low Income Energy Efficiency Program</i>	<i>Weatherization</i>	4,068,902	428.04	834.86
	<i>LI - Products</i>	4,834,764	2,222.18	338.86
	<i>LI - HVAC</i>	3,064	0.43	0.61
	<i>LI - Audits</i>	-	-	-
	<i>LI - Behavioral</i>	2,218,000	103.97	102.22
	<i>LI - New Homes</i>	82,362	10.60	16.60
	<i>LI - Multifamily - Res</i>	1,842,756	240.55	267.51
	<b>Subtotal</b>	<b>13,049,848</b>	<b>3,005.79</b>	<b>1,560.66</b>
	<b>Residential Total</b>	<b>65,425,798</b>	<b>27,816.40</b>	<b>30,207.37</b>
<i>C&amp;I Energy Solutions Program - Small<sup>1</sup></i>	<i>Multi Family - SCI</i>	3,755,876	479.70	521.01
	<i>Prescriptive - SCI</i>	38,470,680	8,276.02	4,961.18
	<i>Custom - SCI</i>	12,152,250	1,737.79	1,072.00
	<i>Energy Management - SCI</i>	18,068,187	2,484.82	1,922.85
	<i>DLS &amp; DR - SCI</i>	-	2,142.61	2,218.25
	<i>FTM-SCI</i>	-	-	-
	<b>Subtotal</b>	<b>72,446,992</b>	<b>15,121</b>	<b>10,695</b>
	<b>Small Commercial &amp; Industrial Total</b>	<b>72,446,992</b>	<b>15,120.95</b>	<b>10,695.29</b>
<i>C&amp;I Energy Solutions Program - Large</i>	<i>Multi Family - LCI</i>	12,017	1.58	1.65
	<i>Prescriptive - LCI</i>	31,333,179	5,268.70	4,541.67
	<i>Custom - LCI</i>	46,820,575	7,175.16	4,275.01
	<i>Energy Management - LCI</i>	700,000	88.71	50.08
	<i>DLS &amp; DR - LCI</i>	-	2,239.06	2,314.72
	<i>FTM-LCI</i>	-	-	-
	<b>Subtotal</b>	<b>78,865,770</b>	<b>14,773.22</b>	<b>11,183.12</b>
	<b>Large Commercial &amp; Industrial Total</b>	<b>78,865,770</b>	<b>14,773.22</b>	<b>11,183.12</b>
	<b>Non-Residential Total</b>	<b>151,312,763</b>	<b>29,894.16</b>	<b>21,878.42</b>
	<b>Total</b>	<b>216,738,561</b>	<b>57,710.57</b>	<b>52,085.79</b>

<sup>1</sup> Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		Total		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	93,432,722	27,695.60	9,966.04
	HVAC & Solar	82,225,765	14,533.49	12,748.79
	Comprehensive Audits	3,523,443	281.11	976.72
	Multi Family - Res	592,719	78.00	84.81
	Behavioral	92,648,140	15,694.55	15,668.28
	New Homes	19,558,720	2,517.58	3,942.56
	DLS & DR - Res	-	66,729.19	100,175.87
	FTM-Res	-	-	-
	<b>Subtotal</b>	<b>291,981,509</b>	<b>127,529.52</b>	<b>143,563.08</b>
Low Income Energy Efficiency Program	Weatherization	20,344,508	2,140.22	4,174.30
	LI - Products	24,650,869	11,181.42	1,759.50
	LI - HVAC	44,028	5.48	8.56
	LI - Audits	-	-	-
	LI - Behavioral	15,821,000	1,776.31	1,767.55
	LI - New Homes	411,812	53.01	83.01
	LI - Multifamily - Res	9,213,779	1,202.76	1,337.53
	<b>Subtotal</b>	<b>70,485,995</b>	<b>16,359.20</b>	<b>9,130.45</b>
	<b>Residential Total</b>	<b>362,467,504</b>	<b>143,888.72</b>	<b>152,693.53</b>
C&I Energy Solutions Program - Small <sup>1</sup>	Multi Family - SCI	18,779,378	2,398.52	2,605.05
	Prescriptive - SCI	192,353,398	41,380.11	24,805.90
	Custom - SCI	60,761,250	8,688.96	5,359.99
	Energy Management - SCI	90,340,935	12,424.10	9,614.25
	DLS & DR - SCI	-	10,329.82	10,647.53
	FTM-SCI	-	-	-
	<b>Subtotal</b>	<b>362,234,961</b>	<b>75,221.51</b>	<b>53,032.72</b>
	<b>Small Commercial &amp; Industrial Total</b>	<b>362,234,961</b>	<b>75,221.51</b>	<b>53,032.72</b>
C&I Energy Solutions Program - Large	Multi Family - LCI	60,084	7.90	8.25
	Prescriptive - LCI	156,665,893	26,343.49	22,708.34
	Custom - LCI	234,102,875	35,875.82	21,375.04
	Energy Management - LCI	3,500,000	443.56	250.39
	DLS & DR - LCI	-	11,114.41	11,432.16
	FTM-LCI	-	-	-
	<b>Subtotal</b>	<b>394,328,852</b>	<b>73,785.18</b>	<b>55,774.18</b>
	<b>Large Commercial &amp; Industrial Total</b>	<b>394,328,852</b>	<b>73,785.18</b>	<b>55,774.18</b>
	<b>Non-Residential Total</b>	<b>756,563,813</b>	<b>149,006.69</b>	<b>108,806.90</b>
	<b>Total</b>	<b>1,119,031,317</b>	<b>292,895.41</b>	<b>261,500.43</b>

<sup>1</sup> Includes projected participation of Low Income households living in Multifamily housing.

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	Products	Freezer Recycling	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator Recycling	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dehumidifier Recycling	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Cooler Recycling	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Washer	14	112	0.017	0.017	0.59	\$36	\$25	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	14	75	0.010	0.008	0.59	\$0	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	11	41	0.006	0.004	0.59	\$0	\$10	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	14	74	0.010	0.010	0.59	\$206	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	14	33	0.004	0.005	0.59	\$206	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	9	172	0.019	0.025	0.59	\$39	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Room Air Conditioner	9	13	0.022	0.000	0.59	\$95	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dehumidifier	12	148	0.028	0.000	0.59	\$0	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	10	1,960	0.207	0.345	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	10	231	0.024	0.041	0.59	\$1,685	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	10	110	0.035	0.000	0.59	\$218	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dishwasher	10	49	0.008	0.013	0.59	\$79	\$10	\$0.00	0.00	381	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	10	22	0.002	0.002	0.59	\$143	\$40	\$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	PA IC DB
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncs	9	211	0.039	0.016	0.59	\$104	\$25	\$0.00	6.87	0.00	1 Unit controlling 2.5 Ton CAC / ASHP	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Cooler	14	45	0.006	0.005	0.59	\$282	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	14	145	0.021	0.021	0.59	\$242	\$48	\$0.00	0.13	1,764	1 Unit	PA TRM	Co Assumption	Co Assumption
Residential Energy Solutions Program	Products	LED Linear	15	20	0.003	0.003	0.59	\$14	\$10	\$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	8	14	0.000	0.000	0.59	\$3	\$3	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	10	13	0.000	0.000	0.59	\$1	\$1	\$0.00	0.00	0.00	100 Light String	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	5	113	0.013	0.016	0.59	\$41	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	8	20	0.003	0.003	0.59	\$25	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	15	20	0.003	0.003	0.59	\$14	\$10	\$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Agricultural Process Lighting	7	36	0.004	0.004	0.66	\$21	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Auto Milker Takeoff	10	1,938	0.329	0.329	0.66	\$9,025	\$414	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	15	797	0.136	0.136	0.66	\$557	\$114	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	HE Ventilation Fans	13	656	0.129	0.000	0.66	\$226	\$82	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Reclaimer	15	5,055	0.859	0.910	0.66	\$5,840	\$727	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	15	8,600	4.300	0.000	0.66	\$5,608	\$1,398	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Livestock Waterer	10	1,004	0.000	0.400	0.66	\$553	\$150	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	15	10,076	1.411	1.411	0.66	\$6,717	\$1,360	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Low Pressure Irrigation	5	12,985	33.760	0.000	0.66	\$13,745	\$5,519	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Custom - Agricultural	15	100,000	10.000	10.000	0.66	\$40,520	\$12,500	\$0.00	0.00	0.00	1 Unit	Actuals	Co Assumption	Actuals

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	Products	Engine Block Heater Timer	15	738	0.000	0.000	0.66	\$17	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	15	567	0.074	0.102	0.54	\$418	\$300	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	15	1,467	0.075	0.212	0.54	\$1,044	\$600	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	15	296	0.135	0.000	0.54	\$418	\$150	\$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	15	596	0.163	0.000	0.54	\$1,044	\$300	\$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	15	1,023	0.078	0.180	0.54	\$711	\$400	\$0.00	0.00	0.00	1- 1.5 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	PTAC	15	173	0.091	0.000	0.54	\$522	\$100	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	PTHP	15	220	0.091	0.014	0.54	\$522	\$100	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	15	1,516	0.447	0.521	0.54	\$18,665	\$4,000	\$0.00	0.00	0.00	1- 3 Ton Unit	PA TRM	PA TRM	Co Assumption
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	5	195	0.045	0.043	0.54	\$196	\$50	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	9	318	0.045	0.029	0.54	\$104	\$50	\$0.00	4.97	0.00	1 Unit controlling 2.5 Ton CAC / ASHP	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	3	127	0.051	0.000	0.54	\$141	\$50	\$0.00	0.00	0.00	1 - Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	15	24	0.003	0.004	0.54	\$52	\$25	\$0.00	0.00	0.00	1-20 CFM unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	9	399	0.048	0.735	0.54	\$1,228	\$300	\$0.00	0.00	0.00	1 - Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	15	7,144	0.135	2.204	0.54	\$2,088	\$2,000	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	15	3,945	0.078	1.394	0.54	\$3,553	\$1,000	\$0.00	0.00	0.00	1- 1.5 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	15	3,596	0.091	1.035	0.54	\$2,610	\$1,000	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Solar	15	1,263	0.299	0.040	0.92	\$1,911	\$150	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	5	1,425	0.055	0.408	0.92	\$2,929	\$1,750	\$0.00	0.00	87	1 - Audit w DI & Wgtd Retrofits	PA TRM	Actuals	Actuals
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	15	1,263	0.299	0.040	0.92	\$1,911	\$150	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	15	567	0.074	0.102	0.54	\$731	\$450	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	15	296	0.135	0.000	0.54	\$731	\$225	\$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	10	231	0.024	0.041	0.59	\$1,915	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	1	31	0.006	0.006	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	2	55	0.009	0.009	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	1	45	0.009	0.009	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	2	58	0.008	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	1	47	0.005	0.005	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	On-Line Audit	1	150	0.010	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	Co Assumption	Actuals	Co Assumption
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Townhouse and Duplex	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Two on Two Cond Units	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	14	2,367	0.278	0.436	0.72	\$2,803	\$1,100	\$0.00	0.00	0.00	NC Single Family Detached	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	14	1,657	0.195	0.305	0.72	\$2,803	\$650	\$0.00	0.00	0.00	NC Mfg Housing	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	1	0	0.011	0.011	0.00	\$0	\$0	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	1	0	0.200	0.200	0.00	\$0	\$155	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Storage	1	0	2.350	4.700	0.00	\$0	\$810	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	1	0	0.220	0.380	0.00	\$0	\$45	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Summer	1	0	0.158	0.000	0.00	\$0	\$0	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Winter	1	0	0.000	0.530	0.00	\$0	\$0	\$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	0	0	0.000	0.000	0.00	0	\$0	\$0.00	0.00	0.00	-	-	-	-
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	13	105	0.012	0.015	1.00	\$173	\$173	\$0.00	0.00	227	1 Tenant Space	PA TRM	PA TRM	Co Assumption
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	15	3,596	0.091	1.035	0.54	\$3,600	\$3,600	\$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	Weatherization	WARM Plus	13	1,248	0.122	0.224	1.00	\$1,275	\$1,275	\$0.00	0.00	281	Per HH	PA TRM	Actuals	Co Assumption
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	13	1,000	0.100	0.200	1.00	\$1,033	\$1,033	\$0.00	0.00	385	Per HH	PA TRM	Actuals	Co Assumption
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Washer - LI	14	112	0.017	0.017	0.59	\$36	\$28	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	14	75	0.010	0.008	0.59	\$0	\$22	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	11	41	0.006	0.004	0.59	\$0	\$12	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	14	74	0.010	0.010	0.59	\$206	\$27	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	14	33	0.004	0.005	0.59	\$206	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	9	172	0.019	0.025	0.59	\$39	\$32	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	9	13	0.022	0.000	0.59	\$95	\$17	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	12	148	0.028	0.000	0.59	\$0	\$34	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	10	49	0.008	0.013	0.59	\$79	\$12	\$0.00	0.00	381	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	14	145	0.021	0.021	0.59	\$242	\$35	\$0.00	0.13	1,764	1 Unit	PA TRM	Co Assumption	Co Assumption
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	15	20	0.003	0.003	0.59	\$14	\$12	\$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mktplace) - LI	8	14	0.000	0.000	0.59	\$3	\$3	\$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mktplace) - LI	10	13	0.000	0.000	0.59	\$1	\$3	\$0.00	0.00	0.00	100 Light String	-	-	-
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	5	113	0.013	0.016	0.59	\$41	\$20	\$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	8	20	0.003	0.003	0.59	\$25	\$12	\$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mktplace) - LI	15	20	0.003	0.003	0.59	\$14	\$10	\$0.00	0.00	0.00	Per 4' Unit	-	-	-
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	15	567	0.074	0.102	0.54	\$1,148	\$450	\$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	10	1,960	0.207	0.345	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	10	231	0.024	0.041	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	0	0	0.000	0.000	0.00	\$0	\$1,000	\$0.00	0.00	0.00	-	-	-	-
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	1	66	0.008	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	1	94	0.010	0.010	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	1	73	0.009	0.009	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	1	52	0.006	0.006	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	1	58	0.002	0.002	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	1	150	0.010	0.008	1.00	\$0	\$0	\$0.00	0.00	0.00	Per HH	PA TRM	Co Assumption	Co Assumption
Low Income Energy Efficiency Program	LI - New Homes	NC -Townhouse and duplex units - LI	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Townhouse and Duplex	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	14	1,538	0.181	0.283	0.72	\$2,803	\$800	\$0.00	0.00	0.00	NC Two on Two Cond Units	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	14	2,367	0.278	0.436	0.72	\$2,803	\$1,100	\$0.00	0.00	0.00	NC Single Family Detached	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise - LI	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	14	1,657	0.195	0.305	0.72	\$2,803	\$650	\$0.00	0.00	0.00	NC Mfg Housing	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	14	1,420	0.167	0.262	0.72	\$2,803	\$625	\$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily-Res	MF - Tenant - DI - Res - LI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
Low Income Energy Efficiency Program	LI - Multifamily-Res	MF - Common - DI - Res - LI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily-Res	MF - Tenant - Prescriptive - Res - LI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily-Res	MF - Common - Prescriptive - Res - LI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily-Res	MF - Tenant - Custom - Res - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily-Res	MF - Common - Custom - Res - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 <=5.4 Tn - SCI	15	269	0.125	0.000	0.66	\$2,088	\$67	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	PA IC DB

