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December 1, 2025

VIA eFILING

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

**Re: Petition of PECO Energy Company for Approval of Its
Act 129 Phase V Energy Efficiency and Conservation Plan
Docket No. M-2025-3057328**

Dear Secretary Homsher:

Pursuant to Act 129 of 2008 and the Commission's Phase V Implementation Order,¹ enclosed for filing please find the **Petition of PECO Energy Company for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan.**

PECO's filing is organized as follows:

- **Petition**
- **Statement No. 1 - Direct Testimony of Urmila Dighe**
- **Statement No. 2 - Direct Testimony of Marina Geneles**
- **Statement No. 3 - Direct Testimony of Mark van Eeghen**
- **Statement No. 4 - Direct Testimony of Megan A. McDevitt**
- **Exhibit No. 1 - PECO Phase V Energy Efficiency and Conservation Plan (Program Years 18-22)**

¹ *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Order entered June 18, 2025).

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
December 1, 2025
Page 2

A copy of this filing will be served as indicated on the attached Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me at 267-533-1964.

Very truly yours,

A handwritten signature in black ink that reads "Anthony E. Gay". The signature is written in a cursive style with a large, stylized "A" and "G".

Anthony E. Gay

Enclosures

c: Per the Certificate of Service (w/encls.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
ACT 129 PHASE V ENERGY : **Docket No. M-2025-3057328**
EFFICIENCY AND CONSERVATION :
PLAN :

CERTIFICATE OF SERVICE

I hereby certify that I have this date served true and correct copies of the **Petition of PECO Energy Company for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan** on the following individuals in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

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Dated: December 1, 2025

Counsel for PECO Energy Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF :
ITS ACT 129 PHASE V ENERGY : DOCKET NO. M-2025-3057328
EFFICIENCY AND :
CONSERVATION PLAN :**

**PETITION OF PECO ENERGY COMPANY
FOR APPROVAL OF ITS ACT 129
PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN**

DECEMBER 1, 2025

TABLE OF CONTENTS

Petition of PECO Energy Company for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan

PECO Statement No. 1	Direct Testimony of Urmila Dighe, PECO’s Senior Manager of Energy Efficiency Portfolio
PECO Statement No. 2	Direct Testimony of Marina Geneles, PECO’s Manager of Demand Response & Energy Efficiency Evaluation
PECO Statement No. 3	Direct Testimony of Mark van Eeghen, Associate Director at Guidehouse, Inc.
Exhibit MVE-1	Resume of Mark van Eeghen
PECO Statement No. 4	Direct Testimony of Megan A. McDevitt, PECO’s Senior Manager of Strategic Initiatives
Exhibit MAM-1	Proposed Supplement Setting Forth Revisions to PECO’s Electric Service Tariff (Clean and Redline)
Exhibit MAM-2	Program Costs by Rate Class
Exhibit MAM-3	Calculation of the Cost Recovery Charges by Rate Class for the First Year of PECO’s Phase V EE&C Plan
Exhibit MAM-4	Responses to the Commission’s Filing Requirements at 52 Pa. Code § 53.52
PECO Exhibit No. 1	PECO Phase V Energy Efficiency and Conservation Plan (Program Years 18-22)
Appendix A	CSP Contracts
Appendix B	Calculation Methods and Assumptions
Appendix C	Program by Program Savings, Costs, and TRC Results
Appendix D	Avoided Cost Calculator

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
ACT 129 PHASE V ENERGY : **DOCKET NO. M-2025-3057328**
EFFICIENCY AND CONSERVATION :
PLAN :

**PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF
ITS ACT 129 PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN**

I. INTRODUCTION

PECO Energy Company (“PECO” or the “Company”) petitions the Pennsylvania Public Utility Commission (the “Commission”) for approval of the Company’s Phase V Energy Efficiency and Conservation Plan (the “Phase V Plan” or the “Plan”) to achieve energy and peak demand reductions in accordance with the requirements of Act 129 of 2008, 66 Pa.C.S. § 2806.1 (“Act 129” or the “Act”) and the Commission’s Implementation Order entered June 18, 2025, at Docket No. M-2025-3052826 (the “*Phase V Implementation Order*”).¹ Specifically, PECO requests that the Commission: (1) find that the Phase V Plan satisfies the requirements of 66 Pa.C.S. § 2806.1(b)(1) and the *Phase V Implementation Order*, including those provisions mandating the implementation of programs designed to achieve the peak demand reduction (“PDR”) and consumption reduction targets established for PECO and the energy savings carve-out for the low-income customer sector; and (2) approve a supplement to PECO’s Electric Service Tariff to implement a Section 1307 surcharge to recover Phase V Plan costs.

The Company employed a market-based approach to design Phase V programs that will satisfy the Company’s Phase V energy savings and PDR targets, stay within applicable cost

¹ The proposed Phase V Plan is attached to this Petition as “PECO Exhibit No. 1.”

limitations, and provide meaningful opportunities for customers to save energy and money. PECO's Phase V Plan has three energy efficiency ("EE") programs: (1) Residential (including low-income); (2) Residential Home Energy Reports ("HER," including low-income HER); and (3) Non-Residential. The Plan describes each program in detail, consistent with the content and formatting requirements of the filing template issued by the Commission (the "*Filing Template Letter*").² In keeping with PECO's practice for its Phase I, Phase II, Phase III, and Phase IV plans, PECO actively engaged with a range of stakeholders to receive and consider their perspectives on plan design.

Over the course of the five-year Phase V Plan (June 1, 2026, through May 31, 2031), the Company estimates that its Phase V programs will produce: (1) 1,458,076 MWh in energy savings, or 131% of PECO's overall energy savings target; and (2) 264.5 MW of PDR, or 136% of its overall PDR target.

II. BACKGROUND

1. PECO is a corporation duly incorporated and validly subsisting under the laws of the Commonwealth of Pennsylvania, with the Company's principal office located in Philadelphia, Pennsylvania. PECO provides electric delivery service to approximately 1.7 million customers and natural gas delivery service to more than 553,000 customers in Pennsylvania.

2. On October 15, 2008, then Governor Edward G. Rendell signed into law Act 129, which, *inter alia*, added Section 2806.1 to the Pennsylvania Public Utility Code. The applicable provisions of Act 129 required Pennsylvania electric distribution companies ("EDCs") to file energy efficiency and conservation ("EE&C") plans by July 1, 2009, containing the plan elements

² *Implementation of Act 129 of 2008 – Phase V Energy Efficiency and Conservation Plan Template*, Docket No. M-2025-3052826 (Issued Sept. 8, 2025).

specified in Section 2806.1(b) (“Phase I EE&C Program”).³ *See* 66 Pa.C.S. § 2806.1(b). In addition, Sections 2806.1(c) and (d) required that EDCs’ Phase I EE&C plans be designed: (1) to reduce retail energy consumption by a minimum of 1.0% by May 31, 2011, and a minimum of 3.0% by May 31, 2013; and (2) to reduce peak demand, measured by reference to the 100 highest hours of demand, by a minimum of 4.5% no later than May 31, 2013. *See id.* §§ 2806.1(c) and (d).

3. The EE&C plan filing requirements in Section 2806.1(b) mandated that energy savings be derived from certain customer segments during Phase I. For instance, a minimum of 10% of an EDC’s consumption reductions had to be obtained from the governmental, educational and nonprofit sector. *See id.* § 2806.1(b)(1)(i)(B). In addition, each EDC’s Phase I plan was to include specific EE programs for households with income at or below 150% of the Federal Poverty Income Guidelines (“low-income sector”) that are proportionate to such households’ share of the total energy usage in the EDC’s service territory. *Id.* § 2806.1(b)(1)(i)(G). Finally, an EDC’s plan had to pass a “total resource cost” or “TRC” test to determine whether the avoided cost of supplying electricity was greater than the cost of a plan’s energy efficiency and conservation measures *See id.* § 2806.1(b)(1)(i)(I); *2026 Total Resource Cost (TRC) Test*, Docket No. M-2024-3048998 (Order entered November 7, 2024).

4. Pursuant to the Act, EDCs are entitled to full and current cost recovery of prudent and reasonable costs, including administrative costs, but annual plan expenditures are limited to 2.0% of the EDC’s total annual revenue as of December 31, 2006. *See* 66 Pa.C.S. §§ 2806.1(g), (k). For PECO, this annual spending amount is approximately \$85.5 million.

³ EDCs with fewer than 100,000 customers are exempt from this requirement.

5. In compliance with Section 2806.1 and the Commission’s Order entered January 15, 2009, at Docket No. M-2008-2069887, PECO submitted its EE&C plan for the Phase I EE&C Program on July 1, 2009. The Commission approved PECO’s Phase I Plan, with modifications, on October 28, 2009.⁴ PECO met its Phase I consumption reduction target, consumption reduction carve-outs, and PDR target.

6. Act 129 further required the Commission, by November 30, 2013, to evaluate the costs and benefits of the Phase I EE&C Program. If the benefits of such Program were found to exceed its costs, the Commission was directed to adopt “additional required incremental reductions in consumption” and “additional incremental requirements for reduction in peak demand.” 66 Pa.C.S. §§ 2806.1(c)(3) and (d)(2). The Commission did so and has issued implementation orders for Phase II,⁵ Phase III,⁶ Phase IV,⁷ and Phase V⁸ of the EE&C program.

7. PECO submitted its Phase II Plan consistent with the *Phase II Implementation Order*, which the Commission approved on February 28, 2013. A voluntary PDR program was added to the Phase II Plan on May 9, 2013.⁹ PECO met its Phase II consumption reduction target and carve-outs.

⁴ See *Petition of PECO Energy Company for Approval of its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of its Compact Fluorescent Lamp Program*, Docket No. M-2009-2093215 (Order entered Oct. 28, 2009). Certain revisions were adopted in subsequent orders.

⁵ *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order entered Aug. 3, 2012) (“*Phase II Implementation Order*”).

⁶ *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Order entered June 19, 2015) (“*Phase III Implementation Order*”).

⁷ *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228 (Order entered June 18, 2020) (“*Phase IV Implementation Order*”).

⁸ See *Phase V Implementation Order*.

⁹ See *Petition of PECO Energy Company for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2333992.

8. PECO submitted its Phase III Plan consistent with the *Phase III Implementation Order*, which the Commission approved on May 19, 2016.¹⁰ PECO met its Phase III targets and carve-outs.

9. PECO submitted its Phase IV Plan consistent with the *Phase IV Implementation Order*, which the Commission approved on March 25, 2021.¹¹ PECO expects to meet its Phase IV targets and carve-out by the end of Phase IV (May 31, 2026).

10. In its *Phase V Implementation Order*, the Commission established both consumption reduction and PDR targets for the five-year plan period of June 1, 2026 through May 31, 2031. PECO's total Phase V MWh savings target is 1,111,685 MWh. The Company's total Phase V PDR target is 194.8 MW. The Commission also established a savings carve-out for the low-income sector. Under this carve-out, PECO must obtain 74,456 MWh of savings from programming solely directed at low-income customers or low-income-verified participants in multifamily housing programs.

11. The *Phase V Implementation Order* also includes several plan design requirements, including that plans must: (1) be designed to achieve at least 15% of the MWh savings target and PDR target each program year; (2) include at least one comprehensive program for residential customers and one comprehensive program for non-residential customers; (3) allocate at least 50% of all spending to incentives, with less than 50% allocated to non-incentive categories; and (4)

¹⁰ *Petition of PECO Energy Company for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515691 (Order entered May 19, 2016). Further revisions to PECO's Phase III Plan were adopted in later orders in the same docket.

¹¹ *Petition of PECO Energy Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020830 (Order entered Mar. 25, 2021). Further revisions to PECO's Phase IV Plan were adopted in later orders in the same docket.

include a mix of measures and programs that are designed to acquire at least 75% of the PDR target in each the winter season and summer season.

12. On September 8, 2025, the Commission issued the *Filing Template Letter*, which included an EE&C plan template for use by EDCs in preparing and filing their EE&C Plans for Phase V.

13. This Petition describes PECO’s Phase V Plan and the proposed mechanism for recovery of Plan costs and includes the following statements and exhibits, which are attached to this Petition and incorporated by reference:

PECO Statement No. 1	Direct Testimony of Urmila Dighe, Senior Manager of PECO’s Energy Efficiency Portfolio
PECO Statement No. 2	Direct Testimony of Marina Geneles, PECO’s Manager of Demand Response & Energy Efficiency Evaluation
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III. MARKET-BASED PLAN DESIGN PROCESS

14. As explained in the testimony of Ms. Geneles, Ms. Dighe, and Mr. van Eeghen, PECO employed a market-based approach to design its Phase V Plan. The Company established high-level requirements for each program in the Phase V Plan and then solicited and assessed bids from experienced conservation service providers (“CSPs”) that were consistent with those requirements.

15. PECO first determined the appropriate division of the Company’s mandated EE savings and PDRs between its three Phase V programs. Next, the Company established a budget for each program based on the acquisition cost findings in the statewide evaluator’s (“SWE’s”) Energy Efficiency and Peak Demand Reduction Potential Study and benchmarking of other utility portfolios. Finally, consistent with the Commission’s requirement in the *Phase V Implementation Order*, PECO established requirements that each program be designed to achieve a minimum of 15% of its total EE savings and PDRs each year and that the programs together be designed to acquire at least 75% of the PDR target in each the winter season and summer season. In addition, the non-behavioral programs must: (1) allow customers to access all applicable measures in the Technical Reference Manual; (2) engage a variety of market players (e.g., trade allies); and (3) allocate at least 50% of the program budget to incentives.

16. PECO then issued requests for proposals (“RFPs”) for different program groupings in a manner consistent with the Company’s Commission-approved Phase V RFP process.¹²

¹² PECO’s Phase V RFP process was approved by Secretarial Letter issued September 11, 2025, at Docket No. M-2025-3052826. The RFP utilized to select the behavioral program CSP was administered at the Exelon Corporation level but was consistent with PECO’s approved Phase V RFP process.

Bidders were instructed to propose program designs that met each of the Company’s high-level program requirements and to identify any sub-contractors they would employ. Bidders were also asked to propose a blended delivery and “pay-for-performance” contract pricing structure whereby a portion of the CSP’s compensation would be fixed and a portion would be based on the achievement of verified EE savings.

17. The Company scrutinized each bid in accordance with its Phase V RFP process and selected the winning bidders. The Phase V Plan reflects the program designs proposed by the winning CSPs.

18. There are several benefits to PECO’s market-based approach:

- **Incorporation of diverse market expertise.** By allowing CSPs to design programs to meet the Company’s key requirements, PECO’s Phase V Plan reflects the expertise and experience of multiple market actors in the EE space.
- **Provision of greater flexibility to respond to market changes.** By having a single CSP administer an entire program instead of certain portions of a program, the CSP can take a flexible and market-responsive approach, with PECO’s approval, to achieving the required EE savings and PDRs.
- **Incentivization of innovative and cost-effective CSP activity.** Because a portion of CSP compensation is based on a CSP’s ability to drive EE savings, CSPs are incentivized to design innovative, achievable and cost-effective programs.
- **Engagement of an array of market actors to drive a positive customer experience.** By requiring CSPs to engage a variety of market actors during program implementation, PECO is facilitating customer access to comprehensive savings opportunities. The CSP compensation structure also incentivizes CSPs to carefully monitor subcontractor performance to drive a positive customer experience.

IV. PECO'S PROPOSED PHASE V PROGRAMS

19. The Company's Phase V programs are designed to produce: (1) 1,458,076 MWh in energy savings, or 131% of PECO's overall energy savings target; and (2) 264.5 MW of PDR, or 136% of its overall PDR target. The total Plan budget is approximately \$427.4 million.¹³

20. Consistent with the *Phase V Implementation Order*, at least 74,456 MWh of the Company's overall energy savings will be obtained from the low-income sector. The Plan is further designed to obtain at least 15% of the total MWh savings target and PDR target each program year. Also consistent with the *Phase V Implementation Order*, the Plan includes at least one comprehensive program for residential customers and one comprehensive program for non-residential customers, allocates at least 50% of all spending to incentives, and includes a mix of measures and programs that are designed to acquire at least 75% of the PDR target in each of the winter season and summer season.

21. Below is a summary of the three EE programs, including two low-income subprograms, which are detailed in Section 3 of PECO's Plan and described in the testimony of Ms. Geneles.

- **The Residential Program** is designed to offer customers opportunities to save energy across all their electric end uses. The Program objective is to increase energy efficiency in single-family homes and individual units, as well as common areas of multifamily buildings. In order to meet that objective, the Program will offer incentives for the purchase of efficient equipment and removal of old appliances through responsible recycling. The Program will also drive construction of energy-efficient homes, deliver no-cost and low-cost energy assessments, and support PDRs by encouraging the adoption of smart devices.
 - **The Residential Low-Income Subprogram** is available to residential customers in the low-income sector. The foundational element of the subprogram is a direct install whole-home solution, which provides in-home audits and education as well as the direct installation of EE measures at no charge to the participant. The subprogram also includes

¹³ See, e.g., *Phase V Implementation Order*, p. 232 (identifying PECO's Phase V five-year budget limit of \$427,385,830).

appliance recycling services. Subprogram offerings will be available for low-income families living in multifamily buildings, including measures for the customer premises and common areas. Importantly, the subprogram addresses health and safety barriers in customer homes to enable installation of energy efficiency measures and improve overall comfort and well-being.

- **The Residential HER Program** involves regularly delivering direct mail or digital home energy reports that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations. The Program is designed to influence participant behaviors and influence energy management in their homes.
 - **The Residential Low-Income HER Subprogram** has similar offerings to the overall Residential HER Program but is targeted only to customers in the low-income sector.
- **The Non-Residential Program** objective is to increase energy efficiency for both large and small commercial and industrial customers with rebates for a wide range of energy conservation measures. The Program provides access to technical support, incentives, and concierge-style services to facilitate program participation. The Program includes the following components: strategic energy management, existing buildings, building optimization, distributed energy resources, small business solutions, and new construction.

22. As required by Act 129, PECO has applied the TRC test to the Phase V Plan as a whole. The Company also applied the TRC test to each proposed program. PECO's Plan has an overall gross TRC score of 1.19, demonstrating significant benefits to PECO's customers compared to the total costs of the proposed EE and PDR measures. The projected energy savings, PDRs, costs, and TRC calculations are detailed in PECO's Plan and accompanying appendices.

23. Consistent with Act 129 and the Company's Phase I, Phase II, Phase III, and Phase IV Plans, CSPs will be responsible for program implementation, staffing, training and the tracking of programs and measures pursuant to CSP contracts.

24. PECO's Phase V RFPs have followed the process approved by the Commission in a Secretarial Letter issued September 11, 2025, at Docket No. M-2025-3052826. All future RFPs will follow this approved process. PECO will separately submit proposed Phase V CSP contracts for Commission review on a confidential basis.

25. As required by Act 129, (*see* 66 Pa.C.S. § 2806.1(b)(1)(i)(K)), PECO's Plan includes an analysis of its expected administrative costs as shown in Section 7.3, Table 38, of the Plan. Additionally, consistent with PECO's Act 129 obligations, the Plan includes an extensive set of quality assurance and performance mechanisms for evaluating the Plan on a continual basis. Each of PECO's proposed programs has detailed evaluation, measurement and verification ("EM&V") requirements tailored to the program. PECO will retain the services of an experienced CSP to provide EM&V services as well as data tracking system services for maintaining data and generating reports on each program. A description of PECO's overall approach to quality assurance and the anticipated tracking system functions are set forth in Sections 5 and 6 of the Plan.

V. THE PHASE V EE&C RECOVERY CHARGE

26. Act 129 provides that PECO has a right to recover all reasonable and prudent EE&C plan costs, on a full and current basis, through a Section 1307 cost-recovery mechanism. *See* 66 Pa.C.S. § 2806.1(k). The Commission has previously directed that EDCs develop a separate cost recovery mechanism for each EE&C plan phase and that such mechanism be non-bypassable and not affect the EDCs' prices-to-compare. *See, e.g., Phase II Implementation Order*, p. 118. For Phase V, the Commission also directed that: (1) Phase V charges be calculated to recover projected program costs and be adjusted annually to reflect over- or under-recoveries; (2) an EDC's charges for Phase IV and Phase V be combined into a single surcharge; and (3) EDCs must account for Phase V costs and revenues separately from Phase IV costs and revenues. *See Phase V Implementation Order*, pp. 247-49.

27. In accordance with the foregoing directives, PECO proposes to implement a Phase V Energy Efficiency & Conservation Program Charge ("Phase V EEPC") to recover Plan costs.

The mechanism follows the same format as the Company's existing EEPC, which recovers costs associated with PECO's Phase IV Plan but has been modified to remove references to proceeds/deficiencies from nominated PDR in PJM's Forward Capacity Market ("FCM") as such resources are no longer eligible to participate in the FCM.¹⁴ The Phase V EEPC would be a fully reconcilable, non-bypassable charge in accordance with the Act and previous Commission orders.

28. The Phase V EEPC will recover any fixed capital costs (depreciation and pre-tax return) and operating expenses, not otherwise recovered in base rates, to design and implement the EE programs incorporated in PECO's Phase V Plan. These costs include, among others, the cost of information technology needed to design and implement the programs; the costs of customer outreach and program promotion; incremental labor costs incurred to manage and administer the programs on an ongoing basis; the cost to measure and verify program results; and the cost of incentives offered to customers to participate in the approved programs. PECO also proposes to recover its Phase V SWE costs through the Phase V EEPC.

29. A separate recovery charge will be established for each customer class, corresponding to the costs of the programs or program components that target that class. This procedure ensures that the classes that receive the direct benefits of particular EE measures finance those same measures. For programs that provide benefits to more than one class, costs will be allocated using reasonable and generally accepted cost-of-service principles. Common costs will be allocated to each rate class in proportion to the energy savings (MWh) that each rate class is projected to deliver under the Phase V Plan. Ms. McDevitt's testimony includes an estimate of the proposed charges for each customer class.

¹⁴ See *Phase V Implementation Order*, p. 41.

30. Consistent with the *Phase V Implementation Order* (pp. 247-48), the Phase V EEPC will be developed based on projected plan costs for the coming year. Thereafter, PECO will reset the charge annually to recover the projected Plan costs for the then-upcoming plan year and make the appropriate adjustment to reconcile and true-up revenues and the previous program year's actual costs. No interest will accrue with respect to either over- or under-recoveries, consistent with the Commission's directive in the *Phase V Implementation Order*. PECO also proposes to combine its Phase IV EEPC and Phase V EEPC into a single surcharge and a single tariff provision with the implementation of its Phase V EEPC, as also directed by the Commission.

31. Finally, PECO will comply with the Commission's directive to separately account for Phase V costs and revenues by setting up new general ledger accounts for Phase V costs and revenues. Phase IV costs and revenues are currently tracked through similar, separate accounting measures. Thus, there will be no comingling of Phase V and prior Phase costs or revenues in PECO's accounting records. Phase V costs and revenues will also be clearly identified and tracked separately for purposes of the EEPC. This protocol will allow Phase V costs to be reconciled against Phase V revenues billed under the EEPC.

VI. PROPOSED SCHEDULE

32. The Company proposes the following schedule for review of its Phase V Plan, which is consistent with the *Phase V Implementation Order* and the Commission's September 4, 2025 Order at Docket No. M-2025-3052826:

December 13, 2025	Publication of Notice of Filing in <i>Pennsylvania Bulletin</i>
December 23, 2025	Due Date for Answers/Petitions to Intervene
January 6, 2026	Prehearing Conference

January 12, 2026	Due Date for Comments
February 3, 2026	Evidentiary Hearings
February 13, 2026	Briefs
February 23, 2026	PECO Reply Comments and/or Revised Plan
March 26, 2026	Commission Order

VII. NOTICE

33. PECO is serving copies of this filing on the Office of Consumer Advocate, the Office of Small Business Advocate, the Commission’s Bureau of Investigation and Enforcement, and all parties to the Company’s Phase IV EE&C Plan proceeding.

34. In addition, consistent with the *Filing Template Letter*, the Company will post a copy of its proposed Phase V Plan on PECO’s website at: <https://www.peco.com/my-account/my-dashboard/rates-tariffs/filings>.

35. Should the Commission conclude that further notice of this filing is appropriate, PECO will provide such additional notice as directed by the Commission.

VIII. CONCLUSION

Based on the above, including the attached testimony and exhibits, PECO respectfully requests that the Commission grant this Petition and enter an Order:

(1) Approving PECO’s Phase V Plan and finding that the Plan satisfies the requirements of 66 Pa.C.S. § 2806.1(b)(1) and the *Phase V Implementation Order*; and

(2) Approving the supplement to PECO's Electric Service Tariff to implement a Section 1307 surcharge to recover Phase V Plan costs.

Respectfully submitted,



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Counsel for PECO Energy Company

December 1, 2025

VERIFICATION

I, Urmila Dighe, hereby declare that I am the Senior Manager of the Energy Efficiency Portfolio for PECO Energy Company; that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief; and that I make this verification subject to the penalties of 18 Pa.C.S. § 4904 pertaining to false statements to authorities.



Date: December 1, 2025

By: _____

Urmila Dighe
Senior Manager
PECO Energy Efficiency Portfolio
PECO Energy Company

**PECO ENERGY COMPANY
STATEMENT NO. 1**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ENERGY EFFICIENCY AND CONSERVATION PROGRAM

DOCKET NO. M-2025-3057328

DIRECT TESTIMONY
SUPPORTING PECO'S PETITION FOR APPROVAL
OF ITS PHASE V EE&C PLAN

WITNESS: URMILA DIGHE

SUBJECT: OVERVIEW OF PECO'S FILING, ACT 129
AND PHASE V OBLIGATIONS, AND
OVERVIEW OF PECO'S PHASE V PLAN

DATED: DECEMBER 1, 2025

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND PURPOSE OF TESTIMONY	1
II. BACKGROUND OF PECO’S OBLIGATIONS TO ACHIEVE ENERGY CONSUMPTION AND PEAK DEMAND REDUCTIONS UNDER ACT 129	2
III. OVERVIEW OF PECO’S FILING AND THE PHASE V PLAN	7
IV. CONCLUSION	11

1 **DIRECT TESTIMONY**
2 **OF**
3 **URMILA DIGHE**

4 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

5 **1. Q. Please state your full name, professional position, and business address.**

6 A. My name is Urmila Dighe. I am the Senior Manager of the Energy Efficiency Portfolio
7 for PECO Energy Company (“PECO” or the “Company”). My business address is
8 PECO Energy Company, 2301 Market Street, Philadelphia, Pennsylvania 19103.

9 **2. Q. What are your duties and responsibilities in this position?**

10 A. I have responsibility for the suite of energy efficiency programs offered by PECO to
11 its residential, commercial, and industrial customers. I am responsible for the design,
12 implementation, and promotion of the electric energy efficiency program as related to
13 Act 129. As part of the Company’s Phase V offerings, I will manage coordination with
14 external program partners to identify opportunities for stacking rebates and funding
15 streams to make energy-saving programs more affordable to customers. I am also
16 responsible for implementation of the separate gas energy efficiency program offered
17 by PECO to its residential and commercial and industrial (“C&I”) customers.
18 Additionally, I am responsible for marketing and customer support for the gas
19 neighborhood pilot program offered by PECO.

20 **3. Q. Please describe your educational background and professional experience.**

21 A. I have a Bachelor of Arts in Economics from Mumbai University. I have a Master’s
22 Degree in Finance and Management Information Systems from Drexel University. I

1 joined PECO in 2020 as a Senior Business Analyst in the Government, Regulatory and
2 External Affairs (“GREA”) group. Prior to joining PECO GREA, I worked for 15 years
3 in various wholesale and retail functional groups within Exelon Corporation, including
4 Compliance & Risk Management, Field Meter Services, and Transmission &
5 Substation. In 2022, I assumed the role of Manager, Business Planning with the
6 responsibility for tracking the performance and budget for Energy Efficiency and other
7 programs managed by PECO GREA. In 2025, I was promoted to the role of Senior
8 Manager, Energy Efficiency Portfolio for PECO.

9 **4. Q. What is the purpose of your testimony?**

10 A. The purpose of my testimony is to: (1) describe PECO’s obligations to achieve
11 consumption reductions and peak demand reductions (“PDRs”) under Act 129, prior
12 implementation orders of the Pennsylvania Public Utility Commission (the
13 “Commission”), and the Commission’s Phase V Implementation Order;¹ and (2)
14 provide an overview of PECO’s overall filing and summarize PECO’s Phase V Energy
15 Efficiency and Conservation Plan (the “Phase V Plan” or the “Plan”).

16 **II. BACKGROUND OF PECO’S OBLIGATIONS TO ACHIEVE ENERGY**
17 **CONSUMPTION AND PEAK DEMAND REDUCTIONS UNDER ACT 129**

18 **5. Q. Please describe Act 129’s consumption reduction and PDR requirements.**

19 A. Act 129 directed electric distribution companies (“EDCs”) with greater than 100,000
20 customers to file with the Commission, by July 1, 2009, an energy efficiency and

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

1 conservation plan (“Phase I EE&C Program”).² The EE&C plans were to reduce retail
2 energy consumption by at least 1.0% by May 31, 2011, and at least 3.0% by May 31,
3 2013. These reductions were to be measured against the EDC’s forecasted customer
4 consumption for the period June 1, 2009 through May 31, 2010. For PECO, this
5 2009/2010 baseline is 39,385,000 megawatt-hours (“MWh”).

6 Act 129 also required that each EDC with at least 100,000 customers reduce the average
7 system peak demand for its retail customers in the 100 hours of highest demand by a
8 minimum of 4.5% no later than May 31, 2013. For the Phase I EE&C Program, this
9 demand reduction was to be measured against the EDC’s average peak demand for the
10 100 hours of highest demand over the period of June 1, 2007 through September 30,
11 2007.³

12 In addition to these overall targets, Act 129 mandated that energy savings be obtained
13 from certain designated customer segments during Phase I. Specifically, a minimum
14 of 10% of an EDC’s consumption reduction target had to be obtained from the
15 governmental, educational, and non-profit sector.⁴ In addition, each EDC’s Phase I
16 plan was to include specific energy efficiency programs for households with incomes
17 at or below 150% of the Federal Poverty Income Guidelines that are proportionate to
18 such households’ share of the total energy usage in the EDC’s service territory.⁵

19 Finally, an EDC’s plan had to pass a “total resource cost” or “TRC” test, which is a test

² See 66 Pa.C.S. § 2806.1(b).

³ See Implementation Order, *Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887, at 20-21 (Order entered Jan. 16, 2009) (“*Phase I Implementation Order*”).

⁴ See 66 Pa.C.S. § 2806.1(b)(1)(i)(B).

⁵ See *id.* § 2806.1(b)(1)(i)(G).

1 that establishes whether the avoided cost of supplying electricity is greater than the cost
2 of a plan's energy efficiency and conservation measures.⁶

3 Pursuant to Act 129, EDCs are entitled to full and current cost recovery of prudent and
4 reasonable costs, including administrative costs, but annual plan expenditures were
5 limited to 2.0% of the EDC's total annual revenue as of December 31, 2006.⁷ For
6 PECO, this annual spending amount is approximately \$85.5 million.

7 **6. Q. Did Act 129 contemplate future EE&C programs beyond the Phase I EE&C**
8 **Program?**

9 A. Yes. Act 129 provides that by November 30, 2013, and every five years thereafter, the
10 Commission must assess the cost-effectiveness of the EE&C program and adopt
11 additional incremental consumption reduction targets if the EE&C program's benefits
12 exceed its costs. As for PDR programs, Act 129 directed the Commission to complete
13 a cost benefit analysis by November 30, 2013, and, if the benefits exceed the costs,
14 establish additional incremental requirements for reduction in peak demand.⁸ The
15 Commission has since issued implementation orders for Phase II,⁹ Phase III,¹⁰ Phase

⁶ See *id.* § 2806.1(b)(1)(i)(I); 2016 Total Resource Cost (TRC) Test, Docket No. M-2015-2468992 (Order entered June 22, 2015).

⁷ See 66 Pa.C.S. §§ 2806.1(g), (k).

⁸ See *id.* §§ 2806.1(c)(3), (d)(2).

⁹ See Implementation Order, *Energy Efficiency and Conservation Program*, Docket No. M-2012-2289411 (Order entered Aug. 3, 2012).

¹⁰ See Implementation Order, *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Order entered June 19, 2015).

1 IV,¹¹ and Phase V¹² of the EE&C program. Phase IV of the EE&C program is ongoing
2 and will be complete on May 31, 2026.

3 **7. Q. Has PECO met its compliance obligations for the completed phases of the EE&C**
4 **program?**

5 A. Yes. The Commission approved PECO’s Phase I Plan on October 28, 2009,¹³ and the
6 Company met its Phase I consumption reduction target, consumption reduction carve-
7 outs, and PDR target. The Commission thereafter approved PECO’s Phase II Plan on
8 February 28, 2013, and the Company’s addition of a voluntary demand response
9 program to the Phase II Plan was approved on May 9, 2013.¹⁴ PECO met its Phase II
10 consumption reduction target and carve-outs. The Commission then approved PECO’s
11 Phase III Plan on May 19, 2016,¹⁵ and the Company met its targets and carve-outs.
12 Afterward, PECO submitted its Phase IV Plan consistent with the *Phase IV*
13 *Implementation Order*, which the Commission approved on March 25, 2021.¹⁶ PECO

¹¹ See Implementation Order, *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228 (Order entered June 18, 2020) (“*Phase IV Implementation Order*”).

¹² See *Phase V Implementation Order*.

¹³ See *Petition of PECO Energy Company for Approval of its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of its Compact Fluorescent Lamp Program*, Docket No. M-2009-2093215 (Order entered Oct. 28, 2009). Further revisions to PECO’s Phase I plan were adopted in various subsequent orders on the same docket.

¹⁴ See *Petition of PECO Energy Company for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2333992.

¹⁵ See *Petition of PECO Energy Company for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515691 (Order entered May 19, 2016). Further revisions to PECO’s Phase III Plan were adopted in various subsequent orders in the same docket.

¹⁶ See *Petition of PECO Energy Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020830 (Order entered March 25, 2021). Further revisions to PECO’s Phase IV Plan were adopted in later orders in the same docket.

1 expects to meet its Phase IV targets and carve-out by the end of Phase IV (May 31,
2 2026).

3 **8. Q. What targets did the Commission set for the reduction of consumption and peak**
4 **demand for Phase V?**

5 A. In its *Phase V Implementation Order*, the Commission established both consumption
6 reduction and PDR targets for the five-year plan period of June 1, 2026 through May
7 31, 2031. PECO's total Phase V MWh savings target is 1,111,685 MWh. The
8 Company's total Phase V PDR target is 194.8 MW. PECO will achieve the PDR target
9 using different program channels, including energy efficiency measures, daily load
10 shifting measures, and behavior measures.

11 The Commission also established a savings carve-out for the low-income sector. Under
12 this carve-out, PECO must obtain 74,456 MWh of savings from programming solely
13 directed at low-income customers or low-income-verified participants in multifamily
14 housing programs.

15 The *Phase V Implementation Order* additionally includes several plan design
16 requirements, including that plans must: (1) be designed to achieve at least 15% of the
17 MWh savings target and PDR target each program year; (2) include at least one
18 comprehensive program for residential customers and one comprehensive program for
19 non-residential customers; (3) allocate at least 50% of all spending to incentives, with
20 less than 50% allocated to non-incentive categories; and (4) include a mix of measures
21 and programs that are designed to acquire at least 75% of the PDR target in each the
22 winter season and summer season.

1 **III. OVERVIEW OF PECO’S FILING AND THE PHASE V PLAN**

2 **9. Q. Please explain how PECO’s filing is organized.**

3 A. PECO’s filing is comprised of the following documents and testimony:

- 4 i. Petition for Approval of its Phase V Energy Efficiency and Conservation Plan;
- 5 ii. my Direct Testimony;
- 6 iii. the Direct Testimony of Marina Geneles, PECO’s Manager of Demand
7 Response & Energy Efficiency Evaluation, describing PECO’s market-based
8 Plan design process, the programs comprising the Plan, and expected research
9 and development efforts during Phase V;
- 10 iv. the Direct Testimony of Mark van Eeghen, Associate Director at Guidehouse,
11 Inc., summarizing PECO’s Phase V projected energy and demand savings,
12 program expenditures, and Total Resource Cost (“TRC”) net benefits;
- 13 v. the Direct Testimony of Megan A. McDevitt, PECO’s Senior Manager of
14 Strategic Initiatives, discussing the Plan’s cost-recovery mechanism and tariff;
15 and
- 16 vi. the Phase V Plan, filed in the template format approved by the Commission.¹⁷

17 **10. Q. Please describe the Company’s approach to developing the Phase V Plan.**

18 A. As discussed in detail by Ms. Geneles, PECO employed a market-based approach to
19 design its Phase V Plan. Instead of internally developing a detailed design for each
20 program, the Company established high-level program design requirements and invited
21 conservation service providers (“CSPs”) to submit program design bids reflecting their
22 expertise and experience. Selected CSPs will be responsible for managing program

¹⁷ See *Implementation of Act 129 of 2008 – Phase V Energy Efficiency and Conservation Plan Template*, Docket No. M-2025-3052826 (Issued Sept. 9, 2025).

1 implementation and achieving the required consumption reductions and PDRs within
2 the program budget.

3 The Company believes that the market-based approach has resulted in programs that
4 are well positioned to meet PECO's Phase V obligations. This approach provides
5 meaningful opportunities for customers to save energy and money while providing
6 PECO with flexibility to adjust program offerings based on market conditions. The
7 winning CSPs demonstrated their ability to engage market participants using
8 innovative marketing strategies and multiple channels. In addition, because CSPs will
9 be responsible for administering an entire program, they will, in collaboration with
10 PECO, have the flexibility to directly adjust program offerings based on performance
11 and market response. For example, PECO and the CSP may agree that it is appropriate
12 to adjust incentive values within approved Plan ranges, modify marketing strategies, or
13 even change subcontractors to ensure that the necessary consumption reductions and
14 PDRs are achieved. Finally, as discussed by Ms. Geneles, the strong emphasis on
15 performance-based compensation in the overall CSP payment structure reinforces CSP
16 accountability to deliver the required consumption reductions and PDRs.

17 **11. Q. Please provide an overview of the Phase V Plan.**

18 A. PECO's Phase V Plan has a five-year term (June 1, 2026 through May 31, 2031) and
19 includes three programs: (1) Residential (including low-income); (2) Residential Home
20 Energy Reports (including low-income); and (3) Non-Residential. The Phase V Plan
21 is based on the same central principles used in PECO's Phase IV Plan, including: (1)
22 providing opportunities to all customer types and classes; (2) offering a comprehensive

1 set of energy solutions that includes the broadest measure mix possible across all
2 electric end-uses; and (3) incorporating processes to make participation easy for both
3 customers and market actors.

4 Ms. Geneles describes each program in her testimony, but I would like to highlight
5 several new or enhanced Plan elements for Phase V:

- 6 • ***Stacked or Braided Funding.*** PECO has adapted its outreach and program
7 funding strategies to support stacked or braided funding opportunities with
8 eligible partner programs in an effort to improve affordability for customers and
9 efficiently utilize Act 129 funds.

- 10 • ***Facilitation of Customer Alternative Energy Portfolio Standards Act (“AEPS***
11 ***Act”) Registration.*** PECO has incorporated strategies to facilitate AEPS Act
12 registration for C&I customers who are undertaking eligible Phase V projects.
13 Such registration could enable the customer to generate and monetize
14 alternative energy credits.

- 15 • ***Daily Load Shifting.*** PECO has incorporated daily load shifting measures into
16 suitable program components in support of meeting the Company’s PDR target.

- 17 • ***Health and Safety.*** After piloting health and safety treatments in Phase IV,
18 PECO has designed the Residential Program to accommodate spending up to
19 \$3 million to address health and safety barriers that prevent low-income
20 customers from installing energy efficiency measures, such as mold, electrical
21 and structural issues. Health and safety funding will be used when an

1 opportunity for installing a specific energy efficiency measure is identified but
2 deemed infeasible due to presence of a health and safety hazard.

3 **12. Q. Has the Company reached out to stakeholders about its Phase V Plan?**

4 A. Yes. Over the past few months, PECO actively engaged with potential program
5 partners and stakeholders, including the Pennsylvania Utility Law Project, Community
6 Legal Services, the Philadelphia Energy Authority, the Pennsylvania Department of
7 Environmental Protection, and Rocky Mountain Institute to receive their perspectives
8 on plan design. With the goal of reaching a broader group of stakeholders, PECO
9 recently provided an email update about its plan filing progress. PECO also intends to
10 convene a stakeholder meeting in December 2025, to provide an update on the
11 implementation of the Company's Phase IV Plan and discuss the proposed Phase V
12 Plan.

13 **13. Q. How is PECO preparing for the potential impact of disruptive events, like
14 pandemics and federal funding disruptions, on the delivery and implementation of
15 the Phase V programs?**

16 A. The Company will work with CSPs to monitor evolving conditions and ensure that
17 programs provide safe and appropriate savings opportunities for customers. PECO has
18 incorporated lessons learned from previous phases, including adaptations to challenges
19 such as pandemic-related restrictions and supply constraints. By providing a broad
20 measure and end-use mix and combining field-based program components with virtual
21 program components, the Phase V Plan offers the flexibility to leverage virtual
22 components, if needed. In addition, PECO will proactively track regulatory and market

1 changes and will work with CSPs to respond appropriately. While PECO is excited to
2 work with eligible external program partners on braiding/co-funding opportunities, we
3 recognize that changes to federal funding policies and federal standards can
4 significantly reduce such opportunities. PECO will mitigate federal funding risks by
5 leveraging partnerships between Phase V programs and other PECO programs such as
6 gas energy efficiency and the Low-Income Usage Reduction Program. Overall,
7 proactive planning and diversification across the end-use measure mix and
8 participation channel mix will help PECO mitigate business disruption risk.