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FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBtu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	15	1,409	0.657	0.000	0.66	\$1,860	\$352	\$0.00	0.00	0.00	1- 11 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >=20 Tn - SCI	15	1,607	0.749	0.000	0.66	\$709	\$402	\$0.00	0.00	0.00	1- 20 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	15	666	0.132	0.136	0.66	\$556	\$167	\$0.00	0.00	0.00	1 - 5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	15	1,920	0.263	0.481	0.66	\$31,108	\$480	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP - SCI	15	354	0.054	0.085	0.66	\$711	\$89	\$0.00	0.00	0.00	1-1.5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	15	83	0.039	0.000	0.66	\$169	\$21	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	15	155	0.039	0.025	0.66	\$140	\$39	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner- SCI	9	24	0.040	0.000	0.66	\$95	\$6	\$0.00	0.00	0.00	1-1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	11	204	0.017	0.000	0.66	\$76	\$51	\$0.00	6.87	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom - SCI	15	100,000	10.000	5.000	0.66	\$40,520	\$25,000	\$0.00	0.00	0.00	1 Project	PA TRM	Co Assumption	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	15	282	0.000	0.005	0.66	\$66	\$70	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	3	296	0.105	0.001	0.66	\$438	\$74	\$0.00	0.00	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	5	202	0.026	0.014	0.66	\$395	\$51	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	8	106	0.017	0.014	0.66	\$53	\$8	\$0.00	-0.10	0.00	1 unit controller	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	8	1	0.000	0.000	0.66	\$1	\$0	\$0.00	0.00	0.00	Per sq-ft of building lighting controlled	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	14	172	0.028	0.023	0.66	\$207	\$14	\$0.00	-0.15	0.00	1- 4 lamp trougher	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	15	210	0.024	0.024	0.66	\$69	\$17	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	14	414	0.013	0.067	0.66	\$412	\$33	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	14	586	0.095	0.077	0.66	\$466	\$47	\$0.00	-0.53	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	14	394	0.064	0.052	0.66	\$430	\$32	\$0.00	-0.35	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	14	252	0.000	0.030	0.66	\$197	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzer Light - SCI	8	253	0.036	0.033	0.66	\$59	\$20	\$0.00	-0.23	0.00	1 Door	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzer Occupancy Sensor - SCI	8	76	0.011	0.010	0.66	\$53	\$6	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	14	100,000	16.150	13.147	0.66	\$39,800	\$8,000	\$0.00	-90.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	14	500,000	80.752	65.736	0.66	\$198,999	\$40,000	\$0.00	-450.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	14	21	0.004	0.003	0.66	\$31	\$2	\$0.00	-0.02	0.00	1- Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTU/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	14	293	0.060	0.040	0.66	\$244	\$23	\$0.00	-0.26	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	14	83	0.017	0.011	0.66	\$122	\$7	\$0.00	-0.07	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	8	60	0.012	0.008	0.66	\$53	\$5	\$0.00	-0.05	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frizz -Reach In Special Doors (low/No Anti Swt)- SCI	12	206	0.024	0.024	0.66	\$504	\$19	\$0.00	0.00	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	15	1,417	0.162	0.162	0.66	\$353	\$128	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	15	818	0.077	0.077	0.66	\$767	\$74	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	12	537	0.061	0.061	0.66	\$683	\$48	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	12	2,332	0.266	0.266	0.66	\$453	\$210	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	9	79	0.000	0.000	0.66	\$79	\$7	\$0.00	0.00	0.00	Per LF of Case	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls - SCI	12	673	0.023	0.018	0.66	\$1,119	\$61	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	4	37	0.007	0.007	0.66	\$10	\$3	\$0.00	0.00	0.00	Per SF	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	10	428	0.080	0.051	0.66	\$381	\$38	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	5	375	0.000	0.000	0.66	\$234	\$34	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	12	5,276	0.983	0.629	0.66	\$2,538	\$475	\$0.00	0.00	0.00	1- unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	12	1,187	0.221	0.142	0.66	\$1,903	\$107	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	12	2,739	0.510	0.327	0.66	\$1,289	\$247	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	12	545	0.101	0.065	0.66	\$550	\$49	\$0.00	0.00	0.00	1-15 CU. FT. unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	12	4,682	0.872	0.558	0.66	\$1,899	\$421	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	12	2,554	0.476	0.304	0.66	\$1,118	\$230	\$0.00	0.00	0.00	1-full size unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	10	3,765	0.701	0.449	0.66	\$1,540	\$339	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	10	23	0.004	0.003	0.66	\$574	\$2	\$0.00	0.00	0.00	1-Two well unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	8	1,841	0.476	0.260	0.66	\$113	\$166	\$0.00	0.00	14,016	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTU/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	10	22	0.002	0.002	0.59	\$143	\$40	\$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer - SCI	14	112	0.017	0.017	0.59	\$36	\$26	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	14	74	0.010	0.010	0.59	\$206	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	10	231	0.024	0.041	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	12	148	0.028	0.000	0.59	\$0	\$32	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	7	2,840	0.324	0.324	0.66	\$47	\$350	\$0.00	0.00	0.00	1 - 5kVA Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	7	36	0.004	0.004	0.66	\$21	\$5	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	10	1,938	0.329	0.329	0.66	\$9,025	\$414	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	15	797	0.136	0.136	0.66	\$557	\$114	\$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	13	656	0.129	0.000	0.66	\$226	\$82	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	15	5,055	0.859	0.910	0.66	\$5,840	\$727	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	15	8,600	4.300	0.000	0.66	\$5,608	\$1,398	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	10	1,004	0.000	0.400	0.66	\$553	\$150	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	15	10,076	1.411	1.411	0.66	\$6,717	\$1,360	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	5	12,985	33.760	0.000	0.66	\$13,745	\$5,519	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	15	100,000	10.000	10.000	0.66	\$40,520	\$12,500	\$0.00	0.00	0.00	1 Unit	Actuals	Co Assumption	Actuals
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	15	738	0.000	0.000	0.66	\$17	\$15	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Utility Owned(EMU))	15	252	0.000	0.030	0.66	\$197	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Customer Owned(MU))	15	252	0.000	0.030	0.66	\$197	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	15	100,000	8.168	4.387	0.61	\$40,520	\$9,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	15	100,000	11.126	11.126	0.61	\$46,285	\$9,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	15	100,000	9.457	7.566	0.61	\$40,520	\$9,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	15	1,151	0.285	0.041	0.61	\$1,928	\$150	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	Actuals	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	15	10,000,000	1114.156	1114.156	0.61	\$4,529,326	\$900,000	\$0.00	-52,507.22	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	15	100,000	3.884	0.777	1.00	\$149,388	\$20,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	15	100,000	11.411	2.282	1.00	\$29,997	\$20,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1	0	0.000	0.000	1.00	\$1,225	\$1,250	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Tune Up - SCI	13	51,851	6.780	5.555	0.98	\$37,783	\$16,592	\$0.00	0.00	0.00	1 Project	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Virtual/Meter Data Commissioning - SCI	2	10,000	0.800	0.667	0.98	\$1,173	\$1,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Co Assumption	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Retrocommissioning - SCI	3	10,000	0.800	0.667	0.98	\$5,864	\$1,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Operations Training - SCI	13	50,000	6.667	3.333	0.98	\$6,000	\$5,000	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Customer Concierge - SCI	1	0	0.000	0.000	1.00	\$3,500	\$1,000	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Energy Consultation - SCI	1	0	0.000	0.000	1.00	\$1,225	\$1,000	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Audits - SCI	1	0	0.000	0.000	1.00	\$1,225	\$1,000	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	1	0	0.200	0.200	0.00	\$0	\$155	\$0.00	0.00	0.00	Company Assumption	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	1	0	2.350	4.700	0.00	\$0	\$810	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	1	0	0.300	0.300	0.00	\$0	\$45	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	1	0	0.326	0.326	0.00	\$0	\$0	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	1	0	75.000	75.000	0.00	\$0	\$15,000	\$0.00	0.00	0.00	Vendor	-	-	-
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	0	0	0.000	0.000	0.00	0	\$0	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	13	117	0.013	0.017	1.00	\$175	\$150	\$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	14	11,900	1.460	1.520	1.00	\$21,518	\$3,500	\$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	10	231	0.024	0.041	0.59	\$1,915	\$100	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	14	112	0.017	0.017	0.59	\$36	\$50	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	15	100,000	11.126	11.126	0.61	\$46,285	\$7,500	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 <=5.4 Tn - LCI	15	269	0.125	0.000	0.66	\$2,088	\$67	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	15	1,409	0.657	0.000	0.66	\$1,860	\$352	\$0.00	0.00	0.00	1- 11 ton unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBtu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >=20 Tn - LCI	15	1,607	0.749	0.000	0.66	\$709	\$402	\$0.00	0.00	0.00	1- 20 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	15	666	0.132	0.136	0.66	\$556	\$167	\$0.00	0.00	0.00	1 - 5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	15	1,920	0.263	0.481	0.66	\$31,108	\$480	\$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP - LCI	15	354	0.054	0.085	0.66	\$711	\$89	\$0.00	0.00	0.00	1-1.5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	15	83	0.039	0.000	0.66	\$169	\$21	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	15	155	0.039	0.025	0.66	\$140	\$39	\$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner- LCI	9	24	0.040	0.000	0.66	\$95	\$6	\$0.00	0.00	0.00	1-1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	11	204	0.017	0.000	0.66	\$76	\$51	\$0.00	6.87	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom - LCI	15	100,000	10.000	5.000	0.66	\$40,520	\$25,000	\$0.00	0.00	0.00	1 Project	PA TRM	Co Assumption	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	15	282	0.000	0.005	0.66	\$66	\$70	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	3	296	0.105	0.001	0.66	\$438	\$74	\$0.00	0.00	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	5	202	0.026	0.014	0.66	\$395	\$51	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	8	106	0.017	0.014	0.66	\$53	\$8	\$0.00	-0.10	0.00	1 unit controller	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	8	1	0.000	0.000	0.66	\$1	\$0	\$0.00	0.00	0.00	Per sq-ft of building lighting controlled	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	14	172	0.028	0.023	0.66	\$207	\$14	\$0.00	-0.15	0.00	1- 4 lamp trougher	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	15	210	0.024	0.024	0.66	\$69	\$17	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	14	414	0.013	0.067	0.66	\$412	\$33	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	14	586	0.095	0.077	0.66	\$466	\$47	\$0.00	-0.53	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	14	394	0.064	0.052	0.66	\$430	\$32	\$0.00	-0.35	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	14	252	0.000	0.030	0.66	\$197	\$20	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzr Light - LCI	8	253	0.036	0.033	0.66	\$59	\$20	\$0.00	-0.23	0.00	1 Door	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzr Occupancy Sensor - LCI	8	76	0.011	0.010	0.66	\$53	\$6	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	14	100,000	16.150	13.147	0.66	\$39,800	\$8,000	\$0.00	-90.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	14	500,000	80.752	65.736	0.66	\$198,999	\$40,000	\$0.00	-450.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	14	21	0.004	0.003	0.66	\$31	\$2	\$0.00	-0.02	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	14	293	0.060	0.040	0.66	\$244	\$23	\$0.00	-0.26	0.00	1- Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBtu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	14	83	0.017	0.011	0.66	\$122	\$7	\$0.00	-0.07	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS-LCI	8	60	0.012	0.008	0.66	\$53	\$5	\$0.00	-0.05	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	12	206	0.024	0.024	0.66	\$504	\$19	\$0.00	0.00	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	15	1,417	0.162	0.162	0.66	\$353	\$128	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	15	818	0.077	0.077	0.66	\$767	\$74	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	12	537	0.061	0.061	0.66	\$683	\$48	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	12	2,332	0.266	0.266	0.66	\$453	\$210	\$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	9	79	0.000	0.000	0.66	\$79	\$7	\$0.00	0.00	0.00	Per LF of Case	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	12	673	0.023	0.018	0.66	\$1,119	\$61	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	4	37	0.007	0.007	0.66	\$10	\$3	\$0.00	0.00	0.00	Per SF	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	10	428	0.080	0.051	0.66	\$381	\$38	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	5	375	0.000	0.000	0.66	\$234	\$34	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	12	5,276	0.983	0.629	0.66	\$2,538	\$475	\$0.00	0.00	0.00	1- unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	12	1,187	0.221	0.142	0.66	\$1,903	\$107	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	12	2,739	0.510	0.327	0.66	\$1,289	\$247	\$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	12	545	0.101	0.065	0.66	\$550	\$49	\$0.00	0.00	0.00	1-15 CU. FT. unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	12	4,682	0.872	0.558	0.66	\$1,899	\$421	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	12	2,554	0.476	0.304	0.66	\$1,118	\$230	\$0.00	0.00	0.00	1-full size unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	10	3,765	0.701	0.449	0.66	\$1,540	\$339	\$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	10	23	0.004	0.003	0.66	\$574	\$2	\$0.00	0.00	0.00	1-Two well unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	8	1,841	0.476	0.260	0.66	\$113	\$166	\$0.00	0.00	14,016	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	5	757	0.084	0.060	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	6	757	0.103	0.077	0.46	\$60	\$60	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	3	106	0.262	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	4	491	0.173	0.000	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	5	392	0.053	0.040	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	5	104	0.014	0.011	0.46	\$30	\$30	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA																
Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit (\$/Unit/Yr)	Gas Savings (MMBTU/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	10	22	0.002	0.002	0.59	\$143	\$40	\$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer - LCI	14	112	0.017	0.017	0.59	\$36	\$26	\$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	14	74	0.010	0.010	0.59	\$206	\$25	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	14	8	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	10	231	0.024	0.041	0.59	\$1,685	\$450	\$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	11	10	0.001	0.001	0.59	\$0	\$2	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	12	148	0.028	0.000	0.59	\$0	\$32	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	7	2,840	0.324	0.324	0.66	\$47	\$350	\$0.00	0.00	0.00	1 - 5kVA Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	15	100,000	9.709	8.766	0.61	\$47,090	\$11,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	15	100,000	11.416	11.416	0.61	\$91,960	\$11,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	15	100,000	9.457	7.566	0.61	\$40,520	\$11,000	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	15	1,151	0.285	0.041	0.61	\$1,928	\$127	-\$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	15	10,000,000	1114.156	1114.156	0.61	\$4,529,326	\$1,100,000	\$0.00	-\$2,507.22	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	15	100,000	14.000	11.000	1.00	\$149,388	\$49,960	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	15	100,000	11.411	2.282	1.00	\$29,997	\$49,960	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1	0	0.000	0.000	1.00	\$1,225	\$1,250	\$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Virtual/Meter Data Commissioning - LCI	2	10,000	0.800	0.667	0.98	\$1,173	\$1,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Co Assumption	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Retrocommissioning - LCI	3	100,000	8.000	6.667	0.61	\$58,637	\$10,000	\$0.00	0.00	0.00	1 Project	Co Assumption	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Building Operations Training - LCI	13	50,000	6.667	3.333	0.98	\$6,000	\$5,000	\$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Customer Concierge - LCI	1	0	0.000	0.000	1.00	\$3,500	\$3,500	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Energy Management - LCI	Energy Consultation - LCI	1	0	0.000	0.000	1.00	\$1,750	\$3,500	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Energy Management - LCI	Audits - LCI	1	0	0.000	0.000	1.00	\$1,750	\$3,500	\$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	1	0	0.200	0.200	0.00	\$0	\$155	\$0.00	0.00	0.00	Company Assumption	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	1	0	2.350	4.700	0.00	\$0	\$810	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	1	0	200.000	200.000	0.00	\$0	\$40,000	\$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	0	0	0.000	0.000	0.00	0	\$0	\$0.00	0.00	0.00	-	-	-	-

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION FOR  
APPROVAL OF THE PHASE V ENERGY AND CONSERVATION PLAN OF  
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

**DOCKET NO. M-2025-3057327**

**Direct Testimony  
of  
Edward C. Miller**

**LIST OF TOPICS ADDRESSED**

**The EE&C Plan  
Phase IV EE&C Targets and Spending Limitations  
Summary of the Predecessor Companies' Phase IV EE&C Plans and Programs  
Administration and Implementation of the Proposed Plan and Programs  
The Use of Conservation Service Providers and the Company's Competitive  
Bidding/Contracting Process  
Compliance with Statutory and Regulatory Requirements**

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**DIRECT TESTIMONY  
OF  
EDWARD C. MILLER**

1 **I. INTRODUCTION AND BACKGROUND**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Edward C. Miller, and my business address is 800 Cabin Hill Drive,  
4 Greensburg, PA 15601.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by FirstEnergy Service Company, which is a direct subsidiary of  
7 FirstEnergy Corp. (“FirstEnergy”), as Manager, Compliance and Development in the  
8 Energy Efficiency Department. I report to the Director, Energy Efficiency Implementation.  
9 I am responsible for compliance and development activities related to energy efficiency  
10 and conservation (“EE&C”) programs for the FirstEnergy utilities in Ohio, Maryland, New  
11 Jersey, Pennsylvania, and West Virginia. This primarily involves the development of  
12 programs and filings to meet the FirstEnergy utilities’ EE&C and/or peak demand  
13 reduction (“PDR”) requirements and obligations.

14 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

15 A. I hold a Bachelor of Science degree in Electrical Engineering from the University of  
16 Pittsburgh. For over seventeen years, I was employed by Allegheny Energy Service  
17 Corporation, the service company for Allegheny Energy Inc. (“Allegheny”), which merged  
18 in 2011 with FirstEnergy. While with Allegheny, I held various engineering, customer  
19 service, and management positions in Customer Services, Sales & Marketing, Customer  
20 Management, and Energy Efficiency. After FirstEnergy and Allegheny merged in 2011, I

1 was assigned my current position as Manager, Compliance and Development in  
2 FirstEnergy's Energy Efficiency Department.

3 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN PROCEEDINGS BEFORE THE**  
4 **PENNSYLVANIA PUBLIC UTILITY COMMISSION?**

5 A. Yes. I have provided testimony before this Commission, as well as before the Public  
6 Utilities Commission of Ohio, the West Virginia Public Service Commission, the  
7 Maryland Public Service Commission, and the New Jersey Board of Public Utilities.

8 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE RELEVANT TO**  
9 **THE DIRECT TESTIMONY YOU ARE NOW SPONSORING.**

10 A. Between 2009 and the FirstEnergy-Allegheny merger in 2011, I was involved in the  
11 development of EE&C/PDR programs and filings for the utilities formerly owned by  
12 Allegheny in Pennsylvania, Maryland, and West Virginia. Since completion of the merger,  
13 I have been involved in the same activities for the FirstEnergy utilities in West Virginia,  
14 Maryland, New Jersey, Ohio, and Pennsylvania. I was significantly involved in the  
15 development of the Phase II, Phase III and Phase IV EE&C Plans of Metropolitan Edison  
16 Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power  
17 Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively,  
18 the "Predecessor Companies"), each of which were approved by the Pennsylvania Public  
19 Utility Commission ("Commission").<sup>1</sup> I have the same responsibilities related to the EE&C

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<sup>1</sup> The Predecessor Companies' Phase II EE&C Plans were approved at Docket Nos. M-2012-2334387 (Met-Ed), M-2012-2334392 (Penelec), M-2012-2334395 (Penn Power), and M-2012-2334398 (West Penn). The Predecessor Companies' Phase III EE&C Plans were approved at Docket Nos. M-2015-2514767 (Met-Ed), M-2015-2514768 (Penelec), M-2015-2514769 (Penn Power), and M-2015-2514772 (West Penn). The Predecessor Companies' Phase IV EE&C Plans were approved at Docket Nos. M-2020-3020820 (Met-Ed), M-2020-3020821 (Penelec), M-2020-3020822 (Penn Power) and M-2020-3020823 (West Penn).

1 Plan being proposed in this proceeding (“Phase V Plan” or “Proposed Plan”). In fulfilling  
2 my responsibilities, I collaborate with energy efficiency consultants and vendors who assist  
3 with program design, implementation and the evaluation, measurement, and verification  
4 (“EM&V”) of EE&C/PDR programs.

5 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A. I am testifying on behalf of FirstEnergy Pennsylvania Electric Company (“FE PA” or the  
7 “Company”).<sup>2</sup> Further, rather than reiterating what is included in the Company’s Proposed  
8 Plan in my testimony, any references to sections of the Proposed Plan are incorporated as  
9 if fully rewritten herein.

10 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

11 A. The purpose of my testimony is to: (i) summarize the additional EE&C and PDR targets  
12 set for the Company by the Commission’s Phase V Implementation Order<sup>3</sup> and the  
13 spending limitations for each company under Act 129;<sup>4</sup> (ii) summarize and sponsor the  
14 Proposed Plan; (iii) describe the development of the Proposed Plan; (iv) describe how the  
15 Company plans the administration and implementation of the Proposed Plan and its related  
16 programs; (v) describe the Company’s competitive bidding/contracting process; and (vi)  
17 analyze whether the Proposed Plan complies with all statutory and regulatory requirements,

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<sup>2</sup> By Order entered on December 7, 2023, at Docket Nos. A-2023-3038771, *et al.*, the Commission approved the merger of the Predecessor Companies into FE PA, which became effective on January 1, 2024.

<sup>3</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Implementation Order entered June 18, 2025) (“Phase V Implementation Order”).

<sup>4</sup> Act 129 of 2008 was signed into law on October 15, 2008, and became effective on November 14, 2008. Among other things, the Act created an EE&C Program, codified in the Pennsylvania Public Utility Code at Sections 2806.1 and 2806.2, 66 Pa.C.S. §§ 2806.1 and 2806.2.

1 including the Commission’s Phase V Implementation Order and its 2026 Total Resource  
2 Cost (“TRC”) Test Order.<sup>5</sup>

3 **Q. PLEASE IDENTIFY THE OTHER WITNESS WHO WILL BE PROVIDING**  
4 **TESTIMONY IN THIS PROCEEDING.**

5 A. Ms. Stephanie R. Zieger, an Analyst in Rates and Regulatory Affairs – Pennsylvania, will  
6 discuss the Company’s proposed cost recovery mechanism that will be used to recover the  
7 costs incurred by the Company during the planning and implementation of the Company’s  
8 Phase V Plan. She will also explain how the Company will recover final costs incurred  
9 under the Company’s Phase IV Plan.

10 **Q. HOW IS THE PHASE V PLAN ORGANIZED?**

11 A. The Company’s Phase V Plan, which is included as Attachment A to the Petition, is  
12 organized consistent with the filing format and template outlined by the Commission in its  
13 September 8, 2025 Secretarial Letter issued in Docket No. Docket No. M-2025-3052826.  
14 The organization of the Phase V Plan is set forth in the Table of Contents and addresses all  
15 topics identified in the Commission’s template.

16 **Q. WHAT WAS YOUR ROLE IN THE DEVELOPMENT OF THE PHASE V PLAN?**

17 A. My role in the development of the Proposed Plan was to manage the creation of the Phase  
18 V EE&C programs and budgets; evaluate the cost-effectiveness of the Proposed Plan  
19 consistent with the Commission’s requirements; and finalize the Proposed Plan’s  
20 components to achieve the goals of Act 129 given the regulatory requirements, spending  
21 limits, and targeted reductions.

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<sup>5</sup> 2026 Total Resource Cost Test Final Order, Docket No. M-2024-3048998 (Order entered November 7, 2024) (“2026 TRC Test Order”).

1 **Q. WAS THE PROPOSED PLAN DEVELOPED UNDER YOUR DIRECTION,**  
2 **SUPERVISION, AND CONTROL?**

3 A. Yes. The Proposed Plan was developed under my direction. To guide the development of  
4 the Proposed Plan, I primarily reviewed the requirements of the Commission’s Phase V  
5 Implementation Order, the Commission’s Order regarding the 2026 Technical Reference  
6 Manual (“TRM”),<sup>6</sup> and the 2026 TRC Test Order.

7 **Q. PLEASE DESCRIBE FIRSTENERGY’S ENERGY EFFICIENCY GROUP AND**  
8 **ITS ROLE IN THE DEVELOPMENT OF THE PROPOSED PLAN.**

9 A. The FirstEnergy Energy Efficiency group is made up of approximately 50 employees with  
10 a broad spectrum of skills. This group is responsible for ensuring compliance with all state  
11 EE&C and PDR requirements and the successful implementation of EE&C and PDR  
12 programs offered throughout the FirstEnergy footprint. They also are responsible for the  
13 EM&V of program results as well as the tracking and reporting of the same to management  
14 and as required by the various state regulatory agencies. A more detailed description of this  
15 group, as well as a management team organization chart, is included in Section 4.2 of the  
16 Phase V Plan.

17 The Compliance and Development team is a subgroup within the Energy Efficiency  
18 Group. It consists of internal FirstEnergy employees and is primarily responsible for the  
19 development of not only the Phase V Plan, but also other EE&C and PDR plans offered by  
20 the Company’s sister utilities in other states. When practical, this team designs programs  
21 consistently throughout the FirstEnergy footprint to avoid market confusion and to create

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<sup>6</sup> 2026 Technical Reference Manual Final Order, Docket No. M-2023-3044491(entered September 12, 2024).

1 economies of scale in both program administration and EM&V activities. When designing  
2 EE&C and PDR programs, this group relies not only on its expertise and experience, but  
3 also on the experience and expertise brought by evaluators, the program implementation  
4 team, program implementers, consultants and interested stakeholders.

5 **Q. PLEASE GENERALLY DESCRIBE THE COMPANY'S PROPOSED PLAN**  
6 **BEING FILED IN THIS PROCEEDING.**

7 A. The Company's Phase V Plan is, in essence, an extension of the successful programs and  
8 measures included in the Predecessor Companies' Phase IV EE&C Plans, with the addition  
9 of new program measures and a revision of some existing programs and measures. There  
10 is one significant change between the Phase IV and Phase V Plans, which is the need to  
11 achieve the peak demand reduction target during daily Winter (January and February) and  
12 Summer (June, July and August) performance periods, through coincident peak savings  
13 from energy efficiency measures and demand response measures.

14 **Q. WHAT WERE THE COMPANY'S OVERALL OBJECTIVES WHEN**  
15 **DEVELOPING THE PROPOSED PLAN?**

16 A. When developing the Phase V Plan, the Company strove to design a plan that: (i) achieves  
17 all of the EE&C and PDR targets, including those for the low-income sector carve out; (ii)  
18 includes at least one program for each of the major customer segments; (iii) includes at  
19 least one comprehensive program for each of the residential sector and the non-residential  
20 sector; and (iv) balances costs with results. The Company's Phase V Plan accomplishes  
21 each of these objectives.

1 **II. PHASE V EE&C TARGETS AND SPENDING LIMITATIONS**

2 **Q. DID THE COMMISSION ADOPT ADDITIONAL INCREMENTAL EE&C AND**  
 3 **PDR TARGETS FOR THE COMPANY?**

4 A. Yes. The Commission adopted new energy savings and coincident peak demand reduction  
 5 targets for the Company. The targets for the period June 1, 2026 through May 31, 2031  
 6 (“Phase V Period”) are set forth in the Commission’s Phase V Implementation Order.

7 **Q. WHAT ARE THE OVERALL MEGAWATT-HOUR (“MWH”) AND MEGAWATT**  
 8 **(“MW”) REDUCTION TARGETS THAT THE COMPANY MUST ACHIEVE**  
 9 **PURSUANT TO ACT 129 AND THE COMMISSION’S PHASE V**  
 10 **IMPLEMENTATION ORDER?**

11 A. The following table shows the MWh target, which represent the total incremental savings,  
 12 and the MW target, which represents the required amount of coincident peak MW  
 13 reductions, that are required to be met with energy efficiency or demand response measures  
 14 by the Company for the Phase V Period.

EDC	Phase V Target MWh	Phase V Target MW
FE PA	1,097,605	191.0

15  
 16 **Q. WHAT ARE THE ANNUALIZED SPENDING LIMITS FOR THE**  
 17 **DEVELOPMENT AND IMPLEMENTATION OF THE PHASE V PLAN?**

18 A. Act 129 specifies that “[t]he total cost of any plan required under this section shall not  
 19 exceed 2% of the electric distribution company’s total annual revenue as of December 31,

1 2006.”<sup>7</sup> Per Act 129, the 5-year spending limit as established by the Commission for the  
2 Company based on this requirement is \$390,320,135.<sup>8</sup>

3 **Q. HOW MUCH HAS BEEN BUDGETED FOR THE COMPANY’S PROGRAMS?**

4 A. The proposed budgets for each program included in the Company’s Phase V Plan can be  
5 found in Appendix B, Table 10 of the Proposed Plan. The total portfolio budget for the  
6 Company is \$390,319,523 and is also summarized in Appendix B, Tables 5 and 13 of Phase  
7 V Plan.

8 **III. DEVELOPMENT OF THE PROPOSED PLAN**

9 **Q. PLEASE DESCRIBE GENERALLY HOW THE COMPANY’S PHASE V PLAN**  
10 **WAS DEVELOPED.**

11 A. Sections 1.2 and 3.1 of the Phase V Plan describe how the FirstEnergy Plan development  
12 team (“EE&C Team”) designed the Company’s Phase V Plan. Generally, the EE&C Team  
13 reviewed the existing programs and measures in the Predecessor Companies’ Phase IV  
14 Plans to assess implementation and performance to date. Programs and measures offered  
15 by other FirstEnergy affiliate utilities and non-FirstEnergy utilities were reviewed for  
16 consideration. Further, the EE&C Team reviewed the Energy Efficiency and Peak Demand  
17 Reduction Market Potential Study and the Demand Response Potential Study (collectively  
18 the Market Potential Studies (“MPS”),<sup>9</sup> the 2026 TRM, comments filed regarding the  
19 Commission’s Tentative Implementation Order,<sup>10</sup> and consulted with its implementation

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<sup>7</sup> 66 Pa.C.S. § 2806.1(m).

<sup>8</sup> Phase V Implementation Order at 34.

<sup>9</sup> *Act 129 Statewide Evaluator Energy Efficiency and Peak Demand Reduction Market Potential and Demand Response Potential Studies Secretarial Letter*, Docket No. M-2025-3052827 (served February 21, 2025).

<sup>10</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Tentative Implementation Order entered February 20, 2025).

1 team, implementation vendors, and the Company’s energy efficiency consultant and  
2 independent EM&V contractor, all in an effort to identify additional opportunities. The  
3 EE&C Team considered the programs and measures and completed initial modeling, taking  
4 into account: (i) implementation experience and actual results through existing programs;  
5 (ii) program benefit and cost assumptions; (iii) input from stakeholders, consultants and  
6 vendors; (iv) the 2026 TRM; (v) the MPS; and (vi) other industry sources. Based on this  
7 analysis and evaluation, the EE&C Team selected the measures to be included in the Phase  
8 V Plan, estimated participation levels with corresponding program and measure savings  
9 results, and developed program budgets within the budget constraints established under  
10 Act 129’s statutory 2% spending cap.

11 **Q. PLEASE DESCRIBE THE PROCESS USED BY THE COMPANY DURING THE**  
12 **DEVELOPMENT OF THE PROPOSED PLAN TO INCORPORATE IDEAS**  
13 **FROM INTERESTED PARTIES.**

14 A. Throughout the development of the Phase V Plan, the Company sought input and insight  
15 concerning potential program offerings through stakeholder meetings and informal  
16 discussions. In addition to regular meetings with Phase IV program implementers, the  
17 Company held stakeholder meetings on different aspects of the Proposed Plan design in  
18 July 2025 and September 2025. The Company also participated in numerous meetings with  
19 interested parties, current and potential Conservation Service Providers (“CSPs”) and  
20 vendors. The Company further involved stakeholders and considered stakeholder input  
21 through consideration of stakeholder comments to the Tentative Implementation Order and  
22 outreach with both program allies and other interested parties. Input from this broad group  
23 of interested parties was factored into the various programs’ design.

1 **Q. DID THE COMPANY DISCUSS DEVELOPMENT OF THE PHASE V PLAN**  
2 **WITH INTERESTED STAKEHOLDERS?**

3 A. Yes. During the development of the Phase V Plan, the Company discussed and sought  
4 feedback on the proposed EE&C programs from stakeholders through several methods. As  
5 noted above, stakeholder meetings discussing the Proposed Plan’s development and  
6 program design were held in July 2025 and September 2025. At the July 2025 stakeholder  
7 meeting, the Company communicated its overall approach to develop the Phase V Plan,  
8 that it had started development and was in the process of researching program and measure  
9 opportunities, discussed potential changes, opportunities and strategies that were under  
10 consideration; input was also solicited from stakeholders.