9 **IV. CONCLUSION**

10 **14. Q. Does this conclude your direct testimony?**

11 A. Yes.

**PECO ENERGY COMPANY
STATEMENT NO. 2**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ENERGY EFFICIENCY AND CONSERVATION PROGRAM

DOCKET NO. M-2025-3057328

DIRECT TESTIMONY
SUPPORTING PECO'S PETITION FOR APPROVAL
OF ITS PHASE V EE&C PLAN

WITNESS: MARINA GENELES

SUBJECT: PECO'S MARKET-BASED PLAN DESIGN
PROCESS, PECO'S PHASE V PROGRAMS,
RESEARCH AND DEVELOPMENT EFFORTS

DATED: DECEMBER 1, 2025

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND PURPOSE OF TESTIMONY	1
II. PECO'S MARKET-BASED PLAN DESIGN PROCESS.....	3
III. PECO'S EE PROGRAMS	7
IV. RESEARCH AND DEVELOPMENT EFFORTS.....	12
V. CONCLUSION	12

1 **DIRECT TESTIMONY**
2 **OF**
3 **MARINA GENELES**

4 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

5 **1. Q. Please state your full name, professional position, and business address.**

6 A. My name is Marina Geneles. I am the Manager of Demand Response & Energy
7 Efficiency Evaluation for PECO Energy Company (“PECO” or the “Company”). My
8 business address is PECO Energy Company, 2301 Market Street, Philadelphia,
9 Pennsylvania 19103.

10 **2. Q. What are your duties and responsibilities in this position?**

11 A. I oversee energy efficiency and demand response evaluation projects, leading teams to
12 deliver high-impact program evaluations and policy-shaping initiatives to ensure both
13 compliance and continuous improvement. I also represent PECO in interactions with
14 the Statewide Evaluator (“SWE”) for the Pennsylvania Public Utility Commission (the
15 “Commission”) working groups and stakeholders concerning the Company’s energy
16 efficiency and conservation (“EE&C”) programming. I additionally manage requests
17 for proposals (“RFPs”), contracts, and the scope of projects, ensuring adherence to
18 budget and timelines. Further, I provide executive oversight for PECO’s energy
19 efficiency and demand response evaluation initiatives, ensuring alignment with
20 corporate objectives and regulatory mandates. My responsibilities extend beyond
21 project management to include leading comprehensive EE&C plan development,
22 shaping long-term strategy, and driving portfolio performance. I engage actively with

1 internal leadership and external stakeholders to foster collaboration and secure
2 consensus on key initiatives. In addition, I oversee portfolio management and data
3 governance, including ensuring robust tracking systems that support transparent
4 reporting and informed decision-making. Through these efforts, I position PECO to
5 deliver innovative, market-responsive programs that advance statewide energy
6 efficiency goals under Act 129.

7 **3. Q. Please describe your educational background and your professional experience.**

8 A. I hold a Master of Business Administration in Marketing with a minor in Finance from
9 LaSalle University and a Bachelor of Science in Computer Information Systems from
10 Drexel University, both with honors. I have over 20 years of experience at
11 PECO/Exelon Corporation (“Exelon”) in roles spanning IT analysis, business planning,
12 and EE&C program management. Since July 2022, I have served as Manager of
13 Demand Response & Energy Efficiency Evaluation, overseeing \$22 million in research
14 projects. My prior roles include Lead Business Analyst and Senior IT Analyst, where
15 I directed performance evaluation, reliability reporting, and vendor management
16 initiatives.

17 **4. Q. What is the purpose of your direct testimony?**

18 A. The purpose of my direct testimony is to: (1) describe the market-based process used
19 to determine the details of the Company’s proposed energy efficiency (“EE”) programs
20 in PECO’s Phase V EE&C Plan (the “Phase V Plan” or the “Plan”); (2) describe the
21 EE programs and how they will meet the requirements of Act 129 and the

1 Commission’s *Phase V Implementation Order*;¹ and (3) discuss the expected research
2 and development efforts during Phase V.

3 **II. PECO’S MARKET-BASED PLAN DESIGN PROCESS**

4 **5. Q. Please describe PECO’s approach to Plan design.**

5 A. Similar to Phase IV, the Company established high-level requirements for each
6 program in the Phase V Plan and then solicited and evaluated bids from experienced
7 Conservation Service Providers (“CSPs”) for program designs that were aligned with
8 those requirements. PECO’s Phase V process is designed to leverage the creativity and
9 expertise of the marketplace to achieve the Company’s mandated EE savings and peak
10 demand reductions (“PDRs”), while supporting programs that provide customers with
11 meaningful opportunities to save energy and money.

12 **6. Q. How did the Company develop its Phase V program requirements?**

13 A. First, the Company used the results of the SWE’s Energy Efficiency and Peak Demand
14 Reduction (“EEPDR”) Potential Study, which served as the basis for the EE and PDR
15 targets in the *Phase V Implementation Order*, to inform the division of EE savings and
16 PDRs between the residential (including low-income) and commercial and industrial
17 (“C&I”) sectors. The SWE performed electric distribution company-specific studies
18 that presented the technical, economic, and achievable potential over 10 years and
19 program potential over five years beginning June 1, 2026, for each of those customer
20 sectors.

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

1 PECO then determined the appropriate division of the Company’s mandated EE
2 savings and PDRs between its three Phase V programs: (1) Residential (including low-
3 income); (2) Residential Home Energy Reports (including low-income); and (3) Non-
4 Residential. As part of that process, PECO determined what portion of the assigned
5 residential and residential low-income EE savings and PDRs could reasonably come
6 from behavioral programs by analyzing Phase IV behavioral program data and
7 reviewing the most recent Technical Reference Manual (“TRM”). To account for
8 program implementation risks, the Company multiplied the EE savings and PDRs
9 assigned to each program by 105%.

10 After the EE savings and PDRs were assigned to each program, the Company relied
11 upon the SWE’s acquisition cost findings in the EEPDR Potential Study and
12 benchmarking of other utility portfolios to establish the budget for each program.

13 **7. Q. Did the Company utilize additional program design requirements?**

14 A. Yes. Consistent with the Commission’s requirement in the *Phase V Implementation*
15 *Order*, each program must be designed to achieve a minimum of 15% of its total EE
16 savings and PDRs each year and together the programs must be designed to acquire at
17 least 75% of the PDR target in each of the winter season and summer season. In
18 addition, the non-behavioral programs must: (1) allow customers to access all
19 applicable measures in the TRM; (2) engage a variety of market players (e.g., trade
20 allies); and (3) allocate at least 50% of the program budget to incentives.

1 **8. Q. How did the Company solicit and assess bids for Phase V programs?**

2 A. The Company issued RFPs for different program groupings in a manner consistent with
3 the Company’s Commission-approved Phase V RFP process.² Bidders were instructed
4 to propose program designs (including measures, rebates, trade ally engagement, etc.)
5 that met each of the Company’s high-level program requirements and to identify any
6 subcontractors that the bidders would employ. Bidders were also asked to propose a
7 blended delivery and “pay-for-performance” contract pricing structure, whereby a
8 portion of the CSP’s compensation would be fixed, and a portion would be based on
9 the achievement of verified EE savings. Program design submissions were made on
10 specialized workbooks developed by Guidehouse, PECO’s third-party consultant, to
11 ensure that each CSP provided an appropriate level of information.

12 The Company carefully reviewed each bid in accordance with its Phase V RFP process
13 and selected the winning bidders. The Company’s Phase V Plan reflects the program
14 designs proposed by the winning CSPs.

15 **9. Q. Why is PECO utilizing a blended delivery and “pay-for-performance” contract**
16 **pricing structure instead of 100% “pay-for-performance”?**

17 A. PECO identified some implementation challenges associated with the 100% “pay-for-
18 performance” approach utilized by the Company in Phase IV. First, CSPs had to
19 undertake certain pre-implementation activities, such as marketing and delivery

² PECO’s Phase V RFP process was approved by Secretarial Letter issued September 11, 2025, at Docket No. M-2025-3052826. The RFP utilized to select the behavioral program CSP was administered at the Exelon level but was consistent with PECO’s approved Phase V RFP process.

1 channel infrastructure, before receiving any funds from PECO. Second, by paying
2 CSPs a single blended rate representing all their costs, PECO had less visibility into
3 how CSPs were managing spending on measure-related and non-measure-related
4 activities. Finally, a singular focus on achieving savings discouraged innovation and
5 creativity by the CSPs and encouraged the use of existing, well-known approaches. By
6 incorporating a limited level of fixed compensation (no more than 40% of the total
7 contract value), PECO can address those challenges and still encourage strong CSP
8 performance.

9 **10. Q. What are the benefits of using the market-based plan design process that you have**
10 **described?**

11 A. There are numerous benefits to the Company's approach:

- 12 • *Incorporation of diverse market expertise.* By allowing CSPs to design
13 programs to meet the Company's key requirements, PECO's Phase V Plan
14 reflects the expertise and experience of multiple market actors in the EE space.
- 15 • *Provision of greater flexibility to respond to market changes.* By having a
16 single CSP manage an entire program instead of certain portions of a program,
17 the CSP can take a flexible and market-responsive approach to achieving the
18 required EE savings and PDRs. If, for example, a certain component of the
19 program is underperforming, the CSP and PECO can agree to promptly increase
20 incentive levels, employ a new marketing strategy, or even shift emphasis to
21 other program components to stay on track (subject to Commission approval in
22 accordance with Commission guidance).

- 1 • *Incentivization of innovative and cost-effective CSP activity.* Because a
2 portion of CSP compensation is based on a CSP’s ability to drive EE savings
3 and PDRs, CSPs are incentivized to design innovative, achievable and cost-
4 effective programs. The flexibility provided to CSPs will further promote
5 creative responses to challenges that occur during program implementation.

- 6 • *Engagement of an array of market actors to drive a positive customer*
7 *experience.* By requiring CSPs to engage a variety of market actors during
8 program implementation, PECO is facilitating customer access to
9 comprehensive savings opportunities. The CSP compensation structure also
10 incentivizes CSPs to carefully monitor subcontractor performance to drive a
11 positive customer experience.

12 **11. Q. Will the Company be engaging CSPs to implement other elements of the Phase V**
13 **Plan that are not specific to a particular program?**

14 A. Yes. Separate from the program-specific process I described above, the Company will
15 be using its Phase V RFP process to engage CSPs for a variety of other Phase V Plan
16 matters, such as evaluation, measurement, and verification (“EM&V”) and data
17 tracking.

18 III. PECO’S EE PROGRAMS

19 **12. Q. Please provide an overview of the EE programs in PECO’s Phase V Plan.**

20 A. The Company proposes three EE programs: (1) Residential (including low-income);
21 (2) Residential Home Energy Reports (including low-income); and (3) Non-

1 Residential. As I previously explained, the Company identified the key requirements
2 for each program, and CSPs were then given the opportunity to compete with one
3 another and propose the design details for each program. Each winning program design
4 is consistent with the requirements I previously described.

5 **13. Q. What programs will be offered to residential customers?**

6 A. The **Residential Program** is designed to offer customers opportunities to save energy
7 across all their electric end uses and to make participation in the program a pleasant
8 experience. The Program objective is to increase energy efficiency in single family
9 homes and individual units and common areas of multifamily buildings. In order to
10 meet that objective, the Program will offer incentives for the purchase of efficient
11 equipment and removal of old appliances through responsible recycling. The Program
12 will also drive construction of energy-efficient homes and deliver no-cost and low- cost
13 energy assessments. The Program further supports daily load shifting and PDR by
14 encouraging adoption of smart devices and participation in time-of-use rates. Program
15 offerings will be available for customer premises as well as the common areas of
16 multifamily buildings (both individually metered and master metered).

17 PECO will also offer a **Residential Home Energy Reports (“HER”) Program** that
18 involves regularly delivering direct mail or digital HERs that motivate customers to act
19 through contextualized energy-usage information, personal and neighborhood
20 comparisons, and energy savings recommendations. The Program is designed to
21 influence participant behaviors and influence energy management in their homes.

1 **14. Q. What programs will be offered to low-income customers?**

2 A. The Residential Program and Residential HER Program will each include a low-income
3 subprogram that is available to customers with a household income at or below 150%
4 of the Federal Poverty Income Guidelines (“FPIG”). The low-income subprogram of
5 the Residential Program builds upon the Company’s successful Phase IV low-income
6 program. The foundational element of the subprogram is a direct install whole-home
7 component, which provides in-home audits and education as well as the direct
8 installation of EE measures at no charge to the participant. The subprogram also
9 includes new construction, daily load shifting, and appliance recycling services to
10 remove old, inefficient refrigerators, freezers, and window AC units. Subprogram
11 offerings will be available for low-income families living in multifamily buildings,
12 including measures for the customer premises and common areas. Importantly, the
13 low-income subprogram of the Residential Program addresses health and safety
14 barriers in customer homes to enable installation of energy efficiency measures and
15 improve overall comfort and well-being.

16 The low-income subprogram of the Residential HER Program has similar offerings to
17 the overall Residential HER Program but is targeted only to customers in the low-
18 income sector.

19 Taken together, the subprograms offered to low-income customers are designed to
20 exceed the requirement that PECO obtain 74,456 MWh of the Company’s overall
21 energy savings from customers with a household income of 150% or less of the FPIG.

1 15. Q. Please describe the Non-Residential Program.

2 A. PECO Plan's includes a single comprehensive program for both large and small C&I
3 customers. The **Non-Residential Program** objective is to increase energy efficiency
4 for both large and small commercial and industrial customers with rebates for a wide
5 range of energy conservation measures. The Program provides access to technical
6 support, incentives, and concierge-style services to facilitate program participation.
7 The Program includes the following components: strategic energy management,
8 existing buildings, building optimization, distributed energy resources, small business
9 solutions, and new construction. As part of the building optimization component,
10 customers identified as strong candidates will be invited to enroll in a daily load-
11 shifting measure. This measure is designed to strategically manage energy usage by
12 shifting operations away from peak periods to achieve PDRs.

13 16. Q. Does the Company's Plan provide at least one comprehensive program for
14 residential customers and one for non-residential customers as required by the
15 *Phase V Implementation Order*?

16 A. Yes. The Residential and Non-Residential Programs each provide customers with
17 comprehensive opportunities to save energy across all electric end-uses.

1 17. Q. Is the Company's Plan designed to achieve at least 15% of the required EE savings
2 and PDRs each program year as required by the *Phase V Implementation Order*?

3 A. Yes. The Plan is designed to achieve over 15% of the total EE savings and PDR targets
4 in each of the five program years (PY 18-PY 22) as illustrated in Tables 2 and 3 of the
5 Plan.

6 18. Q. Is the Company's Plan designed to allocate at least 50% of all spending to
7 incentives, with less than 50% allocated to non-incentive categories, as required
8 by the *Phase V Implementation Order*?

9 A. Yes. As shown in Table 4 of the Direct Testimony of Mr. van Eeghen, over 50% of all
10 spending has been allocated to incentives in each of the five program years (PY 18-PY
11 22).

12 19. Q. Is the Company's Plan designed to acquire at least 75% of the PDR target in each
13 the winter season and summer season, as required by the *Phase V Implementation*
14 *Order*?

15 A. Yes. Table 4 of the Plan summarizes the seasonal demand savings for each of the five
16 program years.

**PECO ENERGY COMPANY
STATEMENT NO. 3**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
ENERGY EFFICIENCY AND CONSERVATION
PROGRAM

DOCKET NO. M-2025-3057328

DIRECT TESTIMONY
SUPPORTING PECO'S PETITION FOR APPROVAL
OF ITS PHASE V EE&C PLAN

WITNESS: MARK VAN EEGHEN

SUBJECT: GUIDEHOUSE'S ROLE IN
SUPPORTING PLAN
DEVELOPMENT, PROGRAM
SAVINGS, EXPENDITURES AND
COST-EFFECTIVENESS

DATED: DECEMBER 1, 2025

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND PURPOSE OF TESTIMONY	1
II. GUIDEHOUSE'S ROLE IN SUPPORTING THE DEVELOPMENT OF THE PHASE V PLAN	2
III. PROGRAM SAVINGS, EXPENDITURES, AND COST- EFFECTIVENESS.....	3
IV. CONCLUSION	8

1 **DIRECT TESTIMONY**
2 **OF**
3 **MARK VAN EEGHEN**

4 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

5 **1. Q. Please state your name and business address.**

6 A. My name is Mark van Eeghen. My business address is 1735 Market Street, Suite 2210,
7 Philadelphia, PA 19103.

8 **2. Q. By whom are you employed and in what capacity?**

9 A. I am employed by Guidehouse Inc. (“Guidehouse”) as an Associate Director in the
10 Communities, Energy, and Infrastructure Segment.

11 **3. Q. Please state your educational background.**

12 A. I received a Bachelor of Science in Industrial Engineering from the University of
13 Groningen in the Netherlands in 2012 and a Master of Engineering Management from
14 Dartmouth College in 2014.

15 **4. Q. Please describe your current and prior work experience.**

16 A. My resume is set forth in Exhibit MVE-1. In summary, for the past eight years, I have
17 been employed as a consultant to the utility industry on matters related to demand-side
18 management (“DSM”) program planning, design, and evaluation. I currently work for
19 Guidehouse’s Communities, Energy and Infrastructure Practice. My work covers
20 topics such as energy efficiency, portfolio design planning, portfolio cost-effectiveness,
21 and benchmarking. Recently, I have supported electric and natural gas utilities in the

1 Mid-Atlantic, including Pennsylvania, with planning, program design, and modelling
2 to meet Energy Efficiency (“EE”) resource standards.

3 **5. Q. What is the purpose of your testimony in this case?**

4 A. Guidehouse was retained by PECO Energy Company (“PECO” or the “Company”) to
5 assist in the development of the Company’s Act 129 Phase V Energy Efficiency and
6 Conservation Plan (the “Phase V Plan” or the “Plan”) for the period of June 1, 2026 to
7 May 31, 2031. The purpose of my testimony is to: (1) describe how Guidehouse
8 supported the development of the Phase V Plan; and (2) summarize PECO’s Phase V
9 Plan projected energy and demand savings, program expenditures, and Total Resource
10 Cost (“TRC”) benefits.

11 **II. GUIDEHOUSE’S ROLE IN SUPPORTING THE DEVELOPMENT OF**
12 **THE PHASE V PLAN**

13 **6. Q. Please describe how Guidehouse assisted with development of the Phase V Plan.**

14 A. As detailed in the direct testimony of Ms. Geneles, PECO employed a market-based
15 process to determine the details of its proposed Phase V EE programs. Guidehouse
16 supported PECO’s process by: (1) documenting Phase IV learnings to inform the Phase
17 V Plan design; (2) facilitating workshops with PECO to determine the appropriate
18 division of PECO’s mandated EE savings, peak demand reductions (“PDRs”), and
19 budget between its three Phase V programs; (3) conducting measure characterizations
20 and plan modelling, and (4) drafting requests for proposals (“RFPs”) seeking bids from
21 conservation service providers (“CSPs”) to implement programs consistent with
22 PECO’s high-level program requirements.

1 **III. PROGRAM SAVINGS, EXPENDITURES, AND COST-EFFECTIVENESS**

2 **7. Q. How were the projected energy savings and PDRs for each Phase V program**
3 **determined?**

4 A. The projected energy savings and PDRs for each program were provided by the CSP
5 that successfully bid to design and implement that program. As part of the RFP process,
6 Guidehouse developed a workbook that incorporated 2026 Technical Resource Manual
7 (“TRM”) measure characterizations as well as savings and PDR achievable program
8 targets from the Statewide Evaluator’s (“SWE’s”) energy efficiency and PDR potential
9 study. CSPs were required to input program details into the workbook to calculate the
10 reasonably achievable energy savings and PDRs from the CSPs’ program design. CSPs
11 were also required to adequately support any proposed savings values that differed
12 from what was presented in the workbook.

13 **8. Q. Please summarize the total energy savings and PDRs projected for the Plan.**

14 A. Overall, PECO anticipates saving a total of 1,458,076 MWh and achieving 264.5 MW
15 of PDRs in Phase V, which represent approximately 131% and 136% of PECO’s
16 mandated targets, respectively. Tables 1 and 2 present the forecasted gross annual
17 energy and PDR savings by program for each year of the Phase V Plan. Approximately
18 32% of energy and 36% of PDR savings come from the residential sector, and 68% of
19 energy and 64% of PDR savings from the non-residential sector. PECO anticipates
20 that 95,766 MWh of the overall forecasted savings will come from low-income targeted
21 subprograms, which represents roughly 8.6% of PECO’s Phase V target and exceeds
22 the required 74,456 MWh of savings for the low-income carve-out. Note that Tables

1 1 and 2 provide totals by subprogram rather than sector, and table totals may not add
 2 due to rounding.

3 **Table 1. Annual Gross Energy Savings by Program**

Program	Subprogram	Annual Energy Savings (MWh)					5-Year Total
		PY18	PY19	PY20	PY21	PY22	
Residential		48,223	48,521	48,880	49,053	48,853	243,530
	Low-Income	17,756	18,079	18,718	19,356	16,483	90,392
Residential Program Total		65,979	66,600	67,598	68,409	65,336	333,922
Residential Home Energy Reports		24,698	36,636	26,807	28,172	26,236	142,549
	Low-Income Home Energy Reports	1,815	913	969	860	817	5,374
Residential Home Energy Reports Program Total		26,513	37,549	27,776	29,032	27,053	147,923
Non-Residential		145,694	192,786	216,366	251,250	170,135	976,231
Grand Total - All Phase V Programs		238,186	296,934	311,740	348,691	262,524	1,458,076

5 **Table 2. Annual Peak Demand Reduction Savings by Program**

Program	Subprogram	Peak Demand Reduction (MW)					5-Year Total
		PY18	PY19	PY20	PY21	PY22	
Residential		9.6	9.8	10.1	10.3	10.5	50.2
	Low-Income	2.8	2.9	3.0	3.1	2.7	14.5
Residential Program Total		12.4	12.7	13.0	13.4	13.2	64.7
Residential Home Energy Reports		4.0	9.4	7.2	6.3	5.3	32.2
	Low-Income Home Energy Reports	0.4	0.2	0.2	0.2	0.2	1.1
Residential Home Energy Reports Program Total		4.4	9.6	7.4	6.5	5.4	33.3
Non-Residential		25.4	32.9	37.0	41.2	30.1	166.5
Grand Total - All Phase V Programs		42.2	55.2	57.4	61.0	48.7	264.5

7 **9. Q. What are the annual and cumulative program expenditures projected for the**
 8 **Plan?**

9 A. PECO expects to spend \$427.4 million over the five-year Plan period to achieve the
 10 projected energy savings and PDRs. This represents 100% of PECO's spending cap
 11 under Act 129 Phase V. Of that total, PECO expects to spend 34% of the program

1 delivery budget for residential programs, 50% on non-residential programs, and 16%
2 for cross-cutting common costs. Table 3 lists the anticipated annual and total
3 expenditures by program. Projected costs by program represent all anticipated costs to
4 be incurred by PECO and competitively selected CSPs for program implementation.
5 The Common Costs category includes all PECO delivery costs (e.g., staff and material
6 costs) and third-party contractor costs to be incurred by PECO for overall portfolio and
7 program management, data tracking, education and awareness, various technical
8 support and program design needs, research and development, and third-party
9 evaluation, measurement, and verification.

10 **Table 3. Annual and Total Expenditures by Program**

Program	Subprogram	Budget (Million \$)					5-Year Total
		PY18	PY19	PY20	PY21	PY22	
Residential		\$14.74	\$15.02	\$15.32	\$15.58	\$15.84	\$76.50
	Low-Income	\$10.87	\$11.03	\$11.39	\$11.75	\$10.16	\$55.20
<i>Residential Program Total</i>		<i>\$25.61</i>	<i>\$26.05</i>	<i>\$26.71</i>	<i>\$27.33</i>	<i>\$26.00</i>	<i>\$131.70</i>
	Residential Home Energy Reports	\$2.34	\$3.64	\$2.63	\$2.78	\$2.59	\$13.99
	Low-Income Home Energy Reports	\$0.17	\$0.09	\$0.10	\$0.08	\$0.08	\$0.52
<i>Residential Home Energy Reports Program Total</i>		<i>\$2.51</i>	<i>\$3.73</i>	<i>\$2.73</i>	<i>\$2.86</i>	<i>\$2.67</i>	<i>\$14.51</i>
Non-Residential		\$34.18	\$41.90	\$47.19	\$51.00	\$39.61	\$213.90
Common Costs		\$13.46	\$13.46	\$13.46	\$13.46	\$13.46	\$67.28
<i>Grand Total - All Phase V Programs</i>		<i>\$75.76</i>	<i>\$85.14</i>	<i>\$90.09</i>	<i>\$94.65</i>	<i>\$81.74</i>	<i>\$427.38</i>

11
12 **10. Q. What portion of the projected expenditures are for incentives?**

13 A. PECO's incentive budget is 51% of the total Phase V Plan. The incentive budget
14 includes funds that will be distributed to program participants, including incentives, the
15 cost of kit and direct install measures, health and safety, the cost of labor associated
16 with directly installing measures, and the cost of interest buy down associated with

1 offering 0% financing. Table 4 presents PECO’s incentive budget and portfolio
 2 incentive percent.

3 **Table 4. Incentive Budget and Portfolio Incentive Percent**

Program	Subprogram	Incentive Budget (Million \$)					5-Year Total	Avg. Annual
		PY18	PY19	PY20	PY21	PY22		
Residential		\$8.09	\$8.37	\$8.67	\$8.93	\$9.19	\$43.25	\$8.65
	Low-Income	\$7.85	\$7.99	\$8.33	\$8.67	\$7.19	\$40.03	\$8.01
Residential Program Total		\$15.94	\$16.36	\$17.00	\$17.60	\$16.38	\$83.28	\$16.66
Residential Home Energy Reports		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	Low-Income Home Energy Reports	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Residential Home Energy Reports Program Total		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Non-Residential		\$21.11	\$26.97	\$29.96	\$33.21	\$24.11	\$135.36	\$27.07
Total Incentives		\$37.05	\$43.33	\$46.96	\$50.81	\$40.49	\$218.64	\$43.73
Total Portfolio Budget (Incentives, Admin, etc.)		\$75.76	\$85.14	\$90.09	\$94.65	\$81.74	\$427.38	\$85.48
Incentive Budget as % of Total		49%	51%	52%	54%	50%	51%	51%

4
 5 **11. Q. How did you determine cost-effectiveness?**

6 A. Guidehouse followed the Commission’s guidance in the 2026 TRC Test Final Order¹
 7 to calculate the TRC test as the basis for judging the economic viability of the Phase V
 8 Plan. To this end, Guidehouse worked with PECO to complete the SWE Phase V
 9 Avoided Cost Calculator yielding avoided costs for energy, capacity, and natural gas
 10 reductions. The avoided cost of water as well as other important drivers including
 11 system loss factors, discount rates, maximum economic lifetime, and inflation rate were
 12 sourced from the 2026 TRC Order and the 2026 TRM.² Plan measure characterizations
 13 were largely developed using the 2026 TRM, Phase IV evaluation results, the Phase V
 14 SWE Incremental Cost Database, and CSP implementation experience. The TRC test

¹ 2026 Total Resource Cost (TRC) Test, Docket No. M-2024-3048998 (Order entered Nov. 7, 2024).

² 2026 Technical Reference Manual Final Order, Docket No. M-2023-3044491 (Adopted Sept. 12, 2024).

1 was calculated and reviewed using both gross savings estimates and net savings
 2 estimates. Guidehouse incorporated the following specific modifications to the TRC
 3 test to comply with Commission guidance:

- 4 a) Measure lifetime was capped at 15 years;
- 5 b) Energy savings were calculated at the meter, without line losses, while PDRs
 6 were calculated at the generator, with line losses;
- 7 c) Additional arrearages benefits were applied to the low-income customer
 8 segment;
- 9 d) Benefits were awarded for PDRs at both the summer peak and winter peak
 10 periods; and
- 11 e) Costs associated with the free provision of efficient equipment and
 12 installation labor costs (e.g., low income, multifamily and single-family direct
 13 install, small business direct install) are all treated as incentive costs.

14 **12. Q. Is PECO’s Phase V Plan cost-effective?**

15 A. Yes. For the Plan, as a whole, over Phase V, the gross TRC benefit-to-cost ratio is 1.3,
 16 and the net TRC benefit-to-cost ratio is 1.2, yielding total net benefits based on gross
 17 savings of \$279 million. Table 5 shows the TRC results and discounted benefits and
 18 costs for the Phase V Plan by program.

19 **Table 5. Phase Total TRC Results by Program**

Program	Subprogram	Phase Total TRC Results				
		Discounted Benefits (Million \$)	Discounted Costs (Million \$)	Net Benefits (Million \$)	B/C Ratio (Gross)	B/C Ratio (Net)
Residential		\$257.41	\$314.35	-\$56.94	0.8	0.8
	Low-Income	\$86.55	\$64.60	\$21.95	1.3	1.5

<i>Residential Program Total</i>	<i>\$343.96</i>	<i>\$378.95</i>	<i>-\$34.99</i>	<i>0.9</i>	<i>1.5</i>
Residential Home Energy Reports	\$57.71	\$12.73	\$44.98	4.5	4.5
Low-Income Home Energy Reports	\$3.42	\$0.48	\$2.94	7.1	7.1
<i>Residential Home Energy Reports Program Total</i>	<i>\$61.13</i>	<i>\$13.21</i>	<i>\$47.92</i>	<i>4.6</i>	<i>4.6</i>
Non-Residential	\$972.36	\$645.05	\$327.31	1.5	1.3
Common Costs		\$61.17			
Grand Total - All Phase V Programs	\$1,377.45	\$1,098.38	\$279.07	1.3	1.2

1
2

IV. CONCLUSION

3 **13. Q. Does this conclude your direct testimony?**

4 A. Yes.

Mark van Eeghen, CFA

Associate Director

mark.van.eeghen@guidehouse.com
Philadelphia, PA
Direct: 202.973.4526

Professional Summary

Mark van Eeghen is an Associate Director in the Communities, Energy, and Infrastructure Practice at Guidehouse and he has over 10 years of experience in the energy industry. Mr. van Eeghen has extensive experience designing and evaluating utility demand side management programs. He brings a deep understanding of electrification and building decarbonization. Mr. van Eeghen is a CFA Charterholder and he earned a Master of Engineering Management degree from Dartmouth College.

Areas of Expertise

- **Program Design:** Design utility demand side management programs
- **Evaluation of Clean Energy Programs:** Conduct impact and cost effectiveness evaluations
- **Go-to-Market Strategies:** Develop clean energy go-to-market strategies.

Professional Experience

- Conduct utility demand side management program design activities, including strategy support, modelling and stakeholder engagement.
- Lead evaluation, measurement and verification for gas and electric utilities in the mid-Atlantic and Northeast, including impact and cost-effectiveness evaluations.
- Conduct electrification studies for mid-Atlantic utilities to forecast load driven by building electrification and vehicle electrification.
- Conduct clean energy go-to-market strategies for front of the meter and behind the meter distributed energy resources for financial institutions.

Education

- CFA Charterholder
- Master of Engineering Management, Dartmouth College
- BS, Industrial Engineering, University of Groningen (Netherlands)

Work History

- Associate Director, Guidehouse
 - Managing Consultant, Guidehouse
 - Senior Consultant, Navigant
-

**PECO ENERGY COMPANY
STATEMENT NO. 4**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ENERGY EFFICIENCY AND CONSERVATION PROGRAM

DOCKET NO. M-2025-3057328

DIRECT TESTIMONY
SUPPORTING PECO'S PETITION FOR APPROVAL
OF ITS PHASE V EE&C PLAN

WITNESS: MEGAN A. MCDEVITT

SUBJECT: COST RECOVERY

DATED: DECEMBER 1, 2025

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND PURPOSE OF TESTIMONY	1
II. PECO'S PROPOSED METHOD OF COST RECOVERY.....	3
III. SEPARATE ACCOUNTING FOR COSTS INCURRED AND EEPC REVENUES BILLED FOR PHASE V AND PREVIOUS PHASES	12
IV. CONCLUSION	13

1 to my current position of Senior Manager,¹ Strategic Initiatives.

2 **4. Q. Ms. McDevitt, have you submitted testimony previously before the Commission?**

3 A. Yes. I submitted testimony on behalf of PECO in the Company’s Petition for Approval
4 of its Default Service Program for June 1, 2025 to May 31, 2029, before the
5 Pennsylvania Public Utility Commission (the “Commission”) at Docket No. P-2024-
6 3046008. I also provided testimony in the Company’s 2024 Electric Rate Case at
7 Docket No. R-2024-3046931, and the 2024 Gas Rate Case at Docket No. R-2024-
8 3046932.

9 **5. Q. What is the purpose of your direct testimony?**

10 A. I am sponsoring a supplement to PECO’s Electric Service Tariff bearing a proposed
11 effective date of June 1, 2026, which contains provisions designed to implement
12 PECO’s proposed Phase V Energy Efficiency and Conservation (“EE&C”) Plan
13 Charge (“Phase V EEPC”). Accordingly, my testimony (1) describes PECO’s Phase
14 V EEPC, which is the rate adjustment mechanism the Company proposes to establish
15 under Section 1307 of the Pennsylvania Public Utility Code² to recover the costs
16 associated with the Company’s Phase V Energy Efficiency and Conservation Plan
17 (“Phase V Plan” or “Phase V EE&C Plan”); (2) identifies the categories of PECO’s
18 Phase V EE&C Plan costs that the Phase V EEPC will recover; and (3) provides the
19 Company’s current estimates of its Phase V Plan costs. In addition, I will describe how

¹ I am holding the position of Senior Manager, Retail Rates, in parallel until a replacement is named.

² Hereafter, unless specifically stated otherwise, all section references are to the Pennsylvania Public Utility Code.

1 PECO’s rates will be adjusted annually over the term of its Phase V EE&C Plan to
2 reflect over- or under-recoveries.

3 Finally, I will describe how the Company will separate costs incurred and EEPC
4 revenues billed with respect to PECO’s Phase V EE&C Plan from costs incurred and
5 EEPC revenues billed with respect to its Phase IV EE&C Plan.

6 **6. Q. Have you prepared any exhibits to accompany your testimony?**

7 A. Yes, I have prepared four exhibits, which consist of the following:

8 **Exhibit MAM-1** – Proposed supplement setting forth revisions to
9 PECO’s Electric Service Tariff (Clean and Redline).

10 **Exhibit MAM-2** – Program costs by rate class.

11 **Exhibit MAM-3** – Calculations of the cost recovery charges by rate class
12 for the first year of PECO’s Phase V EE&C Plan.

13 **Exhibit MAM-4** – Responses to the Commission’s filing requirements at
14 52 Pa. Code § 53.52.

15 **II. PECO’S PROPOSED METHOD OF COST RECOVERY**

16 **7. Q. Do the EE&C provisions of Act 129 of 2008 (“Act 129”)³ and the Commission’s**
17 **Implementation Orders⁴ grant an electric distribution company (“EDC”) the right**
18 **to recover the costs of its EE&C plan?**

19 A. Yes, they do. Act 129 contains Section 2806.1, which provides that EDCs are entitled
20 to recover all reasonable and prudent EE&C plan costs, on a full and current basis,

³ 66 Pa.C.S. §§ 2806.1, et seq.
⁴ See, e.g., Implementation Order, *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 -
(Order entered June 18, 2025) (“*Phase V Implementation Order*”).

1 through a cost-recovery mechanism established under Section 1307.⁵ The Commission
2 previously directed EDCs to develop separate cost recovery mechanisms for their
3 EE&C Plans and also required that the cost recovery mechanism be non-bypassable
4 and that it does not affect the EDCs' prices-to-compare.⁶

5 **8. Q. Please explain the mechanism that PECO is proposing to recover Phase V Plan**
6 **costs.**

7 A. Consistent with the authority granted by Section 2806.1(k) and the *Phase V*
8 *Implementation Order*, PECO's Phase V EEPC will be a fully reconcilable, non-
9 bypassable charge. The Phase V EEPC is designed to adjust customers' distribution
10 rates by the amount of the charge calculated for each rate class and, as a result, PECO's
11 price-to-compare will not be affected by the recovery of Phase V EE&C Plan costs.
12 The Phase V EEPC follows the same format the Company used for its currently
13 effective, Commission-approved Phase IV EEPC, which, as previously noted, recovers
14 costs associated with PECO's Phase IV EE&C Plan. Exhibit MAM-1 is a pro forma
15 supplement, in both clean and redlined versions, to PECO's Electric Service Tariff,
16 which sets forth the revisions to PECO's currently effective Electric Service Tariff
17 needed to implement PECO's Phase V EEPC and, therefore, reflects changes with
18 respect to the cost recovery method, the formula for calculating the Phase V EEPC
19 charge, and the Phase V EEPC charges specific to each rate class. All the rate schedules
20 setting forth distribution rates that would have to be adjusted to reflect the Phase V

⁵ See 66 Pa.C.S. § 2806.1(k).

⁶ See Implementation Order, *Energy Efficiency and Conservation Program*, Docket No. M-2012-2289411 (Order entered Aug. 3, 2012) ("*Phase II Implementation Order*").

1 EEPC are also included in the proposed tariff supplement provided as Exhibit MAM-
2 1. However, PECO will submit the final distribution rates in a compliance filing after
3 the Phase V EE&C Plan and Phase V EEPC are approved.

4 **9. Q. What categories of costs will be recovered under the Phase V EEPC?**

5 A. The Phase V EEPC will recover any of the fixed capital costs (depreciation and pre-tax
6 return) and operating expenses not otherwise recovered in base rates, to design and
7 implement the EE&C programs incorporated in its Phase V EE&C Plan. These costs
8 include, among others, the cost of information technology (“IT”) needed to design and
9 implement the EE&C programs, the costs of customer outreach and program
10 promotion, incremental labor costs incurred to manage and administer the EE&C
11 programs on an ongoing basis, the cost to measure and verify EE&C program results,
12 and the cost of incentives offered to customers to participate in the approved EE&C
13 programs.⁷

14 **10. Q. Will the Phase V EEPC recover any capital expenditures?**

15 A. If the Company incurs capital costs, such as IT costs, to implement the Phase V Plan,
16 these costs would be capitalized for financial accounting purposes and depreciated over
17 the service life of the property, which would correspond to the five-year term of
18 PECO’s Phase V EE&C Plan. Accordingly, PECO would include as recoverable costs
19 in its Phase V EEPC the annual depreciation of this property and a pre-tax return on

⁷ See *Phase V Implementation Order*, p. 233.

1 the depreciated original cost at PECO’s weighted cost of capital, as permitted by the
2 *Phase V Implementation Order* (p. 233).⁸

3 **11. Q. What are the Company’s budgeted expenditures for its Phase V Plan?**

4 A. As explained in Section 7 of PECO’s Phase V EE&C Plan, which is being submitted
5 as PECO Exhibit 1 accompanying the Petition of PECO Energy Company for Approval
6 of its Phase V Energy Efficiency and Conservation Plan, the Company’s budgeted
7 Phase V expenditures total \$427.4 million for the five-year term of the Plan. This
8 amount does not exceed the cost limitation imposed by Section 2806.1(g). The
9 Company projects that its budgeted expenditures by rate class will be as follows:

Residential	\$161.7 million
Small Commercial and Industrial (“SC&I”)	\$128.4 million
Large Commercial and Industrial (“LC&I”)	\$137.3 million
Municipal Lighting (“ML”)	\$44,995
<u>Total</u>	<u>\$427.4 million</u>

10 Exhibit MAM-2 contains a summary of the projected expenditures by class for all of
11 the programs in the Phase V EE&C Plan.

13 **12. Q. How will Statewide Evaluator (“SWE”) costs be handled?**

14 A. Similar to what the Commission ordered in prior Phases, the *Phase V Implementation*
15 *Order* (p. 235) requires PECO to remove the SWE costs from its EE&C Phase V
16 budget. Accordingly, PECO has not included SWE costs in its Phase V Plan budget.
17 PECO will track Phase V SWE costs separately from its Phase V EE&C Plan costs and,

⁸ PECO proposes to calculate its weighted average cost of capital in the same manner specified by the Commission in the Final Implementation Order, *Implementation of Act 11 of 2012*, Docket No. M-2012- 2293611 (Order entered Aug. 2, 2012), pp. 29-35 and App. A, Section 2.B.2.

1 as permitted by the *Phase V Implementation Order*,⁹ recover both categories of costs
2 through its Phase V EEPC. Because the Phase V SWE has not yet been selected, the
3 Company is using estimated SWE costs for the five-year term of the Phase V EE&C
4 Plan (approximately \$2.0 million) as a placeholder for the actual Phase V SWE costs.
5 More up-to-date projected Phase V SWE costs will be included in a compliance filing
6 after the Phase V Plan is approved.

7 **13. Q. What is the cost recovery period and when will it begin?**

8 A. The cost recovery period will begin when bills are sent to customers during July 2026
9 for June 2026 usage and will continue through bills sent to customers in June 2031 for
10 May 2031 usage. There will be a final “true-up” to the actual EE&C Plan costs at the
11 end of the recovery period, and any over- or under-collection will then be refunded or
12 recouped, as applicable, without interest, over a twelve-month period following the
13 completion of Phase V.