11 At the September 2025 stakeholder meeting, the Company provided an update on  
12 the in-progress development of the Phase V Plan, presented a draft plan including the  
13 program component portfolio, discussed key changes, provided a listing of draft program  
14 components and measures and solicited input from stakeholders. The Company also  
15 participated in numerous meetings with interested parties, current and potential CSPs and  
16 vendors to discuss input regarding development of the Phase V Plan.

17 **Q. WILL THE COMPANY CONTINUE TO UTILIZE THE STAKEHOLDER**  
18 **PROCESS IN PHASE V?**

19 A. Yes. During the Phase V Period, the Company intends to conduct annual stakeholder  
20 meetings where the Company will review the performance, progress, and operation of the  
21 programs and will highlight any significant issues encountered and solicit stakeholder  
22 input. The Company also plans to continue to hold regular meetings with its Phase V

1 program implementers and to conduct outreach with both program allies and other  
2 interested parties on an ongoing basis during the Phase V Period.

3 **IV. SUMMARY OF THE COMPANY’S PHASE V PLAN AND PROGRAMS**

4 **Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE PHASE V PLAN.**

5 A. The Company’s Phase V Plan includes a portfolio of EE&C programs, program  
6 components, and measures that are designed to achieve the specific consumption and peak  
7 demand reduction targets during the Phase V Period as established by the Commission in  
8 its Phase V Implementation Order. Like the Predecessor Companies’ prior EE&C Plans,  
9 the proposed Phase V Plan includes a portfolio of EE&C programs targeted to a variety of  
10 customer segments, including: (i) residential (with programs specific to the low-income  
11 sector); (ii) small commercial and industrial (“C&I”), including government, non-profit,  
12 and institutional (“GNI”) customers; and (iii) large C&I, also including GNI customers. In  
13 addition, the proposed Phase V Plan also includes new Daily Load Shifting (“DLS”) and  
14 PDR program components for the Residential, Small Commercial and Industrial (“SCI”)  
15 and Large Commercial and Industrial (“LCI”) sectors to supplement the coincident peak  
16 demand reductions from the EE&C programs.

17 The Phase V Plan also includes Front of the Meter (“FTM”) program components  
18 in the Residential, SCI and LCI sectors to target and potentially include FTM EE&C  
19 measures that enhance the efficiency of the energy delivery system, reduce demand during  
20 peak hours, and help mitigate growing resource adequacy concerns in the Commonwealth.

21 The Phase V Plan is generally an extension and evolution of the programs and measures  
22 included in the Predecessor Companies’ Phase IV Plans, with modifications to the  
23 programs, the elimination of program components and measures, and the addition of new

1 program components and measures such as DLS and PDR, and FTM. Also, like the  
2 Predecessor Companies' Phase IV Plans, the Phase V Plan continues the use of incentive  
3 level ranges. Under this approach, the Company has the ability to adjust rebate levels  
4 within the approved range as market conditions warrant, provided that these adjustments  
5 do not increase program costs beyond approved budgets.

6 **Q. WHY DOES THE COMPANY BELIEVE THAT A STRATEGY TO CONTINUE A**  
7 **NUMBER OF THE PHASE IV PROGRAMS INTO PHASE V WILL BE**  
8 **SUCCESSFUL IN MEETING THE EE&C REDUCTION TARGETS?**

9 A. The Predecessor Companies' Phase IV Plans are a comprehensive portfolio of proven and  
10 successful EE&C programs that offer a solid foundation on which to build the Phase V  
11 Plan. Continuing the Phase IV programs not only allows the Company to build upon the  
12 momentum gained during the Phase IV Period through program implementation, customer  
13 education, and marketing efforts, but also allows the Company to leverage the experience  
14 as well as the implementation practices, procedures, and systems that were put in place to  
15 support the operation of the programs. Leveraging the Phase IV programs also avoids the  
16 potential for market confusion and disruption that could result from unnecessarily changing  
17 program portfolios between phases.

18 **Q. YOU INDICATED THAT THERE WERE MODIFICATIONS TO THE PHASE IV**  
19 **PROGRAMS AND CERTAIN MEASURES WERE EITHER ELIMINATED**  
20 **FROM OR ADDED TO THE PHASE V PLAN. WOULD YOU PLEASE**

1           **SUMMARIZE THE DIFFERENCES BETWEEN THE PREDECESSOR**  
2           **COMPANIES' PHASE IV PLANS AND THE PHASE V PLAN?**

3    A.     From a practical perspective, the significant changes between the Predecessor Companies'  
4           Phase IV Plans and the Phase V Plan are: (i) the shift of the residential and residential low-  
5           income Energy Efficiency Kits and School Education program offerings to marketing and  
6           outreach initiatives; (ii) the addition of DLS, PDR, and FTM program components; (iii)  
7           and the expansion of the Phase IV program offerings to include new program components  
8           and measures such as incentives targeting the conversion of resistive electric space and  
9           water heating to heat pumps, solar photovoltaic ("PV"), and combined heat and power  
10          projects to target these installations in alignment with MPS and the Company's targets per  
11          the Phase V Implementation Order.

12                 Further, the Company's Phase V Plan shifts the Predecessor Companies' Phase IV  
13           Energy Management - Building Tune-up – LCI component to its Custom-LCI program  
14           component to better tailor this offering for LCI customers. In addition, the Company  
15           consolidated the Phase IV Residential Energy Efficient Homes and Residential Energy  
16           Efficient Products Programs into the new Residential Energy Solutions Program in order  
17           to support increased cross promotion of these offerings to customers to achieve greater  
18           participation. A summary listing of all key changes from the Predecessor Companies'  
19           Phase IV Plan programs to the Phase V Plan program offerings is included in Sections 3.2,  
20           3.2.1, 3.3, and 3.4 of the Proposed Plan.

1 **Q. WHAT RESIDENTIAL PROGRAMS IS THE COMPANY PROPOSING FOR**  
2 **PHASE V?**

3 A. The Company is proposing a Residential Energy Solutions Program for residential  
4 customers. This program is summarized in FE PA Table 1, Appendix B, Table 6, and is  
5 fully described in Section 3.2 of the Phase V Plan. The EE&C program components are  
6 designed to address both educational and initial cost barriers tapping a variety of delivery  
7 channels and vendors to support customer engagement, education, and participation. The  
8 residential program includes direct or targeted program components that engage customers  
9 and serves as a gateway for other program offerings.

10 These cross-functional offerings serve the dual purpose of providing customers  
11 with energy efficiency education as well as information regarding other program services  
12 and opportunities in which they can participate. The program incorporates strategies to  
13 change behaviors and includes incentives to help offset the initial cost barrier to encourage  
14 the participation of all residential customers. The program also provides opportunities for  
15 prescriptive equipment (*e.g.* Products, Appliance Recycling, etc.) and direct install, so that  
16 customers who are unable or unwilling to undertake whole-home/comprehensive solutions  
17 are still able to participate and increase efficiency. Further, the program offers  
18 opportunities for customers interested in whole-home/comprehensive solutions (*e.g.*  
19 Comprehensive Audits & Retrofits), which encourage customers to consider a holistic  
20 approach to energy efficiency in their homes.

21 In addition to the EE&C program components, the Residential Energy Solutions  
22 Program also includes a DLS and PDR program component that supplements the  
23 coincident peak load reductions which result from EE&C programs with additional peak

1 load reductions during certain daily peak hours for both the Summer and Winter periods.  
2 These include a combination of daily load shifting strategies and event-based demand  
3 response. Initiatives include, but are not limited to, behavioral daily load shifting,  
4 behavioral demand response, and connected device load shifting and demand response.  
5 Connected device load shifting strategies include technologies such as, but are not limited  
6 to, connected thermostats, battery storage, and electric vehicles.

7 **Q. DOES THE PHASE V PLAN INCLUDE PROGRAMS THAT ARE DESIGNED**  
8 **FOR RESIDENTIAL LOW-INCOME CUSTOMERS?**

9 A. Yes. The Company is proposing a Low-Income Energy Efficiency Program under which  
10 educational, prescriptive, enhanced, and comprehensive services will be offered to give  
11 low-income households more control over their energy usage and spending. The Low-  
12 Income Energy Efficiency Program is also designed with progression from general to  
13 specific in an effort to make EE&C programs and services available to all low-income  
14 customers.

15 The Company will provide targeted outreach including education, giveaways,  
16 and/or quick home energy assessments. This will include no-cost direct install measures  
17 and customized home energy reports providing low-income customers with basic energy  
18 savings measures and/or energy efficiency education, recommendations, and information  
19 regarding other services upon which they can act. Additionally, some of the enhanced low-  
20 income customer program offerings (*e.g.*, appliance rebate and turn in, multifamily) will  
21 also be targeted to help identify new low-income customers, achieve additional energy  
22 savings opportunities, or promote energy efficiency in multifamily or other low-income  
23 homes.

1           The Company also plans to achieve additional new and incremental comprehensive  
2 electric energy savings through the Weatherization program component as part of the  
3 delivery of the Company’s existing comprehensive Low-Income Usage Reduction  
4 Program (“LIURP”). This aspect of the Phase V Plan enhances and accelerates the  
5 deployment of services to LIURP-eligible households by providing additional outreach,  
6 measures, and services to achieve incremental or deeper savings or by serving additional  
7 homes. The Low-Income Energy Efficiency Program also includes a New Homes program  
8 component where the Company will promote the construction of new energy efficient  
9 housing for income-qualified customers. Details surrounding the proposed Low-Income  
10 Energy Efficiency Program and each of the low-income program components can be found  
11 in Section 3.2.1 of the Phase V Plan.

12 **Q. ARE THE LOW-INCOME PROGRAMS SPECIFICALLY TARGETED TO LOW-**  
13 **INCOME CUSTOMERS?**

14 A. Yes. In accordance with the Commission’s Phase V Implementation Order,<sup>11</sup> savings  
15 counted towards the low-income target may only come from specific low-income programs  
16 or low-income verified participants in multifamily housing programs. The Company has  
17 designed the Low-Income Energy Efficiency Program and each of the low-income program  
18 components to meet this requirement. The Behavioral program component will continue  
19 to be specifically targeted to low-income customers and provide customized reports, just  
20 as was done under the Predecessor Companies’ Phase IV Plans. Under the Products  
21 component, the Company plans to continue to provide an enhanced rebate to qualified low-  
22 income customers for certain measures, which would offset a greater portion of the

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<sup>11</sup> Phase V Implementation Order at 68-69.

1 incremental cost for participation, while also targeting low-income customers through  
2 specific marketing and outreach activities.

3 Similar to the Predecessor Companies' Phase IV Plans, the Weatherization program  
4 component leverages the considerable expertise and existing infrastructure of LIURP  
5 contractors consisting of both Community Based Organizations ("CBOs") and private  
6 contractors, who specifically target low-income customers for participation. The  
7 Multifamily program component specifically targets multifamily buildings and low-  
8 income residents and is closely coordinated with the Weatherization program component  
9 to avoid duplicating efforts or services targeted to qualified low-income customers.  
10 Further, under the New Homes program component, the Company will work with the  
11 Pennsylvania Housing Finance Authority ("PHFA") and other entities to provide  
12 incentives for the construction of new energy efficient housing for qualified low-income  
13 customers.

14 **Q. DOES THE COMPANY'S PHASE V PLAN INCLUDE SPECIFIC ENERGY**  
15 **EFFICIENCY MEASURES FOR HOUSEHOLDS AT OR BELOW 150% OF THE**  
16 **FEDERAL POVERTY INCOME GUIDELINES?**

17 A. Yes. Act 129 requires that each EE&C Plan include specific energy efficiency measures  
18 for households at or below 150% of the federal poverty income guidelines in proportion to  
19 that sector's share of the total energy usage in the EDC's service territory.<sup>12</sup> The Company  
20 meets the Phase V Implementation Order requirement of 9.33% through the measures  
21 provided by the Low-Income Energy Efficiency Program. As explained in more detail in  
22 Section 9.1.3 of the Phase V Plan, the Company's Plan exceeds this requirement.

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<sup>12</sup> 66 Pa.C.S. § 2806.1(b)(1)(i)(G).

1 **Q. WOULD YOU PLEASE DESCRIBE THE OUTREACH ACTIVITIES THAT WILL**  
2 **BE IMPLEMENTED TO TARGET THE LOW-INCOME SECTOR?**

3 A. The Company will develop marketing materials and complete outreach activities that are  
4 specifically designed to target low-income customers with education and awareness of low-  
5 income program offerings and to encourage these customers' participation. The  
6 Predecessor Companies developed extensive outreach activities during prior phases of the  
7 EE&C Program and the Company plans to expand upon these activities for the Phase V  
8 Period. In addition, the Company will contract with a program implementation CSP who  
9 will be tasked to perform specific outreach activities in coordination with the Company's  
10 LIURP. These outreach activities may include, but are not limited to, social networking,  
11 bill inserts, direct mail, calling campaigns, food pantry events, local pop-up tents,  
12 county/street fairs, appliance recycling events, local community events, and the  
13 Commission's "Be Utility Wise" events within the Company's service territory.

14 As discussed earlier, other outreach activities that target the low-income sector will  
15 be completed by the CBOs and private contractors who provide the Weatherization  
16 services and Multifamily program component, specifically targeting multifamily buildings  
17 with low-income customers, and working with the PHFA and other entities to target the  
18 construction of new energy efficient housing for low-income customers. The Company  
19 routinely discussed these outreach activities in stakeholder meetings and plans to expand  
20 this practice in the Phase V Period. Further, the Company will continue to look for new  
21 outreach activities to assist with identifying and targeting additional qualified low-income  
22 customers for the low-income program components.

1 **Q. CAN YOU DESCRIBE THE PROGRAMS THE COMPANY IS PROPOSING FOR**  
2 **SMALL AND LARGE COMMERCIAL & INDUSTRIAL CUSTOMERS IN THE**  
3 **PHASE V PLAN?**

4 A. The Company is proposing C&I Energy Solutions Programs for both the Small and Large,  
5 Commercial and Industrial Sectors. The C&I Energy Solutions Programs, Small and Large,  
6 are summarized in FE PA Table 1, Appendix B, Table 6 and are fully described in Sections  
7 3.3 and 3.4 of the Phase V Plan. The EE&C program components are designed to provide  
8 customer engagement and education, incorporate energy controls and strategies to change  
9 behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery  
10 channels and vendors that promote the participation of all C&I customers. C&I customers  
11 are also addressed through program components that provide a variety of opportunities,  
12 including prescriptive rebates, custom measures, building tune-up, whole  
13 building/comprehensive solutions, and energy management initiatives. The programs  
14 include specific opportunities that ensure access for small commercial customers and  
15 provide opportunities for single or multiple prescriptive and/or custom measures, so that  
16 customers who are unable or unwilling to undertake whole building/comprehensive  
17 solutions are still able to increase efficiency. Further, the programs include outreach and  
18 tailored program services that encourage customers to consider a holistic or structured  
19 approach to energy efficiency for those interested and able to participate in whole  
20 building/comprehensive solutions.

21 In addition to the EE&C program components, the C&I Energy Solutions  
22 Programs, Small and Large, also include DLS and PDR program components that  
23 supplement the coincident peak load reductions that result from EE&C programs with

1 additional peak load reductions during certain daily peak hours for both the Summer and  
2 Winter periods. The components include a combination of daily load shifting strategies and  
3 event-based demand response. Initiatives include connected device load shifting and  
4 demand response, as well as custom demand response tailored to customer opportunities.  
5 Connected device load shifting strategies include technologies such as, but not limited to,  
6 battery storage and electric vehicles.