14 **14. Q. How will the Company ensure that its Phase V EEPC recovers the cost of**
15 **particular programs from the classes of customers that will receive the benefits**
16 **those programs provide?¹⁰**

17 A. The programs included in PECO’s Phase V EE&C Plan are designed such that the cost
18 of each program is directly assigned to the customer class that will receive the benefits
19 of that program. For programs that provide benefits to more than one class, costs will

⁹ See *Phase V Implementation Order*, p. 235.

¹⁰ See *Phase V Implementation Order*, pp. 244-246.

1 be allocated using reasonable and generally accepted cost-of-service principles.
2 Common costs will be allocated to each rate class in proportion to the energy savings
3 (MWh) that each rate class is projected to deliver in first year of the Phase V EE&C
4 Plan (“Program Year 18” or “PY18”). The total projected costs of each program for
5 the five-year Phase V EE&C Plan term, by rate class, are shown on page 1 of Exhibit
6 MAM-2.

7 **15. Q. Have you developed proposed charges for the Phase V EEPC for each customer**
8 **class?**

9 A. Yes, I have developed charges under the Phase V EEPC based on the total projected
10 program costs to be incurred for each rate class for Program Year 18. To develop the
11 charge for each rate class, the total projected program costs to be incurred for that class
12 for PY 18 (*see* Exh. MAM-2, p. 2) was divided by the appropriate projected class billing
13 units (e.g., kilowatt hours of energy use or kilowatts of demand) for the period from
14 June 1, 2026 through May 31, 2027. For Municipal Lighting, I have developed charges
15 by allocating streetlighting costs across the SC&I, LC&I and ML classes using the
16 allocation factors previously approved by the Commission.^{11,12} In addition, as
17 described previously, although the Phase V SWE costs will be tracked separately from
18 the Phase V Plan costs, they are included for recovery under the Phase V EEPC. The
19 resulting charges were then grossed up to provide for recovery of the Pennsylvania
20 Gross Receipts Tax. This calculation produces a charge designed to recover the total

¹¹ See *Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020830 (Order entered May 23, 2024).

¹² Rate TLCL will be removed from the ML rate recovery after final reconciliation since traffic lighting measures are no longer part of the Commission’s Technical Reference Manual.

1 program costs for PY 18. Exhibit MAM-3 contains the detailed calculations for the
2 development of the charges for each class.

3 **16. Q. Are there any differences between the Phase IV and Phase V EEPCs?**

4 A. Yes. The *Phase V Implementation Order* states that because of FERC approval of
5 recent PJM tariff changes that disallow EE participation in the Forward Capacity
6 Market (“FCM”), peak demand reductions are no longer eligible to participate in the
7 FCM.¹³ Thus, the Phase V EEPC has been revised to remove references to
8 proceeds/deficiencies from resources participating in the FCM.

9 **17. Q. Please explain the annual calculation and adjustment of Phase V EEPC charges.**

10 A. In the *Phase V Implementation Order* (pp. 247-248), the Commission required the
11 charge to be developed using “projected program costs” and not “the authorized budget
12 amount” because “[t]he development of the surcharge using the projected program
13 costs rather than the authorized budget amount would mitigate over- or under-
14 recoveries of costs during the surcharge application period.” Additionally, in that
15 Order (p. 247), the Commission required “each EDC to annually reconcile (i.e., 1307(e)
16 Statement) actual expenses incurred with actual revenues received for the
17 reconciliation period.” Accordingly, for the first year of the Phase V EE&C Plan
18 (PY18), which runs from June 1, 2026 through May 31, 2027, PECO will develop
19 EEPC-adjusted rates based on projected Plan costs that PECO anticipates will be
20 incurred over that year. Thereafter, PECO will reset the EEPC annually to recover the

¹³ See *Phase V Implementation Order*, p. 41.

1 projected Plan costs for the then-upcoming plan year and the appropriate adjustment to
2 reconcile and true-up revenues and the previous program years' actual costs.

3 **18. Q. How does PECO propose to combine the Phase IV and V EEPCs into a single**
4 **charge?**

5 A. Similar to what the Commission ordered in prior Phases, the *Phase V Implementation*
6 *Order* states “that surcharges should be combined into a single surcharge and tariff with
7 the implementation of Phase V” (pp. 248-249). Accordingly, PECO proposes
8 combining its Phase IV EEPC and Phase V EEPC into a single surcharge and a single
9 tariff provision with the implementation of its Phase V EEPC.

10 **19. Q. What does the *Phase V Implementation Order* provide as to the transition from the**
11 **Phase IV EEPC to Phase V EEPC?**

12 A. In the *Phase V Implementation Order* (pp. 248-249), the Commission adopted a plan
13 for the transition from the cost recovery methodology utilized during Phase IV, ending
14 May 31, 2026, to the cost recovery methodology to be utilized during Phase V,
15 beginning on June 1, 2026. The *Phase V Implementation Order* requires that each EDC
16 reconcile its total actual recoverable EE&C Plan expenditures incurred through March
17 31, 2026, with its actual EE&C Plan revenues received through March 31, 2026. In
18 addition, each EDC should include, as part of the calculation of the Phase V rates to
19 become effective June 1, 2026, as clearly identified separate line items, projections of
20 the expenses to finalize any measures installed and commercially operable on or before
21 May 31, 2026, expenses to finalize any contracts, and other Phase IV administrative
22 obligations. The Phase IV rate that became effective June 1, 2025, will remain effective

1 through May 31, 2026. Consistent with the requirements, for PY18 (June 1, 2026,
2 through May 31, 2027), PECO's cost recovery rates will be calculated based on the
3 projected total program expenditures for each rate class for PY18 plus the
4 reconciliation amount for PY17 and any costs remaining from previous periods. As
5 previously explained, for each subsequent plan year, PECO will develop annual Phase
6 V recovery rates based on its projected program expenditures for that plan year plus
7 amounts necessary for the reconciliation of costs and revenues from prior periods.

8 **20. Q. What has the Commission directed regarding the application of interest to any**
9 **Phase IV and Phase V over- and under-recoveries?**

10 A. In the *Phase V Implementation Order* (pp. 247-248), the Commission addressed the
11 application of interest to Phase IV and to Phase V over- and under-recovered amounts.
12 The Commission concluded that interest should not be included on any Phase IV or
13 Phase V net over- or under-recovery amounts. Thus, the Phase V EEPC as described
14 in Exhibit MAM-1 does not include the application of interest. In addition, the EEPC
15 reflects the other provisions that I previously explained (i.e., annual calculation and
16 adjustment, exclusion of SWE costs from the 2.0% spending cap, the application of a
17 single charge and the transition plan) in order to ensure that the EEPC complies with
18 the Commission's directives on cost recovery.

1 **III. SEPARATE ACCOUNTING FOR COSTS INCURRED AND EEPC REVENUES**
2 **BILLED FOR PHASE V AND PREVIOUS PHASES**

3 **21. Q. What has the Commission directed regarding accounting for costs to be incurred**
4 **and EEPC revenues to be billed for Phase V and such costs and revenues associated**
5 **with prior Phases?**

6 A. On September 8, 2025, the Commission issued a Secretarial letter captioned *Re:*
7 *Implementation of Act 129 of 2008 – Phase V Energy Efficiency and Conservation Plan*
8 *Template* at Docket No. M-2025-3052826. In that Secretarial letter, the Commission
9 stated that EDCs must account for Phase V costs and revenues separately from the costs
10 and revenues associated with prior Phases.

11 **22. Q. Please explain how the Company intends to comply with the Commission’s**
12 **accounting requirements.**

13 A. PECO will comply with the Commission’s directive to separately account for Phase V
14 costs and revenues by setting up new general ledger accounts for Phase V costs and
15 revenues. Phase IV costs and revenues are currently tracked through similar, separate
16 accounting measures. Thus, there will be no comingling of Phase V and prior Phase
17 costs or revenues in PECO’s accounting records. Phase IV costs and revenues will also
18 be clearly identified and tracked separately for purposes of the EEPC. This procedure
19 will allow Phase V costs to be reconciled against Phase V revenues billed under the
20 EEPC as explained in the pro forma tariff supplement provided as Exhibit MAM-1.

1

IV. CONCLUSION

2 23. Q. Does this conclude your direct testimony?

3 A. Yes.

PECO Energy Company

Electric Service Tariff

COMPANY OFFICE LOCATION

2301 Market Street

Philadelphia, Pennsylvania 19103

For List of Communities Served, See Page 4.

Issued December 1, 2025

Effective June 1, 2026

**ISSUED BY: David M. Vahos – President & CEO
PECO Energy Distribution Company
2301 MARKET STREET
PHILADELPHIA, PA. 19103**

NOTICE

LIST OF CHANGES MADE BY THIS SUPPLEMENT**PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS (EEPC) xx Revised Page No. 48**

Changes as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE R RESIDENCE SERVICE – xx Revised Page No. 52

Change to the Variable Distribution Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE R-H RESIDENTIAL HEATING SERVICE – xx Revised Page No. 53

Change to the Variable Distribution Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE-GS GENERAL SERVICE – xx Revised Page No. 57

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE-PD PRIMARY-DISTRIBUTION POWER – xx Revised Page No. 59

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE-HT HIGH-TENSION POWER – xx Revised Page No. 60

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE EP ELECTRIC PROPULSION – xx Revised Page No. 61

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program

RATE SL-E STREET LIGHTING CUSTOMER-OWNED FACILITIES – xx Revised Page No. 66

Changes as a result of Phase V of the Energy Efficiency and Conservation Program.

Rate SL-C SMART LIGHTING CONTROL CUSTOMER OWNED FACILITIES - xx Revised Page No. 68

Change as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE TLCL TRAFFIC LIGHTING CONSTANT LOAD SERVICE - xx Revised Page No. 71

Change as a result of Phase V of the Energy Efficiency and Conservation Program.

RATE AL - ALLEY LIGHTING IN CITY OF PHILADELPHIA - xx Revised Page No. 73

Change as a result of Phase V of the Energy Efficiency and Conservation Program.

TABLE OF CONTENTS

List of Communities Served.....	4
How to Use Loose-Leaf Tariff.....	5
Definition of Terms and Explanation of Abbreviations	6,7,8,9
RULES AND REGULATIONS:	
1. The Tariff	10
2. Service Limitations	10
3. Customer's Installation	11
4. Application for Service.....	12 ¹
5. Credit.....	13
6. Private-Property Construction.....	14 ¹ , 15
7. Extensions	16,17
8. Rights-of-Way.....	18
9. Introduction of Service.....	19
10. Company Equipment	19
11. Tariff and Contract Options.....	21
12. Service Continuity	22
13. Customer's Use of Service	24
14. Metering.....	24
15. Demand Determination.....	25
16. Meter Tests	26
17. Billing and Standard Payment Options.....	27 ¹
18. Payment Terms & Termination of Service.....	28
19. Unfulfilled Contracts	31
20. Cancellation by Customer.....	31
21. General.....	32
22. Rules For Designation of Procurement Class.....	32
23. EGS Switching	33
24. Load Data Exchange.....	33
STATE TAX ADJUSTMENT CLAUSE.....	34
INCREMENTAL COVID-19-RELATED UNCOLLECTIBLE EXPENSE (ICUS)	35 ¹
FIBER AFFILIATE REVENUE SURCHARGE (FARS)	36 ¹
GENERATION SUPPLY ADJUSTMENT FOR PROCUREMENT CLASS 1 AND 2.....	37 ² , 38 ² , 39 ²
GENERATION SUPPLY ADJUSTMENT FOR PROCUREMENT CLASS 3/4	40 ³
RECONCILIATION.....	41 ¹ , 42 ¹
NUCLEAR DECOMMISSIONING COST ADJUSTMENT CLAUSE (NDCA).....	43
PROVISIONS FOR RECOVERY OF UNIVERSAL SERVICE FUND CHARGE (USFC).....	44
PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS	45 ¹
TRANSMISSION SERVICE CHARGE	46 ¹
NON-BYPASSABLE TRANSMISSION CHARGE (NBT).....	47 ¹
PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS PHASE V.....	48 ^x
DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)	49 ² , 50, 51
RATES:	
Rate R Residence Service	52 ^x
Rate R-H Residential Heating Service	53 ^x
Rate RS-2 Net Metering	54, 55, 56
Rate GS General Service.....	57 ^x , 58
Rate PD Primary-Distribution Power.....	59 ^x
Rate HT High-Tension Power.....	60 ^x
Rate EP Electric Propulsion.....	61 ^x
Rate POL Private Outdoor Lighting.....	62 ³ , 63
Rate SL-S Street Lighting-Suburban Counties	64 ³ , 65
Rate SL-E Street Lighting Customer-Owned Facilities	66 ^x , 67
Rate SL-C Smart Lighting Control Customer Owned Facilities	68 ^x , 69, 70
Rate TLCL Traffic Lighting Constant Load Service.....	71 ^x
Rate BLI Borderline Interchange Service	72
Rate AL Alley Lighting in City of Philadelphia.....	73 ^x
RIDERS:	
Applicability Index of Riders.....	74
Capacity Reservation Rider.....	75, 76, 77, 78, 79
CAP Rider - Customer Assistance Program.....	80
Casualty Rider	81
Construction Rider	82

PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS (EEPC)

Purpose: The purpose of this surcharge is to provide for full and current cost recovery of expenditures associated with the Company's Phase V Energy Efficiency and Conservation Program Costs (EEPC).

Applicability: The surcharge shall be calculated for billing purposes for all customers. The EEPC shall be charged to each rate schedule using the following units:

Phase V

Rates R, RS, RH:	\$x.xxxxx/kWh
Rates GS:	\$x.xxxxx /kWh
Rate SL-E,	\$x.xx/location
Rate SL-C	\$x.xx/location
Rate AL:	\$x.xx/location
Rate TLCL*	\$x.xxxxx/kWh
Rates HT, PD, EP:	\$x.xx/kW based on PJM Peak Load Contribution (PLC)

*The TLCL surcharge is eliminated; any remaining over/under balances will be applied as needed.

The Variable Distribution Service charges, for the residential rate schedules shall include the above listed EEPC surcharge. For the municipal lighting rate schedules, the applicable variable or fixed distribution service charges shall include the EEPC surcharge.

For Rate GS, the EEPC shall be recovered through a separate variable distribution charge listed on customer's bills. For Rates PD, HT and EP, a PJM PLC shall be determined in accordance with PJM rules and used to calculate the EEPC. Customer's PLC will be computed to the nearest kilowatt. The EEPC shall be recovered through a separate variable distribution charge listed on customer bills.

Calculation of EEPC Surcharge and the Over/Under Recovery:

Billing Provisions: The surcharge and over/under recovery shall be calculated by rate schedule on an annual basis using the following formulas:

$$EEPC(n) = \frac{(C-E)+(SWE) \times (1)}{(BU) \quad (1-T)}$$

C – The cost of the Energy Efficiency and Conservation Program includes: all expenditures, of the individual programs such as materials, equipment, installation, custom programs, evaluation measurement/verification, educating customers about availability to the extent not included in Consumer Education cost, not recovered through any separate recovery mechanism, and any other cost associated with implementation of the programs. Costs that relate to measures that are applicable to more than one rate class or that are shown to provide system-wide benefits, will be allocated to each class based on the ratio of class-specific projected program costs to the total projected program costs. The program costs are those approved by the PAPUC and audit costs for the Phase V program ending May 31, 2026

E - The over or (under) recovery from the applicable reconciliation period. Interest will not be applied to any over/under collections.

SWE – The cost in dollars of the PaPUC's Statewide Evaluator. These costs will be reconciled separately and added to the EEPC and will not be subject to the 2% spending limit of the EE&C Plan.

BU – The total Billing Units for the applicable recovery period.

T – The current Pennsylvania gross receipts tax rate included in base rates.

n - The rate class for which the EEPC is being calculated: 1 = Residential, 2 = Small C&I, 3 = LC&I, 4 = Street lighting

- Residential - Rates R, RH
- Small C&I – Rate GS
- Large C&I – Rates HT, PD, EP
- Street Lighting – Rates SLE, SLC, AL, TLCL

Filings and Reconciliations: The EEPC shall be filed by May 1 each year to be effective June 1 through May 31.

(C)

The EEPC effective June 1 each year will be calculated using a 12 month "C factor" for the period June 1 through May 31 and an "E factor" for the period of April 1 through March 31.

A reconciliation statement filing, in accordance with C.S. Title 66 §1307(e), will be made by April 30 of each year. The EEPC mechanism is subject to annual audit review by the Bureau of Audits.

RATE R RESIDENCE SERVICE

AVAILABILITY.

Single phase service in the entire territory of the Company to the dwelling and appurtenances of a single private family (or to a multiple dwelling unit building consisting of two to five dwelling units, whether occupied or not), for the domestic requirements of its members when such service is supplied through one meter. Service is also available for related farm purposes when such service is supplied through one meter in conjunction with the farmhouse domestic requirements.

Each dwelling unit connected after May 10, 1980 except those dwelling units under construction or under written contract for construction as of that date must be individually metered for their basic service supply. Centrally supplied master metered heating, cooling or water heating service may be provided if such supply will result in energy conservation.

The term "residence service" includes service to: (a) the separate dwelling unit in an apartment house or condominium, but not the halls, basement, or other portions of such building common to more than one such unit; (b) the premises occupied as the living quarters of five persons or less who unite to establish a common dwelling place for their own personal comfort and convenience on a cost sharing basis; (c) the premises owned by a church, and primarily designated or set aside for, and actually occupied and used as, the dwelling place of a priest, rabbi, pastor, rector, nun or other functioning Church Divine, and the resident associates; (d) private dwellings in which a portion of the space is used for the conduct of business by a person residing therein; (e) A detached garage, located on the same premises as the customer's dwelling unit, that is utilized solely for the domestic requirements of the dwelling unit's members and is served through the same meter as the dwelling unit; (g) A detached garage, located on the same premises as the customer's dwelling unit, that is utilized solely for the domestic requirements of the dwelling unit's members and requires separate metering service as a result of wiring restrictions or legal requirements.

The term does NOT include service to: (a) Premises institutional in character including Clubs, Fraternities, Orphanages or Homes; (b) premises defined as a rooming house or boarding house in the Municipal Code for Cities of the First Class enacted by Act of General Assembly; (c) a premises containing a residence unit but primarily devoted to a professional or other office, studio, or other gainful pursuit; (d) electric furnaces or welding apparatus other than a transformer type "limited input" arc welder with an input not to exceed 37 1/2 amperes at 240 volts.

CURRENT CHARACTERISTICS. Standard single phase secondary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$11.30

FIXED DISTRIBUTION SERVICE CHARGE FOR FORMER OFF-PEAK METERS: \$2.19

VARIABLE DISTRIBUTION SERVICE CHARGE:

All kWhs \$ x.xxxxx per kWh

ENERGY SUPPLY CHARGE:

Refer to the Generation Supply Adjustment Procurement Class 1.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

MINIMUM CHARGE: The minimum charge per month will be the Fixed Distribution Service Charge.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT, UNIVERSAL SERVICE FUND CHARGE, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE, AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

PAYMENT TERMS. Standard.

RATE RH RESIDENTIAL HEATING SERVICE

AVAILABILITY.

Single phase service to the dwelling and appurtenances of a single private family (or to a multiple dwelling unit building consisting of two to five dwelling units, whether occupied or not), for domestic requirements when such service is provided through one meter and where the dwelling is heated by specified types of electric space heating systems. The systems eligible for this rate are (a) permanently connected electric resistance heaters where such heaters supply all of the heating requirements of the dwelling, (b) heat pump installations where the heat pump serves as the heating system for the dwelling and all of the supplementary heating required is supplied by electric resistance heaters, and (c) heat pump installations where the heat pump serves as the heating system for the dwelling and all of the supplementary heating required is supplied by non electric energy sources. All space heating installations must meet Company requirements. This rate schedule is not available for commercial, institutional or industrial establishments.

Each dwelling unit connected after May 10, 1980 except those dwelling units under construction or under written contract for construction as of that date, must be individually metered

CURRENT CHARACTERISTICS. Standard single phase secondary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$11.30

FIXED DISTRIBUTION SERVICE CHARGE FOR FORMER OFF-PEAK METERS: \$2.19

VARIABLE DISTRIBUTION SERVICE CHARGE:

SUMMER MONTHS. (June through September)

\$ x.xxxxx per kWh for all kWh.

WINTER MONTHS. (October through May)

\$ x.xxxxx per kWh for all kWh

ENERGY SUPPLY CHARGE:

Refer to the Generation Supply Adjustment Procurement Class 1.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

MINIMUM CHARGE. The minimum charge per month will be the Fixed Distribution Service Charge.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT, UNIVERSAL SERVICE FUND CHARGE NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND CONSERVATION PROGRAM COSTS AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

COMBINED RESIDENTIAL AND COMMERCIAL SERVICE. Where a portion of the service provided is used for commercial purposes, the appropriate general service rate is applicable to all service; or, at the option of the customer, the wiring may be so arranged that the residential service may be separately metered and this rate is then applicable to the residential service only.

PAYMENT TERMS. Standard.

RATE-GS GENERAL SERVICE

AVAILABILITY.

Service for offices, professional, commercial or industrial establishments, governmental agencies, farms and other applications outside the scope of the Residence Service rate schedules.

Transformed service from the Company's distribution system where the company installs, owns, and maintains any transforming, switching and other receiving equipment required.

For service configurations that are nominally 120/208 volts, 3 phase, 4 wires – If either the service capacity or the parallel-generating capacity exceeds 750 kVA for transformers located inside the building, the only rate option available to the customer will be Rate HT. If either the service capacity or the parallel-generating capacity exceeds 750 kVA but remains at or below 1,500 kVA for transformers outside the building, the customer may request service at 277/480 volts, 3-phase 4-wires from transformers located outside the building. Otherwise the only rate option available to the customer will be Rate HT.

For service configurations that are nominally 277/480 volts, 3 phase, 4 wires - If either the service capacity or the parallel-generating capacity exceeds either 750 kVA for transformers located inside the building or 1,500 kVA for transformers located outside the building, the only rate option available to the customer will be Rate HT.

CURRENT CHARACTERISTICS.

Standard single-phase or polyphase secondary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE:

- \$ 24.47 for single-phase service without demand measurement, or
- \$ 31.20 for single-phase service with demand measurement, or
- \$ 74.66 for polyphase service.

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$11.34 per kW of billed demand

(\$0.0006) per kWh for all kWh

ENERGY EFFICIENCY CHARGE: \$ x.xxxxx per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Classes 2 and ¾.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand may be measured where consumption exceeds 1,100 kilowatt-hours per month for three consecutive months; or where load tests indicate a demand of five or more kilowatts; or where the customer requests demand measurement. Measured demands will be determined to the nearest 0.1 of a kilowatt but will not be less than 1.2 kilowatts, and will be adjusted for power factor in accordance with the Rules and Regulations.

For those customers with demand measurement the billing demand will be determined as follows:

- (a) For customers with demand up to 500 kW, the billing demand shall be the measured demand, with a minimum billing demand of 1.2 kW.
- (b) For customers with measured demand or maximum demand greater than 500 kW, the billing demand shall be the greater of (i) the measured demand, or (ii) 40% of the maximum contract demand.

If a measured demand customer has less than 1,100 monthly kilowatt-hours of use, the monthly billing demand will be the measured demand or the metered monthly kilowatt-hours divided by 175 hours, whichever is less, but not less than 1.2 kilowatts.

For those customers without demand measurement, the monthly billing demand will be computed by dividing the metered monthly kilowatt-hours by 175 hours. The computed demand will be determined to the nearest 0.1 of a kilowatt, but will not be less than 1.2 kilowatts.

MINIMUM CHARGE.

The monthly minimum charge for customers without demand measurement will be the Fixed Distribution Service Charge, plus the Variable Distribution Service Charge per KW of minimum billing demand as described above. The monthly minimum charge for customers with demand measurement will be the Fixed Distribution Service Charge, plus per KW of billing demand. In addition to the above, for customers in Procurement Class ¾ charges will be assessed on PJM's reliability pricing model.

RATE-PD PRIMARY DISTRIBUTION POWER

AVAILABILITY.

Untransformed service from the primary supply lines of the Company's distribution system where the customer installs, owns, and maintains any transforming, switching and other receiving equipment required. However, standard primary service is not available in areas where the distribution voltage has been changed to either 13 kV or 33 kV unless the customer was served with standard primary service before the conversion of the area to either 13 kV or 33 kV. This rate is available only for service locations served on this rate on July 6, 1987 as long as the original primary service has not been removed. PECO Energy may refuse to increase the load supplied to a customer served under this rate when, in PECO Energy's sole judgment, any transmission or distribution capacity limitations exist. If a customer changes the billing rate of a location being served on this rate, PECO Energy may refuse to change that location back to Rate PD when, in PECO Energy's sole judgment, any transmission or distribution capacity limitations exist.

CURRENT CHARACTERISTICS.

Standard primary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$297.61

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$11.21 per kW of billing demand
(\$0.0006) per kWh for all kWh

ENERGY EFFICIENCY CHARGE: \$x.xx per kW of Peak Load Contribution

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Classes 2 and 3/4.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand will be computed to the nearest kilowatt and will never be less than the measured demand, adjusted for power factor in accordance with the Rules and Regulations, nor less than 25 kilowatts. The 25kW minimum shall apply to the Energy Supply Charge and the Transmission Supply Charge. Additionally, the billing demand will not be less than 40% of the maximum demand specified in the contract.

MINIMUM CHARGE.

The monthly minimum charge shall be the Fixed Distribution Service Charge, plus the charge per kW component of the Variable Distribution Service Charge, plus in the case of Procurement Class 3/4 customers, charges assessed under PJM's reliability pricing model.

TERM OF CONTRACT.

The initial contract term shall be for at least three years.

PAYMENT TERMS.

Standard.

RATE-HT HIGH TENSION POWER

AVAILABILITY.

Untransformed service from the Company's standard high tension lines, where the customer installs, owns, and maintains, any transforming, switching and other receiving equipment required.

CURRENT CHARACTERISTICS.

Standard high tension service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$371.68

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$7.12 per kW of billing demand
(\$0.0006) per kWh for all kWh

HIGH VOLTAGE DISTRIBUTION DISCOUNT:

For customers supplied at 33,000 volts: \$0.24 per kW of measured demand.
For customers supplied at 69,000 volts: \$1.94 per kW of measured demand.
For customers supplied over 69,000 volts: \$1.94 per kW of measured demand.

ENERGY EFFICIENCY CHARGE: \$x.xx per kW of Peak Load Contribution

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Classes 2 and 3/4.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND CONSERVATION PROGRAM AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand will be computed to the nearest kilowatt and will never be less than the measured demand, adjusted for power factor in accordance with the Rules and Regulations, nor less than 25 kilowatts. Additionally, the billing demand will not be less than 40% of the maximum demand specified in the contract. The 25 kW minimum shall apply to the Energy Supply Charge and the Transmission Supply Charge.

CONJUNCTIVE BILLING OF MULTIPLE DELIVERY POINTS.

If the load of a customer located at a delivery point becomes greater than the capacity of the standard circuit or circuits established by the Company to supply the customer at that delivery point, upon the written request of the customer, the Company will establish a new delivery point and bill the customer as if it were delivering and metering the two services at a single point, as long as installation of the new service is, in the Company's opinion, less costly for the Company than upgrading the service to the first delivery point and provided that such multi-point delivery is not disadvantageous to the Company.

MINIMUM CHARGE.

The monthly minimum charge shall be the Fixed Distribution Service Charge, plus the charge per kW component of the Variable Distribution Service Charge, and modify less the high voltage discount where applicable plus in the case of Procurement Class 3/4 customers, charges assessed on PJM's reliability pricing model.

TERM OF CONTRACT.

The initial contract term shall be for at least three years.

PAYMENT TERMS.

Standard.

RATE EP ELECTRIC PROPULSION

AVAILABILITY.

This rate is available only to the National Rail Passenger Corporation (AMTRAK) and to the Southeastern Pennsylvania Transportation Authority (SEPTA) for untransformed service from the Company's standard high tension lines, where the customer installs, owns, and maintains any transforming, switching and other receiving equipment required and where the service is provided for the operation of electrified transit and railroad systems and appurtenances. Rate EP is also available to legacy transformed service that is receiving service pursuant to Rate EP as of January 1, 2020; Rate EP or successor rates shall remain available for such legacy transformed service until at least December 31, 2040.

CURRENT CHARACTERISTICS.

Standard sixty hertz (60 Hz) high tension service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$1,292.35 per delivery point

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$6.15 per kW of billing demand

(\$0.0006) per kWh for all kWh

HIGH VOLTAGE DISTRIBUTION DISCOUNT:

For delivery points supplied at 33,000 volts: \$0.24 per kW.

For delivery points supplied at 69,000 volts: \$1.94 per kW for first 10,000 kW of measured demand.

For delivery points supplied over 69,000 volts \$1.94 per kW for first 100,000 kW of measured demand.

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class ¾.

ENERGY EFFICIENCY CHARGE: \$x.xx per kW of Peak Load Contribution

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand will be computed to the nearest kilowatt and will never be less than the measured demand, adjusted for power factor in accordance with the Rules and Regulations, nor less than 5,000 kilowatts. Additionally, the billing demand will not be less than 40% of the maximum demand specified in the contract.

CONJUNCTIVE BILLING OF MULTIPLE DELIVERY POINTS.

If the load of a customer located at a delivery point becomes greater than the capacity of the standard circuit or circuits established by the Company to supply the customer at that delivery point, upon the written request of the customer, the Company will establish a new delivery point and bill the customer as if it were delivering and metering the two services at a single point, as long as installation of the new service is, in the Company's opinion, less costly for the Company than upgrading the service to the first delivery point and provided that such multi-point delivery is not disadvantageous to the Company. Conjunctive billing under this section is available regardless of whether the conjunctively-billed sites take generation service from one or more generation suppliers and/or PECO default service.

RATE SL-E STREET LIGHTING CUSTOMER OWNED FACILITIES

AVAILABILITY.

To any governmental agency for outdoor lighting provided for the safety and convenience of the public of streets, highways, bridges, parks or similar places, including directional highway signs at locations where other outdoor lighting service is established hereunder only if all of the Utilization Facilities, as defined in Terms and Conditions in this Base Rate, are installed, owned and maintained by a governmental agency.

This rate is also available to community associations of residential property owners both inside and outside the City of Philadelphia for the lighting of streets that are not dedicated. This rate is not available to commercial or industrial customers. All facilities and their installation shall be approved by the Company.

MONTHLY RATE TABLE.

SERVICE LOCATION DISTRIBUTION CHARGE: \$x.xx per Service Location (as defined below) *
VARIABLE DISTRIBUTION CHARGE: \$0.02541 per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2*.

* The service location charge includes an Energy Efficiency Program Surcharge (\$0.08) per location.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SERVICE LOCATION.

A Service Location is the Point of Delivery on the Company's secondary circuit. That connects to one or more Utilization Facilities. A customer may connect multiple Utilization Facilities to a single Service Location in accordance with Paragraph 2c and approval by the Company.

DETERMINATION OF ENERGY BILLED.

The energy use for a month of a Service Location shall be computed to the nearest kilowatt hour as the product of one thousandth of its wattage and the effective hours of use of such wattage during the calendar month under the established operation schedules as set forth under Terms and Conditions, Paragraph 1 Service. The wattage, expressed to the nearest tenth of a watt, of a Service Location shall be composed of manufacturer's rating of its lamps, ballasts, transformers, individual controls and other load components required for its operation. The aggregate of the kilowatt hours thus computed for all Active Service Locations shall constitute the energy billed for the month.

TERMS AND CONDITIONS.

1. Service. Lighting service will be operated on all-night, every-night lighting schedules, under which lights normally are turned on after sunset and off before sunrise with approximately 4,100 annual operating hours (average monthly burning hours = 341.11 hours). Extended lighting service during all daylight hours will be supplied for lamps specified by the customer.
2. Ownership of Utilization Facilities.

a. Service Locations Supplied from Aerial Circuits: customer shall provide, own and maintain the Utilization Facilities defined as the brackets, hangers, luminaires, lamps/LED array(s), ballasts/drivers, transformers, individual controls, conductors, molding and supporting insulators between the lamp receptacles and line wires of the Company's distribution facilities and any other components as required for the operation of each Service Location.

The Company shall provide the supporting pole or post for such aerially supplied Service Location and will issue authorization to permit the customer to install thereon the said Utilization Facilities. If the Company sells aerially supplied streetlighting facilities to a government agency in order to qualify for SL-E, such sale will include the supporting pole or post.

b. Service Locations Supplied from Underground Circuits: customer shall provide, own and maintain the Utilization Facilities defined as brackets or hangers, luminaires, lamps/LED array(s), ballasts/drivers, transformers, individual controls, and conductors and shall assume all costs of installing such Utilization Facilities. Customer shall also provide, own, and maintain the supporting pole or post foundation with 90 degree pipe bend, and conduits from the luminaires to sidewalk level, or in special cases, such as Federally and State financed limited access highways, to a Service Location designated by the Company on its secondary voltage circuit.

Except as provided in Paragraph 5 Supply Facilities, the Company shall own conduit from the distribution circuit to the 90 degree pipe bend, shall own conductors from its distribution system to the designated Service Location and shall provide sufficient length of conductors for splicing at the designated Service Location or in the post base where sidewalk level access is provided.

c. Service to Group of Utilization Facilities:

AERIAL SUPPLY

When the customer requests service to a group of Utilization Facilities supplied from aerial distribution facilities, the customer is responsible for providing the support poles or posts for the Utilization Facilities. The Company will provide a service, nominally 100 feet, to the customer's first supporting structure. The customer is responsible for installing supply conductors from the first supporting structure to all Utilization Facilities.

UNDERGROUND SUPPLY

When groups of Utilization Facilities are supplied from underground distribution facilities, the customer is responsible for the supporting poles or posts and the supply conductors to each Utilization Facility from the designated Service Location. If the customer requests an underground supply to a group of Utilization Facilities and the designated Service Location is a secondary terminal pole, the customer will install, own, maintain all cable, including the cable on the pole.

3. Standards of Construction for Utilization Facilities. Customer construction shall meet the Company's standards which are based upon the National Electrical Safety Code. Designs of proposed construction deviating from such standards shall be submitted to the Company for approval before proceeding with any work.

RATE SL-C SMART LIGHTING CONTROL LIGHTING CUSTOMER OWNED FACILITIES

AVAILABILITY.

Any governmental agency for outdoor lighting, provided for the safety and convenience of the public of streets, highways, bridges, parks or similar places, that complies with each of the following conditions:

- (A) Installs a Smart Lighting Control Module approved by the Company that has capabilities including but not necessarily limited to:
 - a. Measurement of energy usage at the individual Utilization Facility level.
 - b. Customer control of the lamp's burning hours.
 - c. Data showing failure of the lamp to burn, such as customer notification, that customer can provide to Company upon request.
 - d. Ability of customer to dim the lights (LED only).
- (B) Provides energy usage to the Company as described below under Data Requirements.
- (C) Installs, owns, and maintains all Utilization Facilities, as defined in the Terms and Conditions of this Base Rate. (All facilities and their installation shall be approved by the Company.)

This rate is also available to community associations of residential property owners both inside and outside the City of Philadelphia for the lighting of streets that are not dedicated. This rate is not available to commercial or industrial customers.

Customers may take service under the rate beginning on July 1, 2019. The below listed pricing will be revised, as needed, based on applicable surcharge adjustments prior to the SL-C effective service date of July 1, 2019.

MONTHLY RATE TABLE.

SERVICE LOCATION DISTRIBUTION CHARGE: \$x.xx per Service Location (as defined below)*
VARIABLE DISTRIBUTION CHARGE: \$0.04780 per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2*.

* The service location charge includes an Energy Efficiency Program Surcharge of \$x.xx per location.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SERVICE LOCATION.

A Service Location is the Point of Delivery on the Company's secondary circuit that connects to one or more Utilization Facilities. A customer may connect multiple Utilization Facilities to a single Service Location in accordance with Paragraph 2c and approval by the Company

DATA REQUIREMENTS.

The customer must notify the Company of its intent to enroll or modify lights under this rate at least 30 days prior to the start of the regularly scheduled billing cycle during which the enrollment or modification will become effective.

The customer must provide the following data to the Company from its Company-approved Smart Lighting Control Module for each light added or modified:

- 8. Manufacturer-rated wattage
- 9. Annual burning hours, if different than the standard 4,100 burning hours as defined below under paragraph 1 Service of Terms and Conditions
- 10. Dimming percentage/factor

The Company also requires the customer to provide the Global Positioning System (GPS) coordinates for each light.

DETERMINATION OF ENERGY BILLED.

Upon acceptance of the required data, the Company shall modify the energy billed going forward for a period of up to twelve months or at another frequency as required by the Company. The energy use for a month of a Service Location shall be computed to the nearest kilowatt hour as the product of one thousandth of its wattage, adjusted based on the provided dimming percentage/factor, and the provided burning hours during the calendar month.

The Company may, at any time and without prior notice, request that the customer provide updates to the above data or provide actual energy consumption data and burning hours for each light, by calendar month, for up to the past 12 months to verify the continued accuracy of Company billing.

For any regularly scheduled billing cycle in which the customer has not provided acceptable information from its Company-approved Smart Lighting Control Module, the Company shall modify the energy billed going forward by changing the burning hours used to the standard 4,100 burning hours as defined below under Paragraph 1 Service of Terms and Conditions.

The Company reserves the right to modify the customer's rate to SL-E in the continued absence of required data from the customer.

TERMS AND CONDITIONS.

1. Service. For any regularly scheduled billing cycle in which the customer has not provided acceptable information from its Company-approved Smart Lighting Control Module, lighting service will be operated on all-night, every-night lighting schedules, under which lights normally are turned on after sunset and off before sunrise with approximately 4,100 annual operating hours (average monthly burning hours = 341.11 hours). Extended lighting service during all daylight hours will be supplied for lamps specified by the customer. If the customer provides information from the Smart Lighting Control Module as described above to justify a different billing usage, the burning hours provided by the customer will be used instead of the standard 4,100 annual operating hours.

RATE TLCL TRAFFIC LIGHTING CONSTANT LOAD SERVICE

AVAILABILITY.

To any municipality using the Company's standard service for (a) electric traffic signal lights installed, owned and maintained by the municipality, and/or (b) unmetered traffic control cameras or other small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the municipality.

To any non-municipal non-residential customer using the Company's standard service for unmetered small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the non-municipal customer, which are electrically separate from any other facilities, whether municipally-owned or non-municipally-owned, that are receiving service from PECO as a separate account.

To any non-municipal non-residential customer using the Company's standard service for unmetered small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the non-municipal customer, which are electrically integrated with any other facilities, whether municipally-owned or non-municipally-owned, that are receiving service from PECO as a separate account, but only if the non-municipal customer meets the conditions of the Special Termination Rights provision of this Rate.

CURRENT CHARACTERISTICS.

Standard single phase secondary service.

RATE TABLE.

SERVICE LOCATION CHARGE: \$4.08 PER LOCATION

VARIABLE DISTRIBUTION SERVICE CHARGE: \$x.xxxxx per kWh (as defined below)*

*The Variable Distribution charge includes an Energy Efficiency Program Surcharge of (\$x.xxxxx) per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, NON-BYPASSABLE TRANSMISSION CHARGE, CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SPECIAL RULES AND REGULATIONS.

The use of energy will be estimated by the Company on the basis of the size of lamps and controlling apparatus and the burning hours. The customer shall immediately notify the Company whenever any change is made in the equipment or the burning hours or constant load devices, so that the Company may forthwith revise its estimate of the energy used.

The Company shall not be liable for damage to person or property arising, accruing or resulting from the attachment of the signal equipment to its poles, wires, or fixtures. The customer shall be responsible to determine the amount, location and sufficiency of illumination, including conducting all studies of luminosity, lighting location, and traffic.

SPECIAL TERMINATION RIGHTS

Some facilities that receive service under Rate TLCL may be electrically configured such that it is not possible to terminate service to the Rate TLCL facility without also terminating service to a facility that is receiving service under a separate account, Rate or Rider. In the event of non-payment of bills for service to such a Rate TLCL facility, PECO will provide a termination notice to the customer. The customer may then, at its discretion, notify PECO that it intends to engage in self-termination by removing its facilities from the PECO system within 30 days. If the customer has not removed its facilities within 30 days, then PECO may, at its sole discretion and upon 72-hour notice, physically remove the customer facility as a means of terminating service to that facility. Taking service under Rate TLCL constitutes full customer permission for PECO to engage in such removals. Notwithstanding any removal of such facilities by either the customer or PECO, the customer shall remain fully obligated to PECO for payment of all charges incurred under Rate TLCL. In addition, the customer shall pay to PECO its full cost of removing the facilities, including direct and indirect labor costs, use of truck or other equipment, fuel costs, and costs of storing the customer equipment, all at PECO's normal rates for such work at such time as it may perform such removals. PECO shall not be liable for damage, if any, to the customer equipment that occurs during removal or storage.

TERM OF CONTRACT.

The initial contract term for each signal light installation and constant load device shall be for at least one year.

PAYMENT TERMS.

Standard.

RATE AL – ALLEY LIGHTING IN CITY OF PHILADELPHIA

APPLICABILITY. To multiple, unmetered lighting service supplied the City of Philadelphia to operate lamps and appurtenances for all night outdoor lighting of alleys and courts that are installed, owned and maintained by the City, which assumes the cost involved in making the connections to the Company's facilities. This rate shall no longer be available to new lighting installations effective January 1, 2011.

LIGHTING DISTRIBUTION SERVICE DEFINED. All night outdoor lighting of alleys and courts by lights installed on poles or supports supplied by the City.

NOTICE TO COMPANY. The City shall give advance notice to the Company of all proposed new installations or of the replacement, removal or reconstruction of existing installations. The City shall advise the Company as to each new installation or change in the equipment or connected load of an existing installation, including any change in burning hours and the date on which such new or changed operation took effect.

MONTHLY RATE TABLE.

SERVICE LOCATION CHARGE: \$x.xx Per Location (as defined below)*

*The service location charge includes an Energy Efficiency Program Surcharge of \$x.xx

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT CLAUSE APPLY TO THIS RATE.

PLAN OF MONTHLY BILLING.

Bills may be rendered in equal monthly installments, computed from the calculated annual use of energy, adjusted each month to give effect to any new or changed rate of annual use, by reason of changes in the City's installation, with charge or credit for fractional parts of the month during which a change occurred.

LIABILITY PROVISION.

The Company shall not be liable for damage, or for claims for damage, to persons or property, arising, accruing or resulting from, installation, location or use of lamps, wires, fixtures and appurtenances; or resulting from failure of any light, or lights, to burn for any cause whatsoever. The customer shall be responsible to determine the amount, location and sufficiency of illumination, including conducting all studies of luminosity, lighting location, and traffic.

Supplement No. ~~xx~~ to
ELECTRIC PA P.U.C NO. 8

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PECO Energy Company

Electric Service Tariff

COMPANY OFFICE LOCATION

2301 Market Street
Philadelphia, Pennsylvania 19103

For List of Communities Served, See Page 4.

Issued ~~December 1~~, 2025

Effective ~~June 1~~, 2026

Deleted: August

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Deleted: September

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ISSUED BY: David M. Vahos – President & CEO
PECO Energy Distribution Company
2301 MARKET STREET
PHILADELPHIA, PA. 19103

NOTICE

LIST OF CHANGES MADE BY THIS SUPPLEMENT

PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS (EEPC) ~~xx~~ Revised Page No. 48.

Changes as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE R RESIDENCE SERVICE – ~~xx~~ Revised Page No. 52

Change to the Variable Distribution Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE R-H RESIDENTIAL HEATING SERVICE – ~~xx~~ Revised Page No. 53

Change to the Variable Distribution Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE-GS GENERAL SERVICE – ~~xx~~ Revised Page No. 57

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE-PD PRIMARY-DISTRIBUTION POWER – ~~xx~~ Revised Page No. 59

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE-HT HIGH-TENSION POWER – ~~xx~~ Revised Page No. 60

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE EP ELECTRIC PROPULSION – ~~xx~~ Revised Page No. 61

Change to the Energy Efficiency Charge as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE SL-E STREET LIGHTING CUSTOMER-OWNED FACILITIES – ~~xx~~ Revised Page No. 66

Changes as a result of Phase V of the Energy Efficiency and Conservation Program.

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Rate SL-C SMART LIGHTING CONTROL CUSTOMER OWNED FACILITIES - ~~xx~~ Revised Page No. 68

Change as a result of Phase V of the Energy Efficiency and Conservation Program.

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RATE TLCL TRAFFIC LIGHTING CONSTANT LOAD SERVICE - ~~xx~~ Revised Page No. 71

Change as a result of Phase V of the Energy Efficiency and Conservation Program.

Deleted: APPLICABILITY INDEX OF RIDERS – ~~x~~ Revised Page No. 71 ¶
Removal of the Commercial/Industrial Direct Load Control Program (DLC) Rider and Residential Direct Load Control Program (DLC) Rider. ¶

RATE AL - ALLEY LIGHTING IN CITY OF PHILADELPHIA - ~~xx~~ Revised Page No. 73

Change as a result of Phase V of the Energy Efficiency and Conservation Program.

Deleted: COMMERCIAL/INDUSTRIAL DIRECT LOAD CONTROL PROGRAM (DLC) RIDER - Originalx Page No. 79 and Original x Page No. 80 ¶
Rider being eliminated in accordance with PECO's Phase V Energy Efficiency and Conservation Program. Thus, this page intentionally left blank. ¶

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Deleted: RESIDENTIAL DIRECT LOAD CONTROL PROGRAM (DLC) RIDER - Originalx Page No. 92, Originalx Page No. 93, and Original x Page No. 94 ¶
Rider being eliminated in accordance with PECO's Phase V Energy Efficiency and Conservation Program. Thus, this page intentionally left blank.¶

RATE POL PRIVATE OUTDOOR LIGHTING –Third Revised Page No. 62 – Clean-up page which reflects all rate changes effective September 1, 2025.¶

¶
RATE SL-S STREET LIGHTING-SUBURBAN COUNTIES – Third Revised Page No. 64 – Clean-up page which reflects all rate changes effective September 1, 2025.¶

▼

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PECO Energy Company

TABLE OF CONTENTS

List of Communities Served.....4
 How to Use Loose-Leaf Tariff.....5
 Definition of Terms and Explanation of Abbreviations6,7,8,9
RULES AND REGULATIONS:
 1. The Tariff10
 2. Service Limitations10
 3. Customer's Installation11
 4. Application for Service12¹
 5. Credit13
 6. Private-Property Construction.....14¹, 15
 7. Extensions16,17
 8. Rights-of-Way18
 9. Introduction of Service.....19
 10. Company Equipment19
 11. Tariff and Contract Options21
 12. Service Continuity22
 13. Customer's Use of Service24
 14. Metering.....24
 15. Demand Determination.....25
 16. Meter Tests26
 17. Billing and Standard Payment Options.....27¹
 18. Payment Terms & Termination of Service28
 19. Unfulfilled Contracts31
 20. Cancellation by Customer.....31
 21. General32
 22. Rules For Designation of Procurement Class.....32
 23. EGS Switching33
 24. Load Data Exchange.....33
 STATE TAX ADJUSTMENT CLAUSE34
 INCREMENTAL COVID-19-RELATED UNCOLLECTIBLE EXPENSE (ICUS)35¹
 FIBER AFFILIATE REVENUE SURCHARGE (FARS)36¹
 GENERATION SUPPLY ADJUSTMENT FOR PROCUREMENT CLASS 1 AND 2.....37², 38², 39²
 GENERATION SUPPLY ADJUSTMENT FOR PROCUREMENT CLASS 3/440³
 RECONCILIATION41¹, 42¹
 NUCLEAR DECOMMISSIONING COST ADJUSTMENT CLAUSE (NDCA).....43
 PROVISIONS FOR RECOVERY OF UNIVERSAL SERVICE FUND CHARGE (USFC).....44
 PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS45¹
 TRANSMISSION SERVICE CHARGE46¹
 NON-BYPASSABLE TRANSMISSION CHARGE (NBT).....47¹
 PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS PHASE V.....48¹
 DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)49², 50, 51
RATES:
 Rate R Residence Service52²
 Rate R-H Residential Heating Service53³
 Rate RS-2 Net Metering54, 55, 56
 Rate GS General Service57², 58
 Rate PD Primary-Distribution Power59²
 Rate HT High-Tension Power.....60²
 Rate EP Electric Propulsion.....61¹
 Rate POL Private Outdoor Lighting.....62³, 63
 Rate SL-S Street Lighting-Suburban Counties.....64³, 65
 Rate SL-E Street Lighting Customer-Owned Facilities66², 67
 Rate SL-C Smart Lighting Control Customer Owned Facilities68², 69, 70
 Rate TLCL Traffic Lighting Constant Load Service.....71²
 Rate BLI Borderline Interchange Service72
 Rate AL Alley Lighting in City of Philadelphia73²
RIDERS:
 Applicability Index of Riders.....74
 Capacity Reservation Rider75, 76, 77, 78, 79
 CAP Rider - Customer Assistance Program.....80
 Casualty Rider81
 Construction Rider82

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PECO Energy Company

PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS (EEPC)

Purpose: The purpose of this surcharge is to provide for full and current cost recovery of expenditures associated with the Company's Phase V Energy Efficiency and Conservation Program Costs (EEPC).

Applicability: The surcharge shall be a calculated for billing purposes for all customers. The EEPC shall be charged to each rate schedule using the following units:

- Phase V
- Rates R, RS, RH: \$x.xxxxx/kWh
 - Rates GS: \$x.xxxxx/kWh
 - Rate SL-E, \$x.xx/location
 - Rate SL-C, \$x.xx/location
 - Rate AL: \$x.xx/location
 - Rate TLCL: \$x.xxxxx/kWh
 - Rates HT, PD, EP: \$x.xx/kW based on PJM Peak Load Contribution (PLC)

*The TLCL surcharge is eliminated; any remaining over/under balances will be applied as needed.

The Variable Distribution Service charges, for the residential rate schedules shall include the above listed EEPC surcharge. For the municipal lighting rate schedules, the applicable variable or fixed distribution service charges shall include the EEPC surcharge.

For Rate GS, the EEPC shall be recovered through a separate variable distribution charge listed on customer's bills. For Rates PD, HT and EP, a PJM PLC shall be determined in accordance with PJM rules and used to calculate the EEPC. Customer's PLC will be computed to the nearest kilowatt. The EEPC shall be recovered through a separate variable distribution charge listed on customer bills.

Calculation of EEPC Surcharge and the Over/Under Recovery:

Billing Provisions: The surcharge and over/under recovery shall be calculated by rate schedule on an annual basis using the following formulas:

$$EEPC(n) = \frac{(C-E)+(SWE)}{(BU)} \times \frac{(1)}{(1-T)}$$

C – The cost of the Energy Efficiency and Conservation Program includes: all expenditures, of the individual programs such as materials, equipment, installation, custom programs, evaluation measurement/verification, educating customers about availability to the extent not included in Consumer Education cost, not recovered through any separate recovery mechanism, and any other cost associated with implementation of the programs. Costs that relate to measures that are applicable to more than one rate class or that are shown to provide system-wide benefits, will be allocated to each class based on the ratio of class-specific projected program costs to the total projected program costs. The program costs are those approved by the PAPUC and audit costs for the Phase V program ending May 31, 2026

E – The over or (under) recovery from the applicable reconciliation period. Interest will not be applied to any over/under collections.

SWE – The cost in dollars of the PaPUC's Statewide Evaluator. These costs will be reconciled separately and added to the EEPC and will not be subject to the 2% spending limit of the EE&C Plan.

BU – The total Billing Units for the applicable recovery period.

T – The current Pennsylvania gross receipts tax rate included in base rates.

n – The rate class for which the EEPC is being calculated: 1 = Residential, 2 = Small C&I, 3 = LC&I, 4 = Street lighting
 Residential - Rates R, RH
 Small C&I – Rate GS
 Large C&I – Rates HT, PD, EP
 Street Lighting – Rates SLE, SLC, AL, TLCL

Filings and Reconciliations: The EEPC shall be filed by May 1 each year to be effective June 1 through May 31. (C)

The EEPC effective June 1 each year will be calculated using a 12 month "C factor" for the period June 1 through May 31 and an "E factor" for the period of April 1 through March 31.

A reconciliation statement filing, in accordance with C.S. Title 66 §1307(e), will be made by April 30 of each year. The EEPC mechanism is subject to annual audit review by the Bureau of Audits.

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Effective June 1, 2026

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- Deleted: PDR – The savings/costs from the portion of project EE Peak Demand Resources (PDR) nominated into PJM's Forward Capacity Market ¶ (FCM). The Company will apply any proceeds/deficiencies from nominated PDR to the appropriate customer classes. These costs will be ¶ reconciled separately and added to the EEPC and will not be subject to the 2% spending limit of the EE&C Plan.¶ ¶
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- Deleted: The first surcharge, effective June 1, 2021 will contain "C" and "E" factors calculated as follows: The "C-factor" will have two components;¶ one including Phase III costs and the other including Phase IV costs. The Phase IV component will be set using projected costs for the 12 month period from June 1, 2021 through May 31, 2022. The Phase III component will be set using any Phase III costs from projects started prior to the end of Phase III, but not yet billed as of June 1, 2021. For the "E-factor" over/under rate will include the Phase III costs for the 10 month period from June 1, 2020 through March 31, 2021. ¶
- Deleted: The second EEPC, effective June 1, 2022, will be calculated as follows: the "C-factor" will include Phase IV costs for the period June 1, 2022 through May 31, 2023 and the "E-factor" will include costs for 12 months comprising Phase III costs for the 2 months of April and May 2021 and Phase IV costs for the 10 months of June 1, 2021 through March 31, 2022. Subsequent
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PECO Energy Company

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RATE R RESIDENCE SERVICE

AVAILABILITY.

Single phase service in the entire territory of the Company to the dwelling and appurtenances of a single private family (or to a multiple dwelling unit building consisting of two to five dwelling units, whether occupied or not), for the domestic requirements of its members when such service is supplied through one meter. Service is also available for related farm purposes when such service is supplied through one meter in conjunction with the farmhouse domestic requirements.

Each dwelling unit connected after May 10, 1980 except those dwelling units under construction or under written contract for construction as of that date must be individually metered for their basic service supply. Centrally supplied master metered heating, cooling or water heating service may be provided if such supply will result in energy conservation.

The term "residence service" includes service to: (a) the separate dwelling unit in an apartment house or condominium, but not the halls, basement, or other portions of such building common to more than one such unit; (b) the premises occupied as the living quarters of five persons or less who unite to establish a common dwelling place for their own personal comfort and convenience on a cost sharing basis; (c) the premises owned by a church, and primarily designated or set aside for, and actually occupied and used as, the dwelling place of a priest, rabbi, pastor, rector, nun or other functioning Church Divine, and the resident associates; (d) private dwellings in which a portion of the space is used for the conduct of business by a person residing therein; (e) A detached garage, located on the same premises as the customer's dwelling unit, that is utilized solely for the domestic requirements of the dwelling unit's members and is served through the same meter as the dwelling unit; (g) A detached garage, located on the same premises as the customer's dwelling unit, that is utilized solely for the domestic requirements of the dwelling unit's members and requires separate metering service as a result of wiring restrictions or legal requirements.

The term does NOT include service to: (a) Premises institutional in character including Clubs, Fraternities, Orphanages or Homes; (b) premises defined as a rooming house or boarding house in the Municipal Code for Cities of the First Class enacted by Act of General Assembly; (c) a premises containing a residence unit but primarily devoted to a professional or other office, studio, or other gainful pursuit; (d) electric furnaces or welding apparatus other than a transformer type "limited input" arc welder with an input not to exceed 37 1/2 amperes at 240 volts.

CURRENT CHARACTERISTICS. Standard single phase secondary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$11.30

FIXED DISTRIBUTION SERVICE CHARGE FOR FORMER OFF-PEAK METERS: \$2.19

VARIABLE DISTRIBUTION SERVICE CHARGE:

All kWhs \$ ~~x.xxxxx~~ per kWh

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ENERGY SUPPLY CHARGE:

Refer to the Generation Supply Adjustment Procurement Class 1.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

MINIMUM CHARGE: The minimum charge per month will be the Fixed Distribution Service Charge.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT, UNIVERSAL SERVICE FUND CHARGE, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE, AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

PAYMENT TERMS. Standard.

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Issued December 1, 2025

Effective June 1, 2026

PECO Energy Company

RATE RH RESIDENTIAL HEATING SERVICE

AVAILABILITY.

Single phase service to the dwelling and appurtenances of a single private family (or to a multiple dwelling unit building consisting of two to five dwelling units, whether occupied or not), for domestic requirements when such service is provided through one meter and where the dwelling is heated by specified types of electric space heating systems. The systems eligible for this rate are (a) permanently connected electric resistance heaters where such heaters supply all of the heating requirements of the dwelling, (b) heat pump installations where the heat pump serves as the heating system for the dwelling and all of the supplementary heating required is supplied by electric resistance heaters, and (c) heat pump installations where the heat pump serves as the heating system for the dwelling and all of the supplementary heating required is supplied by non electric energy sources. All space heating installations must meet Company requirements. This rate schedule is not available for commercial, institutional or industrial establishments.

Each dwelling unit connected after May 10, 1980 except those dwelling units under construction or under written contract for construction as of that date, must be individually metered

CURRENT CHARACTERISTICS. Standard single phase secondary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$11.30
FIXED DISTRIBUTION SERVICE CHARGE FOR FORMER OFF-PEAK METERS: \$2.19

VARIABLE DISTRIBUTION SERVICE CHARGE:

SUMMER MONTHS. (June through September)

\$ ~~x.xxxxx~~ per kWh for all kWh.

WINTER MONTHS. (October through May)

\$ ~~x.xxxxx~~ per kWh for all kWh

ENERGY SUPPLY CHARGE:

Refer to the Generation Supply Adjustment Procurement Class 1.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

MINIMUM CHARGE. The minimum charge per month will be the Fixed Distribution Service Charge.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT, UNIVERSAL SERVICE FUND CHARGE NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND CONSERVATION PROGRAM COSTS AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

COMBINED RESIDENTIAL AND COMMERCIAL SERVICE. Where a portion of the service provided is used for commercial purposes, the appropriate general service rate is applicable to all service; or, at the option of the customer, the wiring may be so arranged that the residential service may be separately metered and this rate is then applicable to the residential service only.

PAYMENT TERMS. Standard.

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RATE-GS GENERAL SERVICE

AVAILABILITY.

Service for offices, professional, commercial or industrial establishments, governmental agencies, farms and other applications outside the scope of the Residence Service rate schedules.

Transformed service from the Company's distribution system where the company installs, owns, and maintains any transforming, switching and other receiving equipment required.

For service configurations that are nominally 120/208 volts, 3 phase, 4 wires – If either the service capacity or the parallel-generating capacity exceeds 750 kVA for transformers located inside the building, the only rate option available to the customer will be Rate HT. If either the service capacity or the parallel-generating capacity exceeds 750 kVA but remains at or below 1,500 kVA for transformers outside the building, the customer may request service at 277/480 volts, 3-phase 4-wires from transformers located outside the building. Otherwise the only rate option available to the customer will be Rate HT.

For service configurations that are nominally 277/480 volts, 3 phase, 4 wires - If either the service capacity or the parallel-generating capacity exceeds either 750 kVA for transformers located inside the building or 1,500 kVA for transformers located outside the building, the only rate option available to the customer will be Rate HT.

CURRENT CHARACTERISTICS.

Standard single-phase or polyphase secondary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE:

\$ 24.47 for single-phase service without demand measurement, or
\$ 31.20 for single-phase service with demand measurement, or
\$ 74.66 for polyphase service.

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$11.34 per kW of billed demand
(\$0.0006) per kWh for all kWh

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ENERGY EFFICIENCY CHARGE: \$ ~~x.xxxxx~~ per kWh

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ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Classes 2 and ¼.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand may be measured where consumption exceeds 1,100 kilowatt-hours per month for three consecutive months; or where load tests indicate a demand of five or more kilowatts; or where the customer requests demand measurement. Measured demands will be determined to the nearest 0.1 of a kilowatt but will not be less than 1.2 kilowatts, and will be adjusted for power factor in accordance with the Rules and Regulations.

For those customers with demand measurement the billing demand will be determined as follows:

- (a) For customers with demand up to 500 kW, the billing demand shall be the measured demand, with a minimum billing demand of 1.2 kW.
- (b) For customers with measured demand or maximum demand greater than 500 kW, the billing demand shall be the greater of (i) the measured demand, or (ii) 40% of the maximum contract demand.

If a measured demand customer has less than 1,100 monthly kilowatt-hours of use, the monthly billing demand will be the measured demand or the metered monthly kilowatt-hours divided by 175 hours, whichever is less, but not less than 1.2 kilowatts.

For those customers without demand measurement, the monthly billing demand will be computed by dividing the metered monthly kilowatt-hours by 175 hours. The computed demand will be determined to the nearest 0.1 of a kilowatt, but will not be less than 1.2 kilowatts.

MINIMUM CHARGE.

The monthly minimum charge for customers without demand measurement will be the Fixed Distribution Service Charge, plus the Variable Distribution Service Charge per KW of minimum billing demand as described above. The monthly minimum charge for customers with demand measurement will be the Fixed Distribution Service Charge, plus per KW of billing demand. In addition to the above, for customers in Procurement Class ¼ charges will be assessed on PJM's reliability pricing model.

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RATE-PD PRIMARY DISTRIBUTION POWER

AVAILABILITY.

Untransformed service from the primary supply lines of the Company's distribution system where the customer installs, owns, and maintains any transforming, switching and other receiving equipment required. However, standard primary service is not available in areas where the distribution voltage has been changed to either 13 kV or 33 kV unless the customer was served with standard primary service before the conversion of the area to either 13 kV or 33 kV. This rate is available only for service locations served on this rate on July 6, 1987 as long as the original primary service has not been removed. PECO Energy may refuse to increase the load supplied to a customer served under this rate when, in PECO Energy's sole judgment, any transmission or distribution capacity limitations exist. If a customer changes the billing rate of a location being served on this rate, PECO Energy may refuse to change that location back to Rate PD when, in PECO Energy's sole judgment, any transmission or distribution capacity limitations exist.

CURRENT CHARACTERISTICS.

Standard primary service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$297.61

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$11.21 per kW of billing demand
(\$0.0006) per kWh for all kWh

ENERGY EFFICIENCY CHARGE: ~~\$x.xx~~ per kW of Peak Load Contribution

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ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Classes 2 and 3/4.

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TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

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STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), NUCLEAR DECOMMISSIONING COST ADJUSTMENT PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE AND PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand will be computed to the nearest kilowatt and will never be less than the measured demand, adjusted for power factor in accordance with the Rules and Regulations, nor less than 25 kilowatts. The 25kW minimum shall apply to the Energy Supply Charge and the Transmission Supply Charge. Additionally, the billing demand will not be less than 40% of the maximum demand specified in the contract.

MINIMUM CHARGE.

The monthly minimum charge shall be the Fixed Distribution Service Charge, plus the charge per kW component of the Variable Distribution Service Charge, plus in the case of Procurement Class 3/4 customers, charges assessed under PJM's reliability pricing model.

TERM OF CONTRACT.

The initial contract term shall be for at least three years.

PAYMENT TERMS.

Standard.

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Tariff Electric Pa. P.U.C. No. 8
~~x~~ Revised Page No. 60
Supersedes ~~x~~ Revised Page No. 60

PECO Energy Company

RATE-HT HIGH TENSION POWER

AVAILABILITY.
Untransformed service from the Company's standard high tension lines, where the customer installs, owns, and maintains, any transforming, switching and other receiving equipment required.

CURRENT CHARACTERISTICS.
Standard high tension service.

MONTHLY RATE TABLE.
FIXED DISTRIBUTION SERVICE CHARGE: \$371.68

VARIABLE DISTRIBUTION SERVICE CHARGE:
\$7.12 per kW of billing demand
(\$0.0006) per kWh for all kWh

HIGH VOLTAGE DISTRIBUTION DISCOUNT:
For customers supplied at 33,000 volts: \$0.24 per kW of measured demand.
For customers supplied at 69,000 volts: \$1.94 per kW of measured demand.
For customers supplied over 69,000 volts: \$1.94 per kW of measured demand.

ENERGY EFFICIENCY CHARGE: \$~~x.xx~~ per kW of Peak Load Contribution

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Classes 2 and 3/4.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND CONSERVATION PROGRAM AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.
The billing demand will be computed to the nearest kilowatt and will never be less than the measured demand, adjusted for power factor in accordance with the Rules and Regulations, nor less than 25 kilowatts. Additionally, the billing demand will not be less than 40% of the maximum demand specified in the contract. The 25 kW minimum shall apply to the Energy Supply Charge and the Transmission Supply Charge.

CONJUNCTIVE BILLING OF MULTIPLE DELIVERY POINTS.
If the load of a customer located at a delivery point becomes greater than the capacity of the standard circuit or circuits established by the Company to supply the customer at that delivery point, upon the written request of the customer, the Company will establish a new delivery point and bill the customer as if it were delivering and metering the two services at a single point, as long as installation of the new service is, in the Company's opinion, less costly for the Company than upgrading the service to the first delivery point and provided that such multi-point delivery is not disadvantageous to the Company.

MINIMUM CHARGE.
The monthly minimum charge shall be the Fixed Distribution Service Charge, plus the charge per kW component of the Variable Distribution Service Charge, and modify less the high voltage discount where applicable plus in the case of Procurement Class 3/4 customers, charges assessed on PJM's reliability pricing model.

TERM OF CONTRACT.
The initial contract term shall be for at least three years.

PAYMENT TERMS.
Standard.

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PECO Energy Company

RATE EP ELECTRIC PROPULSION

AVAILABILITY.

This rate is available only to the National Rail Passenger Corporation (AMTRAK) and to the Southeastern Pennsylvania Transportation Authority (SEPTA) for untransformed service from the Company's standard high tension lines, where the customer installs, owns, and maintains any transforming, switching and other receiving equipment required and where the service is provided for the operation of electrified transit and railroad systems and appurtenances. Rate EP is also available to legacy transformed service that is receiving service pursuant to Rate EP as of January 1, 2020; Rate EP or successor rates shall remain available for such legacy transformed service until at least December 31, 2040.

CURRENT CHARACTERISTICS.

Standard sixty hertz (60 Hz) high tension service.

MONTHLY RATE TABLE.

FIXED DISTRIBUTION SERVICE CHARGE: \$1,292.35 per delivery point

VARIABLE DISTRIBUTION SERVICE CHARGE:

\$6.15 per kW of billing demand
(\$0.0006) per kWh for all kWh

HIGH VOLTAGE DISTRIBUTION DISCOUNT:

For delivery points supplied at 33,000 volts: \$0.24 per kW.
For delivery points supplied at 69,000 volts: \$1.94 per kW for first 10,000 kW of measured demand.
For delivery points supplied over 69,000 volts \$1.94 per kW for first 100,000 kW of measured demand.

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class ¾.

ENERGY EFFICIENCY CHARGE: ~~\$x.xx~~ per kW of Peak Load Contribution

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

DETERMINATION OF BILLING DEMAND.

The billing demand will be computed to the nearest kilowatt and will never be less than the measured demand, adjusted for power factor in accordance with the Rules and Regulations, nor less than 5,000 kilowatts. Additionally, the billing demand will not be less than 40% of the maximum demand specified in the contract.

CONJUNCTIVE BILLING OF MULTIPLE DELIVERY POINTS.

If the load of a customer located at a delivery point becomes greater than the capacity of the standard circuit or circuits established by the Company to supply the customer at that delivery point, upon the written request of the customer, the Company will establish a new delivery point and bill the customer as if it were delivering and metering the two services at a single point, as long as installation of the new service is, in the Company's opinion, less costly for the Company than upgrading the service to the first delivery point and provided that such multi-point delivery is not disadvantageous to the Company. Conjunctive billing under this section is available regardless of whether the conjunctively-billed sites take generation service from one or more generation suppliers and/or PECO default service.

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PECO Energy Company

RATE SL-E STREET LIGHTING CUSTOMER OWNED FACILITIES

AVAILABILITY.

To any governmental agency for outdoor lighting provided for the safety and convenience of the public of streets, highways, bridges, parks or similar places, including directional highway signs at locations where other outdoor lighting service is established hereunder only if all of the Utilization Facilities, as defined in Terms and Conditions in this Base Rate, are installed, owned and maintained by a governmental agency.

This rate is also available to community associations of residential property owners both inside and outside the City of Philadelphia for the lighting of streets that are not dedicated. This rate is not available to commercial or industrial customers. All facilities and their installation shall be approved by the Company.

MONTHLY RATE TABLE.

SERVICE LOCATION DISTRIBUTION CHARGE: ~~\$x.xx~~ per Service Location (as defined below) *
VARIABLE DISTRIBUTION CHARGE: \$0.02541 per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2*.

* The service location charge includes an Energy Efficiency Program Surcharge (\$0.08) per location.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SERVICE LOCATION.

A Service Location is the Point of Delivery on the Company's secondary circuit. That connects to one or more Utilization Facilities. A customer may connect multiple Utilization Facilities to a single Service Location in accordance with Paragraph 2c and approval by the Company.

DETERMINATION OF ENERGY BILLED.

The energy use for a month of a Service Location shall be computed to the nearest kilowatt hour as the product of one thousandth of its wattage and the effective hours of use of such wattage during the calendar month under the established operation schedules as set forth under Terms and Conditions, Paragraph 1 Service. The wattage, expressed to the nearest tenth of a watt, of a Service Location shall be composed of manufacturer's rating of its lamps, ballasts, transformers, individual controls and other load components required for its operation. The aggregate of the kilowatt hours thus computed for all Active Service Locations shall constitute the energy billed for the month.

TERMS AND CONDITIONS.

1. Service. Lighting service will be operated on all-night, every-night lighting schedules, under which lights normally are turned on after sunset and off before sunrise with approximately 4,100 annual operating hours (average monthly burning hours = 341.11 hours). Extended lighting service during all daylight hours will be supplied for lamps specified by the customer.
2. Ownership of Utilization Facilities.

a. Service Locations Supplied from Aerial Circuits: customer shall provide, own and maintain the Utilization Facilities defined as the brackets, hangers, luminaires, lamps/LED array(s), ballasts/drivers, transformers, individual controls, conductors, molding and supporting insulators between the lamp receptacles and line wires of the Company's distribution facilities and any other components as required for the operation of each Service Location.

The Company shall provide the supporting pole or post for such aerially supplied Service Location and will issue authorization to permit the customer to install thereon the said Utilization Facilities. If the Company sells aerially supplied streetlighting facilities to a government agency in order to qualify for SL-E, such sale will include the supporting pole or post.

b. Service Locations Supplied from Underground Circuits: customer shall provide, own and maintain the Utilization Facilities defined as brackets or hangers, luminaires, lamps/LED array(s), ballasts/drivers, transformers, individual controls, and conductors and shall assume all costs of installing such Utilization Facilities. Customer shall also provide, own, and maintain the supporting pole or post foundation with 90 degree pipe bend, and conduits from the luminaires to sidewalk level, or in special cases, such as Federally and State financed limited access highways, to a Service Location designated by the Company on its secondary voltage circuit.

Except as provided in Paragraph 5 Supply Facilities, the Company shall own conduit from the distribution circuit to the 90 degree pipe bend, shall own conductors from its distribution system to the designated Service Location and shall provide sufficient length of conductors for splicing at the designated Service Location or in the post base where sidewalk level access is provided.

c. Service to Group of Utilization Facilities:

AERIAL SUPPLY

When the customer requests service to a group of Utilization Facilities supplied from aerial distribution facilities, the customer is responsible for providing the support poles or posts for the Utilization Facilities. The Company will provide a service, nominally 100 feet, to the customer's first supporting structure. The customer is responsible for installing supply conductors from the first supporting structure to all Utilization Facilities.

UNDERGROUND SUPPLY

When groups of Utilization Facilities are supplied from underground distribution facilities, the customer is responsible for the supporting poles or posts and the supply conductors to each Utilization Facility from the designated Service Location. If the customer requests an underground supply to a group of Utilization Facilities and the designated Service Location is a secondary terminal pole, the customer will install, own, maintain all cable, including the cable on the pole.

3. Standards of Construction for Utilization Facilities. Customer construction shall meet the Company's standards which are based upon the National Electrical Safety Code. Designs of proposed construction deviating from such standards shall be submitted to the Company for approval before proceeding with any work.

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PECO Energy Company

RATE SL-C SMART LIGHTING CONTROL LIGHTING CUSTOMER OWNED FACILITIES

AVAILABILITY.

Any governmental agency for outdoor lighting, provided for the safety and convenience of the public of streets, highways, bridges, parks or similar places, that complies with each of the following conditions:

- (A) Installs a Smart Lighting Control Module approved by the Company that has capabilities including but not necessarily limited to:
 - a. Measurement of energy usage at the individual Utilization Facility level.
 - b. Customer control of the lamp's burning hours.
 - c. Data showing failure of the lamp to burn, such as customer notification, that customer can provide to Company upon request.
 - d. Ability of customer to dim the lights (LED only).
- (B) Provides energy usage to the Company as described below under Data Requirements.
- (C) Installs, owns, and maintains all Utilization Facilities, as defined in the Terms and Conditions of this Base Rate. (All facilities and their installation shall be approved by the Company.)

This rate is also available to community associations of residential property owners both inside and outside the City of Philadelphia for the lighting of streets that are not dedicated. This rate is not available to commercial or industrial customers.

Customers may take service under the rate beginning on July 1, 2019. The below listed pricing will be revised, as needed, based on applicable surcharge adjustments prior to the SL-C effective service date of July 1, 2019.

MONTHLY RATE TABLE.

SERVICE LOCATION DISTRIBUTION CHARGE: ~~\$x.xx~~ per Service Location (as defined below)*
VARIABLE DISTRIBUTION CHARGE: \$0.04780 per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2*.

* The service location charge includes an Energy Efficiency Program Surcharge of ~~\$x.xx~~ per location.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SERVICE LOCATION.

A Service Location is the Point of Delivery on the Company's secondary circuit that connects to one or more Utilization Facilities. A customer may connect multiple Utilization Facilities to a single Service Location in accordance with Paragraph 2c and approval by the Company

DATA REQUIREMENTS.

The customer must notify the Company of its intent to enroll or modify lights under this rate at least 30 days prior to the start of the regularly scheduled billing cycle during which the enrollment or modification will become effective.

The customer must provide the following data to the Company from its Company-approved Smart Lighting Control Module for each light added or modified:

- 8. Manufacturer-rated wattage
- 9. Annual burning hours, if different than the standard 4,100 burning hours as defined below under paragraph 1 Service of Terms and Conditions
- 10. Dimming percentage/factor

The Company also requires the customer to provide the Global Positioning System (GPS) coordinates for each light.

DETERMINATION OF ENERGY BILLED.

Upon acceptance of the required data, the Company shall modify the energy billed going forward for a period of up to twelve months or at another frequency as required by the Company. The energy use for a month of a Service Location shall be computed to the nearest kilowatt hour as the product of one thousandth of its wattage, adjusted based on the provided dimming percentage/factor, and the provided burning hours during the calendar month.

The Company may, at any time and without prior notice, request that the customer provide updates to the above data or provide actual energy consumption data and burning hours for each light, by calendar month, for up to the past 12 months to verify the continued accuracy of Company billing.

For any regularly scheduled billing cycle in which the customer has not provided acceptable information from its Company-approved Smart Lighting Control Module, the Company shall modify the energy billed going forward by changing the burning hours used to the standard 4,100 burning hours as defined below under Paragraph 1 Service of Terms and Conditions.

The Company reserves the right to modify the customer's rate to SL-E in the continued absence of required data from the customer.

TERMS AND CONDITIONS.

1. Service. For any regularly scheduled billing cycle in which the customer has not provided acceptable information from its Company-approved Smart Lighting Control Module, lighting service will be operated on all-night, every-night lighting schedules, under which lights normally are turned on after sunset and off before sunrise with approximately 4,100 annual operating hours (average monthly burning hours = 341.11 hours). Extended lighting service during all daylight hours will be supplied for lamps specified by the customer. If the customer provides information from the Smart Lighting Control Module as described above to justify a different billing usage, the burning hours provided by the customer will be used instead of the standard 4,100 annual operating hours.

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PECO Energy Company

RATE TLCL TRAFFIC LIGHTING CONSTANT LOAD SERVICE

AVAILABILITY.

To any municipality using the Company's standard service for (a) electric traffic signal lights installed, owned and maintained by the municipality, and/or (b) unmetered traffic control cameras or other small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the municipality.

To any non-municipal non-residential customer using the Company's standard service for unmetered small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the non-municipal customer, which are electrically separate from any other facilities, whether municipally-owned or non-municipally-owned, that are receiving service from PECO as a separate account.

To any non-municipal non-residential customer using the Company's standard service for unmetered small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the non-municipal customer, which are electrically integrated with any other facilities, whether municipally-owned or non-municipally-owned, that are receiving service from PECO as a separate account, but only if the non-municipal customer meets the conditions of the Special Termination Rights provision of this Rate.

CURRENT CHARACTERISTICS.

Standard single phase secondary service.

RATE TABLE.

SERVICE LOCATION CHARGE: \$4.08 PER LOCATION

VARIABLE DISTRIBUTION SERVICE CHARGE: \$x,xxxx per kWh (as defined below)*

*The Variable Distribution charge includes an Energy Efficiency Program Surcharge of (\$x,xxxx) per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, NON-BYPASSABLE TRANSMISSION CHARGE, CONSERVATION PROGRAM COSTS, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SPECIAL RULES AND REGULATIONS.

The use of energy will be estimated by the Company on the basis of the size of lamps and controlling apparatus and the burning hours. The customer shall immediately notify the Company whenever any change is made in the equipment or the burning hours or constant load devices, so that the Company may forthwith revise its estimate of the energy used.

The Company shall not be liable for damage to person or property arising, accruing or resulting from the attachment of the signal equipment to its poles, wires, or fixtures. The customer shall be responsible to determine the amount, location and sufficiency of illumination, including conducting all studies of luminosity, lighting location, and traffic.

SPECIAL TERMINATION RIGHTS

Some facilities that receive service under Rate TLCL may be electrically configured such that it is not possible to terminate service to the Rate TLCL facility without also terminating service to a facility that is receiving service under a separate account, Rate or Rider. In the event of non-payment of bills for service to such a Rate TLCL facility, PECO will provide a termination notice to the customer. The customer may then, at its discretion, notify PECO that it intends to engage in self-termination by removing its facilities from the PECO system within 30 days. If the customer has not removed its facilities within 30 days, then PECO may, at its sole discretion and upon 72-hour notice, physically remove the customer facility as a means of terminating service to that facility. Taking service under Rate TLCL constitutes full customer permission for PECO to engage in such removals. Notwithstanding any removal of such facilities by either the customer of PECO, the customer shall remain fully obligated to PECO for payment of all charges incurred under Rate TLCL. In addition, the customer shall pay to PECO its full cost of removing the facilities, including direct and indirect labor costs, use of truck or other equipment, fuel costs, and costs of storing the customer equipment, all at PECO's normal rates for such work at such time as it may perform such removals. PECO shall not be liable for damage, if any, to the customer equipment that occurs during removal or storage.

TERM OF CONTRACT.

The initial contract term for each signal light installation and constant load device shall be for at least one year.

PAYMENT TERMS.

Standard.

Issued December 1, 2025

Effective June 1, 2026

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PECO Energy Company

RATE AL – ALLEY LIGHTING IN CITY OF PHILADELPHIA

APPLICABILITY. To multiple, unmetered lighting service supplied the City of Philadelphia to operate lamps and appurtenances for all night outdoor lighting of alleys and courts that are installed, owned and maintained by the City, which assumes the cost involved in making the connections to the Company's facilities. This rate shall no longer be available to new lighting installations effective January 1, 2011.

LIGHTING DISTRIBUTION SERVICE DEFINED. All night outdoor lighting of alleys and courts by lights installed on poles or supports supplied by the City.

NOTICE TO COMPANY. The City shall give advance notice to the Company of all proposed new installations or of the replacement, removal or reconstruction of existing installations. The City shall advise the Company as to each new installation or change in the equipment or connected load of an existing installation, including any change in burning hours and the date on which such new or changed operation took effect.

MONTHLY RATE TABLE.

SERVICE LOCATION CHARGE: \$~~x.xx~~ Per Location (as defined below)*

*The service location charge includes an Energy Efficiency Program Surcharge of \$~~x.xx~~

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: The Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC), PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY AND CONSERVATION PROGRAM COSTS, NON-BYPASSABLE TRANSMISSION CHARGE, FIBER AFFILIATE REVENUE SURCHARGE, INCREMENTAL COVID-19 RELATED UNCOLLECTIBLE SURCHARGE AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT CLAUSE APPLY TO THIS RATE.

PLAN OF MONTHLY BILLING.

Bills may be rendered in equal monthly installments, computed from the calculated annual use of energy, adjusted each month to give effect to any new or changed rate of annual use, by reason of changes in the City's installation, with charge or credit for fractional parts of the month during which a change occurred.

LIABILITY PROVISION.

The Company shall not be liable for damage, or for claims for damage, to persons or property, arising, accruing or resulting from, installation, location or use of lamps, wires, fixtures and appurtenances; or resulting from failure of any light, or lights, to burn for any cause whatsoever. The customer shall be responsible to determine the amount, location and sufficiency of illumination, including conducting all studies of luminosity, lighting location, and traffic.

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Issued December 1, 2025

Effective June 1, 2026

**PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN
PROGRAM COST BY RATE CLASS (PY18 -PY22)**

Cost	Residential (Includes Low Income)	Small C&I	Large C&I	Municipal*	Total
Residential					
1. Incentives	\$77,172,235	\$0	\$0	\$0	\$77,172,235
2. CSP Delivery Fees	\$48,223,069	\$0	\$0	\$0	\$48,223,069
3. Marketing	\$11,265,135	\$0	\$0	\$0	\$11,265,135
4. AEPS Registration Support	\$0	\$0	\$0	\$0	\$0
5. Common Costs	\$25,039,032	\$0	\$0	\$0	\$25,039,032
Subtotal Residential Programs	\$161,699,470	\$0	\$0	\$0	\$161,699,470
Small Commercial					
6. Incentives	\$0	\$69,622,197	\$0	\$0	\$69,622,197
7. CPS Delivery Fees	\$0	\$36,103,112	\$0	\$0	\$36,103,112
8. Marketing	\$0	\$1,585,504	\$0	\$0	\$1,585,504
9. AEPS Registration Support	\$0	\$33,423	\$0	\$0	\$33,423
10. Common Costs	\$0	\$21,016,193	\$0	\$0	\$21,016,193
Subtotal C&I Small Programs	\$0	\$128,360,429	\$0	\$0	\$128,360,429
Large Commercial					
11. Incentives	\$0	\$0	\$71,842,639	\$0	\$71,842,639
12. CPS Delivery Fees	\$0	\$0	\$42,393,912	\$0	\$42,393,912
13. Marketing	\$0	\$0	\$1,792,947	\$0	\$1,792,947
14. AEPS Registration Support	\$0	\$0	\$39,327	\$0	\$39,327
15. Common Costs	\$0	\$0	\$21,199,117	\$0	\$21,199,117
Subtotal C&I Large Programs	\$0	\$0	\$137,267,942	\$0	\$137,267,942
Municipal					
16. Incentives	\$0	\$0	\$0	\$253	\$253
17. CPS Delivery Fees	\$0	\$0	\$0	\$37,066	\$37,066
18. Marketing	\$0	\$0	\$0	\$0	\$0
19. AEPS Registration Support	\$0	\$0	\$0	\$0	\$0
20. Common Costs	\$0	\$0	\$0	\$20,671	\$20,671
Subtotal Municipal Programs	\$0	\$0	\$0	\$57,991	\$57,991
Subtotal Com., Ind. & Muni. Programs	\$0	\$128,360,429	\$137,267,942	\$57,991	\$265,686,362
Grand Total	\$161,699,470	\$128,360,429	\$137,267,942	\$57,991	\$427,385,831

* Municipal lighting costs have been allocated across the Small C&I, Large C&I and ML rate classes using the allocation methodology approved by the Commission at Docket No. M-2020-3020830, adopted on May 23, 2024.

**PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN
PROGRAM COST BY RATE CLASS (PY18)**

Cost	Residential (Includes Low Income)	Small C&I	Large C&I	Municipal*	Total
Residential					
1. Incentives	\$15,939,279	\$0	\$0	\$0	\$15,939,279
2. CSP Delivery Fees	\$9,825,060	\$0	\$0	\$0	\$9,825,060
3. Marketing	\$2,358,099	\$0	\$0	\$0	\$2,358,099
4. AEPS Registration Support	\$0	\$0	\$0	\$0	\$0
5. Common Costs	\$5,224,837	\$0	\$0	\$0	\$5,224,837
Subtotal Residential Programs	\$33,347,275	\$0	\$0	\$0	\$33,347,275
Small Commercial					
6. Incentives	\$0	\$11,513,741	\$0	\$0	\$11,513,741
7. CPS Delivery Fees	\$0	\$5,770,556	\$0	\$0	\$5,770,556
8. Marketing	\$0	\$290,492	\$0	\$0	\$290,492
9. AEPS Registration Support	\$0	\$8,011	\$0	\$0	\$8,011
10. Common Costs	\$0	\$4,094,773	\$0	\$0	\$4,094,773
Subtotal C&I Small Programs	\$0	\$21,677,573	\$0	\$0	\$21,677,573
Large Commercial					
11. Incentives	\$0	\$0	\$9,591,313	\$0	\$9,591,313
12. CPS Delivery Fees	\$0	\$0	\$6,655,619	\$0	\$6,655,619
13. Marketing	\$0	\$0	\$335,018	\$0	\$335,018
14. AEPS Registration Support	\$0	\$0	\$9,239	\$0	\$9,239
15. Common Costs	\$0	\$0	\$4,131,258	\$0	\$4,131,258
Subtotal C&I Large Programs	\$0	\$0	\$20,722,447	\$0	\$20,722,447
Municipal					
16. Incentives	\$0	\$0	\$0	\$51	\$51
17. CPS Delivery Fees	\$0	\$0	\$0	\$7,413	\$7,413
18. Marketing	\$0	\$0	\$0	\$0	\$0
19. AEPS Registration Support	\$0	\$0	\$0	\$0	\$0
20. Common Costs	\$0	\$0	\$0	\$4,134	\$4,134
Subtotal Municipal Programs	\$0	\$0	\$0	\$11,598	\$11,598
Subtotal Com., Ind. & Muni. Programs	\$0	\$21,677,573	\$20,722,447	\$11,598	\$42,411,618
Grand Total	\$33,347,275	\$21,677,573	\$20,722,447	\$11,598	\$75,758,893

* Municipal lighting costs have been allocated across the Small C&I, Large C&I and ML rate classes using the allocation methodology approved by the Commission at Docket No. M-2020-3020830, adopted on May 23, 2024.

PECO - Electric
Calculation of EEPC Phase V Rate Effective June 1, 2026
Residential

	<u>Amount</u>	<u>\$/KWH</u>	
(1) C = Projected Recoverable EEPC Costs	\$ 33,045,196	\$0.00230	p. 2 of 3
(2) E = Experienced & Estimated Net Over/(Under) Over/(Under) - Phase IV - Year 5 ^(a) ^(b)	<u>\$ 665,230</u>	\$0.00005	p. 3 of 3
(3) Net Recoverable (C - E)	\$ 32,379,966	\$0.00226	
(4) BU = Projected R, RH Sales for Computation Period	14,337,885,762		
(5) T = Pennsylvania gross receipts tax rate	5.90%		
(6) EEPC = [(C-E)+(SWE)/BU]/(1-T)	\$0.00240		

(a) Includes SWE costs

(b) E-factor includes a credit estimate of \$117,425 of true up from the Phase IV PJM FCM Cost Reduction. This was eliminated in the Phase V program.

PECO
Phase V Energy Efficiency and Conservation Plan
C-Factor Calculation

Residential - C-Factor	
	Expenditures
EE&C Recovery - Phase V (2026-2027)	\$ 33,347,275
Less Embedded EE&C Labor⁽¹⁾	\$ 453,417
Plus Statewide Evaluator⁽²⁾	\$ 151,338
Total EE&C and Statewide Evaluator	<u>\$ 33,045,196</u>
Estimated Sales - kWh	14,337,885,762

⁽¹⁾Adjustment for the costs of embedded employees working on Phase V EE&C

⁽²⁾ Statewide Evaluator costs based on estimated Phase V spend prorated to 5 years for Phase V

PECO - Electric
Phase IV Energy Efficiency and Conservation Program Costs (EEPC)
Residential Class
(Rates R, RH, CAP)
E-Factor Calculation

Phase IV Balance Y4 \$ 1,010,936

E-Factor Period	Phase III	Phase IV	Residential	C-Factor	C-Factor	C-Factor	E-Factor	E-Factor	SWE	Total E-Factor	Total Revenues (E + C)	Over/(Under)	Cumulative
	Expenditures	Expenditures	Sales - kWh	Rate	Revenue ^(b)	Over/(Under)	Rate	Revenue ^(b)	Revenues	Revenues (a)	Recovery	Recovery	Over/(Under)
	(1)	(2)	(3)	(4)	(5)	(6) = (5) - (1) - (2)	(7)	(8)	(9)	(10) = (8) - (9)	(11) = (10) + (5)	(12) = (11) - (1) - (2)	(13)
Apr-25	\$ -	\$ 1,978,625	942,079,494	0.00185	\$ 1,895,893	\$ (82,731)	0.00028	\$ 107,589	\$ 17,591	\$ 89,998	\$ 1,985,892	\$ 7,267	\$ 1,018,203
May-25	\$ -	\$ 2,161,337	875,590,961	0.00185	\$ 1,762,088	\$ (399,249)	0.00028	\$ 99,996	\$ 16,349	\$ 83,647	\$ 1,845,735	\$ (315,602)	\$ 702,601
Jun-25	\$ -	\$ 2,585,168	1,004,956,432	0.00174	\$ 1,996,823	\$ (588,345)	(0.00008)	\$ (96,038)	\$ 16,689	\$ (112,728)	\$ 1,884,095	\$ (701,073)	\$ 1,528
Jul-25	\$ -	\$ 2,760,444	1,590,960,287	0.00174	\$ 3,554,382	\$ 793,938	(0.00008)	\$ (170,950)	\$ 23,135	\$ (194,085)	\$ 3,360,297	\$ 599,853	\$ 601,381
Aug-25	\$ -	\$ 2,826,066	1,504,213,125	0.00174	\$ 2,617,088	\$ (208,978)	(0.00008)	\$ (125,870)	\$ 21,873	\$ (147,744)	\$ 2,469,344	\$ (356,721)	\$ 244,660
Sep-25	\$ -	\$ 1,888,713	1,113,421,847	0.00174	\$ 1,937,174	\$ 48,461	(0.00008)	\$ (93,170)	\$ 16,191	\$ (109,360)	\$ 1,827,814	\$ (60,900)	\$ 183,760
Oct-25	\$ -	\$ 1,782,664	993,372,150	0.00174	\$ 1,728,307	\$ (54,357)	(0.00008)	\$ (83,124)	\$ 14,445	\$ (97,569)	\$ 1,630,738	\$ (151,926)	\$ 31,834
Nov-25 (est)	\$ -	\$ 2,036,543	1,032,026,305	0.00174	\$ 1,795,410	\$ (241,132)	(0.00008)	\$ (86,351)	\$ 14,445	\$ (100,796)	\$ 1,694,614	\$ (341,929)	\$ (310,094)
Dec-25 (est)	\$ -	\$ 2,015,086	1,358,577,647	0.00174	\$ 2,363,510	\$ 348,424	(0.00008)	\$ (113,674)	\$ 14,445	\$ (128,119)	\$ 2,235,391	\$ 220,305	\$ (89,790)
Jan-26 (est)	\$ -	\$ 2,078,661	1,494,435,038	0.00174	\$ 2,599,860	\$ 521,199	(0.00008)	\$ (125,042)	\$ 14,445	\$ (139,487)	\$ 2,460,373	\$ 381,712	\$ 291,923
Feb-26 (est)	\$ -	\$ 2,094,949	1,237,299,955	0.00174	\$ 2,152,524	\$ 57,575	(0.00008)	\$ (103,527)	\$ 14,445	\$ (117,972)	\$ 2,034,552	\$ (60,397)	\$ 231,526
Mar-26 (est)	\$ -	\$ 2,029,910	1,128,688,505	0.00174	\$ 1,963,573	\$ (66,337)	(0.00008)	\$ (94,439)	\$ 14,445	\$ (108,884)	\$ 1,854,689	\$ (175,221)	\$ 56,305
Total	\$ -	\$ 26,238,165	14,275,621,745		\$ 26,366,634	\$ 128,468		\$ (884,601)	\$ 198,499	\$ (1,083,100)	\$ 25,283,534	\$ (954,631)	\$ 491,500
											SWE Over/Under		\$ 491,500
											Total Over/(Under)		\$ 547,805

(a) Revenues do not include GRT and rounding

(b) C Factor and E Factor Revenues are allocated on a percentage basis.

PECO - Electric
Calculation of EEPC Phase V Rate Effective June 1, 2026
Commercial

	<u>Amount</u>	<u>\$/KWH</u>	
(1) C = Projected Recoverable EEPC Costs ^(c)	\$ 21,652,856	\$0.00285	p. 2 of 3
(2) E = Experienced & Estimated Net Over/(Under) Over/(Under) - Phase IV - Year 5 ^{(a) (b)}	\$ 11,232,045	\$0.00148	p. 3 of 3
(3) Net Recoverable (C - E)	\$ 10,420,810	\$0.00137	
(4) BU = Projected SCI Sales for Computation Period	7,610,659,471		
(5) T = Pennsylvania gross receipts tax rate	5.90%		
(6) EEPC = [(C-E)+(SWE)/BU]/(1-T)	\$0.00146		

(a) Includes SWE costs

(b) E-factor includes a charge estimate of \$1,449,704 of true up from the Phase IV PJM FCM Cost Reduction. This was eliminated in the Phase V program.

(c) Municipal lighting costs have been allocated in accordance with the Opinion and Order at Docket No. M-2020-3020830, adopted on May 23, 2024.

PECO
Phase V Energy Efficiency and Conservation Plan
C-Factor Calculation

Commercial - C-Factor	
	Expenditures
EE&C Recovery - Phase IV (2026-2027)	\$ 21,677,573
Less Embedded EE&C Labor⁽¹⁾	\$ 144,853
Plus Statewide Evaluator⁽²⁾	\$ 120,135
Total EE&C and Statewide Evaluator	\$ 21,652,856
Estimated Sales - kWh	7,610,659,471

⁽¹⁾Adjustment for the costs of embedded employees working on Phase V EE&C

⁽²⁾ Statewide Evaluator costs based on estimated Phase V spend prorated to 5 years for Phase V

PECO - Electric
Phase IV Energy Efficiency and Conservation Program costs (EEPC)
Commercial Class
(Rate GS)
E Factor Calculation

Phase IV Balance Y4 \$ (4,287,701)

E-Factor Period	Phase III	Phase IV	Commercial	C-Factor	C-Factor	C-Factor	E-Factor	E-Factor	SWE	Total E-Factor	Total Revenues (E + C)	Over/(Under)	Cumulative
	Expenditures	Expenditures	Sales - kWh	Rate	Revenue ^(b)	Over/(Under)	Rate	Revenue ^(b)	Revenues	Revenues (a)	Recovery	Recovery	Over/(Under)
	(1)	(2)	(3)	(4)	(5)	(6) = (5) - (1) - (2)	(7)	(8)	(9)	(10) = (8) - (9)	(11) = (10) + (5)	(12) = (11) - (1) - (2)	(13)
Apr-25	\$ -	\$ 1,466,867	627,677,521	0.00415	\$ 4,766,879	\$ 3,300,011	\$ 0.00431	\$ 518,025	\$ 39,231	\$ 478,793	\$ 5,245,672	\$ 3,778,805	\$ (508,896)
May-25	\$ -	\$ 3,138,256	597,590,050	0.00415	\$ 4,534,309	\$ 1,396,053	\$ 0.00431	\$ 492,751	\$ 37,317	\$ 455,434	\$ 4,989,743	\$ 1,851,487	\$ 1,342,590
Jun-25	\$ -	\$ 1,594,503	651,194,605	0.00335	\$ 3,720,406	\$ 2,125,903	\$ 0.00034	\$ 373,449	\$ 30,390	\$ 343,059	\$ 4,063,465	\$ 2,468,962	\$ 3,811,553
Jul-25	\$ -	\$ 2,794,499	714,580,392	0.00335	\$ 2,348,278	\$ (446,221)	\$ 0.00034	\$ 235,717	\$ 19,182	\$ 216,535	\$ 2,564,813	\$ (229,686)	\$ 3,581,866
Aug-25	\$ -	\$ 2,015,638	744,005,937	0.00335	\$ 2,640,608	\$ 624,970	\$ 0.00034	\$ 265,060	\$ 21,570	\$ 243,491	\$ 2,884,099	\$ 868,461	\$ 4,450,327
Sep-25	\$ -	\$ 2,206,089	639,831,573	0.00335	\$ 2,176,722	\$ (29,367)	\$ 0.00034	\$ 218,496	\$ 17,780	\$ 200,716	\$ 2,377,438	\$ 171,349	\$ 4,621,676
Oct-25	\$ -	\$ 1,209,475	624,781,910	0.00335	\$ 2,090,566	\$ 881,091	\$ 0.00034	\$ 209,848	\$ 17,077	\$ 192,771	\$ 2,283,337	\$ 1,073,863	\$ 5,695,539
Nov-25 (est)	\$ -	\$ 1,584,146	565,858,169	0.00335	\$ 1,894,696	\$ 310,550	\$ 0.00034	\$ 190,187	\$ 17,077	\$ 173,110	\$ 2,067,806	\$ 483,660	\$ 6,179,198
Dec-25 (est)	\$ -	\$ 1,279,436	657,936,380	0.00335	\$ 2,203,007	\$ 923,571	\$ 0.00034	\$ 221,135	\$ 17,077	\$ 204,058	\$ 2,407,064	\$ 1,127,628	\$ 7,306,826
Jan-26 (est)	\$ -	\$ 870,838	708,934,566	0.00335	\$ 2,373,767	\$ 1,502,928	\$ 0.00034	\$ 238,275	\$ 17,077	\$ 221,198	\$ 2,594,965	\$ 1,724,127	\$ 9,030,953
Feb-26 (est)	\$ -	\$ 940,291	623,678,589	0.00335	\$ 2,088,299	\$ 1,148,008	\$ 0.00034	\$ 209,620	\$ 17,077	\$ 192,543	\$ 2,280,843	\$ 1,340,552	\$ 10,371,505
Mar-26 (est)	\$ -	\$ 480,118	625,830,913	0.00335	\$ 2,095,506	\$ 1,615,388	\$ 0.00034	\$ 210,344	\$ 17,077	\$ 193,267	\$ 2,288,773	\$ 1,808,655	\$ 12,180,160
Total	\$ -	\$ 19,580,156	7,781,900,605		\$ 32,933,042	\$ 13,352,885		\$ 3,382,907	\$ 267,932	\$ 3,114,976	\$ 36,048,017	\$ 16,467,861	
												SWE Over/Under	\$ 501,589
												Total Over/(Under)	\$ 12,681,749

(a) Revenues do not include GRT and rounding
(b) C Factor and E Factor Revenues are allocated on a percentage basis.

PECO - Electric
Calculation of EEPC Phase V Rate Effective June 1, 2026
Industrial

	<u>Amount</u>	<u>\$/KW</u>	
(1) C = Projected Recoverable EEPC Costs ^(c)	\$ 20,538,487	\$0.73	p. 2 of 3
(2) E = Experienced & Estimated Net Over/(Under) Over/(Under) - Phase IV - Year 5 ^{(a) (b)}	<u>\$ 4,279,852</u>	\$0.15	p. 3 of 3
(3) Net Recoverable (C - E)	\$ 16,258,635	\$0.58	
(4) BU = Projected Industrial Sales for Computation Period	28,163,433		
(5) T = Pennsylvania gross receipts tax rate	5.90%		
(6) EEPC = [(C-E)+(SWE)/BU]/(1-T)	\$0.61		

(a) Includes SWE costs

(b) E-factor includes a charge estimate of \$924,975 of true up from the Phase IV PJM FCM Cost Reduction. This was eliminated in the Phase V program.

(c) Municipal lighting costs have been allocated in accordance with the Opinion and Order at Docket No. M-2020-3020830, adopted on May 23, 2024.

PECO
Phase V Energy Efficiency and Conservation Plan
C-Factor Calculation

Industrial - C-Factor	
	Expenditures
EE&C Recovery - Phase IV (2026-2027)	\$ 20,722,447
Less Embedded EE&C Labor⁽¹⁾	\$ 312,432
Plus Statewide Evaluator⁽²⁾	\$ 128,472
Total EE&C and Statewide Evaluator	\$ 20,538,487
Estimated Sales - PLC	28,163,433

⁽¹⁾ Adjustment for the costs of embedded employees working on Phase V EE&C

⁽²⁾ Statewide Evaluator costs based on estimated Phase V spend prorated to 5 years for Phase V

**PECO - Electric
Phase IV Energy Efficiency and Conservation Program Costs (EEPC)
Industrial Class
(Rates PD, HT, EP)
E-Factor Calculation**

Phase IV Balance Y4 \$ (944,255)

E-Factor Period	Phase III	Phase IV	Industrial	C-Factor	C-Factor	C-Factor	E-Factor	E-Factor	SWE	Total E-Factor	Total Revenues (E + C)	Over/(Under)	Cumulative
	Expenditures	Expenditures	Sales - PLC	Rate	Revenue ^(b)	Over/(Under) Recovery	Rate	Revenue ^(b)	Revenues	Revenues (a)	Recovery	Recovery	Over/(Under)
	(1)	(2)	(3)	(4)	(5)	(6) = (5) - (1) - (2)	(7)	(8)	(9)	(10) = (8) - (9)	(11) = (10) + (5)	(12) = (11) - (1) - (2)	(13)
Apr-25	\$ -	\$ 1,896,133	2,278,619	0.98	\$ 3,700,655	\$ 1,804,522	\$ 0.09	\$ (1,256,290)	\$ 19,306	\$ (1,275,596)	\$ 2,425,059	\$ 528,926	\$ (415,329)
May-25	\$ -	\$ 2,714,865	2,469,055	0.98	\$ 4,009,938	\$ 1,295,073	\$ 0.09	\$ (1,361,284)	\$ 20,920	\$ (1,382,204)	\$ 2,627,734	\$ (87,131)	\$ (502,460)
Jun-25	\$ -	\$ 1,980,209	2,368,468	1.12	\$ 2,655,264	\$ 675,055	\$ (0.01)	\$ (25,364)	\$ 20,771	\$ (46,136)	\$ 2,609,128	\$ 628,919	\$ 126,459
Jul-25	\$ -	\$ 2,902,080	2,772,826	1.12	\$ 3,108,585	\$ 206,506	\$ (0.01)	\$ (29,695)	\$ 24,318	\$ (54,012)	\$ 3,054,573	\$ 152,493	\$ 278,953
Aug-25	\$ -	\$ 2,834,172	2,262,426	1.12	\$ 2,536,382	\$ (297,790)	\$ (0.01)	\$ (24,229)	\$ 19,841	\$ (44,070)	\$ 2,492,311	\$ (341,860)	\$ (62,907)
Sep-25	\$ -	\$ 2,698,660	2,295,079	1.12	\$ 2,572,989	\$ (125,671)	\$ (0.01)	\$ (24,579)	\$ 20,128	\$ (44,706)	\$ 2,528,283	\$ (170,378)	\$ (233,285)
Oct-25	\$ -	\$ 2,121,462	2,477,623	1.12	\$ 2,777,636	\$ 656,174	\$ (0.01)	\$ (26,533)	\$ 21,729	\$ (48,262)	\$ 2,729,374	\$ 607,912	\$ 374,627
Nov-25 (est)	\$ -	\$ 2,170,415	2,298,743	1.12	\$ 2,582,315	\$ 411,900	\$ (0.01)	\$ (4,420)	\$ 21,729	\$ (26,149)	\$ 2,556,166	\$ 385,751	\$ 760,379
Dec-25 (est)	\$ -	\$ 2,415,833	2,521,222	1.12	\$ 2,832,239	\$ 416,405	\$ (0.01)	\$ (4,468)	\$ 21,729	\$ (26,197)	\$ 2,806,041	\$ 390,208	\$ 1,150,587
Jan-26 (est)	\$ -	\$ 1,121,325	2,352,233	1.12	\$ 2,642,403	\$ 1,521,078	\$ (0.01)	\$ (16,323)	\$ 21,729	\$ (38,052)	\$ 2,604,352	\$ 1,483,027	\$ 2,633,613
Feb-26 (est)	\$ -	\$ 1,418,280	2,292,567	1.12	\$ 2,575,377	\$ 1,157,097	\$ (0.01)	\$ (12,417)	\$ 21,729	\$ (34,146)	\$ 2,541,231	\$ 1,122,951	\$ 3,756,565
Mar-26 (est)	\$ -	\$ 998,992	2,200,837	1.12	\$ 2,472,331	\$ 1,473,339	\$ (0.01)	\$ (15,810)	\$ 21,729	\$ (37,539)	\$ 2,434,792	\$ 1,435,799	\$ 5,192,364
Total	\$ -	\$ 25,272,425	28,589,697		\$ 34,466,114	\$ 9,193,688		\$ (2,801,412)	\$ 255,657	\$ (3,057,070)	\$ 31,409,044	\$ 6,136,619	\$ 12,463
												SWE Over/Under	\$ 12,463
												Total Over/(Under)	\$ 5,204,827

(a) Revenues do not include GRT and rounding
(b) C Factor and E Factor Revenues are allocated on a percentage basis.

PECO - Electric
Calculation of EEPC Phase V Rate Effective June 1, 2026
Municipal Lighting

	<u>Amount</u>	<u>\$/KWH</u>	
(1) C = Projected Recoverable EEPC Costs ^(c)	\$ 8,847	\$0.00006	p. 2 of 3
(2) E = Experienced & Estimated Net Over/(Under) Over/(Under) - Phase IV - Year 5 ^{(a) (b)}	<u>\$ 317,369</u>	\$0.00210	p. 3 of 3
(3) Net Recoverable (C - E)	\$ (308,522)	(\$0.00204)	
(4) BU = Projected Municipal Sales for Computation Period	151,152,685		
(5) T = Pennsylvania gross receipts tax rate	5.90%		
(6) EEPC = [(C-E)+(SWE)/BU]/(1-T)	(\$0.00217)		

(a) Includes SWE costs

(b) E-factor includes a charge estimate of \$55,006 of true up from the Phase IV PJM FCM Cost Reduction. This was eliminated in the Phase V program.

(c) Municipal lighting costs have been allocated in accordance with the Opinion and Order at Docket No. M-2020-3020830, adopted on May 23, 2024.

PECO
Phase V Energy Efficiency and Conservation Plan
C-Factor Calculation

Municipal Lighting - C-Factor	
	Expenditures
EE&C Recovery - Phase IV (2026-2027)	\$ 11,598
Less Embedded EE&C Labor⁽¹⁾	\$ 2,805
Plus Statewide Evaluator⁽²⁾	\$ 54
Total EE&C and Statewide Evaluator	\$ 8,847
Estimated Sales - kWh	151,152,685

⁽¹⁾Adjustment for the costs of embedded employees working on Phase V EE&C

⁽²⁾ Statewide Evaluator costs based on estimated Phase V spend prorated to 5 years for Phase V

PECO - Electric
Phase IV Energy Efficiency and Conservation Program Costs
Municipal Lighting Rates
E-Factor Calculation

E-Factor Period	Phase IV Balance Y4															Previous Balance				
																\$ 657,246				
	Locations	SLE Rate	Revenues	Locations	SLC Rate	Revenues	Location	AL Rate	Revenues	kWh	TLCL Rate	Revenues	E Factor Revenues	SWE Revenues	Total Revenues	Phase III Expenditures	Phase IV Expenditures	Over/(Under) Recovery	Over/(Under) Cumulative	
Apr-25	183,091	\$0.00	\$ -	10,638	\$0.00	\$ -	16,032	\$0.00	\$ -	6,418,044	\$0.00002	\$ 128	\$ 128	\$ (1)	\$ 129	\$ -	\$ 4,227	\$ (4,098)	\$ 653,148	
May-25	183,091	\$0.00	\$ -	10,638	\$0.00	\$ -	16,032	\$0.00	\$ -	3,869,953	\$0.00002	\$ 77	\$ 77	\$ (1)	\$ 78	\$ -	\$ 15,504	\$ (15,426)	\$ 637,722	
Jun-25	183,091	-\$0.04	\$ (7,753)	10,638	-\$0.04	\$ (400)	16,032	-\$0.01	\$ (151)	3,662,810	(\$0.00042)	\$ (1,551)	\$ (9,855)	\$ (22)	\$ (9,833)	\$ -	\$ 4,586	\$ (14,419)	\$ 623,302	
Jul-25	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	6,011,435	(\$0.00080)	\$ (4,828)	\$ (19,260)	\$ (36)	\$ (19,224)	\$ -	\$ 23,241	\$ (42,465)	\$ 580,837	
Aug-25	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,625,501	(\$0.00080)	\$ (2,911)	\$ (17,344)	\$ (22)	\$ (17,322)	\$ -	\$ 21,272	\$ (38,594)	\$ 542,243	
Sep-25	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,905,368	(\$0.00080)	\$ (3,136)	\$ (17,568)	\$ (23)	\$ (17,545)	\$ -	\$ 19,124	\$ (36,669)	\$ 505,574	
Oct-25	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	4,134,823	(\$0.00080)	\$ (3,320)	\$ (17,753)	\$ (25)	\$ (17,728)	\$ -	\$ 3,192	\$ (20,920)	\$ 484,654	
Nov-25 (est)	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,736,104	(\$0.00080)	\$ (3,000)	\$ (17,432)	\$ (25)	\$ (17,407)	\$ -	\$ 14,761	\$ (32,169)	\$ 452,486	
Dec-25 (est)	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,706,006	(\$0.00080)	\$ (2,976)	\$ (17,408)	\$ (25)	\$ (17,383)	\$ -	\$ 764	\$ (18,148)	\$ 434,338	
Jan-26 (est)	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,876,627	(\$0.00080)	\$ (3,113)	\$ (17,545)	\$ (25)	\$ (17,520)	\$ -	\$ 5,023	\$ (22,544)	\$ 411,795	
Feb-26 (est)	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,377,741	(\$0.00080)	\$ (2,713)	\$ (17,145)	\$ (25)	\$ (17,120)	\$ -	\$ 5,023	\$ (22,143)	\$ 389,652	
Mar-26 (est)	183,091	-\$0.07	\$ (13,376)	10,638	-\$0.07	\$ (735)	16,032	-\$0.02	\$ (322)	3,674,120	(\$0.00080)	\$ (2,951)	\$ (17,383)	\$ (25)	\$ (17,358)	\$ -	\$ 8,974	\$ (26,332)	\$ 363,320	
Total	2,197,092		\$ (128,137)	127,656		\$ (7,011)	192,384		\$ (3,046)	49,998,532		\$ (30,294)	\$ (168,487)	\$ (255)	\$ (168,233)	\$ -	\$ 125,693	\$ (293,926)		
																			SWE Over/Under	\$ 9,055
																			Total Over/(Under)	\$ 372,375

Responses to the Questions in 52 Pa. Code, Section 53.52(a)

(a)(1) The specific reason for each change

PECO is proposing to revise its Electric Service Tariff to implement its Phase V Energy Efficiency and Conservation Plan (EE&C) Plan, as required by the Commission's Implementation Order at Docket No. M-2025-3052826.

(a)(2) The total number of customers served by the utility.

As of September 30, 2025, PECO Energy served 1,709,970 electric customers.

(a)(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

The bills of 1,709,970 of PECO customers will be affected by the tariff revisions proposed in connection with the implementation of PECO's Phase V EE&C Plan. By rate class, the number of affected customers breaks down as follows:

Residential:	1,539,345
Commercial:	157,128
Industrial:	3,159
Lighting:	10,338

(a)(4) The effect of the change on the utility's customers.

The applicable variable distribution charges of residential customers (which currently contain the energy efficiency charge), the existing, separately stated energy efficiency charges for small commercial and industrial customers, and the applicable distribution charges for lighting customers will be revised to reflect Phase V EE&C Plan costs consistent with the terms of the Company's Phase V Provision for Recovery of Energy Efficiency and Conservation Program Costs (EEPC) established under Section 1307 of the Public Utility Code and the revisions to the EEPC proposed in this filing.

(a)(5) The effect, whether direct or indirect, of the proposed change on the utility's revenue and expenses.

PECO will incur additional, incremental administrative and infrastructure costs and operating expenses associated with developing and implementing its Phase V EE&C Plan. Revenues are projected to decrease over the five-year term of the Phase V Plan (June 1, 2026 through May 31, 2031) due to decreased demand and energy sales.

(a)(6) The effect of the change on the service rendered by the utility.

None.

(a)(7) A list of factors considered by the utility in its determination to make a change. The list shall include a comprehensive statement as to why these factors were chosen

and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa. CS 1308.

PECO is required to submit a Phase V EE&C by the Commission's Implementation Order entered at Docket No. M-2025-3052826.

- (a)(8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of the tariff change seeking a general rate increase as defined in 66 Pa. C.S. 1308.**

PECO did not perform any studies in order to develop the proposed Phase V EE&C Plan. Instead, PECO challenged the Conservation Service Providers bidding under PECO's Act 129 RFP to leverage their market expertise in the design and delivery of programs to achieve the energy savings and peak demand reduction goals while delivering a premium customer and market participant experience.

- (a)(9) Customer polls taken and other documents, which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernable public opposition, an explanation of why the change is in the public interest shall be provided.**

See the above response to (a)(8).

- (a)(10) Plans the utility has for introducing or implementing the changes with respect to ratepayers.**

PECO plans to communicate to customers in a multi-faceted way. PECO will issue a press release explaining that it has filed its Phase V Plan for PUC approval. The current PECO Ways to Save campaign will be amended to include information about the enhanced features of PECO's existing EE&C programs and to introduce the new programs in PECO's Phase V Plan. In addition, the Company will continue to maintain robust relationships with contractors, retailers, design firms, and distributors across the energy efficiency value chain. PECO will expand and innovate its grassroots customer education and enrollment efforts to inform customers about how the programs in its Phase V Plan can help them save money by reducing their energy use. PECO will use a multi-channeled approach to communicate existing program changes well in advance of implementing those changes in order to avoid customer confusion and to promote customer satisfaction. The communication channels will vary by program and may include, but not be limited to, print and digital formats.

(a)(11) F.C.C., FERC, or Commission orders or ruling applicable to the filing.

The following Act 129 Phase V orders at Docket M-2025-3052826 are applicable to the filing:

- Energy Efficiency and Conservation (EEC) Program Implementation Order
- Final EE&C Plan Template and Tables Workbook Secretarial Letter

The following orders are also applicable:

- Docket No. M-2025-3052827 Data Sharing Working Group
- Docket No. M-2024-3048998 – 2026 Total Resource Cost Final Order
- Docket No. M-2023-3044491– 2026 Technical Reference Manual Final Order
- Docket No. M-2023-3044490 – SWE Baseline Studies
- Docket No. M-2020-3020830 – Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan
- Docket No. M-2008-2074154 – Final Order - Registry of Conservation Service Providers

PECO Program Years 18 to 22

Act 129 – Phase V Energy Efficiency and Conservation Plan

Submitted to:



Pennsylvania Public Utility Commission

Submitted by:



December 1, 2025

Table of Contents

1. Overview of Plan	1
1.1 Summary Description of Plan, Objectives, and Overall Strategy.....	2
1.2 Summary Description of the Process Used to Develop the Phase V Plan	4
1.3 Summary Tables of Portfolio Savings Goals, Budget, and Cost-Effectiveness	6
1.4 Summary of Program Implementation	12
1.5 Summary Description of PECO’s Strategy to Acquire at Least 15% of Its Consumption Reduction and Peak Demand Reduction Target Each Year	12
1.6 Summary Description of PECO’s Implementation Strategy to Acquire at Least 75% of the Portfolio Megawatt Compliance Target in Each Season	12
1.7 Summary Descriptions of PECO’s Implementation Strategy to Manage the EE&C Portfolio and Engage Customers and Trade Allies	12
1.8 Summary Description of PECO’s Data Management, Quality Assurance, and Evaluation Processes	14
1.9 Summary Description of the Cost Recovery Mechanism	14
2. Energy-Efficiency Portfolio/Program Summary Tables and Charts	16
2.1 Market Rate Residential, Residential Low-Income, SCI, and LCI Sector Summaries	16
2.2 Plan Data: Costs, Cost-Effectiveness, and Savings by Program, Sector, and Portfolio	18
2.3 Budget and Parity Analysis.....	19
3. Program Descriptions	20
3.1 Discussion of Criteria and Process Used for Selection of Programs	20
3.1.1 Portfolio Objectives and Metrics that Define Program Success	20
3.1.2 Process for Program Development	21
3.1.3 How Energy Efficiency, Combined Heat and Power, Renewables, Load-Shifting, and Other Measures Were Included in the Portfolio	22
3.1.4 Fuel Switching Measures Proposed Minimum Standard and Justification for Threshold to Receive Program Support	22
3.1.5 PECO Program Delivery Alignment with Non-Act 129 Programs	22
3.1.6 Front-of-the Meter Measures Included and Expected Contribution.....	23
3.1.7 How PECO Defines Comprehensive in the Context of Plan Design and Delivery	23
3.1.8 TOU Contributions to Portfolio	23
3.2 Residential Sector	24
Residential Program (2026-2031).....	24
Residential HER Program (2026-2031).....	57
3.2.1 Residential Low-Income Sub-Sector Programs.....	68
<i>Residential Low-Income Subprogram Components (2026-2031)</i>	68
<i>Residential Low-Income HER Subprogram (2026-2031)</i>	95

3.3 Commercial/Industrial Small Sector	105
3.4 Commercial/Industrial Large Sector.....	106
Non-Residential Program (2026-2031)	106
3.5 Government/Nonprofit/Institutional Sector	149
4. Program Management and Implementation Strategies.....	150
4.1 Overview of PECO Management and Implementation Strategies.....	150
4.1.1 Services to be Provided by PECO, Consultants, Trade Allies, and CSPs	150
4.1.2 Risk Categories and Risk Mitigation Strategies.....	153
4.1.2.1 Performance Risk.....	153
4.1.2.2 Technology Risk.....	154
4.1.2.3 Market Risk	154
4.1.2.4 Evaluation Risk.....	155
4.1.3 Human Resource and Contractor Resource Constraints.....	155
4.1.4 Early Warning Systems To Indicate Progress Towards Goals and Process for Adjustment.....	155
4.1.5 Implementation Schedule with Milestones	156
4.1.6 Stakeholder Engagement Overview.....	156
4.2 Executive Management Structure.....	157
4.2.1 PECO Structure for Addressing Portfolio Strategy	157
4.2.2 Approach for Overseeing the Performance of CSPs and Other Providers.....	158
4.2.3 Basis for Administrative Budget (non-incentive costs).....	158
4.3 CSPs.....	159
4.3.1 Selected CSPs.....	159
4.3.2 Describe the Work and Measures Being Performed by CSPs.....	159
4.3.3 Describe Any Pending RFPs to Be Issued for Additional CSPs.....	160
4.4 Coordination with Other State Conservation Programs.....	160
4.4.1 Collaboration with Other State or Federal Programs to Achieve Savings	160
4.4.2 PECO's Plan to Highlight the Availability of Multiple Funding Sources	160
4.4.3 Process to Facilitate Alternative Energy Portfolio Standards Registration for C&I Participants of Act 129 Programs	160
4.4.4 Plans to Address Health and Safety Issues that Arise in the Delivery of Act 129 Services	161
4.4.5 Strategies to Collect Information about Dual Participation to Facilitate Accurate Reporting on Braided Funding Opportunities and Calculation of the "Leverage Ratio" by Program.	161
5. Reporting and Tracking Systems	162
5.1 Reporting.....	162
5.2 Project Management Tracking Systems	163
5.2.1 Data Tracking System Overview	163

5.2.2 Software Format, Data Exchange Format, and Database Structure	164
5.2.3 Describe How CSPs Will Integrate with the Tracking System	166
5.2.4 Access for Commission and SWE.....	166
5.2.5 PECO Cybersecurity Procedures to Protect Program Participant Personally Identifiable Information	166
6. QA and EM&V	168
6.1 Overall Approach to QA/QC	168
6.2 Procedures for Measure and Project Installation Verification, QA/QC, and Savings Documentation	169
6.3 Process for Collecting and Addressing Participant, Contractor, and Trade Ally Feedback	170
6.4 Market and Process Evaluations	170
6.5 Strategy for Coordinating with SWE	171
6.6 Approach to Incorporating Changes to Codes and Standards	171
7. Cost Recovery Mechanism.....	172
7.1 Total Annual Revenues for Phase V	172
7.2 Description of Phase V Plan in Accordance with 66 Pa. C.S. § 1307 and 2806.1	173
7.3 Data Tables.....	174
7.4 Tariffs and Section 1307 Cost Recovery Mechanism for Phase V Plan	184
7.4.1 Cost Recovery Mechanism	184
7.5 Ensuring Recovery Alignment with Benefitting Customer Classes.....	185
7.6 Accounting for Phase V Costs versus Prior Phase Costs	186
8. Cost-Effectiveness	187
8.1 Avoided Costs	187
8.2 Confirm Use of 3% Real Discount Rate and 5% Nominal Discount Rate	187
8.3 Cost-Effectiveness Analysis Approach	187
8.4 Data Tables.....	188
9. Plan Compliance Information and Other Key Issues	192
9.1 Plan Compliance Considerations.....	192
9.1.1 Description of Plan.....	192
9.1.2 Statement Delineating the EE&C Plan	192
9.1.3 Low-Income Requirements	192
9.1.4 Spending on Experimental Equipment or Devices Limited to 2% of Funds ...	193
9.1.5 Competitively Neutral to All Electric Distribution Customers.....	193
9.1.6 Midstream Delivery Documentation Process.....	194
9.2 Other Key Issues.....	194
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	194
9.2.2 Describe, by Sector, How the EDC Will Address Customer Education for Its	

Programs	194
9.2.3 Describe How the EDC Will Provide the Public with Information about the Results from the Programs.....	195
10. Appendices	196

List of Figures

Figure 1. PECO's Phase V Program Structure, Savings, and Budget.....	2
Figure 2. PECO's Phase V Budget and Savings Targets	20
Figure 3. PECO Proposed EE&C Organization	158
Figure 4. Proposed Schedule for PY18 and PY19.....	163
Figure 5. Program Documentation and EM&V.....	165
Figure 6. Calculation of 2006 Annual Revenue	172

List of Tables

Table 1. Summary of PECO's Phase V Plan: Portfolio Lifetime Costs and Benefits	6
Table 2. Summary of PECO's Phase V Plan: Summary of Portfolio Energy Savings	8
Table 3. Summary of PECO's Phase V Plan: Summary of Portfolio Demand Savings	9
Table 4. Summary of Seasonal Demand Savings	10
Table 5. Summary of Portfolio Costs.....	11
Table 6. Program Summaries ¹	16
Table 7. Budget and Parity Analysis Summary.....	19
Table 8. Residential Eligible Measures	30
Table 9. Residential Estimated Savings and Participation	38
Table 10. Residential Program Budget.....	52
Table 11. Residential Summary of EE&C Costs.....	54
Table 12. Residential TRC Benefits (Gross).....	55
Table 13. Residential TRC Benefits (Net).....	56
Table 14. HER Eligible Measures	60
Table 15. HER Estimated Savings and Participation	63
Table 16. HER Subprogram Budget.....	64
Table 17. HER Summary of EE&C Costs.....	65
Table 18. HER TRC Benefits (Gross).....	66
Table 19. HER TRC Benefits (Net).....	67
Table 20. Residential Low-Income Subprogram Eligible Measures	73
Table 21. Residential Low-Income Subprogram Estimated Savings and Participation	79
Table 22. Residential Low-Income Subprogram Budget.....	90
Table 23. Residential Low-Income Subprogram Summary of EE&C Costs	92
Table 24. Residential Low-Income Subprogram TRC Benefits (Gross).....	93
Table 25. Residential Low-Income Subprogram TRC Benefits (Net).....	94
Table 26. Residential Low-Income HER Subprogram	98
Table 27. Residential Low-Income HER Subprogram Estimated Savings and Participation ..	100
Table 28. Residential Low-Income HER Subprogram Budget	101
Table 29. Residential Low-Income HER Subprogram Budget	102
Table 30. Residential Low-Income HER Subprogram TRC Benefits (Gross).....	103
Table 31. Residential Low-Income HER Subprogram TRC Benefits (Net).....	104
Table 32. Non-Residential Eligible Measures.....	111
Table 33. Non-Residential Estimated Savings and Participation	122
Table 34. Non-Residential Program Budget.....	145
Table 35. Non-Residential Summary of EE&C Costs	146
Table 36. Non-Residential TRC Benefits (Gross).....	147