7 **Q. HOW DOES THE COMPANY PLAN TO FACILITATE ALTERNATIVE**  
8 **ENERGY PORTFOLIO STANDARDS (“AEPS”) REGISTRATIONS FOR C&I**  
9 **PARTICIPANTS OF ITS ACT 129 PROGRAMS?**

10 A. The Company plans to promote the availability of and support registrations for C&I  
11 participants of its Act 129 programs with eligible energy-efficiency projects. This will  
12 include collaborating and coordinating with the Pennsylvania Department of  
13 Environmental Protection (“DEP”) and the AEPS program administrator to increase  
14 customer awareness and education and help facilitate customer registrations. Potential  
15 activities to help facilitate and support registrations include obtaining customer  
16 authorization to share and providing project information to the AEPS program  
17 administrator. See Section 4.4.3 of the Company’s Phase V Plan for more information.

18 **Q. HOW DOES THE COMPANY’S PHASE V PROGRAMS SERVE GOVERNMENT,**  
19 **NON-PROFIT, AND INSTITUTIONAL CUSTOMERS?**

20 A. The Phase V Plan provides program services for GNI customers through the C&I Energy  
21 Solutions Programs, Small and Large. The C&I Energy Solutions, Small and Large  
22 programs include components and measures applicable to and targeted at serving GNI  
23 customers, including direct install, single and multiple prescriptive measures, custom

1 projects, and energy management services. Marketing and outreach will specifically target  
2 GNI entities within the Company’s service territory depending upon the component or  
3 measure offered. These efforts will include the leveraging of existing Company  
4 relationships with GNI customers and employing experienced vendors who have expertise  
5 working with GNI accounts.

6 **Q. HOW WILL THE COMPANY’S PHASE V PLAN COORDINATE WITH OTHER**  
7 **CONSERVATION PROGRAMS?**

8 A. The Company and its CSPs will collaborate with other conservation program  
9 administrators (*e.g.*, DEP) to provide education, marketing and cross-promotion, and other  
10 assistance or support helping customers to understand incentives available to them in  
11 programs outside of the Company’s Proposed Plan (*e.g.*, Inflation Reduction Act (“IRA”  
12 of 2022) for eligible energy efficiency measures across programs “braided funding.”

13 The goal is to collaborate and coordinate with other program administrators in order  
14 to communicate and inform customers regarding rebates and other program opportunities  
15 and braided funding incentives. Further, this collaboration and coordination will educate  
16 customers, so they understand the program opportunities and incentives available to them,  
17 further encouraging customer participation while also leveraging other programs and  
18 braided funding opportunities in delivery of the Act 129 programs. Additionally, the  
19 Company has included measures in its Proposed Plan that provide the opportunity to co-  
20 fund audits or technical studies (*e.g.* IRA Home Energy Rebate program) as part of an  
21 incentive towards an overall eligible energy efficiency project.

1 **V. IMPLEMENTATION OF PROGRAMS**

2 **Q. PLEASE EXPLAIN HOW THE PHASE V PLAN WILL BE ADMINISTERED AND**  
3 **IMPLEMENTED.**

4 A. The Company will provide overall administration and oversight of its Phase V Plan, and it  
5 will utilize third party CSPs to perform various program implementation and support  
6 duties. Specific activities that the Company will oversee include: (i) the Phase V Plan  
7 implementation and performance; (ii) the execution of marketing campaigns; (iii) quality  
8 assurance/quality control activities; (iv) tracking and reporting activities; and (v)  
9 management of CSPs. The Company will utilize CSPs to provide program-related services,  
10 including program implementation, marketing, and EM&V. A more detailed discussion of  
11 the responsibilities of both the Energy Efficiency Group and the CSPs is set forth in  
12 Sections 4.2 and 4.3 of the Phase V Plan, respectively.

13 **Q. PLEASE DESCRIBE THE COMPANY'S APPROACH TO IMPLEMENTING THE**  
14 **PHASE V PLAN.**

15 A. The Company will rely on experienced CSPs, program allies, and other entities engaged in  
16 energy-efficiency to promote, deliver, and support effective implementation of the EE&C  
17 programs. Some CSPs will be contracted to fulfil all aspects of program implementation  
18 and delivery for certain program components while others will provide specific functions  
19 across multiple programs or program components. The Company's implementation  
20 strategy is more fully discussed in Sections 1.4, 1.7, and 4 of the Phase V Plan.

1 **Q. IS IT POSSIBLE THAT THE PROGRAMS INCLUDED IN THE COMPANY'S**  
2 **PROPOSED PLAN MIGHT NEED TO BE ADJUSTED DURING THE PLAN**  
3 **PERIOD?**

4 A. Yes, adjustments to programs may be necessary during the Phase V Period. Given that  
5 many of these programs have been in place throughout at least Phase IV, if not also  
6 throughout Phases I, II and III, the Company anticipated many of the potential  
7 contingencies surrounding the programs and factored these contingencies into the Phase V  
8 Plan designs. However, due to the five-year term of the Phase V Period, there may be  
9 uncertainties in the economy, such as the impact of tariffs and changing government policy,  
10 in the regulatory environment, in customer participation, and in technology that may  
11 require adjustments during Phase V. Adjustments may also be necessary as results evolve  
12 and as the Company receives feedback from customers, trade allies, consultants, CSPs,  
13 evaluators, interested stakeholders, and program managers.

14 **Q. HOW WILL THE COMPANY MAKE ADJUSTMENTS TO PROGRAMS**  
15 **DURING PHASE V?**

16 A. As discussed in Section 4.1.4 of the Proposed Plan, the Company will actively monitor the  
17 progress of each program component towards its goals, individually and for the program  
18 and portfolio collectively, identifying performance issues, gaps, and opportunities for  
19 improvement. The Company leverages the tracking and reporting processes it has  
20 established to obtain timely data and closely monitor the progress of each program  
21 component.

22 Review meetings are performed at least monthly both internally and with CSPs. In  
23 addition, evaluation activities will also inform how well the programs are moving toward

1 the achievement of goals and provide an additional basis upon which any recommendations  
2 for adjustments to programs are made. Sections 4.1.2, 4.1.3, and 4.1.4 of the Phase V Plan  
3 further discuss potential steps the Company may take to identify and manage risks and  
4 corrective actions it may take, including program adjustments, to improve program  
5 performance and help meet its Phase V targets.

6 While many steps and actions can be performed within approved program budgets  
7 and designs, the Company has included in its proposed Phase V Plan the ability to make  
8 minor budget and measure changes to improve its ability to timely react to program  
9 performance issues and leverage successful program components, as well as to support  
10 program continuation and increased customer participation and achieving greater benefits  
11 from the programs.

12 More specifically, to target increased participation in certain programs, additional  
13 resources or budgets may be necessary, such as outreach and marketing to increase  
14 customer awareness and engagement of trade allies. Conversely, it may be possible to  
15 reduce budgets allocated to other programs and shift funds to the programs that are needed  
16 to meet its goals. To support an improved ability to achieve its goals, the Company reserves  
17 the right to reallocate up to 10% of the total Program budget between sectors and programs.

18 The ability to make incremental adjustments to the program budgets provides an  
19 improved opportunity for the Company to sustain program operations and momentum and  
20 avoid market disruptions, leverage overperforming programs, or drive market activity  
21 where needed. This flexibility also provides the ability to sustain programs that are nearing  
22 exhaustion of approved budgets prior to the end of the Phase when time constraints may  
23 not otherwise permit the Company to pursue a formal budget transfer.

1           The opportunity for the Company to make swift and efficient budget adjustments  
2 will enable increased program participation by customers and trade allies without the need  
3 to wait for approval through a months-long formal regulatory process. The result is a more  
4 realistic opportunity for the Company to achieve its goals for the Proposed Plan in a more  
5 cost-effective manner.

6           In addition, to timely and efficiently respond to market conditions and maintain or  
7 improve program performance while supporting its ability and efforts to achieve its goals,  
8 the Company reserves the ability to add or revise the conditions of a measure or to eliminate  
9 a measure based on evaluation guidance or results, such as, but not limited to, TRM  
10 changes, Guidance Memos, Interim Measure Protocols (“IMP”), process or impact  
11 evaluations, and cost-effectiveness results. This flexibility allows the Company to avoid  
12 providing incentives for a measure that is no longer supported, as well as to revise the  
13 conditions of a measure based on market changes, such as if the ENERGYSTAR program  
14 changes or is discontinued. It also provides the Company with the ability to add a measure  
15 such as due to the adoption of a measure through the PA TRM or IMP.

16           To the extent that the Company makes any budget or measure changes as discussed  
17 above, the Company will include a discussion detailing any such changes in its semi-annual  
18 reports. If additional adjustments are necessary, the Company will seek all required  
19 approvals either through the Commission’s expedited review process established for Phase

1 II,<sup>13</sup> Phase III,<sup>14</sup> Phase IV,<sup>15</sup> and extended for Phase V,<sup>16</sup> or through an amendment to the  
2 Phase V Plan.

3 **VI. CSPs AND THE COMPETITIVE BIDDING PROCESS**

4 **Q. PLEASE EXPLAIN HOW THE CSPs WILL BE SELECTED.**

5 A. The Company will use a competitive bidding process to select all CSPs that provide  
6 consultation, design, administration and management, or advisory services to the  
7 Company, with the exception of its Tracking and Reporting system vendor. The Company  
8 will adhere to the vendor selection requirements set forth in the Commission’s Phase V  
9 Implementation Order and the Company’s Act 129 Conservation Service Provider  
10 Contracts Request for Proposal (“RFP”) Procedure for the Company’s Phase V EE&C Plan  
11 that was approved by Secretarial Letter issued September 8, 2025.

12 Every CSP contract will be contingent upon Commission approval of both the  
13 contract and the applicable programs that are the subject of the contract. RFPs have been  
14 distributed to all qualified CSPs registered on the Commission’s website, and the Company  
15 is making and will continue to make an effort to acquire bids from minority or other special  
16 category businesses.

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<sup>13</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887, at 114-18 (Implementation Order entered June 10, 2011) (“Phase II Implementation Order”).

<sup>14</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864, at 118 (Implementation Order entered June 19, 2015) (“Phase III Implementation Order”).

<sup>15</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228, at 94-96 (Implementation Order entered June 18, 2020) (“Phase IV Implementation Order”).

<sup>16</sup> Phase V Implementation Order at 200-205.

1 **Q. WHY IS THE COMPANY NOT SELECTING ITS TRACKING AND REPORTING**  
2 **SYSTEM VENDOR FOR PHASE V THROUGH A COMPETITIVE BIDDING**  
3 **PROCESS?**

4 A. In accordance with the Phase V Implementation Order,<sup>17</sup> EDCs may forego the competitive  
5 bidding process with individual vendors, such as tracking database services, if the value of  
6 contracts for that vendor's work is not more than 1% of the Phase V budget. The Plan  
7 budget for the T&R contract is less than 1% of the Phase V budget. The Company plans to  
8 leverage its existing T&R system for Phase V, which contains historic data and contains  
9 established processes, interfaces and reports, and would require significant efforts and cost  
10 to change vendors.

11 **Q. HAS THE COMPANY SELECTED THE CSPs AND OTHER VENDORS THAT**  
12 **WILL BE ASSISTING WITH THE IMPLEMENTATION OF THE PHASE V**  
13 **PLAN?**

14 A. Thus far, the Company has selected ADM Associates, Inc. as its EM&V CSP for Phase V.  
15 The RFP for that contract was issued on September 10, 2025, and the Company selected  
16 ADM Associates, Inc. as the winning bidder in October 2025. The EM&V CSP contract  
17 was filed with the Commission on November 26, 2025. As of the submission of this  
18 testimony, no other CSPs have been selected. A RFP was issued for the C&I Program  
19 components on October 24, 2025, and the Company plans to issue a RFP for the Residential  
20 Program components in December 2025. The Company expects to complete the CSP  
21 selection process for its Residential and C&I program implementation CSPs in early 2026  
22 (conditioned on Commission approval of the CSP contracts and related programs), so as to

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<sup>17</sup> *Id.* at 226.

1 enable a timely transition, start up and implementation of the programs and measures once  
2 Phase V begins.

3 **VII. COMPLIANCE WITH STATUTORY AND REGULATORY REQUIREMENTS**

4 **Q. IS THE COMPANY'S PHASE V PLAN DESIGNED TO MEET THE ENERGY**  
5 **AND PEAK DEMAND REDUCTION TARGETS IDENTIFIED IN THE**  
6 **COMMISSION'S PHASE IV IMPLEMENTATION ORDER?**

7 A. Yes, the Proposed Plan is designed to meet the energy and peak demand reduction targets,  
8 including the low-income carve out, as established in the Commission's Phase V  
9 Implementation Order. Appendix B, Tables 2 and 3 of the Phase V Plan show the projected  
10 MWh and MW savings, respectively, for the Company. Further, as explained in Section  
11 9.1.3 of the Phase V Plan, low-income participation in the Small and Large C&I Energy  
12 Solutions Multifamily program components is targeted towards meeting the low-income  
13 savings carve out and provides specific energy efficiency measures for households at or  
14 below 150% of the federal poverty income guidelines, and is in excess of the proportion  
15 required for that sector's share of the total energy usage in the Company's service territory,  
16 as required by 66 Pa.C.S. § 2806.1(b)(1)(i)(G).

17 **Q. IS THE COMPANY'S PHASE V PLAN DESIGNED TO ACHIEVE AT LEAST**  
18 **15% OF THE CONSUMPTION REDUCTION AND PEAK DEMAND**  
19 **REDUCTION TARGETS AND IN EACH PROGRAM YEAR?**

20 A. Yes. The aforementioned Appendix B, Tables 2 and 3 of the Proposed Plan also provide  
21 the projected energy and peak demand savings for each program year as a percentage of  
22 the Company's targets. It also illustrates that the Phase V Plan is designed to meet at least  
23 15% of the energy and peak demand reduction targets each year.

1 **Q. IS THE COMPANY'S PHASE V PLAN DESIGNED TO ACHIEVE AT LEAST**  
2 **75% OF THE PEAK DEMAND REDUCTION TARGET IN EACH SEASON?**

3 A. Yes, Appendix B, Table 4 of the Proposed Plan provides the total projected peak demand  
4 savings for each season and illustrates that the Phase V Plan is designed to achieve at least  
5 75% of the peak demand reduction target in each season.

6 **Q. DOES THE COMPANY'S PROPOSED PLAN ACHIEVE THE OVERALL TRC**  
7 **COST-BENEFIT THRESHOLD?**

8 A. Yes. Appendix B, Table 1 of the Phase V Plan shows the projected TRC results on a  
9 portfolio basis. The successful implementation of the Company's Phase V Plan is projected  
10 to be cost-effective at the portfolio level under the PA TRC test having a benefit-cost ratio  
11 greater than 1.0. Specifically, the Company's Phase V Plan has a TRC ratio of 1.1.  
12 Additional details are provided in Appendix B, Tables 1, 14 and 15 of the Proposed Plan.

13 **Q. HOW WERE THE TRC RESULTS CALCULATED?**

14 A. Each of the TRC values was calculated consistent with the methodology prescribed by the  
15 Commission in the 2026 TRC Test Order. Section 8.0 of the Proposed Plan provides more  
16 detail on the cost effectiveness methodology.

17 **Q. DOES THE COMPANY'S PHASE V PLAN INCLUDE BOTH RESIDENTIAL AND**  
18 **NON-RESIDENTIAL COMPREHENSIVE PROGRAMS?**

19 A. Yes. As more fully discussed across Sections 3.2, 3.2.1, 3.3, and 3.4 of the Phase V Plan,  
20 the Company's Plan includes comprehensive programs and measures for both residential  
21 and non-residential customers. Section 3.1.7 further provides the Company's definition of

1 a comprehensive program, and Appendix B, Table 8 classifies individual residential and  
2 low-income measures as comprehensive.