Table 37. Non-Residential TRC Benefits (Net).....	148
Table 38. Budget by Program and Subprogram	174
Table 39. Summary of EE&C Costs by Sector and Program	177
Table 40. Allocation of Common Costs to Applicable Customer Sector.....	179
Table 41. Summary of Portfolio EE&C Costs	179
Table 42. TRC Benefits Table (Gross)	180
Table 43. TRC Benefits Table (Net)	181
Table 44. TRC Benefits (Gross)	188
Table 45. TRC Benefits (Net)	190
Table 46. Hybrid Heat Pump Load Shifting Pilot.....	193
Table 47. Summary of EE&C Costs by Sector and Program	198
Table 48. Allocation of Common Costs to Applicable Customer Sector.....	199
Table 49. Summary of Portfolio EE&C Costs	199
Table 50. TRC Benefits (Gross)	200
Table 51. TRC Benefits (Net)	202

Table of Acronyms

AEPS	Alternative Energy Portfolio Standards
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
BOC	Building Operator Certification
BPI	Building Performance Institute
BYOB	Bring-Your-Own-Battery
C&I	Commercial and Industrial
CAP-PIPP	Customer Assistance Program-Percentage of Income Payment Program
CHP	Combined Heat and Power
CRM	Customer Relationship Management
CSP	Conservation Service Provider
PA DEP	Pennsylvania Department of Environmental Protection
DERs	Distributed Energy Resources
DLS	Daily Load Shifting
EE&C	Energy Efficiency and Conservation
EEPC	Energy Efficiency & Conservation Program Charge
EGS	Electric Generation Supplier
EM&V	Evaluation, Measurement, and Verification
E&O	Education and Outreach
EV	Electric Vehicle
FTE	Full-Time Equivalent
HER	Home Energy Report
IRA	Inflation Reduction Act
LCI	Large Commercial and Industrial
LI	Low-Income
LIURP	Low-Income Usage Reduction Program
MBCx	Monitoring-Based Commissioning
MW	Megawatt
MWh	Megawatt-hour
NTGR	Net-to-Gross Ratio
O&M	Operations and Maintenance
PII	Personal Identifiable Information
PUC	Public Utility Commission
PY	Program Year
QA	Quality Assurance
QC	Quality Control
RCx	Retro-Commissioning

RFI	Request for Information
RFP	Request for Proposal
SCI	Small Commercial and Industrial
SEM	Strategic Energy Management
SWE	Statewide Evaluator
TOU	Time-of-Use
TRC	Total Resource Cost
TRM	Technical Reference Manual
VCx	Virtual Commissioning

Mapping of Program Years to Dates

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

1. Overview of Plan

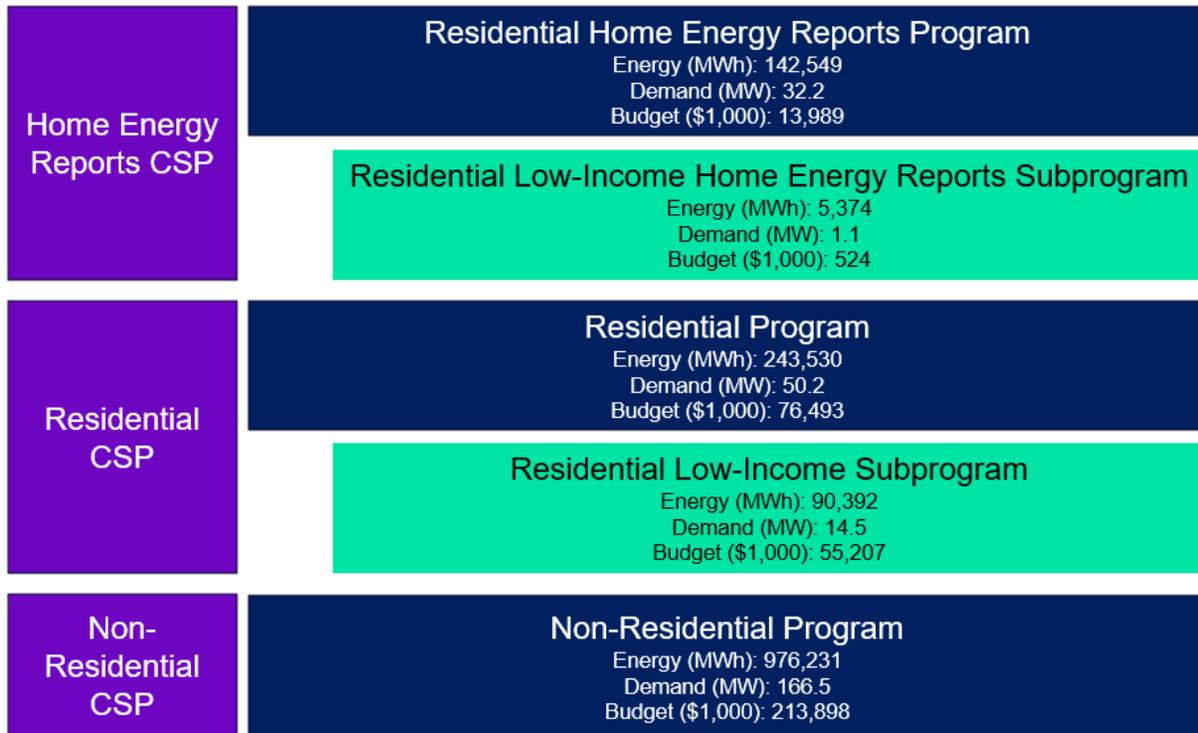
PECO Energy Company's ("PECO's") Phase V Energy Efficiency and Conservation Plan (the "EE&C Plan" or the "Plan") is a customer-centric portfolio of offerings to meet PECO's customers' energy-saving needs, regardless of customer class. PECO's Plan has three comprehensive customer programs:

1. Residential;
2. Residential Home Energy Reports ("HER"); and
3. Non-Residential.

PECO is competitively contracting with Conservation Service Providers ("CSPs") to implement the Phase V programs. A CSP for each program will manage a team of subcontractors to implement various subprograms and program components. Additionally, PECO will hire an independent evaluation contractor to evaluate all of PECO's Phase V programs.

The Plan includes three programs: (1) Residential; (2) Residential Home Energy Reports; (3) Non-Residential. The Residential program includes the Residential Low-Income subprogram. The Residential Home Energy Reports program includes the Residential Low-Income Home Energy Reports subprogram. Each program and subprogram contain program components. Figure 1 summarizes the program and subprogram structure for PECO's Phase V portfolio.

Figure 1. PECO's Phase V Program Structure, Savings, and Budget¹



1.1 Summary Description of Plan, Objectives, and Overall Strategy

Phase V covers five program years, starting June 1, 2026, and ending on May 31, 2031:

- Program Year (“PY”) 18: June 1, 2026 – May 31, 2027
- PY 19: June 1, 2027 – May 31, 2028
- PY 20: June 1, 2028 – May 31, 2029
- PY 21: June 1, 2029 – May 31, 2030
- PY 22: June 1, 2030 – May 31, 2031

The savings achieved under this Plan will meet the energy and demand savings compliance targets specified in the Public Utility Commission (“PUC” or “the Commission”) Phase V Final Implementation Order (the “Phase V Final Order”). From June 1, 2026, through May 31, 2031, PECO shall achieve the compliance target of at least 1,111,685 MWh of energy savings and 194.8 MW of peak demand reduction with a budget of \$427.4 million. These goals are all-

¹ The Residential program is primarily funded by the residential sector, except for the multifamily component, which receives funding from the Small Commercial and Industrial (“SCI”), Large Commercial and Industrial (“LCI”), and Residential sectors. The Non-Residential program is funded by the SCI, LCI, and Municipal Lighting sectors. The Residential Low-Income subprogram and Residential Low-Income Home Energy Reports subprogram contribute to the low-income savings carve-out.

inclusive of the residential, low-income, and commercial sectors. The Plan is designed to achieve a minimum of 15% of its total Phase V savings compliance targets each year.

The EE&C Plan objectives include:

- Delivering required energy savings and peak demand reduction with the broadest mix of cost-effective technologies;
- Generating energy savings through streamlined processes that make participation easy for customers and market actors, continuously striving to provide customers with a positive experience and help them save energy in their homes and businesses;
- Meeting data and documentation needs of evaluators and regulators; and
- Responsibly using Act 129 dollars on behalf of PECO customers.

PECO developed its program portfolio to offer a holistic, easy customer experience across its service territory.

Key features of PECO's Plan include:

- **Program Components:** Programs tailor service delivery to the needs of each customer class through program components. Section 3 details each program's components.
- **Customer and Market Actor Engagement:** The Residential and Non-Residential programs will each use a customer relationship management ("CRM") system to document customer interactions and experience with Act 129 programs. The CRM system will contain all interactions that CSPs and subcontractors have with customers. In addition, CSPs will provide support for when a customer, at any point in their energy efficiency journey, requires assistance to participate. Assistance includes scheduling an appointment, checking application status, determining rebate status, completing an application, and responding to questions on eligibility. CSPs will provide customer assistance through outreach methods such as a call center, online chat, email, social media, texting, and apps.
- **Education and Outreach ("E&O"):** PECO will educate customers on energy efficiency by conducting outreach to school districts and educational networks, speaking with local nonprofits and community groups, hosting tables at events, and reaching diverse communities. PECO will send customers emails, distribute program materials, and canvas neighborhoods. Additionally, PECO will leverage its strong relationships with community organizations to help increase awareness about energy efficiency.
- **Measure Mix:** PECO's goal is to achieve compliance targets with the broadest measure mix possible and with processes that make participation easy for customers and market actors. When CSPs review all the technologies and occupant behaviors in a home or building, they arrive at the most comprehensive treatments or plans to adjust the behavior of occupants to use less energy.
- **Incentive Structure:** Per the Phase V Final Order, a minimum of 50% of the total phase budget is allocated to customer incentives (including direct-installation measure costs and labor). The incentive budget includes funds that will be distributed to program participants, including incentives, the cost of kit and direct install measures, health and

safety, the cost of labor associated with directly installing measures, and the cost of interest buy down associated with offering 0% financing.

1.2 Summary Description of the Process Used to Develop the Phase V Plan

PECO adopted an iterative approach to develop the Phase V Plan informed by experience from Phase IV, regulatory guidance, and engagement with the market through a request for information (“RFI”), and subsequently a request for proposal (“RFP”). During Phase IV, PECO implemented a comprehensive process to monitor program and portfolio performance, document lessons learned, and make targeted adjustments to improve program outcomes. These insights, combined with a deep understanding of Pennsylvania’s regulatory environment, provided the foundation for the Phase V Plan.

The following steps outline an overview of the Phase V Plan development process:

1. **Program Structure and CSP Framework:** PECO first established the overall program architecture, including defining the payment structure for CSPs and outlining expectations for program development, implementation, and performance metric tracking. This framework allowed for consistency across delivery channels while allowing flexibility for CSP innovation.
2. **Integration of Regulatory and Market Data:** To inform program budgets, plan savings targets, and design parameters, PECO referenced the 2026 TRM to inform savings calculations,² the Pennsylvania Statewide Evaluator (“SWE”) Baseline³ and Potential Studies⁴ to determine plan savings targets and budget by program, the Phase V Tentative⁵ and Final⁶ Implementation Orders to identify specific regulatory requirements to incorporate into the Scope of Work, and the lessons learned from the Phase IV evaluation and research to address customer needs and improve program effectiveness.
3. **Scope of Work and Competitive Bidding:** PECO issued an RFI on March 5, 2025, to engage the market and to identify innovative implementation approaches. PECO developed a detailed scope of work to specify program design elements, performance requirements, and compliance obligations. PECO then initiated a competitive RFP process,⁷ inviting CSPs to submit proposals that met these criteria and aligned with Phase V objectives.

² Pennsylvania Statewide Act 129 2026 TRM, September 2024, [2026 Technical Reference Manual Final Order](#).

³ 2023 Pennsylvania Statewide Act 129 Residential Baseline Study, February 2023, [2023 Residential Baseline Study](#), 2023 Non-Residential Baseline Study, February 2023, [2023 Non-Residential Baseline Study](#).

⁴ Pennsylvania Act 129 - Phase V Energy Efficiency and Peak Demand Reduction Market Potential Study Report, February 2023, [Phase V Energy Efficiency and Peak Demand Reduction Potential Study Report](#)
Phase V Demand Response Potential Study, February 2025, [Phase V Demand Response Potential Study Report](#).

⁵ [Phase V Tentative Implementation Order](#) – The Act 129 Phase V EE&C Program Tentative Implementation Order, From the Public Meeting of February 2025, Docket No. M-2025-3052826.

⁶ [Phase V Final Implementation Order](#) – The Act 129 Phase V EE&C Program Implementation Order, From the Public Meeting of June 2025, Docket No. M-2025-3052826.

⁷ The RFP for the Residential HER Program was issued by Exelon for support to all Exelon Operating Companies.

Key elements of the CSP Scope of Work include:

- **Program savings and budget targets are established using multiple data sources to develop optimal allocation across programs:** To design and define the appropriate savings and budgets by program to meet compliance targets established in the Phase V Final Order, PECO employed a comprehensive process using multiple inputs. Key inputs included the SWE Phase V Potential Studies for energy efficiency and demand response, benchmarking against similar utility portfolios, and modeling to evaluate various allocation scenarios; and
- **Program details are defined by the market:** PECO released the CSP RFPs in August 2025, consistent with the company's PUC-approved Phase V RFP process. This RFP timeline was designed to allow CSPs sufficient lead time to prepare for Phase V implementation beginning in early 2026, providing for a smooth transition from Phase IV to Phase V program activities.

Through the RFP process, CSPs contributed to the Plan design. Each CSP developed comprehensive proposals that included:

Budget development: CSPs defined total program component budgets, given the constraints outlined from PECO's modeling efforts, specifying allocations between customer incentives and CSP delivery costs. PECO emphasized maximizing incentive budgets to drive participation and deliver greater benefits to ratepayers;

Program implementation plans: PECO required CSPs to adopt a rigorous approach informed by regulatory and market data. CSPs reviewed the Phase V Final Order and the SWE Potential Studies to align program strategies with statewide objectives;

Program structure and delivery components: CSPs proposed detailed program architecture, delivery mechanisms, and eligible measure portfolios that leverage historical PECO participation and savings data, evaluation reports from prior years, and direct input from market actors; and

Savings calibration and forecasting: CSPs calibrated savings estimates to the 2026 Technical Reference Manual ("TRM") and developed forward-looking adoption forecasts for each measure through 2031.

This process led to a Phase V program design that reflects both regulatory requirements and real-world market dynamics while incorporating CSP expertise to optimize program performance and customer engagement.

- **The CSP payment structure is a blended delivery and pay-for-savings model:** PECO must meet energy and peak demand reduction goals. As part of the CSP procurement process, PECO established a minimum pay-for-savings threshold (60% of total CSP payment) and required vendors to specify how their compensation would be divided between program delivery and performance-based payments.
- **CSPs are responsible for program-level marketing:** Implementation CSPs are expected to develop and implement a customer-focused marketing strategy for the Phase V programs. Marketing efforts must be tailored to different customer segments, leverage both existing and innovative communication channels, and be tracked through detailed lead lifecycle metrics, with regular reporting and continuous improvement based on feedback. All marketing materials must be PECO-approved, accessible, and

designed to maximize program participation, drive energy and demand savings, and support customers throughout their engagement with the programs.

PECO prioritized transparency and collaboration throughout the development of the Phase V Plan. PECO engaged stakeholders and incorporated their recommendations, for example the CSP payment structure and CSP responsibility for program-level marketing, so that the Plan reflects diverse perspectives and meets the needs of all customers.

1.3 Summary Tables of Portfolio Savings Goals, Budget, and Cost-Effectiveness

PECO will invest up to \$427.4 million in energy efficiency and peak demand reduction programs over a five-year program period (PY18 through PY22). The plan target Plan outlined in this document aims to achieve approximately 131% of the energy compliance savings target established in the Phase V Final Order. Consistent with Phase V requirements, PECO developed this Plan to meet or exceed the required 6.3% of the overall compliance energy savings target from the low-income sector. PECO plans to achieve approximately 136% of the PY18–PY22 compliance peak demand reduction target of 194.8 MW.

Figure 1 presents the Phase V portfolio structure. Section 3 provides full descriptions of each program. Table 1 through

Table 4 summarizes PECO’s lifetime costs and benefits of energy efficiency measures, portfolio energy and demand savings by program year, and portfolio costs by program year. Note these tables provide data at the sector level, and sector-level breakouts do not directly map to programs. Therefore, these tables should not be directly compared with Figure 1.

Table 1. Summary of PECO’s Phase V Plan: Portfolio Lifetime Costs and Benefits⁸

Sector	Total Discounted Lifetime Costs (\$000) ⁹	Total Discounted Lifetime Benefits (\$000)	Present Value of Net Benefits (\$000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate Residential (exclusive of Low-Income)	\$344,312	\$314,199	-\$30,113	0.9
Residential Low-Income	\$62,503	\$78,938	\$16,435	1.3
Small Commercial & Industrial	\$316,367	\$449,338	\$132,972	1.4
Large Commercial & Industrial	\$375,196	\$534,973	\$159,777	1.4
Total Portfolio	\$1,098,378	\$1,377,448	\$279,070	1.3

Table 2 summarizes portfolio energy savings using Act 129 accounting conventions. Reported values reflect incremental annual savings achieved within the program year, which are weather

⁸ In this and subsequent tables, unless otherwise noted, SCI and LCI totals include the Municipal Lighting sector

⁹ Lifetime costs and benefits have all been discounted to PY18

normalized to account for variations in heating and cooling loads. Savings are presented at both the meter level, representing customer-side impacts, and the system level, which adjusts for transmission and distribution losses.

Additionally, results are shown as gross savings prior to adjustments for free ridership and spillover. These distinctions support consistency with Act 129 protocols and provide a transparent basis for compliance and cost-effectiveness evaluation.

Table 2. Summary of PECO's Phase V Plan: Summary of Portfolio Energy Savings¹⁰

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh	Lifetime MWh										
Baseline	39,386,000		39,386,000		39,386,000		39,386,000		39,386,000		39,386,000	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	72,625	645,554	84,856	699,524	75,370	667,805	76,894	676,575	74,823	670,992	384,569	3,360,450
Residential Low-Income Sub-Sector – Projected Incremental Savings	16,025	104,292	15,352	101,968	15,870	104,793	16,223	106,967	14,104	95,121	77,574	513,140
SCI Sector – Projected Incremental Savings	74,481	1,102,097	95,968	1,420,464	100,064	1,479,581	111,167	1,350,560	70,952	1,046,703	452,631	6,399,405
LCI Sector – Projected Incremental Savings	75,055	1,111,847	100,758	1,496,526	120,436	1,790,188	144,407	1,853,365	102,645	1,525,485	543,301	7,777,411
EE&C Plan Total – Projected Incremental Savings	238,186	2,963,790	296,934	3,718,483	311,740	4,042,366	348,691	3,987,467	262,524	3,338,300	1,458,076	18,050,406
EE&C Plan Total – Projected Cumulative Savings	238,186	2,963,790	535,120	6,682,273	846,860	10,724,639	1,195,552	14,712,106	1,458,076	18,050,406	1,458,076	18,050,406
EE&C Plan Total – Percentage of Target to be Met ²	21%		48%		76%		108%		131%		131%	
Estimated Phase IV Carryover Savings ¹¹											171,867	
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	410,053		706,987		1,018,727		1,367,419		1,629,943		1,629,943	

¹⁰ SCI Sector and LCI Sector totals include street lighting measures which may be a part of the Municipal Lighting sector

¹¹ Phase IV carryover savings were estimated using the phase-to-date verified totals from the PY16 SWE Report and PECO's PY17 Q1 reported savings values extrapolated over a full program year.

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh	Lifetime MWh										
Cumulative Percent Reduction from Baseline	1%		1%		2%		3%		4%		4%	
Commission-Identified Goal											1,111,685	

Table 3 and

Table 4 present the key peak demand accounting elements for Phase V as outlined in the Phase V Final Order. Table 3 summarizes overall demand savings requirements and compliance metrics, providing a consolidated view of total plan peak demand reduction targets across the program portfolio.

Table 4 complements this summary by detailing seasonal demand savings, distinguishing between summer and winter performance. Together, these tables provide peak demand reduction savings for demand impacts aligning TRM methodologies for accurate evaluation.

Table 3. Summary of PECO’s Phase V Plan: Summary of Portfolio Demand Savings

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW					
Baseline	7,899	7,899	7,899	7,899	7,899	7,899
Market Rate Residential Sector (<i>exclusive of Low-Income</i>) – Projected Incremental Annual Savings	11.9	17.4	15.2	14.4	13.4	72.2
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	2.6	2.5	2.6	2.6	2.3	12.6
SCI Sector – Projected Incremental Annual Savings	11.9	15.3	16.3	17.0	11.1	71.6
LCI Sector – Projected Incremental Annual Savings	14.0	18.1	21.1	24.6	19.4	97.1
Coincident Demand Reduction from EE Subtotal	40.4	53.2	55.2	58.6	46.1	253.6

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
Residential Load Shifting - Projected MW Savings	8.7	9.4	10.3	11.3	12.4	10.4
SCI Sector Load Shifting – Projected MW Savings	0.1	0.1	0.1	0.1	0.1	0.1
LCI Sector Load Shifting – Projected MW Savings	0.1	0.3	0.4	0.5	0.5	0.4
Daily Load Shifting Subtotal	8.9	9.9	10.9	11.9	13.0	10.9
Cumulative Projected Compliance Savings	42.2	97.4	154.8	215.8	264.5	264.5
Cumulative EE&C Plan Total – Percentage of Target to be Met	22%	50%	79%	111%	136%	136%
Estimated Phase IV Carryover Savings						7.2
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	49.4	104.6	162.0	223.0	271.7	271.7
Cumulative Percent Reduction from Baseline	0.53%	1.23%	1.96%	2.73%	3.35%	3.35%
Commission-Identified Goal						194.8

Table 4. Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW	Winter MW										
Coincident Reduction from EE - Residential	17.4	11.6	23.7	16.1	21.3	14.3	20.1	13.9	19.0	12.3	101.5	68.2
Coincident Reduction from EE - Non-Residential	28.3	23.4	36.1	30.6	40.4	34.5	43.4	39.9	31.3	29.6	179.5	157.9
Daily Load Shifting - Residential	6.1	11.2	6.7	12.2	7.4	13.3	8.2	14.4	9.0	15.7	7.5	13.4
Daily Load Shifting - Non-Residential	0.2	0.2	0.4	0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.5	0.5
Total											289.0	240.0

Phase V Peak Demand Reduction Target												194.8	
Percentage of Goal in Season												148%	123%

Table 5 provides a summary of the portfolio costs by sector.

Table 5. Summary of Portfolio Costs¹²

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%	\$000	%
Residential Market Rate	\$16,888	22%	\$18,461	22%	\$17,756	20%	\$18,161	19%	\$18,247	22%	\$89,513	21%
Residential Low-Income	\$9,358	12%	\$9,401	11%	\$9,712	11%	\$10,002	11%	\$8,675	11%	\$47,147	11%
SCI	\$18,521	24%	\$21,852	26%	\$23,545	26%	\$24,629	26%	\$18,775	23%	\$107,323	25%
LCI	\$17,537	23%	\$21,963	26%	\$25,626	28%	\$28,414	30%	\$22,588	28%	\$116,127	27%
Common Costs	\$13,455	18%	\$13,455	16%	\$13,455	15%	\$13,455	14%	\$13,455	16%	\$67,275	16%
Total Portfolio Budget	\$75,759	100%	\$85,132	100%	\$90,094	100%	\$94,661	100%	\$81,740	100%	\$427,386	
SWE Cost	\$0		\$0		\$0		\$0		\$0		\$0	

¹² SCI and LCI Totals are inclusive of Municipal Lighting

1.4 Summary of Program Implementation

Program implementation from Phase IV to Phase V will be as seamless as possible based on PECO's planning for Phase V. Data tracking and evaluation, measurement, and verification ("EM&V") startup activities will begin in January 2026. In March 2026, PECO and program implementation CSPs will begin the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach are in place. The programs will launch on June 1, 2026, and implementation will occur from June 1, 2026, through May 31, 2031.

1.5 Summary Description of PECO's Strategy to Acquire at Least 15% of Its Consumption Reduction and Peak Demand Reduction Target Each Year

PECO's program portfolio is designed to produce significant savings in each of the five program years. As indicated in Table 2 and Table 3, PECO projects that no less than 15% of the five-year savings and peak demand reduction compliance targets will be achieved in each program year.

1.6 Summary Description of PECO's Implementation Strategy to Acquire at Least 75% of the Portfolio Megawatt Compliance Target in Each Season

PECO's program portfolio is structured to achieve at least 75% of the seasonal megawatt (MW) plan target in each program cycle. Throughout Phase V, PECO will collaborate closely with CSPs to monitor performance and confirm that progress toward this target is consistently tracked and maintained, enabling timely adjustments and successful compliance across the phase. Seasonal PDRs in compliance with the portfolio megawatt plan target are detailed in Table 4.

1.7 Summary Descriptions of PECO's Implementation Strategy to Manage the EE&C Portfolio and Engage Customers and Trade Allies

PECO will take several steps to confirm the effective Act 129-compliant implementation of this EE&C Plan. These steps include:

- **Close Coordination Between PECO and the CSPs:** PECO will oversee the performance and service obligations of CSPs and make sure the CSPs' delivery is aligned with the approved EE&C Plan.
- **Coordination with Non-Act 129 Programs:** In addition to programs implemented under Act 129, PECO is exploring collaborations with other initiatives in its service territory in an effort to maximize savings and improve customer experience. This includes, but is not limited to, exploring aligning PECO's electric energy efficiency programs with PECO's natural gas efficiency offerings, braiding funding with the Pennsylvania

Department of Environmental Protection (“PA DEP”), administration of Inflation Reduction Act (IRA) home energy rebate programs, and exploring collaboration with the City of Philadelphia’s housing programs, such as the Basic Systems Repair Program.¹³ Low-income subprogram components may coordinate with PECO’s Low-Income Usage Reduction Program (“LIURP”),¹⁴ the Low Income Home Energy Assistance Program (“LIHEAP”),¹⁵ and the Weatherization Assistance Program (“WAP”),¹⁶ where appropriate. These partnerships aim to expand program reach, integrate resources, and deliver additional energy savings for customers. Additionally, PECO is exploring opportunities to collaborate with the City of Philadelphia’s HOME Plan, which includes multiple programs focused on improving home condition and implementing health and safety upgrades.

- **Customer and Market Actor Experience:** A positive customer and market actor experience is essential. CSPs will work closely with customers throughout Phase V to help incorporate energy efficiency into their long-term planning projects. Customers will be offered innovative options to engage with the program and market actors will be supported for their program participation.
- **Trade Ally Engagement:** PECO’s programs will use a collaborative approach to engage a diverse network of trade allies including contractors, distributors, and other market actors who are essential to delivering Act 129 programs. Engagement strategies include targeted recruitment, inclusive outreach, structured onboarding, and ongoing training, supported by clear guidelines, user-friendly portals, and regular communication. Trade allies will receive technical assistance, marketing resources, and streamlined processes to reduce administrative burdens while supporting quality installations and customer satisfaction.
- **E&O:** PECO will have an E&O CSP responsible for educating residential, low-income, and multifamily customers about energy efficiency programs, generating qualified leads, and managing outreach activities. The E&O CSP will deliver accessible, innovative, and measurable outreach; collaborate with PECO and community partners; and provide regular reports on the impact of E&O activities. E&O CSP activities may include but are not limited to:
 - Engage and educate customers (residential, low-income, and multifamily) about energy efficiency through events, materials, and presentations.
 - Generate and track qualified leads for PECO’s Act 129 programs, focusing on measurable outcomes.
 - Host or attend community events to educate and generate leads.
 - Manage the Energy Force Ambassador program, which empowers people with disabilities to become energy efficiency educators and ambassadors in the greater Philadelphia region.
 - Implement accessible and equitable outreach, targeting underserved communities and using multilingual and accessible strategies.

¹³ PHDC, [Basic Systems Repair Program](#).

¹⁴ PECO, [Low-Income Usage Reduction Program \(LIURP\)](#).

¹⁵ PECO, [Low-Income Home Energy Assistance Program \(LIHEAP\)](#).

¹⁶ Pennsylvania Department of Community & Economic Development, [Weatherization Assistance Program \(WAP\)](#).

- Report regularly to PECO on activities, lead generated, and event metrics.
- Collaborate with PECO teams, external partners, and community organizations.
- Continuously improve outreach and education tactics based on feedback and performance data.
- **Data Tracking System:** A third-party database vendor will maintain PECO's tracking database. Database protocols support accurate data entry through proper field definitions and input validations. Program activity tracking queries facilitate program tracking and reporting for PECO and the PUC. The implementation CSPs upload program data into the database at defined intervals and according to the data protocols. The independent evaluation contractor can access the information in the database.
- **Pre-Launch Period:** The implementation schedule for each program includes a pre-launch period to properly prepare for the program launch. This time will be used to refine the program, develop protocols and training materials, recruit trade allies, conduct educational activities, and develop and print incentive applications. The elements will be in place prior to full program operation. They will also be reviewed during process evaluations so that improvements may be incorporated during this plan cycle.
- **Continuous Improvement:** PECO and its independent evaluation contractor will regularly review program protocols, procedures, participant and market actor satisfaction, savings, and spending to identify and address issues that arise during program operation and to facilitate ongoing program improvement.

1.8 Summary Description of PECO's Data Management, Quality Assurance, and Evaluation Processes

PECO's data tracking system collects and stores program and invoice data from CSPs. CSPs will input projects and determine incentives. The data management system will track metrics that facilitate effective project tracking and regulatory reporting. This data will support PECO's quality assurance (QA) process and EM&V requirements. PECO will use evaluation findings to prioritize the implementation of high-value measures.

1.9 Summary Description of the Cost Recovery Mechanism

As Act 129 requires, PECO's EE&C Plan costs are recoverable through a 66 Pa. C.S. § 1307 cost-recovery mechanism. In its Phase V Final Order, the PUC provided direction on the cost recovery tariff mechanism. The Commission described a Phase V mechanism like the Phase I through Phase IV mechanisms. The mechanism will be designed to recover (on a full and current basis, without interest, from each customer class) all prudent and reasonable EE&C Plan costs assigned to each class. In addition, the PUC required that the mechanism be reconciled annually with revised rates effective June 1 of each program year. PECO proposes to use a cost recovery mechanism like those used in prior phases but modified to meet the additional Phase V requirements.

As with Phase I through Phase IV, PECO's proposed Phase V cost recovery mechanism includes four separate recovery charges, one for the Residential rate class (which includes low-income customers), one for the Small Commercial and Industrial (SCI) rate class, one for the Large Commercial and Industrial (LCI) rate class, and one for the Municipal Lighting rate class

(streetlights, and alley lights).¹⁷ For the government, nonprofit, and institutional (GNI) customers defined in Act 129, PECO does not have a separate recovery mechanism because its electric accounts are included in the SCI and LCI rate classes. Four separate charges were developed to confirm that the rate classes financing the measures are those receiving the direct energy and conservation benefits. Section 7 includes a detailed description of and estimated values for the cost recovery mechanisms.

¹⁷ For Municipal Lighting, charges were developed in accordance with the Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan, at Docket No. M-2020-3020830, adopted on May 23, 2024.

2. Energy-Efficiency Portfolio/Program Summary Tables and Charts

Section 2 of PECO’s EE&C Plan provides a comprehensive quantitative overview of the five-year phase period. Section 2.1 describes the portfolio of programs and summarizes total energy savings. Section 2.2 offers a deeper analysis of the portfolio, including cost-effectiveness results, annual energy savings, and peak demand reductions broken down by year and seasonal trends. Section 2.3 presents the budget framework and parity analysis, comparing program expenditures with the overall EE&C budget as well as PECO’s total revenue and sales.

2.1 Market Rate Residential, Residential Low-Income, SCI, and LCI Sector Summaries

Table 6 provides brief summaries, as well as the energy and peak demand reductions for each program.

Table 6. Program Summaries:

	Program Name	Program Market	Program Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%)	
Residential Program	Residential Energy Efficiency	Residential	The program goal is to increase the energy efficiency and peak demand reduction in residential spaces through a variety of incentive mechanisms, home assessments, and appliance recycling.	PY18-22	242,020	2,790,254	50.0	17%	19%
	Residential Home Energy Reports	Residential	The program involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations.	PY18-22	142,549	570,196	32.2	10%	12%
	Totals for Residential Sector					384,569	3,360,450	82.2	26%
Residential Program	Low-Income Energy Efficiency	Low-Income	The program goal is to improve the energy efficiency and peak demand reduction for low-income customers to help make their homes more affordable.	PY18-22	72,200	491,644	12.0	6%	5%
	Low-Income Home Energy Reports	Low-Income	The program involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and	PY18-22	5,374	21,496	1.1	0%	0%

Program Name	Program Market	Program Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%)		
		energy savings recommendations.							
Totals for Low-Income Sector				77,574	513,140	13.1	7%	6%	
SCI Programs	Non-Residential Energy Efficiency	Small Commercial	The program offers a comprehensive and cross-cutting array of opportunities so small commercial non-residential customers can reduce their energy consumption and costs.	PY18-22	442,780	6,313,633	70.3	30%	27%
	Residential Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of multifamily buildings and the residential spaces of master-metered multifamily buildings.	PY18-22	755	6,737	0.1	0%	0%
	Low-Income Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of low-income multifamily buildings and the residential spaces of master-metered low-income multifamily buildings.	PY18-22	9,096	79,035	1.3	1%	0%
	Totals for SCI Sector				442,582	6,310,664	70.3	452,631	6,399,405
LCI Programs	Non-Residential Energy Efficiency	Large Commercial	The program offers a comprehensive and cross-cutting array of opportunities so large commercial non-residential customers can reduce their energy consumption and costs.	PY18-22	533,450	7,691,639	96.2	37%	36%
	Residential Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of multifamily buildings and the residential spaces of master-metered multifamily buildings.	PY18-22	755	6,737	0.1	0%	0%
	Low-Income Energy Efficiency	Multifamily	The program goal is to increase the energy efficiency and peak demand reduction in the common areas of low-income multifamily buildings and the residential spaces of master-metered low-income multifamily buildings.	PY18-22	9,096	79,035	1.3	1%	0%
	Totals for LCI Sector				533,648	7,694,608	96.2	543,301	7,777,411
Totals for Plan				1,458,076	18,050,406	264.5	100%	1,458,076	

¹ Municipal Lighting measures are included in both the SCI and the LCI sectors within the Non-Residential Program.

2.2 Plan Data: Costs, Cost-Effectiveness, and Savings by Program, Sector, and Portfolio

Various sections of this report contain the following data tables, as required by the PUC's Plan V template:

Section 1.3: Table 1. Portfolio Summary of Lifetime Costs and Benefits of Energy Efficiency Measures

Section 1.3: Table 2. Portfolio Summary of Energy and Demand Savings

Section 1.3: Table 3. Summary of Portfolio Energy and Demand Savings

- Section 1.3:
 - Table 4. Summary of Seasonal Demand Savings

Section 1.3: Table 5. Summary of Portfolio Costs. Summary of Portfolio Costs

Section 2.1: Table 6. Program Summaries

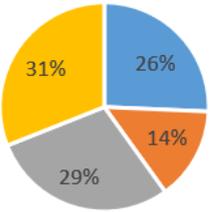
2.3 Budget and Parity Analysis

Table 7 presents the Budget and Parity Analysis, illustrating how program expenditures compare with PECO's total annual revenue and MWh sales by customer sector. Calculations are based on calendar year 2024 data, inclusive of collections for Electric Generation Suppliers, and include both bundled and delivery-only sales.

Table 7. Budget and Parity Analysis Summary

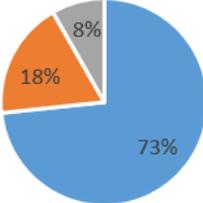
Customer Sector	Phase V EE&C Budget (inclusive of allocated common cost)	% of Total EDC EE&C Budget	% of EDC Total Annual Revenue ¹	% of EDC Total MWh Sales
Residential Sector (<i>exclusive of Low-Income</i>)	\$109,815,107	26%	73%	40%
Residential Low-Income Sub-Sector	\$61,436,925	14%		
Residential Subtotal	\$171,252,032	40%	73%	40%
SCI Sector	\$123,627,960	29%	18%	22%
LCI Sector	\$132,505,839	31%	8%	39%
Non-Residential Subtotal	\$256,133,799	60%	27%	60%
EDC TOTAL	\$427,385,831	100%	100%	100%
EDC TOTAL as Share of Budget Ceiling	100.0%			

% Budget by Customer Sector



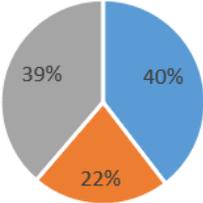
- Residential Sector (*exclusive of Low-Income*)
- Residential Low Income Sub-Sector
- Small C&I Sector
- Large C&I Sector

% 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

3. Program Descriptions

The objective of this section is to provide detailed descriptions of each proposed program, explain PECO’s selection process, and demonstrate how these programs form balanced and integrated portfolios. Section 3.1 outlines the criteria and processes used for program selection. Section 3.2 0 focuses on residential sector programs, including Section 3.2.1, which addresses low-income sub-sector initiatives. Sections 3.3 and 3.4 detail offerings in the combined non-residential program for SCI and LCI customers, while Section 3.5 describes PECO’s strategy for engaging and integrating the government/nonprofit/institutional sector (GNI) into its non-residential Act 129 program initiatives.

3.1 Discussion of Criteria and Process Used for Selection of Programs

This section contains portfolio objectives and metrics, the process for program development, how measures were included, and a discussion of the meaning of comprehensive programs in the context of the Plan.

3.1.1 Portfolio Objectives and Metrics that Define Program Success

PECO’s portfolio objectives are to achieve the requirements set forth in the Phase V Final Order. The Plan will be implemented by delivering the required energy savings and peak demand reductions in a cost-effective manner, on pace, and with a reasonable mix of cost-effective technologies. Figure 2 outlines PECO’s Phase V budget and savings compliance targets. These metrics will define Phase V’s success.

Figure 2. PECO’s Phase V Budget and Savings Targets

Overall Budget	Regulatory Energy Savings Target	Energy Savings Carve-Outs	Pace of Savings	Peak Demand Reduction Target
<p>The total Phase V budget is not to exceed \$427.4 million.</p> <p>The total annual average budget will be \$85.5 million.</p>	<p>The Phase V MWh savings target is 1,111,685 MWh over 5 years, averaging 222,337 MWh/year (2.8% of 2009/2010 annual sales).</p>	<p>Low-income carve-out as defined in the Phase V Final Implementation Order ($\leq 150\%$ FPL):</p> <ul style="list-style-type: none"> • 74,456 MWh for Phase V • 14,891 average annual MWh/year 	<p>The portfolio must plan to achieve at least 15% of MWh savings target each year (166,753 MWh).</p>	<p>The Phase V peak demand target is 194.8 MW. The portfolio must reduce at least 15% of this target each year and achieve at least 75% of the portfolio compliance target (146.1 MW) each season.</p>

PECO will monitor portfolio performance and make mid-course corrections as necessary to:

- Generate energy savings through streamlined processes that make participation easy for customers and market actors;
- Monitor the marketplace for additional measures and solutions that could be offered in the future;
- Maintain a comprehensive set of energy solution offerings across all end uses to all customers;
- Present a comprehensive and appropriate set of participation channels (e.g., retail versus contractor) through which customers can access energy efficiency solutions; and
- Reallocate program funds among components based on market participant response.

3.1.2 Process for Program Development

PECO's detailed and collaborative program development process resulted in a Phase V Plan with three programs (Residential,¹⁸ Non-Residential, and HER¹⁹). PECO took the following steps to develop the program structure:

Reviewed Phase IV Learnings: PECO analyzed evaluation findings, research reports, and stakeholder feedback from Phase IV to identify opportunities for improvement and strategies to enhance performance in Phase V.

Assessed Market Potential: PECO reviewed the SWE Phase V Potential Studies to determine achievable savings by customer segment and measure category to inform an innovative and achievable program design.

Evaluated Potential Program Structures: PECO identified multiple program and subcomponent designed structures and evaluated them against design principles focused on flexibility, customer accessibility and experience, and operational efficiency.

Prioritized and Selected Preferred EE Design Elements: For the non-behavioral programs, PECO developed preferred design elements for an ideal program structure and selected the program structure that met most of the design elements, resulting in a program structure that:

- Provides a single CSP for the residential customer program and a single CSP for the non-residential program
- Allows for flexibility to respond to market demands for measures and services
- Offers consistent measures across residential and non-residential programs and provides mechanisms for customers to pursue comprehensive energy efficiency upgrades
- Provides program-specific residential and non-residential call centers for individualized customer support

Defined Program Components: PECO identified program components based on historical programs in PECO's territory, market research, best practices from other jurisdictions, and market factors in PECO's territory. Through the competitive RFP process, CSPs were

¹⁸ The Residential program includes program components for both market-rate and low-income customers.

¹⁹ The HER program includes HERs for market-rate and low-income customers.

responsible for developing comprehensive implementation strategies aligned with the scope of work and regulatory requirements.

This comprehensive approach reflects PECO's commitment to continuous improvement, stakeholder engagement, and market-driven design to allow Phase V programs to deliver energy savings and enhance customer experience.

3.1.3 How Energy Efficiency, Combined Heat and Power, Renewables, Load-Shifting, and Other Measures Were Included in the Portfolio

Per Section 1.2, bidding CSPs recommended program designs based on PECO's program design criteria and chose measures to include in the programs. CSPs used a data-driven approach and model to estimate the measures, participation levels, and incentive ranges using PECO's design workbook provided as part of the RFP process. Data inputs included the following:

- 2026 TRM;
- SWE IMC Database;
- Phase IV Act 129 Findings;
- Measure Modeling Efforts; and
- Benchmarking with Other Utility Energy Efficiency Portfolios.

Phase V places greater emphasis on peak demand reductions through energy efficiency and daily load shifting ("DLS"). PECO's program design reflects that DLS has significantly higher potential in the residential sector compared with non-residential. As DLS is a new offering for full-scale implementation, PECO will include all residential DLS measures within a dedicated DLS program component to isolate and monitor budgets, savings, and participation. For non-residential programs, PECO will implement DLS measures within the building optimization program component. These measures will be implemented alongside energy efficiency measures. Refer to Section 3.4 for additional details.

In the residential program, solar measures will be included in the Rebates program component alongside other energy efficiency offerings; refer to Section 3.2 for additional details. In the non-residential program, CHP and solar measures will be implemented through the Distributed Energy Resources program component; refer to Section 3.4 for additional details.

3.1.4 Fuel Switching Measures Proposed Minimum Standard and Justification for Threshold to Receive Program Support

As part of PECO's Act 129 initiative, the non-residential program will incorporate CHP projects. In alignment with the 2026 TRM, this measure will be assessed using a custom baseline informed by site-specific historical trend data.

3.1.5 PECO Program Delivery Alignment with Non-Act 129 Programs

Please reference Section 1.7 for details surrounding coordination with non-Act 129 programs.

3.1.6 Front-of-the Meter Measures Included and Expected Contribution

The Phase V portfolio does not include front-of-the-meter measures.

3.1.7 How PECO Defines Comprehensive in the Context of Plan Design and Delivery

PECO's measure mix aims to prioritize comprehensive measures. PECO will use the Commission's definition of a comprehensive measure as outlined in the Table 8 Addendum tab of the template tables. This includes measures that are defined as comprehensive on their own, such as heat pumps and insulation, as well as measures that are considered comprehensive only when paired with the installation of another comprehensive measure.

Residential Program: The comprehensive components in the Residential program include the Market Rate Single Family and Income-Eligible Single Family components.

In addition to offering comprehensive measures, as defined by the Commission, the Residential program is designed to have a comprehensive approach to implementation. The Residential program's comprehensive implementation approach includes delivering components that address a broader customer journey and the whole home by layering multiple measures, incentive streams, and customer support channels to maximize verified savings, affordability, and equity.

Non-Residential Program: The Existing Buildings component is the comprehensive component of the Non-Residential program.

In addition to offering comprehensive measures, the Non-Residential program is designed to have a comprehensive approach to implementation. The Non-Residential program's comprehensive approach includes a diverse mix of measures and services across multiple components, enabling customers to pursue energy efficiency through various pathways tailored to their needs. This approach integrates multiple components to facilitate broad accessibility to allow customers to claim incentives on deep energy savings.

3.1.8 TOU Contributions to Portfolio

PECO recognizes the potential of TOU rates to deliver measurable load shifting benefits and contribute to overall portfolio savings. Consistent with the Commission's guidance, PECO will not claim inherent load shifting benefits from TOU enrollment alone. Instead, PECO will leverage its EE&C Plan to drive customer adoption and maximize impacts through targeted engagement strategies including:

- **Customer Education:** Develop and deploy educational campaigns that explain TOU rate structures, benefits, and practical strategies for shifting usage to lower-cost periods. These campaigns will utilize multiple channels, including digital platforms, bill inserts, and community outreach.
- **Behavioral Programming:** Incorporate behavioral demand response elements that encourage customers to adjust consumption patterns in response to TOU signals. This

may include personalized usage reports, alerts, and tips tailored to individual consumption profiles.

- **Incentives:** Offer financial incentives to accelerate TOU enrollment and encourage sustained participation. Incentives may include enrollment bonuses, bill credits, or rebates tied to verified load shifting performance.

By combining education, behavioral programming, and incentives, PECO aims to bolster the load impacts of TOU adoption and help these measures contribute meaningfully to Phase V objectives. PECO will track enrollment, engagement, and performance metrics to evaluate the effectiveness of these strategies and adjust program delivery as needed.

3.2 Residential Sector

The residential sector, including both market rate and low-income customer populations, is served by two programs: the Residential program and the Residential HER program. Both programs have subprograms dedicated to serving low-income customers. Market rate customers are served through the Residential program and Residential HER program (described in this section) and low-income customers are served through the Residential Low-Income subprogram and the Residential Low-Income HER subprogram (described in Section 3.2.1).

Residential Program (2026-2031)

Objective

The Residential program objective is to increase energy efficiency in single family homes and individual units and common areas of multifamily buildings. PECO will meet this objective by:

- Providing incentives for customer purchases of efficient lighting, appliances, HVAC upgrades, solar, energy-savings devices, and other energy-savings technologies.
- Removing old, inefficient refrigerators, freezers, dehumidifiers, and room AC units from the PECO service area through responsible recycling.
- Driving the construction of energy-efficient homes and demonstrate their value to builders and homebuyers.
- Delivering no-cost and low-cost in-home energy assessments and direct-install measures to help customers identify and implement energy savings opportunities.
- Supporting DLS and peak demand reduction by encouraging adoption of smart devices.

Target Market

The eligible population and target market for the Residential program includes existing residential single family, or new construction, and multifamily customers. At the time of this Plan development, the Residential market size includes approximately 1,400,000 customers:

- **Residential Single Family:** Includes PECO residential electric customers that are individually metered and do not qualify as low-income. Due to the long history of PECO's service territory, the residential housing stock is diverse in age and structure.
 - **Owner-Occupied:** Marketing and outreach will emphasize building performance, bill savings, and comfort improvements. The CSP will leverage successful marketing channels to promote upgrades such as weatherization, HVAC replacement, and smart controls. The CSP will provide owners with clear return-on-investment messaging and guidance through financing or rebate enrollment.
 - **Renter-Occupied:** Engagement will be focused on direct benefits (comfort, energy savings, safety) while coordinating with landlords for approval for comprehensive upgrades, when appropriate. The CSP will use simplified landlord permission forms, text-based communication options, and targeted digital campaigns within rental listings and community networks for customer acquisition.

- **Multifamily:** Includes PECO residential customers who reside in buildings that have more than one unit. This includes the following types of customers:
 - **Building Owners and Property Managers:** The CSP will conduct proactive outreach through property-management associations, housing authorities, and other stakeholders. PECO and the CSP recognize the need to address the split incentive for property owners, managers, and tenants and will position energy upgrades as financial tools that enhance asset value and tenant retention.
 - **Renters and Tenants:** Multilingual and demographically targeted outreach will be deployed through community partners, onsite events, and resident engagement that emphasizes tenant comfort, safety, and ease of participation. Trained energy advisors will coordinate access and scheduling to minimize disruption.

Program Description

The Residential program offers residential customers in single family and multifamily buildings opportunities to save energy across all of their electric end-uses. This customer-friendly approach will enable participants to make comprehensive energy efficiency upgrades to a variety of equipment types while working with a single PECO program, leading to deeper retrofits. For additional detail concerning the program's comprehensive design and delivery please see Section 3.1.7. The following section describes program components.

Program Components

The Residential program contains the following market-rate program components:²⁰

- **In-Home Assessments:** Offers in-home or virtual assessments that include a home inspection, energy usage analysis, direct-install measures, and an energy education session, followed by a custom report to identify larger energy efficiency opportunities (e.g., insulation and air sealing), and encourage participation in other Residential programs, including programs not managed by PECO, when the customer is believed to

²⁰ Residential Low-Income subprogram components are discussed in Section 3.2.1

qualify. BPI-certified Energy Advisors will perform these assessments when possible. Units in individually metered multifamily buildings are served through this component as well.

- **Appliance Recycling:** Offers responsible recycling of refrigerators, freezers, dehumidifiers, and room AC units via drop-off locations/events or pick-ups. Encourages participation in other programs.
- **Rebates:** Provides rebates for energy efficient measures through several channels, including downstream applications; trade ally and distributor networks that apply on behalf of customers or offer incentives directly on invoices; and point-of-purchase discounts at retail locations.
- **Online Marketplace:** Provides a one-stop shopping experience for instant rebates on efficient products with the opportunity to increase customer awareness of products and components.
- **New Construction:** Promotes building homes that are more comfortable, durable, and energy efficient than those built to code. Home Energy Rating System (HERS) raters collaborate with builders during the design and construction phases to achieve greater energy efficiency.
- **DLS:** Delivers peak demand reduction on non-holiday weekdays in summer (June through August) and winter (January and February) by shifting load from on-peak to off-peak hours. This component may incorporate controllable loads (e.g., smart thermostats, electric vehicle [EV] managed charging, battery storage, water heaters) and behavioral measures.
- **Multifamily:** Provides in-unit and common area upgrades in multifamily buildings that are master metered, and common areas in individually metered multifamily buildings.

Coordination of Participation in other Act 129 programs

The CSP will cross-promote other Act 129 program offerings to customers through a variety of methods including:

- Sharing program information in new mover kits
- Promoting other offerings in emails, web content, and Home Energy Reports
- Sharing information about other Act 129 offerings during in-home energy assessments
- Providing customers with informational materials during appliances recycling drop-off events

Implementation Strategy

The Residential program will be administered by a CSP and a team of partners with a proven record of providing the services offered in this program.

The implementation strategy will vary by program component:

-
- **In-Home Assessments:** The CSP will offer two appointment types for customers:
 - **Energy Assessment** will provide customers with an in-depth walkthrough of their home, recommendations for whole-house improvements, and recommendations for other ways to save within the PECO portfolio of energy efficiency components and installation of energy savings products.
 - **Energy Assessment Plus** will be performed in accordance with BPI standards. Comprehensive audits will provide the same services as the Energy Assessment appointment and add depth and detail by using a variety of diagnostic equipment and inspection techniques such as building tightness testing and infrared thermography. Customers will receive more specific information to help them move forward with recommendations, including any applicable available incentives. At the completion of the assessment, customers will receive a detailed summary report outlining findings, recommended improvements, and available program offerings to help guide next steps.
 - **Appliance Recycling:** The CSP will offer appliance drop off events at locations designated by local townships for compact refrigerators, room air conditioners, and dehumidifiers. An additional option will be available for customers to drop off regular household sized refrigerators and freezers at a designated location.
 - **Rebates:** Rebates are available for eligible PECO customers on eligible HVAC equipment, appliances, water heating, and other energy saving measures. Customers may apply for rebates, or HVAC contractors may apply on a customer's behalf. The component also includes an instant markdown channel designed to deliver immediate savings to customers at the point of sale.
 - **Online Marketplace:** A convenient platform where customers can purchase energy-efficiency products, including smart thermostats, air purifiers, dehumidifiers, and advanced power strips. The marketplace will offer exclusive seasonal manufacturer discounts and instant PECO rebates, making it easier for customers to upgrade to more energy efficient equipment.
 - **New Construction:** The new construction component will be implemented similar to Phase IV, working through new home builders and Home Energy Raters.
 - **DLS:** The CSP will offer three participation channels to customers. Customers are eligible to enroll devices in one or multiple channels:
 - **Managed EV Charging** to shift residential EV charging to off-peak periods. The CSP will leverage a network of OEM partner integrations to recruit and enroll customers in this offering.
 - **Thermostat Optimization** to enable ongoing remote adjustment of smart thermostat to reduce HVAC use during demand windows. The CSP will leverage partnerships with device manufacturers and service providers to target potential participants. Enrolled customers will have the option to opt out of load shifting events at any time.
 - **A Bring-Your-Own-Battery (BYOB)** offering that will discharge batteries to lower grid demand during peak periods. The offerings will enroll existing residential battery systems to leverage existing infrastructure rather than providing incentives for new battery installation.
-

- **Multifamily:** The CSP will engage property managers and tenants to perform both in unit and common area upgrades in multifamily buildings. The CSP will provide free assessments, direct-install measures, and training to facility staff about the process and measures to be installed in the building. The CSP will help building owners and operators understand the impacts of proposed measures, including demand, energy use, and non-energy benefits.

Program Issues and Risks and Risk Mitigation

The Residential program will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, incentives, and program resource allocation) to meet the portfolio level targets.

One risk is the transition from Phase IV to Phase V. Part of this risk will be mitigated by the continuity in implementation CSP from Phase IV to Phase V. The CSP has extensive regulatory and market knowledge in Pennsylvania and prior extensive experience with PECO's energy efficiency programs.

An additional risk is market factors that are not controlled by PECO including changing federal and state guidelines and regulations, such as possible changes to the federal ENERGY STAR® program that is currently used to prescribe equipment eligibility in the 2026 TRM. If the ENERGY STAR program were to no longer exist, PECO would consider alternative options such as equipment verification through databases like DOE's Compliance Certification and Management System (CCMS). As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Another potential risk to program design stems from external economic factors that could significantly increase incremental costs, such as substantial tariff impacts or prolonged periods of high inflation. Should these challenges arise and create prohibitive conditions during Phase V, PECO will proactively collaborate with stakeholders and the Commission to identify solutions.

As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential program are projected to incur costs of \$270,251,892 for Phase V after PECO incentives. These costs are calculated by subtracting incentives from incremental costs, representing the anticipated direct expenses for participating customers.

Ramp-Up Strategy

Minimal ramp-up will be needed for the In-Home Assessments, Rebates, Marketplace, Appliance Recycling, Multifamily, and New Construction components because similar components are already operating in Phase IV.

For the DLS component, PECO and the CSP will work to enroll customers with existing measures in the program to claim savings for the peak summer demand period that begins

shortly after the start of Phase V. These efforts will include reaching out to individuals who have previously received potential load shifting measures, such as connected smart thermostats.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. Marketing strategies will vary by component. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Residential program components.

- **In-Home Assessments:** Personalized email outreach; new mover kits; social media; targeted digital ads; community engagement through homeowner associations, newsletters, and events.
- **Appliance Recycling:** Emails; bill inserts; social media; cross-promotions with municipal recycling events.
- **Rebates:** In-store point-of-purchase signage; direct outreach from contractors; targeted emails; digital ads; social media.
- **Online Marketplace:** Website banners; digital ads; emails; social media.
- **New Construction:** Direct builder outreach; education events and partnerships with trusted associations (i.e., Home Building Associations, housing authorities, community developers); technical assistance, case studies, and collaboration with manufacturers.
- **DLS:** Co-branded marketing (i.e., thermostats and EV batteries) with device manufacturers featuring email, web, and in-app messaging; bill inserts; newsletters.
- **Multifamily:** Outreach to property managers and tenants through case studies, testimonials, and industry events; digital advertising.

Eligible Measures and Incentive Strategy

The measure mix is listed in Table 8 and includes a comprehensive mix of end-use technologies such as lighting, HVAC, appliances, shell, water heating, and plug loads. Incentives are based on previous experience and knowledge of the market in PECO's territory.

Table 8. Residential Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Dehumidifier Retirement	per dehumidifier	No	Yes	Phase V TRM	\$10.00	4	\$0.00 - \$10.00
Low-Capacity Refrigerator / Freezer Recycling without Replacement	per refrigerator/freezer	No	Yes	Phase V TRM	\$50.00	5	\$0.00 - \$50.00
Refrigerator / Freezer Recycling with and without Replacement	per refrigerator	No	Yes	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Room AC (RAC) Retirement	per room A/C	No	Yes	Phase V TRM	\$10.00	3	\$0.00 - \$10.00
Low-Flow Faucet Aerators: Kit	per aerator	No	Yes	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Kit	per showerhead	No	Yes	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
WH > 10% UBC \$0.30/kWh	per home	No	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
WH > 10% UBC HPWH \$0.60/kWh	per home	No	Yes	Phase V TRM	\$3,053.95	15	\$0.00 - \$3,053.95
ENERGY STAR Certified Connected Thermostats	per thermostat	No	Yes	Phase V TRM	\$168.42	9	\$0.00 - \$168.42
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	per fixture	No	Yes	Phase V TRM	\$4.40	2	\$0.00 - \$4.40
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	per fixture	No	Yes	Phase V TRM	\$6.41	2	\$0.00 - \$6.41
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	per fixture	No	Yes	Phase V TRM	\$7.08	2	\$0.00 - \$7.08
LED and Electroluminescent Nightlights	per nightlight	No	Yes	Phase V TRM	\$3.25	8	\$0.00 - \$3.25

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Low-Flow Faucet Aerators: Direct install	per aerator	No	Yes	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Direct install	per showerhead	No	Yes	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Thermostatic Shower Restriction Valves	per water heater	No	Yes	Phase V TRM	\$42.00	15	\$0.00 - \$42.00
Water Heater Tank Wrap	per tank	No	Yes	Phase V TRM	\$89.14	7	\$0.00 - \$89.14
Water Heater Temperature Setback	per water heater	No	Yes	Phase V TRM	\$22.47	2	\$0.00 - \$22.47
Advanced Power Strips	per advanced power strip	No	Yes	Phase V TRM	\$60.00	5	\$0.00 - \$60.00
ENERGY STAR Air Purifiers - Direct Install LI & MF	per air purifier	No	Yes	Phase V TRM	\$300.00	9	\$0.00 - \$300.00
LED Exit Signs	per sign	No	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
Lighting Retrofits - Other Interior Fixtures	per fixture	No	No	Phase V TRM	\$80.00	15	\$0.00 - \$80.00
Lighting Retrofits - Outdoor floods	per fixture	No	No	Phase V TRM	\$123.81	15	\$0.00 - \$123.81
Lighting Retrofits - Parking Garage	per fixture	No	No	Phase V TRM	\$120.00	15	\$0.00 - \$120.00
Lighting Retrofits - Parking Lot	per fixture	No	No	Phase V TRM	\$129.00	15	\$0.00 - \$129.00
Lighting: Permanent Fixture Removal	per fixture	No	No	Phase V TRM	\$60.00	11	\$0.00 - \$60.00
Linear LED: Lamp Replacement	per lamp	No	No	Phase V TRM	\$15.00	15	\$0.00 - \$15.00
Linear LED: Retrofit Fixture, surface mount	per fixture	No	No	Phase V TRM	\$150.00	15	\$0.00 - \$150.00
Linear LED: Retrofit Fixture, troffer	per fixture	No	No	Phase V TRM	\$250.00	15	\$0.00 - \$250.00
Occupancy Sensor	per sensor	No	No	Phase V TRM	\$55.00	8	\$0.00 - \$55.00
HVAC Systems: PTAC	per PTAC	No	Yes	Phase V TRM	\$1,600.00	15	\$0.00 - \$1,600.00
HVAC Systems: PTHP	per PTHP	No	Yes	Phase V TRM	\$2,100.00	15	\$0.00 - \$2,100.00
Advanced Power Strips: Kit	per advanced power strip	No	Yes	Phase V TRM	\$40.07	5	\$0.00 - \$40.07
Connected Smart Thermostat	per unit	No	No	Phase V TRM	\$23.06	1	\$0.00 - \$23.06

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Electric Vehicle Managed Charging (Actively Managed)	per unit	No	No	Phase V TRM	\$144.00	1	\$0.00 - \$144.00
Behind the Meter Battery Storage (Bring Your Own)	per unit	No	No	Phase V TRM	\$858.00	1	\$0.00 - \$858.00
Water Heater Pipe Insulation	per water heater	No	Yes	Phase V TRM	\$59.80	11	\$0.00 - \$59.80
Smart Water Heater Controls	per water heater controller	No	Yes	Phase V TRM	\$155.99	11	\$0.00 - \$155.99
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	per gasket	No	Yes	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Advanced Power Strips: Tier 1	per advanced power strip	No	Yes	Phase V TRM	\$30.00	5	\$0.00 - \$30.00
Advanced Power Strips: Tier 2	per advanced power strip	No	Yes	Phase V TRM	\$75.00	5	\$0.00 - \$75.00
ENERGY STAR Certified Connected Thermostats: ASHP	per thermostat	No	Yes	Phase V TRM	\$190.00	9	\$0.00 - \$190.00
ENERGY STAR Certified Connected Thermostats: CAC-Only	per thermostat	No	Yes	Phase V TRM	\$190.00	9	\$0.00 - \$190.00
ENERGY STAR Air Purifiers	per air purifier	No	Yes	Phase V TRM	\$168.75	9	\$0.00 - \$168.75
High Efficiency Equipment: ASHP	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: CAC	per unit	No	Yes	Phase V TRM	\$2,192.34	15	\$0.00 - \$2,192.34
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	No	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
ECM Circulation Fans	per fan	No	Yes	Phase V TRM	\$352.79	5	\$0.00 - \$352.79

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Air Conditioner & Heat Pump Maintenance	per unit	No	Yes	Phase V TRM	\$141.40	3	\$0.00 - \$141.40
Duct Sealing & Duct Insulation	per home	No	Yes	Phase V TRM	\$280.65	15	\$0.00 - \$280.65
Furnace Maintenance	per furnace	No	Yes	Phase V TRM	\$141.40	3	\$0.00 - \$141.40
ENERGY STAR Bathroom Exhaust Fan	per exhaust fan unit	No	Yes	Phase V TRM	\$208.00	15	\$0.00 - \$208.00
Heat Pump Water Heaters	per water heater	No	Yes	Phase V TRM	\$920.44	10	\$0.00 - \$920.44
Residential Air Sealing	per home	No	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	No	Yes	Phase V TRM	\$857.72	15	\$0.00 - \$857.72
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	No	Yes	Phase V TRM	\$300.00	15	\$0.00 - \$300.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	No	Yes	Phase V TRM	\$203.21	15	\$0.00 - \$203.21
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: RJI Insulation	per home	No	Yes	Phase V TRM	\$500.00	15	\$0.00 - \$500.00
Basement or Crawl Space Wall Insulation	per home	No	Yes	Phase V TRM	\$155.63	15	\$0.00 - \$155.63
ENERGY STAR Windows	per window area	No	Yes	Phase V TRM	\$952.20	15	\$0.00 - \$952.20
Water Heater Pipe Insulation: Kit	per water heater	No	Yes	Phase V TRM	\$3.00	11	\$0.00 - \$3.00
Room Air Conditioners	per room A/C	No	Yes	Phase V TRM	\$95.08	9	\$0.00 - \$95.08
Window Heat Pump	per window heat pump	No	Yes	Phase V TRM	\$2,574.50	9	\$0.00 - \$2,574.50
ENERGY STAR Refrigerators	per refrigerator	No	Yes	Phase V TRM	\$128.41	14	\$0.00 - \$128.41
ENERGY STAR Clothes Washers	per washer	No	Yes	Phase V TRM	\$35.72	14	\$0.00 - \$35.72

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
ENERGY STAR Clothes Dryers	per dryer	No	Yes	Phase V TRM	\$206.34	14	\$0.00 - \$206.34
ENERGY STAR Dehumidifiers	per dehumidifier	No	Yes	Phase V TRM	\$25.00	12	\$0.00 - \$25.00
Photovoltaic (PV) Solar Generation	per PV array	No	Yes	Phase V TRM	\$15,232.00	15	\$0.00 - \$15,232.00
Water Heater Pipe Insulation - Instant Markdown	per water heater	No	Yes	Phase V TRM	\$6.00	11	\$0.00 - \$6.00
Residential Occupancy Sensors	per sensor	No	Yes	Phase V TRM	\$65.90	8	\$0.00 - \$65.90
Holiday Lights	per one strand of holiday lights	No	Yes	Phase V TRM	\$0.67	10	\$0.00 - \$0.67
High Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP	per unit	No	Yes	Phase V TRM	\$2,192.37	15	\$0.00 - \$2,192.37
GSHP Desuperheaters	per desuperheater	No	Yes	Phase V TRM	\$2,260.05	15	\$0.00 - \$2,260.05
Air Handler Filter Whistles	per filter whistle	No	Yes	Phase V TRM	\$5.19	5	\$0.00 - \$5.19
Solar Water Heaters	per water heater	No	Yes	Phase V TRM	\$1,111.33	15	\$0.00 - \$1,111.33
Drain Water Heat Recovery Units	per unit	No	Yes	Phase V TRM	\$734.58	15	\$0.00 - \$734.58
ENERGY STAR Freezers	per freezer	No	Yes	Phase V TRM	\$38.93	11	\$0.00 - \$38.93
ENERGY STAR Coolers	per cooler	No	Yes	Phase V TRM	\$281.84	14	\$0.00 - \$281.84
Cooler Recycling with and without Replacement	per cooler	No	Yes	Phase V TRM	\$281.84	9	\$0.00 - \$281.84
Residential Induction Cooktop	per induction cooktop	No	Yes	Phase V TRM	\$1,087.38	15	\$0.00 - \$1,087.38
ENERGY STAR Dishwashers	per dishwasher	No	Yes	Phase V TRM	\$79.45	10	\$0.00 - \$79.45
ENERGY STAR Ceiling Fans	per ceiling fan	No	Yes	Phase V TRM	\$252.74	10	\$0.00 - \$252.74
ENERGY STAR Pool Pumps	per pool pump	No	Yes	Phase V TRM	\$145.38	10	\$0.00 - \$145.38

Measure	Unit	Low-Income Measure (Yes/No) ¹	Comprehensive Measure (Yes/No) ^{2,3}	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Range (\$/unit)
Single Speed Pool Pump Replacement	per VFD pool pump	No	Yes	Phase V TRM	\$986.77	3.3	\$0.00 - \$986.77
Time of Use (TOU) Rates	per household	No	No	Phase V TRM	\$0.00	1	\$0.00 - \$25.00

To maximize opportunities for customer energy savings, PECO reserves the right to include in the program and offer an incentive of up to the incremental measure costs²¹ for any measure that is not listed in Table 8 but identified in the TRM or approved as an interim measure protocol.

²¹ The incremental measure costs is determined through Exhibit 5: 2026 Incremental Measure Cost Database issued by the PUC found here [Total Resource Cost Test | PA PUC](#)

Basis for the Proposed Incentive Levels

Incentives are based on previous experience and knowledge of the market in PECO's territory. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation.

Maximum Deadlines for Rebates

PECO requires 180 days as a maximum length of time for an application to be submitted. Any longer may affect reporting and reconciliation timeframes.

Key Schedule Milestones

The planned implementation schedule is as follows:

March 2026: PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.

June 1, 2026: The programs will launch with some components on a ramp-up period for the first 6 months.

June 2026–May 2031: Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.

May 31, 2031: Last day of the Phase V programs.

Assumed EM&V

The Residential program's proposed evaluation methodology and data collection are consistent with current EM&V practices for PECO's Phase IV programs. The EM&V requirements for this program conform to all applicable state protocols, including the SWE Evaluation Framework and the Pennsylvania TRM. PECO will follow the SWE's Evaluation Framework, utilize a SWE-approved Phase V evaluation plan, and utilize an independent evaluator to verify all Plan-related savings and confirm that there is no double-counting of savings for programs that leverage outside funding. Metrics for monitoring program success include, but are not limited to:

- Customer satisfaction with the program and participation trends
- Energy savings and peak demand reductions associated with installed efficient equipment or removed equipment
- Program implementation costs and program cost-effectiveness
- Data for evaluating the program will come from some of the following sources:
 - Tracking system data
 - Engineering or TRM estimates of measure savings
 - Follow-up surveys of customers, retailers, trade allies, and service providers who participate in the program
 - Program implementer and PECO staff surveys or interviews

- Evaluation of billing data
- Local weather data

Program impacts will be determined using a variety of data sources and tested techniques. These strategies may include:

- Field and phone verification, review of program records and incentive applications
- Project reviews referencing per-unit deemed or default energy savings
- Billing analysis
- Installation follow-up phone interviews with program participants to identify: Rebated measures installed and persistence (e.g., are the measures still installed?), and other changes to the business that affect energy usage, such as changes in occupancy or changes in building size
- Evaluating program process success and efficiency across program delivery, administration, implementation, and customer response includes the following strategies:
 - Assess marketing and promotional efforts
 - Monitor contractor data-tracking system and implementation procedures to confirm that the program is being implemented as designed
 - Interview utility staff, contractors, equipment vendors, and customers
 - Survey program participants
 - Assess customer understanding, satisfaction, and attitudes about the program

See Section 6 for more details about market and process evaluations.

Administrative Requirements

PECO will administer the Residential program through a CSP. PECO will confirm that major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six full-time equivalent (FTE) staff dedicated to the residential sector.

Savings Projections

Table 9. Residential Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Dehumidifier Retirement</i>	2.4.12	Energy Savings (MWh) ²	955	979	1,028	1,077	857	4,897
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	956	980	1,029	1,078	857	4,900
<i>Low-Capacity Refrigerator / Freezer Recycling without Replacement</i>	2.4.4	Energy Savings (MWh) ²	85	87	92	96	78	438
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	286	293	308	322	261	1,470
<i>Refrigerator / Freezer Recycling with and without Replacement</i>	2.4.3	Energy Savings (MWh) ²	19	20	20	22	17	98
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	24	25	26	28	22	125
<i>Room AC (RAC) Retirement</i>	2.2.8	Energy Savings (MWh) ²	51	52	54	57	45	260
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	390	400	420	440	350	2,000
<i>Low-Flow Faucet Aerators: Kit</i>	2.3.6	Energy Savings (MWh) ²	459	459	459	459	459	2,295
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.2	0.2	1.0
		Projected Participation ³	29,162	29,162	29,162	29,162	29,162	145,810
	2.3.7	Energy Savings (MWh) ²	1,022	1,022	1,022	1,022	1,022	5,108

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Low-Flow Showerheads: Kit</i>		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.2	0.3	0.3	0.3	0.3	1.3
		Projected Participation ³	60,662	60,662	60,662	60,662	60,662	303,310
<i>WH > 10% UBC \$0.30/kWh</i>	2.7.1	Energy Savings (MWh) ²	3,200	3,170	3,192	3,216	3,246	16,024
		Summer Demand Reduction (MW)	1.1	1.1	1.1	1.1	1.1	5.5
		Winter Demand Reduction (MW)	0.7	0.7	0.7	0.7	0.7	3.3
		Projected Participation ³	1,600	1,585	1,596	1,608	1,623	8,012
<i>WH > 10% UBC HPWH \$0.60/kWh</i>	2.7.1	Energy Savings (MWh) ²	390	585	780	975	1,170	3,900
		Summer Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.3	0.9
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.3	0.9
		Projected Participation ³	100	150	200	250	300	1,000
<i>ENERGY STAR Certified Connected Thermostats</i>	2.2.12	Energy Savings (MWh) ²	2,910	2,910	2,910	2,910	2,910	14,551
		Summer Demand Reduction (MW)	0.4	0.4	0.4	0.4	0.4	2.1
		Winter Demand Reduction (MW)	0.6	0.6	0.6	0.6	0.6	3.0
		Projected Participation ³	7,906	7,906	7,906	7,906	7,906	39,530
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)</i>	2.1.1	Energy Savings (MWh) ²	556	534	491	454	400	2,435
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.5	0.5	0.6	0.4	2.1
		Projected Participation ³	13,395	12,853	11,831	10,919	9,626	58,625
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))</i>	2.1.1	Energy Savings (MWh) ²	545	517	466	419	377	2,324
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.2	0.2	0.9
		Projected Participation ³	16,712	15,877	14,290	12,862	11,576	71,317
	2.1.1	Energy Savings (MWh) ²	362	344	311	280	252	1,549

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)</i>		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	8,233	7,828	7,060	6,370	5,722	35,213
<i>LED and Electroluminescent Nightlights</i>	2.1.3	Energy Savings (MWh) ²	3	3	2	2	2	12
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	774	666	577	500	422	2,940
<i>Low-Flow Faucet Aerators: Direct install</i>	2.3.6	Energy Savings (MWh) ²	5	5	5	5	4	25
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	85	87	91	95	78	436
<i>Low-Flow Showerheads: Direct install</i>	2.3.7	Energy Savings (MWh) ²	7	6	5	5	4	27
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	102	90	83	75	62	413
<i>Thermostatic Shower Restriction Valves</i>	2.3.8	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	6	6	7	7	6	32
<i>Water Heater Tank Wrap</i>	2.3.3	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
	2.3.4	Energy Savings (MWh) ²	1	1	1	1	1	5

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Water Heater Temperature Setback</i>		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	13	13	13	13	13	65
<i>Advanced Power Strips</i>	2.5.1	Energy Savings (MWh) ²	4,756	4,580	4,404	4,404	4,404	22,549
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.8
		Projected Participation ³	54,135	52,135	50,136	50,136	50,134	256,676
<i>ENERGY STAR Air Purifiers - Direct Install LI & MF</i>	2.4.14	Energy Savings (MWh) ²	24	24	26	27	21	121
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.3	0.3	0.4	0.3	1.3
		Projected Participation ³	82	83	88	92	73	418
<i>LED Exit Signs</i>	3.1.4	Energy Savings (MWh) ²	3	4	4	4	3	18
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	12	13	13	14	11	63
<i>Lighting Retrofits - Other Interior Fixtures</i>	3.1.1	Energy Savings (MWh) ²	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	3.1	3.4	3.1	2.6	12.1
		Projected Participation ³	20	20	21	22	18	101
<i>Lighting Retrofits - Outdoor floods</i>	3.1.1	Energy Savings (MWh) ²	15	15	16	17	13	76
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	1.6	0.9	0.9	0.9	4.4
		Projected Participation ³	25	25	27	28	22	127
	3.1.1	Energy Savings (MWh) ²	6	6	6	7	5	29

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Lighting Retrofits - Parking Garage</i>		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	8	8	8	9	7	40
<i>Lighting Retrofits - Parking Lot</i>	3.1.1	Energy Savings (MWh) ²	16	16	17	18	14	82
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.1	0.0	0.2
		Projected Participation ³	25	25	27	28	22	127
<i>Lighting: Permanent Fixture Removal</i>	3.1.1	Energy Savings (MWh) ²	87	89	93	98	78	444
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.2	0.1	0.6
		Projected Participation ³	244	250	263	275	219	1,251
<i>Linear LED: Lamp Replacement</i>	3.1.1	Energy Savings (MWh) ²	12	12	13	14	11	62
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	366	375	394	413	328	1,876
<i>Linear LED: Retrofit Fixture, surface mount</i>	3.1.1	Energy Savings (MWh) ²	4	4	5	5	4	22
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	25	25	27	28	22	127
<i>Linear LED: Retrofit Fixture, troffer</i>	3.1.1	Energy Savings (MWh) ²	6	6	7	7	6	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	25	25	27	28	22	127
<i>Occupancy Sensor</i>	3.1.3	Energy Savings (MWh) ²	1	1	1	1	1	4

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	6	7	7	7	6	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	3,144	3,150	3,163	3,175	3,119	15,751
<i>HVAC Systems: PTAC</i>	2.2.1	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>HVAC Systems: PTHP</i>	2.2.1	Energy Savings (MWh) ²	14	14	14	14	14	70
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	4	4	4	4	4	20
<i>Advanced Power Strips: Kit</i>	2.5.1	Energy Savings (MWh) ²	1,488	1,488	1,488	1,488	1,488	7,440
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Winter Demand Reduction (MW)	0.2	0.5	0.5	0.5	0.5	2.3
		Projected Participation ³	20,001	20,001	20,001	20,001	20,001	100,005
<i>Connected Smart Thermostat</i>	LS002	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.8	0.8	0.9	0.9	1.0	4.5
		Winter Demand Reduction (MW)	1.7	2.0	2.1	2.2	2.4	10.5
		Projected Participation ³	17,955	19,209	20,539	21,983	23,522	103,208
<i>Electric Vehicle Managed Charging (Actively Managed)</i>	LS006	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.2	0.8

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.1	0.1	0.2	0.2	0.2	0.8
		Projected Participation ³	1,200	1,440	1,728	2,074	2,488	8,930
<i>Behind the Meter Battery Storage (Bring Your Own)</i>	LS012	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.3	0.3	0.4	0.4	0.5	1.9
		Winter Demand Reduction (MW)	0.3	0.3	0.4	0.4	0.5	1.9
		Projected Participation ³	500	575	661	760	875	3,371
<i>Water Heater Pipe Insulation</i>	2.3.5	Energy Savings (MWh) ²	47	47	47	47	47	237
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2	0.2	0.2	0.2	0.7
		Projected Participation ³	112	112	112	112	112	560
<i>Smart Water Heater Controls</i>	2.3.10	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket</i>	2.6.2	Energy Savings (MWh) ²	133	133	133	133	133	666
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	21,940	21,940	21,940	21,940	21,940	109,700
<i>Advanced Power Strips: Tier 1</i>	2.5.1	Energy Savings (MWh) ²	59	59	59	59	59	293
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	822	822	822	822	822	4,110
<i>Advanced Power Strips: Tier 2</i>	2.5.1	Energy Savings (MWh) ²	64	64	64	64	64	320
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	466	466	466	466	466	2,330
<i>ENERGY STAR Certified Connected Thermostats: ASHP</i>	2.2.12	Energy Savings (MWh) ²	14	28	43	43	43	170
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	20	40	60	60	60	240
<i>ENERGY STAR Certified Connected Thermostats: CAC-Only</i>	2.2.12	Energy Savings (MWh) ²	5	18	18	18	18	79
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	20	80	80	80	80	340
<i>ENERGY STAR Air Purifiers</i>	2.4.14	Energy Savings (MWh) ²	351	351	351	351	351	1,756
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	1,985	1,985	1,985	1,985	1,985	9,925
<i>High Efficiency Equipment: ASHP</i>	2.2.1	Energy Savings (MWh) ²	2,760	2,767	2,828	2,828	2,828	14,011
		Summer Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.3	1.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Projected Participation ³	2,256	2,262	2,312	2,312	2,312	11,454
<i>High Efficiency Equipment: CAC</i>	2.2.1	Energy Savings (MWh) ²	757	759	759	759	759	3,793
		Summer Demand Reduction (MW)	2.3	2.3	2.3	2.3	2.3	11.6
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	2,812	2,818	2,818	2,818	2,818	14,084
<i>High Efficiency Equipment: ENERGY STAR Most Efficient</i>	2.2.3	Energy Savings (MWh) ²	1,820	1,823	1,823	1,823	1,823	9,114
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Ductless Mini-Split Heat Pump</i>		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.0
		Projected Participation ³	3,012	3,018	3,018	3,018	3,018	15,084
<i>ECM Circulation Fans</i>	2.2.4	Energy Savings (MWh) ²	961	962	962	962	962	4,811
		Summer Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.3	1.5
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Projected Participation ³	5,010	5,016	5,016	5,016	5,016	25,074
<i>Air Conditioner & Heat Pump Maintenance</i>	2.2.6	Energy Savings (MWh) ²	332	332	332	332	332	1,662
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	1,057	1,057	1,057	1,057	1,057	5,285
<i>Duct Sealing & Duct Insulation</i>	2.2.10	Energy Savings (MWh) ²	42	42	42	42	42	209
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	146	146	146	146	146	730
<i>Furnace Maintenance</i>	2.2.13	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	11	11	11	11	11	55
<i>ENERGY STAR Bathroom Exhaust Fan</i>	2.2.14	Energy Savings (MWh) ²	15	15	15	15	15	73
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	212	212	212	212	212	1,060
<i>Heat Pump Water Heaters</i>	2.3.1	Energy Savings (MWh) ²	542	553	560	560	560	2,777
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.1	0.3	0.3	0.3	0.3	1.1
		Projected Participation ³	302	308	312	312	312	1,546
Residential Air Sealing	2.6.1	Energy Savings (MWh) ²	45	45	45	45	45	227
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	82	82	82	82	82	410
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	2.6.3	Energy Savings (MWh) ²	109	109	109	109	109	544
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2	0.2	0.2	0.2	0.8
		Projected Participation ³	61	61	61	61	61	305
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	2.6.3	Energy Savings (MWh) ²	15	15	15	15	15	74
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	80	80	80	80	80	400
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	2.6.3	Energy Savings (MWh) ²	22	22	22	22	22	110
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	20	20	20	20	20	100
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: RJI Insulation	2.6.3	Energy Savings (MWh) ²	34	34	34	34	34	172
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	93	93	93	93	93	465
Basement or Crawl Space Wall Insulation	2.6.4	Energy Savings (MWh) ²	3	3	3	3	3	17
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	4	4	4	4	4	19
<i>ENERGY STAR Windows</i>	2.6.5	Energy Savings (MWh) ²	3	6	12	15	17	53
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	10	20	40	48	58	176
<i>Water Heater Pipe Insulation: Kit</i>	2.3.5	Energy Savings (MWh) ²	412	412	412	412	412	2,060
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation ³	20,000	20,000	20,000	20,000	20,000	100,000
<i>Room Air Conditioners</i>	2.2.7	Energy Savings (MWh) ²	36	36	36	36	36	179
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1,420	1,420	1,420	1,420	1,420	7,100
<i>Window Heat Pump</i>	2.2.9	Energy Savings (MWh) ²	94	94	94	94	94	469
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.4	0.4	0.4	0.4	0.4	2.0
		Projected Participation ³	150	150	150	150	150	750
<i>ENERGY STAR Refrigerators</i>	2.4.1	Energy Savings (MWh) ²	656	800	944	944	944	4,286
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	9,100	11,100	13,100	13,100	13,100	59,500
<i>ENERGY STAR Clothes Washers</i>	2.4.8	Energy Savings (MWh) ²	310	371	433	433	433	1,981
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	5,000	6,000	7,000	7,000	7,000	32,000
ENERGY STAR Clothes Dryers	2.4.9	Energy Savings (MWh) ²	364	448	532	532	532	2,407
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation ³	4,350	5,350	6,350	6,350	6,350	28,750
ENERGY STAR Dehumidifiers	2.4.11	Energy Savings (MWh) ²	1,763	1,763	1,763	1,763	1,763	8,816
		Summer Demand Reduction (MW)	0.4	0.4	0.4	0.4	0.4	1.8
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	7,100	7,100	7,100	7,100	7,100	35,500
Photovoltaic (PV) Solar Generation	2.8.3	Energy Savings (MWh) ²	13,601	13,601	13,601	13,601	13,601	68,003
		Summer Demand Reduction (MW)	3.3	3.3	3.3	3.3	3.3	16.6
		Winter Demand Reduction (MW)	0.4	0.4	0.4	0.4	0.4	1.9
		Projected Participation ³	1,500	1,500	1,500	1,500	1,500	7,500
Water Heater Pipe Insulation - Instant Markdown	2.3.5	Energy Savings (MWh) ²	5,591	5,591	5,591	5,591	5,591	27,956
		Summer Demand Reduction (MW)	0.6	0.6	0.6	0.6	0.6	3.2
		Winter Demand Reduction (MW)	1.1	1.1	1.1	1.1	1.1	5.3
		Projected Participation ³	75,040	75,040	75,040	75,040	75,040	375,200
Residential Occupancy Sensors	2.1.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
Holiday Lights	2.1.4	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>High Efficiency Equipment for Midstream Delivery: ASHP, CAC, PTAC, PTHP</i>	2.2.2	Energy Savings (MWh) ²	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>GSHP Desuperheaters</i>	2.2.5	Energy Savings (MWh) ²	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>Air Handler Filter Whistles</i>	2.2.11	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Solar Water Heaters</i>	2.3.2	Energy Savings (MWh) ²	2	2	2	2	2	9
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Drain Water Heat Recovery Units</i>	2.3.9	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>ENERGY STAR Freezers</i>	2.4.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
ENERGY STAR Coolers	2.4.5	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
Cooler Recycling with and without Replacement	2.4.6	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
Residential Induction Cooktop	2.4.7	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
ENERGY STAR Dishwashers	2.4.10	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
ENERGY STAR Ceiling Fans	2.4.13	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
ENERGY STAR Pool Pumps	2.8.1	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
Single Speed Pool Pump Replacement	2.8.2	Energy Savings (MWh) ²	1	1	1	1	1	4
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5

Estimated Program Budget (Total) by Year

Table 10. Residential Program Budget

Program Name: ¹		Residential					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$14,738	\$15,015	\$15,321	\$15,580	\$15,840	\$76,493
Incentives (\$000)	Rebates	\$4,976	\$5,199	\$5,467	\$5,741	\$6,037	\$27,419
	Upstream/Midstream Buydown	\$1,787	\$1,837	\$1,887	\$1,887	\$1,887	\$9,285
	Kits	\$758	\$758	\$758	\$758	\$758	\$3,791
	Direct-Install Materials & Labor	\$567	\$572	\$559	\$544	\$510	\$2,753
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$8,089	\$8,366	\$8,671	\$8,929	\$9,192	\$43,248
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$5,046	\$5,161	\$5,016	\$4,920	\$4,769	\$24,912

	Marketing	\$1,603	\$1,488	\$1,634	\$1,730	\$1,878	\$8,333
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$6,649	\$6,649	\$6,650	\$6,650	\$6,647	\$33,245
Percent Incentives		55%	56%	57%	57%	58%	57%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential program offers incentives to customers in the residential, SCI, and LCI sectors. The Residential program accounts for 55.3% of the residential sector, 0.05% of the SCI sector, and 0.04% of the LCI sector spending exclusive of common cost allocation. SCI and LCI spending are attributed to measures rebated through the Residential program to master metered multifamily buildings.