3 In general, the Phase V Plan incorporates both short- and long-term energy saving  
4 opportunities for customers, including multiple prescriptive measures, custom measures,  
5 direct install, comprehensive measures and projects, and whole home/whole building  
6 solutions and energy saving initiatives. More specifically, the Company offers  
7 comprehensive measures to residential customers such as heat pumps and heat pump water  
8 heaters as well as whole house treatments through the Residential Energy Solutions  
9 Program and the Low-Income Energy Efficiency Program.

10 The Residential Energy Solutions Program includes incentives toward home audits  
11 with additional incentives for comprehensive measures and home retrofits as well as for  
12 efficient new home construction. The Low-Income Energy Efficiency Program includes  
13 Multifamily, Weatherization, and New Construction components, which also targets  
14 comprehensive measures and home retrofits as well as efficient new home construction.

15 Similarly, the Company offers comprehensive measures to the non-residential  
16 sector through the Multifamily, Prescriptive, Custom, and Energy Management  
17 components in the C&I Energy Solutions, Small and Large Programs. The Multifamily  
18 component, consistent with its Residential counterpart, targets comprehensive measures  
19 and home retrofits. The Prescriptive component provides the opportunity for incentives for  
20 multiple comprehensive measures such as heat pumps and heat pump water heaters. The  
21 Custom component provides incentives for custom building improvements, process  
22 improvements, and efficient new construction. The Energy Management component  
23 provides a holistic or structured approach to improving the overall operation and energy

1 performance of buildings and building systems by retrofitting, maintaining, adjusting, and  
2 optimizing the systems within the building and the implementation of complementary  
3 energy savings measures.

4 Collectively, the proposed programs promote and support comprehensive measures  
5 and whole home/whole building/comprehensive solutions and structured approaches to  
6 reducing energy consumption and enhancing energy efficiency that provide deep and long-  
7 lasting energy savings across all sectors.

8 **Q. DOES THE COMPANY'S PHASE V PLAN INCLUDE A VARIETY OF**  
9 **MEASURES THAT ARE PROVIDED EQUITABLY TO ALL CUSTOMER**  
10 **CLASSES?**

11 A. Yes. Based on the programs and measures selected and included in the Company's Phase  
12 V Plan, as listed in Appendix B, Table 8, there is at least one energy efficiency program  
13 and a broad portfolio of program components and measures that will be provided to every  
14 customer class.

15 **Q. DOES THE PROPOSED PLAN COMPLY WITH ALL STATUTORY AND**  
16 **REGULATORY REQUIREMENTS?**

17 A. Yes. The Phase V Plan: (i) is designed to achieve the Phase V energy and peak demand  
18 reduction targets as established in Act 129 and the Commission's Phase V Implementation  
19 Order with a budget no greater than the 2% statutory spending cap; (ii) is designed to  
20 achieve the low-income carve out as established in the Commission's Phase V  
21 Implementation Order; (iii) is designed to achieve at least 15% of the energy and peak  
22 demand reduction targets during each year of the Phase V Period; (iv) includes a mix of  
23 measures projected to acquire at least 75% of the proposed peak demand reduction target

1 in each season; (v) includes at least one program for each customer class; (vi) includes both  
2 residential and non-residential comprehensive programs; and (vii) passes the TRC test on  
3 an overall portfolio basis.

4 Further, as Company Witness Zieger explains, the Phase V Plan includes Section  
5 1307 cost recovery mechanisms, which reflect program acquisition costs (i.e., for program  
6 administration, management, and incentives) that are being reasonably allocated to and  
7 recovered from the customer classes receiving the direct benefit of measures supported by  
8 the programs.

9 **VIII. CONCLUSION**

10 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

11 A. Yes, it does. However, I reserve the right to supplement my direct testimony, if necessary.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION FOR  
APPROVAL OF THE PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN  
OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

**DOCKET NO. M-2025-3057327**

**Direct Testimony  
of  
Stephanie R. Zieger**

**LIST OF TOPICS ADDRESSED**

**Phase IV Final Cost Collection  
Phase V Cost Recovery Mechanism and Initial Rates  
Program Cost Reconciliation Process**

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**DIRECT TESTIMONY  
OF  
STEPHANIE R. ZIEGER**

1     **I.    INTRODUCTION AND BACKGROUND**

2     **Q.    PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3     A.    My name is Stephanie R. Zieger. My business address is 2800 Pottsville Pike, Reading,  
4            Pennsylvania, 19605.

5     **Q.    BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6     A.    I am employed by FirstEnergy Service Company as an Analyst in Rates and Regulatory  
7            Affairs - Pennsylvania.

8     **Q.    WHAT ARE YOUR RESPONSIBILITIES AS AN ANALYST IN PENNSYLVANIA  
9            RATES AND REGULATORY AFFAIRS?**

10    A.    Generally, the Pennsylvania Rates and Regulatory Affairs Department provides regulatory  
11           support for FirstEnergy Corp.'s wholly-owned Pennsylvania operating company,  
12           FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company"), which consists  
13           of the following rate districts: Met-Ed Rate District, Penelec Rate District, Penn Power  
14           Rate District, West Penn Rate District, and The Pennsylvania State University Rate District  
15           which is a sub-part of the West Penn Rate District. I support the development, preparation,  
16           and presentation of the FE PA's retail electric rates and related rules and regulations,  
17           ensuring uniform administration and interpretation in all its rate-related matters.

18    **Q.    WHAT IS YOUR EDUCATIONAL BACKGROUND?**

19    A.    I earned a Master of Science degree in Applied Statistics from West Chester University.  
20           Prior to that, I was awarded Bachelor of Science degrees in both Mathematics and

1 Economics from Elizabethtown College. My work experience is more fully described in  
2 Appendix A attached to this testimony.

3 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

4 A. I am testifying on behalf of FE PA. My testimony applies to all rate districts, unless  
5 otherwise stated. Further, rather than reiterating what is included in FE PA’s Phase V  
6 Energy Efficiency and Conservation Plan (“Phase V Plan”) in my testimony, any  
7 references to sections of the Plan are incorporated as if fully rewritten herein.

8 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

9 A. The purpose of my testimony is to explain FE PA’s proposed cost recovery mechanism  
10 that will be used to recover the costs incurred by the Company during the planning and  
11 implementation of the Company’s Phase V Plan, which is required by Act 129<sup>1</sup> and the  
12 Pennsylvania Public Utility Commission’s (“Commission”) Phase V Implementation  
13 Order.<sup>2</sup> I will also explain how the proposed rates estimated for the first year of the Phase  
14 V Plan were determined and how FE PA will recover final costs incurred under its Energy  
15 Efficiency and Conservation (“EE&C”) Plans that are currently in effect during the Phase  
16 IV Period<sup>3</sup> of the Commission’s EE&C Program (“Phase IV Plans”).<sup>4</sup>

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<sup>1</sup> Act 129 of 2008, 66 Pa.C.S. §§ 2806.1-2806.2 (“Act 129”).

<sup>2</sup> *Energy Efficiency and Conservation Program*, Docket No. M-2025-303052826 (Order entered June 18, 2025) (“Phase V Implementation Order”).

<sup>3</sup> Phase IV of the Commission’s EE&C Program is in effect for the five-year period starting on June 1, 2021 and ending on May 31, 2026 (“Phase IV Period”).

<sup>4</sup> Phase IV EE&C Plans were required by Act 129 and the Commission’s Implementation Order issued at Docket No. M-2020-3015228.

1 **Q. HAVE YOU PREPARED EXHIBITS TO ACCOMPANY YOUR DIRECT**  
2 **TESTIMONY?**

3 A. Yes. The following exhibits, which I will explain in detail later in my testimony, were  
4 prepared by me or under my direction, supervision and control:

5 FE PA Exhibit SRZ-1: FE PA Phase V EE&C-C Rider;

6 FE PA Exhibit SRZ-2: Illustrative EE&C-C Rider Rates.

7 **II. FINAL RECONCILIATION OF PHASE IV RIDER COSTS**

8 **Q. HOW IS FE PA RECOVERING COSTS INCURRED UNDER ITS PHASE IV**  
9 **PLANS?**

10 A. The costs associated with the development and implementation of the Phase IV Plans are  
11 currently recovered through each rate district’s Phase IV Energy Efficiency and  
12 Conservation Charge Rider (“EE&C-C Rider”). These recovery mechanisms were  
13 approved by the Commission in the Phase IV Plan proceedings at Docket Nos. M-2020-  
14 3020820 (Met-Ed), M-2020-3020821 (Penelec), M-2020-3020822 (Penn Power), and M-  
15 2020-3020823 (West Penn) (collectively, the “Predecessor Companies’ Phase IV Plans”).

16 **Q. DOES THE COMPANY PLAN TO MAINTAIN THE EXISTING PHASE IV**  
17 **EE&C-C RIDER BEYOND THE END OF THE PHASE IV PERIOD?**

18 A. No, the Company plans to terminate the Phase IV EE&C-C Rider at the end of the Phase  
19 IV Period, which ends on May 31, 2026. Therefore, a process is required to permit full  
20 recovery of Phase IV costs, as certain costs will either not be known by May 31, 2026, or  
21 will continue to accrue after Phase IV comes to an end. Therefore, FE PA proposes that an  
22 additional adjustment be included in the Company’s Phase V recovery mechanism to

1 account for these remaining Phase IV costs. I will discuss this adjustment for Phase IV  
2 costs in more detail later in my testimony.

3 **Q. PLEASE PROVIDE EXAMPLES OF THE TYPES OF PHASE IV COSTS THAT**  
4 **WILL CONTINUE TO ACCRUE POST-COMPLETION OF PHASE IV.**

5 A. The Company will incur a variety of Phase IV-related costs after May 31, 2026, including  
6 costs to close out Phase IV program delivery, for evaluation, measurement and verification  
7 (“EM&V”) of program results, consulting costs related to EM&V analysis, and the  
8 development of final reports to the Commission.

9 **III. PHASE V COST RECOVERY MECHANISM**

10 **Q. PLEASE DESCRIBE THE COST RECOVERY MECHANISM THAT FE PA IS**  
11 **PROPOSING TO USE TO RECOVER ITS PHASE V PLAN COSTS.**

12 A. As permitted by Act 129 and 66 Pa.C.S. § 1307, FE PA is proposing the implementation  
13 of an EE&C-C Rider to recover Phase V-related costs (“Phase V EE&C-C Rider”). The  
14 Phase V EE&C-C Rider is, with the minor exceptions I note later in my testimony, virtually  
15 identical to the Phase IV EE&C-C Rider that is currently in effect to recover costs incurred  
16 under the Predecessor Companies’ Phase IV Plans. A copy of the proposed *pro forma* tariff  
17 supplement for the Phase V EE&C-C Rider for FE PA is attached to my testimony as  
18 Exhibit SRZ-1. Detail regarding the calculation of the rates included in the Phase V EE&C-  
19 C Rider is provided in FE PA Exhibit SRZ-2, which is also attached to my testimony.

1 **Q. HOW DOES THE PROPOSED PHASE V EE&C-C RIDER DIFFER FROM THE**  
2 **PHASE IV EE&C-C RIDER?**

3 A. There are two differences between the Phase IV and Phase V EE&C-C Rider designs. The  
4 proposed Phase V Plan consists of one consolidated FE PA plan, which will be comprised  
5 of one rate per customer class that is uniform among the rate districts. For Phase IV, each  
6 rate district had a unique Phase IV Plan, thus the EE&C-C Rider rates were calculated  
7 separately for each customer class of each rate district.

8 The other change is that PJM Interconnection LLC (“PJM”) Forward Capacity  
9 Market revenues are no longer eligible to be included as a credit in the rate calculation.  
10 Therefore, they have been removed from the proposed tariff language in the Phase V Plan  
11 EE&C-C Rider (Exhibit SRZ-1).

12 **Q. WAS A COLLABORATIVE HELD TO DISCUSS THE PROPOSED**  
13 **CONSOLIDATED PHASE V EE&C-C RIDER RATES?**

14 A. Yes, as agreed to in the 2023 FE PA Consolidation Settlement,<sup>5</sup> FE PA held a collaborative  
15 meeting with the Joint Applicants on November 4, 2025 to discuss the impact of  
16 consolidation on the Company’s proposed Phase V Plan.

17 **Q. PLEASE DESCRIBE THE PHASE V EE&C-C RIDER.**

18 A. In the Phase V EE&C-C Rider, the Phase V EE&C-C rates are expressed as a price per  
19 kilowatt hour (“kWh”) for the Residential, Commercial, and Street Lighting customer  
20 classes. The Industrial customer class will be billed based upon the individual customer’s

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<sup>5</sup> See *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company*, Docket Nos. A-2023-3038771, *et al.* (Final Order entered December 7, 2023) (“Consolidation Settlement”).

1 Peak Load Contribution (“PLC”) kilowatt (“kW”). The Phase V EE&C-C rates will be  
 2 calculated separately for the Residential, Commercial, Street Lighting, and Industrial  
 3 customer classes. As previously indicated, Exhibit SRZ-1 is a copy of the proposed *pro*  
 4 *forma* tariff supplement for the Phase V EE&C-C Rider for the FE PA rate districts. The  
 5 first page of the rider sets forth the Phase V EE&C-C rates, as well as the rate schedules  
 6 that comprise the Residential, Commercial, Street Lighting, and Industrial customer  
 7 classes. The remaining pages of the rider set forth: (i) the rate formula that is used to  
 8 calculate the rates; (ii) a description of how the Phase V EE&C-C rates are developed; and  
 9 (iii) a description of how revenues billed under the Phase V EE&C-C Rider will be  
 10 reconciled to actual costs as they are incurred.

11 **Q. PLEASE LIST THE RATE SCHEDULES THAT ARE INCLUDED IN EACH**  
 12 **CUSTOMER CLASS.**

13 A. The Residential customer class rate schedule is Rate RS. The rate schedules for the  
 14 Commercial customer class include Rate GS-Small, Rate GS-V, Rate GS-Medium, Rate  
 15 H, Rate MS, Rate PNP, Outdoor Area Lighting Service, and Private Outdoor Lighting  
 16 Service. The rate schedules for the Industrial customer class include Rate GS-Large, Rate  
 17 GP, Rate TP, Schedule 44, and Schedule 46. Finally, the rate schedules for the Street  
 18 Lighting customer class include LED Street Lighting Service, Street Lighting Service-ME,  
 19 High Pressure Sodium Vapor Street Lighting Service, Municipal Street Lighting Service,  
 20 Ornamental Street Lighting Service, Rate Schedules 51 through 58, and Rate Schedule 71.

1 **Q. ARE THERE ANY CUSTOMERS WHO WILL NOT PAY THE PHASE V EE&C-**  
2 **C RIDER RATES?**

3 A. Yes, customers taking service under the Met-Ed Rate District's or Penelec Rate District's  
4 Borderline Service rate schedule will not pay the Phase V EE&C-C Rider charge. These  
5 rate schedules are only available to public utility companies for resale in adjacent service  
6 territories under reciprocal agreements between the other public utilities and either Met-Ed  
7 or Penelec Rate Districts. These public utilities are ineligible for any of the energy  
8 efficiency or peak demand reduction programs proposed in the Company's Phase V Plan.  
9 Therefore, no Phase V EE&C-C Rider charge will be applied to Borderline Service  
10 customers.

11 **Q. WHAT WAS THE BASIS FOR DETERMINING THE RATE SCHEDULES THAT**  
12 **WOULD BE INCLUDED WITHIN THE COMPANY'S CUSTOMER CLASSES?**

13 A. The Phase V EE&C-C Rider rate schedule groupings by Residential, Commercial, Street  
14 Lighting, and Industrial customer classes are the same as the customer class groupings that  
15 are currently in place in the Company's Phase IV EE&C-C Rider in the Commission-  
16 approved tariff. Additionally, the customer classes in the Phase V EE&C-C Rider are  
17 aligned with the specific costs within the Phase V Plan budget.

18 **Q. FOR WHAT PERIOD OF TIME WOULD THE PHASE V EE&C-C RIDER FOR**  
19 **THE COMPANY BE EFFECTIVE?**

20 A. The Company proposes that the Phase V EE&C-C Rider become effective for service  
21 rendered on or after June 1, 2026 and continue through May 31, 2031.

1 **Q. HOW DOES THE COMPANY INTEND TO COLLECT PHASE V RELATED**  
2 **COSTS THAT WILL NOT BE COLLECTED BY MAY 31, 2031?**

3 A. Assuming future phases of the Commission's EE&C Program, the Company would  
4 propose true up of Phase V costs as a component of cost recovery. Should there be no  
5 additional phases of the Commission's EE&C Program, the Company reserves the right  
6 herein to request, through a separate filing, approval from the Commission to extend the  
7 Phase V EE&C-C Rider beyond the end of Phase V in order to collect any remaining Phase  
8 V costs and/or to recover any remaining costs through another surcharge mechanism.

9 **Q. WILL THE PHASE V EE&C-C RIDER AND THE ASSOCIATED PHASE V**  
10 **EE&C-C RATES BE BYPASSABLE FOR CUSTOMERS WHO OBTAIN**  
11 **GENERATION SERVICE FROM A SUPPLIER RATHER THAN FROM THE**  
12 **COMPANY'S DEFAULT SERVICE?**

13 A. No. Except for the Met-Ed and Penelec Rate District Borderline Service customers that I  
14 previously discussed, all customers will pay the Phase V EE&C-C Rider rate, regardless  
15 of the source of the customer's generation service. The Phase V EE&C-C Rider and  
16 applicable EE&C-C rates will be applied to each kWh (or PLC kW for the Industrial  
17 customer class) delivered during a billing month to customers served under the rate  
18 schedules identified as part of either the Residential, Commercial, Street Lighting, or  
19 Industrial customer classes.

20 **Q. HOW ARE THE PHASE V EE&C-C RIDER RATES STRUCTURED?**

21 A. Section 7 of the Company's Phase V Plan describes the structure and mechanics of the  
22 Phase V EE&C-C Rider. Generally, the Phase V EE&C-C Rider rates billed to the

1 Residential, Commercial, Street Lighting, and Industrial customer classes consist of three  
2 principal components. The first is the EECc, or “current cost,” component. The second is  
3 the reconciliation component, or “E” factor, for Phase V costs. The third is a second “E”  
4 Factor (E2) for collection of Phase IV related costs not collected through the Phase IV  
5 EE&C-C Rider.

6 **Q. PLEASE DESCRIBE THE EECc COMPONENT.**

7 A. The EECc component represents the recovery of estimated costs to be incurred during the  
8 Annual Computation Period, or “Computational Period,” in which the Phase V EE&C-C  
9 rates will be in effect for each customer class. As shown on the second and third page of  
10 FE PA Exhibit SRZ-1, the EECc component is customer class specific. The costs included  
11 in each customer class’s EECc rate are identified as  $EEC_{Exp1}$ ,  $EEC_{Exp2}$ , and  $EEC_{Exp3}$ .

12  $EEC_{Exp1}$  represents customer class-specific costs that will be associated with the  
13 customer class’s specific EE&C programs as approved by the Commission. These costs  
14 will also include an allocated portion of any indirect costs, such as EE&C Plan marketing  
15 costs, that will be incurred by FE PA.

16  $EEC_{Exp2}$  represents an allocated portion of administrative start-up costs incurred by  
17 FE PA in connection with the development of the Phase V Plan and related programs in  
18 response to the Commission’s orders and guidance in its Phase V Implementation Order.  
19 These costs are incurred to design, create, and obtain Commission approval of the Phase V  
20 Plan and include, but are not limited to, consultant costs, outside legal fees, and other direct  
21 and indirect costs associated with the development and implementation of the Phase V Plan  
22 in compliance with the Commission directives.

1           EEC<sub>Exp3</sub> represents the costs allocated to FE PA for the funding of the  
2 Commission’s statewide evaluator contract. These costs are not subject to the 2% spending  
3 cap imposed by Act 129.

4 **Q. PLEASE DESCRIBE THE E-FACTOR COMPONENT OF THE PHASE V EE&C-**  
5 **C RATES.**

6 A. The E-factor component of the Company’s Residential, Commercial, Street Lighting, and  
7 Industrial customer class-specific Phase V EE&C-C rates represents a reconciliation of  
8 actual Phase V EE&C program costs incurred by customer class to actual Phase V EE&C  
9 revenues billed by customer class on a monthly basis. For FE PA, this monthly  
10 reconciliation by specific customer class will result in either an over-collection of costs by  
11 customer class (revenues billed, excluding Pennsylvania Gross Receipts Tax (“GRT”),  
12 greater than actual costs) or an under-collection by customer class (revenues billed,  
13 excluding GRT, less than actual costs). The E-factor component will be applied on a  
14 customer class-specific basis.

15 **Q. WILL THE INITIAL PHASE V EE&C-C RATES BY CUSTOMER CLASS**  
16 **INCLUDE A RECONCILIATION OR E-FACTOR COMPONENT?**

17 A. No. Because this is a new rider, the initial Phase V EE&C-C rates will not include an initial  
18 Phase V E-factor component. The first time the Phase V E-factor component will be  
19 included as part of the determination of the Phase V EE&C-C Rider rates will be in the  
20 Company’s annual filing that will be submitted to the Commission on or before May 1,  
21 2027 for rates to be effective June 1, 2027. The Phase V E-factor component then will be  
22 included in each subsequent Phase V EE&C-C Rider filing.

1 **Q. PLEASE DESCRIBE THE SECOND E-FACTOR (E<sup>2</sup>).**

2 A. The second E-factor component (E<sup>2</sup>) is a reconciliation adjustment for the collection of  
 3 Phase IV-related costs that were not collected through the Phase IV EE&C-C Rider.  
 4 Because of timing, this adjustment will be made for purposes of determining both the Phase  
 5 V EE&C-C Rider rates that are being proposed as part of the Phase V Plan to be effective  
 6 on June 1, 2026, and the subsequent Program Year rider rates that will be effective on June  
 7 1, 2027. The E<sup>2</sup> over- or under-collection will continue to be collected at the rate district  
 8 level.

9 **Q. PLEASE DESCRIBE HOW THE RECONCILIATION OF FINAL PHASE IV**  
 10 **COSTS WILL BE PERFORMED.**

11 A. Because the rider filings are generally filed with the Commission on May 1st of each year  
 12 to be in effect on June 1st of that same year, the Phase IV costs will be reconciled in two  
 13 distinct steps. The first step will reconcile the total actual recoverable Phase IV Plan  
 14 expenditures incurred through March 31, 2026 to the actual Phase IV Plan revenues  
 15 collected through March 31, 2026. Because the Phase IV EE&C-C Rider will end on May  
 16 31, 2026, the result of the Phase IV reconciliation through March 31, 2026 will appear as  
 17 a separate component of the Phase V EE&C-C Rider, which will go into effect on June 1,  
 18 2026. The second step will account for all actual Phase IV revenues and expenses that are  
 19 realized during the period April 1, 2026 through March 31, 2027 in a final reconciliation.  
 20 The final over/under collection that results from this reconciliation will also be included as  
 21 a separate component of the Phase V EE&C-C Rider rate calculation that will be effective  
 22 on June 1, 2027.

1 **Q. HOW WILL THE COMPANY INCLUDE ACTUAL COSTS INCURRED**  
2 **THROUGH MARCH 31, 2026 IN THE PROPOSED RATES INCLUDED IN THIS**  
3 **PROCEEDING?**

4 A. The Company does not have the actual data available through March 31, 2026 as of the  
5 time of this filing. Therefore, the Company will provide an update to the reconciliation in  
6 connection with the compliance filing by May 1, 2026 for rates to be effective on June 1,  
7 2026.

8 **Q. HOW OFTEN WILL THE PHASE V EE&C-C RIDER RATES BY CUSTOMER**  
9 **CLASS BE CHANGED?**

10 A. The Company anticipates that the Phase V EE&C-C Rider rates will be changed annually  
11 on June 1st of each year. However, the Phase V EE&C-C Rider includes a provision that  
12 allows the Company to seek interim revisions to the Phase V EE&C-C Rider rates should  
13 the Company determine that the rates, if left unchanged, would result in material over- or  
14 under-collection of all recoverable costs incurred or expected to be incurred by customer  
15 class.

16 **Q. WHAT INFORMATION WILL THE COMPANY PROVIDE WHEN SEEKING TO**  
17 **CHANGE THE PHASE V EE&C-C RATES?**

18 A. In its annual submissions to the Commission, the Company will provide the following  
19 information in the derivation of the calculated Phase V EE&C-C Rider rates:

20 1. A reconciliation between actual Phase V EE&C-C revenues and actual Phase V  
21 EE&C-C costs for the Phase V EE&C-C reconciliation period, as adjusted for  
22 removal of GRT Because this is a new rider, this information is not being provided

1 in support of the Phase V EE&C-C Rider rates being proposed for the period June  
2 1, 2026 through May 31, 2027. Such reconciliations will be provided starting in  
3 Program Year 2 for rates to be effective June 1, 2027.

4 2. Any adjustment to the forecasted Phase V EE&C-C Rider revenues anticipated to  
5 be billed during April and May of the applicable program year, as adjusted for the  
6 removal of GRT. Because this is a new rider, this information is not being provided  
7 in support of the Phase V EE&C-C Rider rates being proposed for the period June  
8 1, 2026 through May 31, 2027. Such adjustments will be provided starting in  
9 Program Year 2.

10 3. The Phase V EE&C budget estimate for the forthcoming Phase V EE&C-C  
11 computational period by rate class.

12 4. A reconciliation adjustment for any remaining Phase IV EE&C costs that were not  
13 collected by the end of the Phase IV Period. This adjustment will only be included  
14 in the initial Phase V EE&C-C Rider rates that will become effective on June 1,  
15 2026 and the subsequent Phase V EE&C-C Rider rates that will be in effect for the  
16 period June 1, 2027 through May 31, 2028.

17 **Q. WILL THE COMPANY FILE ANY REPORTS RELATED TO THE PHASE V**  
18 **EE&C-C RIDER WITH THE COMMISSION?**

19 A. Yes. As stated in the Company's Phase V EE&C-C Rider, an annual report that is  
20 consistent with 66 Pa.C.S. § 1307(e) and sets forth the actual revenues and costs incurred  
21 will be filed with the Commission by April 30<sup>th</sup> of each year. This report will be provided  
22 by customer class and will be subject to annual review and audit by the Commission.

1 **IV. INITIAL PHASE V EE&C-C RIDER RATES**

2 **Q. IS THE COMPANY PROPOSING SPECIFIC EE&C-C RIDER RATES IN THIS**  
3 **PROCEEDING?**

4 A. Yes. The first page Exhibit SRZ-1 has the applicable Residential, Commercial, Street  
5 Lighting, and Industrial Phase V EE&C-C Rider rates that would become effective June 1,  
6 2026. These estimated rates are based on the budgeted costs by customer class for the  
7 period June 1, 2026 through May 31, 2027 – costs that are subject to review and approval  
8 in this proceeding. The specific calculation of the estimated Phase V EE&C-C Rider rates  
9 for each of the rate districts is set forth in Exhibit SRZ-2.

10 **Q. ARE ANY OF THE PROJECTED COSTS INCLUDED IN THE INITIAL EE&C-C**  
11 **RIDER RATES BEING RECOVERED THROUGH BASE RATES?**

12 A. No.

13 **V. CONCLUSION**

14 **Q. ARE YOU FAMILIAR WITH THE REQUIREMENTS FOR RECONCILABLE**  
15 **ADJUSTMENT CLAUSES AS SET FORTH IN 66 PA.C.S. § 1307?**

16 A. Yes, I am.

17 **Q. IN YOUR OPINION, DOES THE PHASE V EE&C-C RIDER, AS DESCRIBED IN**  
18 **YOUR TESTIMONY, MEET THE REQUIREMENTS FOR A RECONCILABLE**

1           **ADJUSTMENT CLAUSE TARIFF MECHANISM AS SET FORTH IN 66 PA.C.S.**

2           **§ 1307?**

3    A.     Yes, the Company's Phase V EE&C-C Rider meets the requirements of 66 Pa.C.S. § 1307,  
4           as well as the provisions included in the Commission's Phase V Implementation Order and  
5           Act 129.

6    **Q.     DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

7    A.     Yes, it does. However, I reserve the right to supplement my direct testimony, if necessary.

Resume: Education and Experience of Stephanie R. Zieger

Education:

2012 Bachelor of Science Degrees in Mathematics and Economics –  
Elizabethtown College, Elizabethtown, Pennsylvania  
2016 Master of Science Degree in Applied Statistics – West Chester University,  
West Chester, Pennsylvania

Experience:

05/12 – 05/15 Assistant Program Underwriter – AmWINS Program Underwriters –  
Camphill, PA  
06/15 – 08/15 Corporate Performance Improvement Intern – Exelon Generation – Kennett  
Square, PA  
08/14 – 12/15 Graduate Assistant – Applied Statistics Program, West Chester University  
– West Chester, PA  
12/15 – Present Rates Analyst IV – Rates & Regulatory Affairs – Pennsylvania –  
FirstEnergy Service Corporation

Prepared and presented testimony in the following rate-related cases:

<i>Docket Nos.</i>	<i>Case Name</i>
ER20020146	Jersey Central Power & Light Company Base Rate Case

Assisted in development and preparation in the following cases:

Pennsylvania Public Utility Commission Cases:

<i>Docket Nos.</i>	<i>Case Name</i>
R-2016-2537349	Metropolitan Edison Company Base Rate Case
R-2016-2537352	Pennsylvania Electric Company Base Rate Case
R-2016-2537355	Pennsylvania Power Company Base Rate Case
R-2016-2537359	West Penn Power Company Base Rate Case
R-2024-3047068	FirstEnergy Pennsylvania Electric Company Base Rate Case

State of New York Public Service Commission Cases:

<i>Docket Nos.</i>	<i>Case Name</i>
17-E-0685	Pennsylvania Electric Company Minor Rate Filing
22-E-0668	Pennsylvania Electric Company Minor Rate Filing

**ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER**

An Energy Efficiency and Conservation (“EEC”) Charge (“Phase V EE&C-C”) shall be applied to each Billing Unit during a billing month to Customers served under this Tariff, with the exception of those served under Borderline Service rates.

Residential, Commercial, and Street Lighting Customer Class rates will be calculated to the nearest one-thousandth of a cent per kWh. Industrial Customer Class rates will be calculated to the nearest one-hundredth of a dollar per kW PLC. The Phase V EE&C-C rates shall be calculated separately for each Customer Class according to the provisions of this rider.

For service rendered June 1, 2026 through May 31, 2027, the Phase V EE&C-C rates billed by Customer Class are as follows:

Met-Ed				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, MS, OALs	SLS, LED SLS	GS-L, GP, TP
Charge	0.216 cents per kWh	0.268 cents per kWh	0.060 cents per kWh	\$1.02 per kW PLC

Penelec				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, H, OALs	HPS SLS, Municipal SLS, LED SLS	GS-L, GP, TP
Charge	0.249 cents per kWh	0.440 cents per kWh	0.057 cents per kWh	\$0.95 per kW PLC

Penn Power				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-S, GS-S(GSDS), GS-M, PLS, OALs, GS-V, PNP	SV, LED SLS	GS-L, GP, TP
Charge	0.230 cents per kWh	0.300 cents per kWh	(0.014) cents per kWh	\$0.51 per kW PLC

West Penn				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, OALs	51:58, 71, LED SLS	GS-L, GP, TP, 44, 46
Charge	0.235 cents per kWh	0.351 cents per kWh	0.054 cents per kWh	\$0.94 per kW PLC

PSU				
Customer Class	Industrial			
Rate Schedule	GP			
Charge	\$0.94 per kW PLC			

**ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER (continued)**

The Phase V EE&C-C rates by Customer Class shall be calculated in accordance with the formula set forth below:

$$EE\&C-C = \{[EEC_C - E - E^2] / S\} \times [1 / (1 - T)]$$

$$EEC_C = EEC_{Exp1} + EEC_{Exp2} + EEC_{Exp3}$$

Where:

EE&C-C = The charge in cents or dollar per Billing Unit by Customer Class as defined by this rider applied to each Billing Unit for the Rate Schedules identified in this rider.

EEC<sub>C</sub> = The Energy Efficiency and Conservation Costs by Customer Class incurred and projected to be incurred by the Company for the EE&C-C Computational Period calculated in accordance with the formula shown above.

EEC<sub>Exp1</sub> = Costs incurred and projected to be incurred associated with the Customer Class specific Phase V EE&C Programs as approved by the Commission for the Phase V EE&C-C Computational Period by Customer Class. The direct costs associated with specific programs are charged to the specific programs. EEC<sub>Exp1</sub> costs also include an allocated portion of any indirect costs incurred associated with all the Company's Phase V EE&C programs for the Phase V EE&C-C Computational Period. Such indirect cost shall be allocated to each customer class based on the ratio of class-specific approved budgeted administrative program costs to total plan-specific approved budgeted administrative program costs.

EEC<sub>Exp2</sub> = Incremental administrative start-up costs incurred by the Company through May 31, 2026 in connection with the development of the Company's Phase V EE&C Programs in response to the Commission's order and guidance at Docket No. M-2025-3057327. These costs to design, create, and obtain Commission approval for the Company's Phase V EE&C Programs include, but are not limited to, consultant costs, legal fees, and other direct and indirect costs associated with the development and implementation of the Company's Phase V EE&C Programs in compliance with Commission directives. The direct incremental administrative start-up costs associated with specific programs are charged to the specific programs. EEC<sub>Exp2</sub> costs also include an allocated portion of any indirect incremental administrative start-up costs. Such indirect costs shall be allocated to each customer class based on the ratio of class-specific approved budget budgeted administrative program costs to total plan-specific approved budgeted administrative program cost.

**ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER (continued)**

- $EEC_{Exp3}$  = An allocated portion of the costs the Company incurs and projects to incur to fund the Commission's statewide evaluator contract which shall be excluded in the final determination of the Act 129 limitation on the Company's Phase V EE&C Program costs. Such costs shall be allocated to each customer class based on the ratio of class-specific approved budgeted program costs to total approved budgeted program costs.
- $E$  = The cumulative over or under-collection of Phase V EE&C costs by Customer Class that result from the billing of the Phase V EE&C-C rates (an over- collection is denoted by a positive  $E$  and an under-collection by a negative  $E$ ).
- $E^2$  = Phase IV EE&C final reconciliation over or under-collection of EEC costs for each Rate District, by Customer Class, that results from the billing of the Phase IV EE&C-C rates through March 31, 2026 (an over- collection is denoted by a positive  $E$  and an under- collection by a negative  $E$ ), and any expenses to finalize any measures installed and commercially operable on or before May 31, 2026; expenses to finalize any contracts; other Phase IV administrative obligations; and any remaining Phase IV EE&C revenues after March 31, 2026.
- $S$  = The Company's projected Billing Units (kWh sales delivered to all Customers in the specific customer class or kW PLC demand for the Industrial Customer Class).
- $T$  = The Pennsylvania gross receipts tax rate in effect during the billing month expressed in decimal form as reflected in the Company's base rates.

All capitalized terms not otherwise defined in this rider shall have the definitions specified in the Definitions of Terms section of this Tariff. For the purpose of this rider, the following additional definitions shall apply:

1. Phase V EE&C-C Computational Period – The 12-month period from June 1 through May 31.
2. Phase V EE&C-C Initial Reconciliation Period – June 1, 2026 through March 31, 2027 for the initial period of the rider.

**ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER (continued)**

3. Phase V EE&C-C Reconciliation Period – The 12-month period ending March 31 each year thereafter, except for the Initial Reconciliation Period, for the duration of this rider.
4. Peak Load Contribution (“PLC”) – A Customer’s contribution to the Company’s transmission zone normalized summer peak load, as estimated by the Company in accordance with PJM rules and requirements.
5. Phase IV EE&C – The energy efficiency plan that terminates on May 31, 2026. Revenues and EE&C Costs will continue to accrue past the termination date. A final reconciliation of the remaining balance will be included in the June 1, 2027 Phase V EE&C-C rate calculation as a separate line item.

The Company will submit to the Commission by May 1 of each year starting May 1, 2027: (1) a reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs for the Phase V EE&C-C Reconciliation Period, except for the Phase V EE&C-C Initial Reconciliation Period, as adjusted for removal of gross receipts tax; (2) any adjustment to the forecasted Phase V EE&C-C revenues anticipated to be billed during April through May of that year, as adjusted for removal of gross receipts tax; (3) the Phase V EE&C program cost estimate for the forthcoming Phase V EE&C-C Computational Period by Customer Class; and (4) Phase IV EE&C final reconciliation over or under- collection of EEC costs by Customer Class that results from the billing of the Phase IV EE&C-C rates and remaining Phase IV EE&C costs. There shall also be a final reconciliation of amounts to be collected or refunded after May 31, 2031.

Upon determination that the Phase V EE&C-C rates, if left unchanged, would result in material over or under-collection of all recoverable costs incurred or expected to be incurred by customer class, the Company may request that the Commission approve one or more interim revisions to the Phase V EE&C-C rates to become effective thirty (30) days from the date of filing, unless otherwise ordered by the Commission.

The Company shall file an annual report of collections under this rider by April 30th of each year starting April 30, 2027 until the conclusion of this rider.

At the conclusion of the duration of this rider, the Company is authorized to recover or refund any remaining amounts not reconciled at that time under such mechanism as approved by the Commission.

Application of the Phase V EE&C-C rates shall be subject to annual review and audit by the Commission.

**FirstEnergy Pennsylvania Electric Company's Phase V Energy Efficiency and Conservation Charge ("EE&C-C") C-Factor Rates  
For the Rate Period June 1, 2026 through May 31, 2027**

<b>Line No.</b>	<b>Description</b>	<b>FE PA Residential Customer Class (1)</b>	<b>FE PA Commercial Customer Class (2)</b>	<b>FE PA Street Lighting Customer Class (3)</b>	<b>FE PA Industrial Customer Class (4)</b>	<b>FE PA Total (5)</b>
1	Projected Program Costs for the period June 1, 2026 through May 31, 2027 subject to 2% cap	\$ 36,257,025	\$ 24,264,647	\$ 66,748	\$ 20,335,635	\$ 80,924,055
2	Incremental administrative start-up costs	380,832	254,868	701	213,599	850,000
3	Statewide Evaluator Costs (June 1, 2026 through May 31, 2027)	<u>358,430</u>	<u>239,876</u>	<u>660</u>	<u>201,034</u>	<u>800,000</u>
4	Total Projected Program Costs for the period June 1, 2026 through May 31, 2027 subject to 2% cap	\$ 36,996,287	\$ 24,759,391	\$ 68,109	\$ 20,750,268	\$ 82,574,055
5	The cumulative over/(under) collection of Phase V EE&C costs (beginning June 2027)	-	-	-	-	-
6	Total to be collected June 1, 2026 to May 31, 2027 (Line 4 - Line 5)	\$ 36,996,287	\$ 24,759,391	\$ 68,109	\$ 20,750,268	\$ 82,574,055
7	Billing Units for June 1, 2026 - May 31, 2027 (page 2, line 5)	19,115,351,825 kWhs	10,745,921,734 kWhs	86,109,751 kWhs	34,798,573 kWhs	
8	Phase V - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (Line 6 / Line 7)	\$ 0.00194 per kWh	\$ 0.00230 per kWh	\$ 0.00079 per kWh	\$ 0.60 per kW	
9	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	
10	<b>Proposed Phase V EE&amp;C-C Rates Effective June 1, 2026 (Line 8 x Line 9)</b>	<u><b>\$ 0.00206</b></u> per kWh	<u><b>\$ 0.00245</b></u> per kWh	<u><b>\$ 0.00084</b></u> per kWh	<u><b>\$ 0.63</b></u> per kW	
11	Percentage of Projected Program costs to allocate admin start-up and SWE costs	44.80%	29.98%	0.08%	25.13%	100.00%

(A) Pennsylvania's Act 129 of 2008 states that the maximum annual cost recovery for Energy Efficiency and Conservation Programs cannot exceed 2% of the electric distribution company's total annual revenue as of December 31, 2006.

(B) For purposes of the Industrial class rate calculation, the billing unit is equal to the Peak Load Share in kWhs.

(C) All costs and revenue estimates are current budgets, and subject to modification at a future date. The Statewide Evaluator Cost utilized is the estimate based on the expense to be incurred for Phase V.

**Projected Met-Ed Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates  
For the Rate Period June 1, 2026 through May 31, 2027**

Line No.	Description	Met-Ed Residential Customer Class (1)	Met-Ed Commercial Customer Class (2)	Met-Ed Street Lighting Customer Class (3)	Met-Ed Industrial Customer Class (4)	Met-Ed Total (5)
1	Phase IV over/(under) collection through October 31, 2025	(558,345)	(620,213)	6,543	(3,615,483)	\$ (4,787,498)
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	5,911,222,263 kWh	2,911,355,240 kWh	28,697,930 kWh	9,842,614 kWh	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	\$ 0.00009 per kWh	\$ 0.00021 per kWh	\$ (0.00023) per kWh	\$ 0.36733 per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	
5	<b>Phase IV EE&amp;C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)</b>	<u>\$ 0.00010</u>	<u>\$ 0.00023</u>	<u>\$ (0.00024)</u>	<u>\$ 0.39</u>	
6	<b>FE PA Proposed Phase V EE&amp;C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)</b>	<u>\$ 0.00206</u>	<u>\$ 0.00245</u>	<u>\$ 0.00084</u>	<u>\$ 0.63</u>	
7	<b>Total ME Rate:</b>	<u><u>\$ 0.00216</u></u> per kWh	<u><u>\$ 0.00268</u></u> per kWh	<u><u>\$ 0.00060</u></u> per kWh	<u><u>\$ 1.02</u></u> per kW	

**Projected Penelec Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates  
For the Rate Period June 1, 2026 through May 31, 2027**

Line No.	Description	Penelec Residential Customer Class (1)	Penelec Commercial Customer Class (2)	Penelec Street Lighting Customer Class (3)	Penelec Industrial Customer Class (4)	Penelec Total (5)
1	Phase IV over/(under) collection through October 31, 2025	<u>(1,721,174)</u>	<u>(5,964,739)</u>	<u>8,296</u>	<u>(2,726,803)</u>	<u>\$ (10,404,420)</u>
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	4,290,591,308 kWh	3,244,208,078 kWh	32,483,313 kWh	8,918,755 kWh	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	\$ 0.00040 per kWh	\$ 0.00184 per kWh	\$ (0.00026) per kWh	\$ 0.30574 per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	
5	<b>Phase IV EE&amp;C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)</b>	<u>\$ 0.00043</u>	<u>\$ 0.00195</u>	<u>\$ (0.00027)</u>	<u>\$ 0.32</u>	
6	<b>FE PA Proposed Phase V EE&amp;C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)</b>	<u>\$ 0.00206</u>	<u>\$ 0.00245</u>	<u>\$ 0.00084</u>	<u>\$ 0.63</u>	
7	<b>Total PN Rate:</b>	<u><u>\$ 0.00249</u></u> per kWh	<u><u>\$ 0.00440</u></u> per kWh	<u><u>\$ 0.00057</u></u> per kWh	<u><u>\$ 0.95</u></u> per kW	

**Projected Penn Power Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates  
For the Rate Period June 1, 2026 through May 31, 2027**

<b>Line No.</b>	<b>Description</b>	<b>Penn Power Residential Customer Class (1)</b>	<b>Penn Power Commercial Customer Class (2)</b>	<b>Penn Power Street Lighting Customer Class (3)</b>	<b>Penn Power Industrial Customer Class (4)</b>	<b>Penn Power Total (5)</b>
1	Phase IV over/(under) collection through October 31, 2025	<u>(379,609)</u>	<u>(466,557)</u>	<u>3,009</u>	<u>255,480</u>	\$ <u>(587,677)</u>
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	1,698,301,712 kWh	896,583,834 kWh	3,261,779 kWh	2,190,459 kW	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	\$ 0.00022 per kWh	\$ 0.00052 per kWh	\$ (0.00092) per kWh	\$ (0.11663) per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	
5	<b>Phase IV EE&amp;C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)</b>	<u>\$ 0.00024</u>	<u>\$ 0.00055</u>	<u>\$ (0.00098)</u>	<u>\$ (0.12)</u>	
6	<b>FE PA Proposed Phase V EE&amp;C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)</b>	<u>\$ 0.00206</u>	<u>\$ 0.00245</u>	<u>\$ 0.00084</u>	<u>\$ 0.63</u>	
7	<b>Total PP Rate:</b>	<u><u>\$ 0.00230</u></u> per kWh	<u><u>\$ 0.00300</u></u> per kWh	<u><u>\$ (0.00014)</u></u> per kWh	<u><u>\$ 0.51</u></u> per kW	

**Projected West Penn Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates  
For the Rate Period June 1, 2026 through May 31, 2027**

<b>Line No.</b>	<b>Description</b>	<b>West Penn Residential Customer Class (1)</b>	<b>West Penn Commercial Customer Class (2)</b>	<b>West Penn Street Lighting Customer Class (3)</b>	<b>West Penn Industrial Customer Class (4)</b>	<b>West Penn Total (5)</b>
1	Phase IV over/(under) collection through October 31, 2025	<u>(1,995,239)</u>	<u>(3,697,011)</u>	<u>6,085</u>	<u>(3,992,967)</u>	<u>\$ (9,679,132)</u>
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	7,215,236,543 kWhs	3,693,774,582 kWhs	21,666,728 kWhs	13,846,745 kWhs	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	\$ 0.00028 per kWh	\$ 0.00100 per kWh	\$ (0.00028) per kWh	\$ 0.28837 per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	<u>1.062699</u>	
5	<b>Phase IV EE&amp;C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)</b>	<u>\$ 0.00029</u>	<u>\$ 0.00106</u>	<u>\$ (0.00030)</u>	<u>\$ 0.31</u>	
6	<b>FE PA Proposed Phase V EE&amp;C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)</b>	<u>\$ 0.00206</u>	<u>\$ 0.00245</u>	<u>\$ 0.00084</u>	<u>\$ 0.63</u>	
7	<b>Total WP Rate:</b>	<u><u>\$ 0.00235</u></u> per kWh	<u><u>\$ 0.00351</u></u> per kWh	<u><u>\$ 0.00054</u></u> per kWh	<u><u>\$ 0.94</u></u> per kW	

**FirstEnergy Pennsylvania Electric Company**  
**Phase V Energy Efficiency and Conservation Charge ("EE&C-C") Rates**  
**Projected Billing Units by Rate District and Customer Class**  
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Rate District	Residential Projected kWh (1)	Commercial Projected kWh (2)	Streetlighting Projected kWh (3)	Industrial Peak Load Contribution (kW) (4)
1	Met-Ed Rate District	5,911,222,263	2,911,355,240	28,697,930	9,842,614
2	Penelec Rate District	4,290,591,308	3,244,208,078	32,483,313	8,918,755
3	Penn Power Rate District	1,698,301,712	896,583,834	3,261,779	2,190,459
4	West Penn Rate District	7,215,236,543	3,693,774,582	21,666,728	13,846,745
5	<b>Total</b>	<b>19,115,351,825</b>	<b>10,745,921,734</b>	<b>86,109,751</b>	<b>34,798,573</b>

## VERIFICATION

I, Edward C. Miller, Manager, Compliance and Development in the Energy Efficiency Department at FirstEnergy Corp, hereby state that the facts set forth in the above filing dated November 26, 2025 are true and correct to the best of my knowledge, information and belief and that I expect to be able to provide the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: November 26, 2025

A handwritten signature in black ink that reads "Edward C. Miller". The signature is written in a cursive style and is positioned above a horizontal line.

Edward C. Miller