Table 11. Residential Summary of EE&C Costs

Sector	EE&C Subprogram	Incentives	Cost Elements (\$)								Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
			Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM & V	AEPS Registration Support	Other (Describe)				
Residential	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$163	\$1,510,591
SCI	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
LCI	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
Sector Total	Residential Energy Efficiency	\$43,248,212	\$0	\$0	\$0	\$24,911,942	\$8,332,915	\$0	\$0	\$0	\$76,493,069	\$315	\$162	\$1,539,774

Cost Effectiveness

Table 12. Residential TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Subprogram	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
<i>Residential</i>	<i>PY18</i>	<i>1.00</i>	<i>0.93</i>	<i>\$8,089</i>	<i>\$47,656</i>	<i>\$6,649</i>	<i>\$62,393</i>	<i>\$15,882</i>	<i>\$31,653</i>	<i>\$10,180</i>	<i>\$0</i>	<i>\$57,715</i>	
<i>Residential</i>	<i>PY19</i>	<i>1.00</i>	<i>0.91</i>	<i>\$8,366</i>	<i>\$48,063</i>	<i>\$6,649</i>	<i>\$63,078</i>	<i>\$15,383</i>	<i>\$31,552</i>	<i>\$10,422</i>	<i>\$0</i>	<i>\$57,357</i>	
<i>Residential</i>	<i>PY20</i>	<i>1.00</i>	<i>0.77</i>	<i>\$8,671</i>	<i>\$58,374</i>	<i>\$6,650</i>	<i>\$73,695</i>	<i>\$15,376</i>	<i>\$30,815</i>	<i>\$10,777</i>	<i>\$0</i>	<i>\$56,968</i>	
<i>Residential</i>	<i>PY21</i>	<i>1.00</i>	<i>0.75</i>	<i>\$8,929</i>	<i>\$58,413</i>	<i>\$6,650</i>	<i>\$73,992</i>	<i>\$15,267</i>	<i>\$29,260</i>	<i>\$11,003</i>	<i>\$0</i>	<i>\$55,531</i>	
<i>Residential</i>	<i>PY22</i>	<i>1.00</i>	<i>0.74</i>	<i>\$9,192</i>	<i>\$58,452</i>	<i>\$6,647</i>	<i>\$74,292</i>	<i>\$14,917</i>	<i>\$29,034</i>	<i>\$11,269</i>	<i>\$0</i>	<i>\$55,220</i>	
<i>Residential Total</i>		<i>1.00</i>		<i>\$43,248</i>	<i>\$270,957</i>	<i>\$33,245</i>	<i>\$347,450</i>	<i>\$76,825</i>	<i>\$152,315</i>	<i>\$53,652</i>	<i>\$0</i>	<i>\$282,792</i>	

Table 13. Residential TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Subprogram	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
<i>Residential</i>	<i>PY18</i>	<i>0.655</i>	<i>0.88</i>	<i>\$8,089</i>	<i>\$28,435</i>	<i>\$6,649</i>	<i>\$43,173</i>	<i>\$10,406</i>	<i>\$20,739</i>	<i>\$6,670</i>	<i>\$0</i>	<i>\$37,815</i>	
<i>Residential</i>	<i>PY19</i>	<i>0.655</i>	<i>0.86</i>	<i>\$8,366</i>	<i>\$28,606</i>	<i>\$6,649</i>	<i>\$43,621</i>	<i>\$10,079</i>	<i>\$20,673</i>	<i>\$6,829</i>	<i>\$0</i>	<i>\$37,580</i>	
<i>Residential</i>	<i>PY20</i>	<i>0.655</i>	<i>0.74</i>	<i>\$8,671</i>	<i>\$35,257</i>	<i>\$6,650</i>	<i>\$50,577</i>	<i>\$10,074</i>	<i>\$20,190</i>	<i>\$7,061</i>	<i>\$0</i>	<i>\$37,325</i>	
<i>Residential</i>	<i>PY21</i>	<i>0.655</i>	<i>0.72</i>	<i>\$8,929</i>	<i>\$35,193</i>	<i>\$6,650</i>	<i>\$50,773</i>	<i>\$10,003</i>	<i>\$19,171</i>	<i>\$7,209</i>	<i>\$0</i>	<i>\$36,384</i>	
<i>Residential</i>	<i>PY22</i>	<i>0.655</i>	<i>0.71</i>	<i>\$9,192</i>	<i>\$35,128</i>	<i>\$6,647</i>	<i>\$50,968</i>	<i>\$9,774</i>	<i>\$19,023</i>	<i>\$7,383</i>	<i>\$0</i>	<i>\$36,180</i>	
<i>Residential Total</i>		<i>0.655</i>		<i>\$43,248</i>	<i>\$162,619</i>	<i>\$33,245</i>	<i>\$239,112</i>	<i>\$50,336</i>	<i>\$99,797</i>	<i>\$35,153</i>	<i>\$0</i>	<i>\$185,285</i>	

Summary of Benchmarking Results

As part of its Phase V program design, PECO conducted benchmarking against comparable utilities to validate its program allocation strategy. This process helped determine that the budget distribution between residential and non-residential sectors, as well as the contribution of each sector toward overall savings, was both practical and aligned with achieving mandated targets.

Engagement of Different Housing and Ownership Types

PECO's Phase V strategy includes targeted outreach and tailored program design to engage diverse housing and ownership types, including multifamily properties and rental units. PECO and its CSPs will leverage partnerships with property managers, landlords, and community organizations to overcome common participation barriers and facilitate equitable access to energy efficiency offerings.

Other Information Deemed Appropriate

Refer to Section 9.1.4 for information about the hybrid heat pump load shifting pilot that will be implemented through the residential CSP.

Residential HER Program (2026-2031)

The Residential HER program is divided into two subprograms, one for market-rate customers and one for low-income customers. This section describes the Residential (market rate) HER subprogram, while Section 3.2.1 describes the Low-Income HER subprogram.

Objectives

The Residential HER program's objective is to reduce a home's energy use through HERs and access to online tools where customers can view various aspects of their energy use over time. This program leverages the power of social norms and education "coaching" to drive persistent energy savings through smart energy practices.

Target Market

The eligible population and target market include PECO residential electric customers that do not qualify as low-income. At the time of this Plan development, the Residential market size includes approximately 1,400,000 customers.

Program Description

The Residential HER program involves regularly delivering direct mail or emailed HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations based on customers' specific energy-usage patterns and characteristics. HERs will include marketing opportunities for cross-selling other Phase V energy efficiency programs.

In addition to the information presented on the mailed or emailed HERs, all customers can log onto PECO's website to view their energy usage (energy costs, energy use, neighbor

comparison). The website will also help customers determine what technologies use the most energy in their homes, provide information on how to save energy, and enable sign up for energy usage alerts and notifications. The purpose of the website is to encourage customers to learn more about PECO's energy efficiency programs and help them take action to save energy.

The Residential HER program may also include the following enhanced offerings:

- **Peak Demand Reduction Education:** The CSP would provide weekly emails to a sample of customers detailing how to shift their energy usage to off-peak times (and why it matters). Communications would include an initial welcome email, weekly emails to compare performance against the previous week, post-bill reports, and seasonal change information.
- **Rate Education:** For eligible non-TOU customers, the CSP would promote the adoption of the TOU rates by educating customers about their rate options, providing personalized estimated monthly and annual costs on each rate option, and helping them understand the benefits of TOU rates.

Program Components

The Residential HER program does not contain any components.

Coordination of Participation in other Act 129 programs

HERs will include marketing opportunities for cross-promoting other PECO Phase V Act 129 programs.

Implementation Strategy

The Residential HER program will be implemented by a CSP. The CSP will deliver and manage the website platform and direct mail or digital HERs to customers. HER program participants are grouped in waves, or cohorts. The CSP will launch new waves in addition to maintaining the legacy waves launched prior to Phase V. In Phase V, HER waves will have a multi-year measure life after the first year of deployment for energy and coincident peak demand savings. Savings will persist with a prescribed decay rate during the second year of deployment or later. The CSP will manage participation waves throughout Phase V to address measure life and persistence in accordance with the multiyear measure life framework and PECO's goals.

Program Issues and Risks and Risk Mitigation

The Residential HER program will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, and program resource allocation) to meet the portfolio level targets. As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential HER program have anticipated costs of \$0 for Phase V.

Ramp-Up Strategy

A minimal ramp up will be needed for the Residential HER program because this program is already operating in Phase IV. A longer ramp-up would be needed for the Peak Demand and Rate Education pieces, as they are new customer experiences.

Marketing Strategy

The Residential HER program participants are selected by PECO; customers cannot subscribe themselves. Therefore, there is no marketing of the program to encourage participation.

Eligible Measures and Incentive Strategy

The program measure is the delivery of direct mail or digital HERs to customers. Customers are selected for the program and can choose to opt-out at any time. No incentives are paid to the customers.

Table 14. HER Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Home Energy Reports	per home	No	Yes	Phase V TRM	-	4 ²²	-

²² HER savings experience 31.3% annual decay as outlined in the 2026 TRM and calculated from the [Addendum to Act 129 Home Energy Report Persistence Study](#) - Dated November 2018.

Basis for the Proposed Incentive Levels

Rebates are not applicable to the Residential HER program.

Maximum Deadlines for Rebates

Rebates are not applicable to the Residential HER program.

Key Schedule Milestones

The planned implementation schedule follows:

March 2026: PECO and the CSP will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems are in place, and that the randomization of new customers has been reviewed .

- **June 1, 2026:** The program will launch.
- **June 2026–May 2031:** Program will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2026:** Last day of the Phase V program.

Assumed EM&V

The evaluation methodology and data collection proposed for the program are consistent with current EM&V practices for PECO's Phase IV programs. The EM&V requirements for this program conform to all applicable state protocols, including the SWE Evaluation Framework and the Pennsylvania TRM. PECO follow the SWE's Evaluation Framework, utilize a SWE-approved Phase V evaluation plan, and utilize an independent evaluator to verify all Plan-related savings and confirm that there is no double-counting of savings for programs that leverage outside funding. Metrics for monitoring program success include, but are not limited to:

- Customer satisfaction with the program
- Energy savings associated with customer behavior change
- Program implementation costs
- Data for evaluating the program will come from the following sources:
 - Tracking system data
 - TRM estimates of measure savings persistence
 - Surveys of customers who participate in the program
 - Program implementer and PECO staff surveys or interviews
 - Evaluation of billing data
 - Program impacts will be determined using a customer billing data and billing regression analysis.

Evaluating program process success and efficiency across program delivery, administration, implementation, and customer response, includes the following strategies:

- Interviews with utility staff, implementation staff, and customers
- Survey of program participants
- Assess customer understanding, satisfaction, and attitudes about the program

See Section 6 for more details about market and process evaluations.

Administrative Requirements

PECO will administer the program through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections and Estimated Participation

Table 15. HER Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Home Energy Reports</i>	2.7.3	Energy Savings (MWh)	24,698	36,636	26,807	28,172	26,236	142,549
		Summer Demand Reduction (MW)	4.2	10.5	7.9	6.7	5.9	35.3
		Winter Demand Reduction (MW)	3.8	8.3	6.4	5.9	4.7	29.1
		Projected Participation	456,000	389,100	401,000	383,400	469,900	469,900

Estimated Program Budget (Total) by Year
Table 16. HER Program Budget

Subprogram Name:		HER					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Percent Incentives		0%	0%	0%	0%	0%	0%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential HER program participates in the residential sector. The Residential HER program accounts for 10.2% of residential sector spending exclusive of common cost allocation.

Table 17. HER Summary of EE&C Costs

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other (Description)				
Residential Portfolio	HER	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512

Cost Effectiveness

Table 18. HER TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)					TRC Benefits By Program Per Year (\$000)					
	Subprogram	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
HER	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622	
HER	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692	
HER	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631	
HER	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801	
HER	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116	
<i>HER Total</i>		1.00		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862	

Table 19. HER TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Subprogram	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
HER	PY18	1.000	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622	
HER	PY19	1.000	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692	
HER	PY20	1.000	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631	
HER	PY21	1.000	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801	
HER	PY22	1.000	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116	
HER Total		1.000		\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862	

Summary of Benchmarking Results

As mentioned earlier in this section, PECO conducted benchmarking against similar utilities to inform its budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

For the Residential HER program, PECO will continue to engage existing customers and build on the program success achieved in Phase IV.

Other Information Deemed Appropriate

Not applicable.

3.2.1 Residential Low-Income Sub-Sector Programs

The Residential program and Residential HER program both include low-income subprograms. These subprograms are described below.

Residential Low-Income Subprogram Components (2026-2031)

Objectives

All Residential customers, including Residential Low-Income customers, will have access to all components included in the Residential Program described in Section 3.2.

The objective of the Residential Low-Income subprogram is to increase energy efficiency and address health and safety barriers for low-income customers in single family homes. The subprogram will also serve low-income customers in multifamily buildings in which 66% of occupants have a household income of less than or equal to 150% of the federal poverty level. PECO will meet this objective by:

Aiming to reduce household energy costs for residential customers with a household income less than or equal to 150% of federal poverty level.

Delivering no-cost in-home energy assessments and direct-install measures to help customers identify and implement energy savings opportunities.

Targeting high-impact, low-income multifamily sites for complementary direct-install projects and comprehensive retrofits with more favorable incentives.

Addressing health and safety barriers in single family low-income homes to enable installation of energy efficiency measures and improve overall comfort and well-being. PECO has allocated \$3,000,000 for health and safety measures for low-income customers.

Target Market

- **Low-Income Single Family:** Includes PECO residential electric customers that are individually metered, regardless of building type, with a household income of less than or equal to 150% of the federal poverty level. This customer population includes low-income customers living in single family housing or low-income customers living in multifamily housing that are individually metered. While these customers have similar

usage patterns to non-low-income customers, homes may be more likely to need health and safety improvements prior to energy efficiency measure installation. When implementing components for low-income customers, the CSP will incorporate health and safety measures into the component offerings.

- **Owner-Occupied:** Marketing and outreach will emphasize building performance, bill savings, and comfort improvements. The CSP will leverage successful marketing channels to promote upgrades such as weatherization, HVAC replacement, and smart controls.
- **Renter-Occupied:** Engagement will be focused on direct benefits (comfort, energy savings, safety) while coordinating with landlords for approval of comprehensive upgrades, when appropriate. The CSP will use simplified landlord permission forms, text-based communication options, and targeted digital campaigns within rental listings and community networks for customer acquisition.
- **Low-Income Multifamily:** Includes PECO residential customers who reside in buildings that have more than one unit and at least 66% of the occupants have a household income of less than or equal to 150% of the federal poverty level. This includes the following types of customers:
 - **Building Owners and Property Managers:** The CSP will conduct proactive outreach through property-management associations, housing authorities, and other stakeholders. PECO and the CSP recognize the need to address the split incentive for property owners, managers, and tenants and will position energy upgrades as financial tools that enhance asset value and tenant retention.
 - **Renters and Tenants:** Multilingual and demographically targeted outreach will be deployed through community partners, onsite events, and resident engagement that emphasizes tenant comfort, safety, and ease of participation. Trained energy advisors will coordinate access and scheduling to minimize disruption.

Program Description

The Residential Low-Income subprogram components are designed to offer PECO's low-income customers meaningful opportunities to save energy. For additional detail concerning the program's comprehensive design and delivery, please see Section 3.1.7.

The following section contains detailed descriptions of program components.

Program Components

The Residential Low-Income subprogram components include:

- **Low-Income Single Family:** Enhances energy efficiency in single family homes for eligible customers, reducing electric bills and increasing comfort. All measures are fully subsidized. Offers free energy checkups, either in person or virtual, that include a home inspection, energy usage analysis, direct-install measures, and an energy education session, followed by a custom report. Also provides free electric heating assessments, which add air flow diagnostics, infrared testing, building analysis, and combustion safety

checks when appropriate. Units in individually metered multifamily buildings are served through this component as well.

- **Appliance Recycling:** Offers responsible recycling of refrigerators, freezers, dehumidifiers, and room AC units via drop-off locations/events or pick-ups. Encourages participation in other Residential programs.
- **New Construction:** Promotes building affordable housing that is more comfortable, durable, and energy efficient than those built to code. Collaborates with HERS raters and builders during the design and construction phases to achieve greater energy efficiency.
- **DLS:** Delivers peak demand reduction on non-holiday weekdays in summer (June through August) and winter (January and February) by shifting load from on-peak to off-peak hours. This component may incorporate controllable loads (e.g., smart thermostats, EV managed charging, battery storage, water heaters) and behavioral measures, which may include TOU rates for eligible PECO customers.
- **Multifamily:** Provides in-unit and common area upgrades in multifamily buildings that are master metered, and common areas in individually metered multifamily buildings.

Coordination of Participation in other Act 129 programs

See Section 3.2.

Implementation Strategy

The Residential CSP will administer the Residential Low-Income subprogram components with a team of partners that have a proven record of providing the services offered in this program. The implementation strategy will vary by program component:

Low-Income Single Family: The CSP will offer two appointment types for customers:

- **Free Energy Checkups** include an in-depth inspection of the home, energy use analysis and recommendations, direct-install measures, and an energy education session followed by a customer report and education materials.
- **Free Energy Check Up Plus Assessments** will include all elements of the Free Energy Checkup and will incorporate an in-depth building science approach that mirrors PECO LIURP and meets BPI standards. The assessment will include air flow diagnostics, infrared testing, building analysis, and combustion safety checks when appropriate.

Appliance Recycling: The CSP will offer appliance drop off events at locations designated by local townships for compact refrigerators, room air conditioners, and dehumidifiers. An additional option will be available for customers to drop off regular household sized refrigerators and freezers at a designated location.

- **New Construction:** The new construction component will be implemented similar to Phase IV, working through new home builders and Home Energy Raters. The CSP will target outreach within low-income communities by partnering with affordable housing developers, community-based organizations, and local stakeholders.

DLS: The CSP will offer three participation channels to customers. Customers are eligible to enroll devices in one or multiple channels:

Managed EV Charging to shift residential EV charging to off-peak periods. The CSP will leverage a network of OEM partner integrations to recruit and enroll customers in this offering.

Thermostat Optimization to enable ongoing remote adjustment of smart thermostat to reduce HVAC use during demand windows. The CSP will leverage partnerships with device manufacturers and service providers to target potential participants. Enrolled customers will have the option to opt out of load shifting events at any time.

- A BYO offering that will discharge batteries to lower grid demand during peak periods. The offerings will enroll existing residential battery systems to leverage existing infrastructure rather than providing incentives for new battery installation.
- **Multifamily:** The CSP will engage property managers and tenants to perform both in unit and common area upgrades in multifamily buildings. The CSP will provide free assessments, direct-install measures, and training to facility staff about the process and measures to be installed in the building. The CSP will help building owners and operators understand the impacts of proposed measures, including demand, energy use, and non-energy benefits.

Program Issues and Risks and Risk Mitigation

In addition to the program issues and risks and risk mitigation described in Section 3.2, PECO anticipates potential risks concerning changes to federal program funding for low-income programs including LIHEAP and WAP. As additional guidelines and risks present themselves, PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Residential Low-Income subprogram have anticipated costs of \$0 for Phase V after incentives.

Ramp-Up Strategy

Minimal ramp up will be needed for the Residential Low-Income subprogram components because the Single Family, New Construction, and Appliance Recycling components are already operating in Phase IV.

For the DLS component, PECO and the CSP will work to enroll customers with existing measures in the program to claim savings for the peak summer demand period that begins shortly after the start of Phase V. These efforts will include reaching out to individuals who have previously received load shifting measures, such as connected smart thermostats.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. Marketing strategies will vary by component. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Residential Low-Income subprogram components.

Low-Income Single Family: Emails, direct mail, outbound calls, social media and digital ads, direct engagement at food banks, social service centers, and community events

Appliance Recycling: Emails, bill inserts, social media, cross-promotions with municipal recycling events

New Construction: Direct builder outreach, education events and partnerships with trusted associations (i.e., home building associations, housing authorities, community developers), and technical assistance, case studies, and collaboration with manufacturers

DLS: Co-branded marketing (i.e., thermostats and EV batteries) with device manufacturers featuring email, web, and in-app messaging; bill inserts; and newsletters

Eligible Measures and Incentive Strategy

The measure mix includes a comprehensive mix of end-use technologies such as lighting, HVAC (heat pump, ductless mini-splits, central ACs), appliances, shell (attic insulation, air sealing), duct sealing and insulation, water heating (heat pump water heaters), and plug loads. All measures will be 100% subsidized and offered to homeowners and tenants with landlord approval. All direct installation measures are at no cost for Low-Income multifamily and confirmed Low-Income Multifamily buildings are eligible to receive more favorable incentives for comprehensive projects.

Table 20. Residential Low-Income Subprogram Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Dehumidifier Retirement	per dehumidifier	Yes	Yes	Phase V TRM	\$10.00	4	\$0.00 - \$10.00
Low-Capacity Refrigerator / Freezer Recycling without Replacement	per refrigerator/freezer	Yes	Yes	Phase V TRM	\$50.00	5	\$0.00 - \$50.00
Refrigerator / Freezer Recycling with and without Replacement	per refrigerator	Yes	Yes	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Room AC (RAC) Retirement	per room A/C	Yes	Yes	Phase V TRM	\$10.00	3	\$0.00 - \$10.00
Low-Flow Faucet Aerators: Kit	per aerator	Yes	Yes	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Kit	per showerhead	Yes	Yes	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Refrigerator / Freezer Recycling - LIURP & WRx	per refrigerator	Yes	Yes	Phase V TRM	\$170.00	6	\$0.00 - \$170.00
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)	per fixture	Yes	Yes	Phase V TRM	\$4.40	2	\$0.00 - \$4.40
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))	per fixture	Yes	Yes	Phase V TRM	\$6.41	2	\$0.00 - \$6.41
Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)	per fixture	Yes	Yes	Phase V TRM	\$7.08	2	\$0.00 - \$7.08
LED and Electroluminescent Nightlights	per nightlight	Yes	Yes	Phase V TRM	\$3.25	8	\$0.00 - \$3.25
Low-Flow Faucet Aerators: Direct install	per aerator	Yes	Yes	Phase V TRM	\$23.98	10	\$0.00 - \$23.98
Low-Flow Showerheads: Direct install	per showerhead	Yes	Yes	Phase V TRM	\$65.37	10	\$0.00 - \$65.37
Thermostatic Shower Restriction Valves	per water heater	Yes	Yes	Phase V TRM	\$42.00	15	\$0.00 - \$42.00
Water Heater Pipe Insulation	per water heater	Yes	Yes	Phase V TRM	\$59.80	11	\$0.00 - \$59.80

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Water Heater Tank Wrap	per tank	Yes	Yes	Phase V TRM	\$89.14	7	\$0.00 - \$89.14
Water Heater Temperature Setback	per water heater	Yes	Yes	Phase V TRM	\$22.47	2	\$0.00 - \$22.47
Advanced Power Strips	per advanced power strip	Yes	Yes	Phase V TRM	\$60.00	5	\$0.00 - \$60.00
ENERGY STAR Certified Connected Thermostats	per thermostat	Yes	Yes	Phase V TRM	\$300.00	9	\$0.00 - \$300.00
High Efficiency Equipment: ASHP	per unit	Yes	Yes	Phase V TRM	\$16,000.00	15	\$0.00 - \$16,000.00
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install	per heat pump	Yes	Yes	Phase V TRM	\$10,000.00	15	\$0.00 - \$10,000.00
Room Air Conditioners	per room A/C	Yes	Yes	Phase V TRM	\$600.00	9	\$0.00 - \$600.00
Air Conditioner & Heat Pump Maintenance	per unit	Yes	Yes	Phase V TRM	\$350.00	3	\$0.00 - \$350.00
Duct Sealing & Duct Insulation	per home	Yes	Yes	Phase V TRM	\$600.00	15	\$0.00 - \$600.00
Residential Air Sealing	per home	Yes	Yes	Phase V TRM	\$449.64	15	\$0.00 - \$449.64
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic	per home	Yes	Yes	Phase V TRM	\$1,800.00	15	\$0.00 - \$1,800.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation	per home	Yes	Yes	Phase V TRM	\$660.00	15	\$0.00 - \$660.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation	per home	Yes	Yes	Phase V TRM	\$700.00	15	\$0.00 - \$700.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation	per home	Yes	Yes	Phase V TRM	\$1,800.00	15	\$0.00 - \$1,800.00
Basement or Crawl Space Wall Insulation	per home	Yes	Yes	Phase V TRM	\$550.00	15	\$0.00 - \$550.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
ENERGY STAR Air Purifiers - Direct Install LI & MF	per air purifier	Yes	Yes	Phase V TRM	\$300.00	9	\$0.00 - \$300.00
Heat Pump Water Heaters	per water heater	Yes	Yes	Phase V TRM	\$3,600.00	10	\$0.00 - \$3,600.00
Health & Safety	per audit	Yes	No	Phase V TRM	\$1,000.00	1	\$0.00 - \$1,000.00
Health & Safety - Devices	per audit	Yes	No	Phase V TRM	\$50.00	1	\$0.00 - \$50.00
Advanced Power Strips: Kit	per advanced power strip	Yes	Yes	Phase V TRM	\$40.07	5	\$0.00 - \$40.07
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket: Kit	per gasket	Yes	Yes	Phase V TRM	\$3.58	15	\$0.00 - \$3.58
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep: Kit	per door	Yes	Yes	Phase V TRM	\$26.00	15	\$0.00 - \$26.00
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping: Kit	per door	Yes	Yes	Phase V TRM	\$56.00	15	\$0.00 - \$56.00
Smart Water Heater Controls	per water heater controller	Yes	Yes	Phase V TRM	\$155.99	11	\$0.00 - \$155.99
ENERGY STAR Air Purifiers	per air purifier	Yes	Yes	Phase V TRM	\$66.03	9	\$0.00 - \$66.03
ECM Circulation Fans	per fan	Yes	Yes	Phase V TRM	\$352.79	5	\$0.00 - \$352.79
High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump	per heat pump	Yes	Yes	Phase V TRM	\$378.96	15	\$0.00 - \$378.96
Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket	per gasket	Yes	Yes	Phase V TRM	\$35.84	15	\$0.00 - \$35.84
Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep - LIURP & WRx	per door	Yes	Yes	Phase V TRM	\$26.00	15	\$0.00 - \$26.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping - LIURP & WRx	per door	Yes	Yes	Phase V TRM	\$56.00	15	\$0.00 - \$56.00
WH LI > 10% UBC \$0.40/kWh	per home	Yes	Yes	Phase V TRM	\$1,100.00	15	\$0.00 - \$1,100.00
LED Exit Signs	per sign	Yes	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
Lighting Retrofits - Other Interior Fixtures	per fixture	Yes	No	Phase V TRM	\$80.00	15	\$0.00 - \$80.00
Lighting Retrofits - Outdoor floods	per fixture	Yes	No	Phase V TRM	\$123.81	15	\$0.00 - \$123.81
Lighting Retrofits - Parking Garage	per fixture	Yes	No	Phase V TRM	\$120.00	15	\$0.00 - \$120.00
Lighting Retrofits - Parking Lot	per fixture	Yes	No	Phase V TRM	\$129.00	15	\$0.00 - \$129.00
Lighting: Permanent Fixture Removal	per fixture	Yes	No	Phase V TRM	\$60.00	11	\$0.00 - \$60.00
Linear LED: Lamp Replacement	per lamp	Yes	No	Phase V TRM	\$15.00	15	\$0.00 - \$15.00
Linear LED: Retrofit Fixture, surface mount	per fixture	Yes	No	Phase V TRM	\$150.00	15	\$0.00 - \$150.00
Linear LED: Retrofit Fixture, troffer	per fixture	Yes	No	Phase V TRM	\$250.00	15	\$0.00 - \$250.00
Linear LED: Retrofit Fixture, troffer	per fixture	Yes	No	Phase V TRM	\$55.00	15	\$0.00 - \$55.00
Occupancy Sensor	per sensor	Yes	No	Phase V TRM	\$1,571.00	8	\$0.00 - \$1,571.00
HVAC Systems: PTAC	per PTAC	Yes	Yes	Phase V TRM	\$2,094.00	15	\$0.00 - \$2,094.00
HVAC Systems: PTHP	per PTHP	Yes	Yes	Phase V TRM	\$23.06	15	\$0.00 - \$23.06
Connected Smart Thermostat	per unit	Yes	No	Phase V TRM	\$50.00	1	\$0.00 - \$50.00
Bring Your Own Thermostat (Enrollment Incentive)	per unit	Yes	No	Phase V TRM	\$35.50	1	\$0.00 - \$35.50
Bring Your Own Thermostat	per unit	Yes	No	Phase V TRM	\$4,792.32	1	\$0.00 - \$4,792.32
ASHRAE Level 2 Audit	per audit	Yes	No	Phase V TRM	\$11.20	1	\$0.00 - \$11.20

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam	per can	Yes	Yes	Phase V TRM	\$2,133.95	15	\$0.00 - \$2,133.95
Residential New Construction	per home	Yes	Yes	Phase V TRM	\$1,984.87	15	\$0.00 - \$1,984.87
ENERGY STAR Manufactured Homes	per home	Yes	Yes	Phase V TRM	\$11.20	15	\$0.00 - \$11.20
Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam: Kit	per can	Yes	Yes	Phase V TRM	\$350.00	15	\$0.00 - \$350.00
Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Kneewall Insulation	per home	Yes	Yes	Phase V TRM	\$42.88	15	\$0.00 - \$42.88
Lighting Retrofits - Low Bays	per fixture	Yes	No	Phase V TRM	\$31.94	15	\$0.00 - \$31.94
Lighting Retrofits - High Bays	per fixture	Yes	No	Phase V TRM	\$10.00	15	\$0.00 - \$10.00
Time of Use (TOU) Rates	per household	No	No	Phase V TRM	\$0.00	1	\$0.00 - \$25.00

To maximize opportunities for customer energy savings, PECO reserves the right to offer no-cost installation of additional measures that are not listed Table 20 but are identified in the TRM.

Basis for the Proposed Incentive Levels

All measures will be 100% subsidized and offered to homeowners and tenants with landlord approval. All direct installation measures are at no cost for Low-Income multifamily and confirmed Low-Income Multifamily buildings are eligible to receive more favorable incentives for comprehensive projects.

Maximum Deadlines for Rebates

As Residential Low-Income subprogram direct-installation measures are provided at no charge, an application deadline is not applicable to this subprogram.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

If PECO meets the low-income carve-out before the end of the phase, PECO will continue to implement the Residential Low-Income subprogram components after meeting its low-income carve-out subject to the Commission-approved budget for the program.

Assumed EM&V

See Residential Program Assumed EM&V in Section 3.2.

Administrative Requirements

PECO will administer the Residential Low-Income subprogram components through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections

Table 21. Residential Low-Income Subprogram Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Dehumidifier Retirement</i>	2.4.12	Energy Savings (MWh) ²	20	20	21	22	17	100
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	20	20	21	22	17	100
<i>Low-Capacity Refrigerator / Freezer Recycling without Replacement</i>	2.4.4	Energy Savings (MWh) ²	2	2	2	2	1	9
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	6	6	6	7	5	30
<i>Refrigerator / Freezer Recycling with and without Replacement</i>	2.4.3	Energy Savings (MWh) ²	210	216	227	238	188	1,079
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	268	275	289	303	240	1,375
<i>Room AC (RAC) Retirement</i>	2.2.8	Energy Savings (MWh) ²	76	78	82	86	68	389
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	585	600	630	660	525	3,000
<i>Low-Flow Faucet Aerators: Kit</i>	2.3.6	Energy Savings (MWh) ²	755	755	755	755	755	3,777
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.2	0.2	1.1
		Projected Participation ³	48,002	48,002	48,002	48,002	48,002	240,010
<i>Low-Flow Showerheads: Kit</i>	2.3.7	Energy Savings (MWh) ²	404	404	404	404	404	2,021
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.3	0.3	0.3	0.3	1.2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	24,002	24,002	24,002	24,002	24,002	120,010
<i>Refrigerator / Freezer Recycling - LIURP & WRx</i>	2.4.3	Energy Savings (MWh) ²	314	314	314	314	314	1,570
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	400	400	400	400	400	2,000
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Standard)</i>	2.1.1	Energy Savings (MWh) ²	4,103	4,208	4,418	4,628	3,682	21,038
		Summer Demand Reduction (MW)	0.6	0.6	0.6	0.6	0.5	2.9
		Winter Demand Reduction (MW)	0.4	0.5	0.5	0.6	0.4	2.5
		Projected Participation ³	98,754	101,285	106,350	111,414	88,625	506,428
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Decorative: non-globe (e.g., candelabra))</i>	2.1.1	Energy Savings (MWh) ²	638	654	687	719	572	3,269
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.2	0.2	1.0
		Projected Participation ³	19,566	20,068	21,072	22,075	17,559	100,340
<i>Residential LED Lighting: ENERGY STAR Screw-in LED Bulb (Directional/Reflector)</i>	2.1.1	Energy Savings (MWh) ²	475	487	512	536	426	2,436
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	10,802	11,078	11,632	12,186	9,694	55,392
<i>LED and Electroluminescent Nightlights</i>	2.1.3	Energy Savings (MWh) ²	5	5	6	6	5	27
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1,306	1,339	1,407	1,473	1,172	6,697
<i>Low-Flow Faucet Aerators: Direct install</i>	2.3.6	Energy Savings (MWh) ²	319	327	342	357	290	1,634
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	5,682	5,816	6,081	6,347	5,152	29,078
<i>Low-Flow Showerheads: Direct install</i>	2.3.7	Energy Savings (MWh) ²	225	229	238	246	208	1,147
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	3,476	3,540	3,674	3,805	3,211	17,706
<i>Thermostatic Shower Restriction Valves</i>	2.3.8	Energy Savings (MWh) ²	15	15	16	16	13	75
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	504	516	541	565	456	2,582
<i>Water Heater Pipe Insulation</i>	2.3.5	Energy Savings (MWh) ²	887	908	948	989	806	4,538
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Projected Participation ³	2,092	2,140	2,236	2,332	1,900	10,700
<i>Water Heater Tank Wrap</i>	2.3.3	Energy Savings (MWh) ²	0	0	0	0	0	1
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	2	2	2	2	2	10
<i>Water Heater Temperature Setback</i>	2.3.4	Energy Savings (MWh) ²	28	29	30	32	25	144
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	391	401	421	441	351	2,005
<i>Advanced Power Strips</i>	2.5.1	Energy Savings (MWh) ²	52	54	57	59	47	269
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2	0.2	0.2	0.2	0.6

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	597	612	644	673	536	3,062
<i>ENERGY STAR Certified Connected Thermostats</i>	2.2.12	Energy Savings (MWh) ²	119	121	125	128	112	606
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.6	0.6	0.6	0.6	2.4
		Projected Participation ³	324	329	339	348	305	1,645
<i>High Efficiency Equipment: ASHP</i>	2.2.1	Energy Savings (MWh) ²	104	105	111	116	93	530
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.6
		Projected Participation ³	85	86	91	95	76	433
<i>High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump - IE Direct Install</i>	2.2.3	Energy Savings (MWh) ²	36	37	39	41	33	185
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	42	43	45	48	38	216
<i>Room Air Conditioners</i>	2.2.7	Energy Savings (MWh) ²	28	28	28	28	28	139
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1,101	1,101	1,101	1,101	1,101	5,505
<i>Air Conditioner & Heat Pump Maintenance</i>	2.2.6	Energy Savings (MWh) ²	114	115	117	120	108	574
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.4
		Projected Participation ³	361	365	373	381	345	1,825
<i>Duct Sealing & Duct Insulation</i>	2.2.10	Energy Savings (MWh) ²	2	2	2	2	2	11
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	8	8	8	8	7	39
<i>Residential Air Sealing</i>	2.6.1	Energy Savings (MWh) ²	659	663	670	679	643	3,313
		Summer Demand Reduction (MW)	0.3	0.3	0.3	0.3	0.3	1.5
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Projected Participation ³	1,191	1,198	1,212	1,227	1,162	5,990
<i>Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Ceiling/Attic</i>	2.6.3	Energy Savings (MWh) ²	381	390	408	424	348	1,951
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.2	0.2	0.9
		Projected Participation ³	214	219	229	238	195	1,095
<i>Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Floor Insulation</i>	2.6.3	Energy Savings (MWh) ²	68	71	74	78	62	353
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	62	64	67	71	56	320
<i>Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Rim Joist Insulation</i>	2.6.3	Energy Savings (MWh) ²	32	33	34	37	29	165
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	62	64	67	71	56	320
<i>Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Wall Insulation</i>	2.6.3	Energy Savings (MWh) ²	11	12	12	13	10	57
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	12	13	13	14	11	63
<i>Basement or Crawl Space Wall Insulation</i>	2.6.4	Energy Savings (MWh) ²	1	1	1	1	1	5
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	1	1	1	1	1	5
<i>ENERGY STAR Air Purifiers - Direct Install LI & MF</i>	2.4.14	Energy Savings (MWh) ²	2,021	2,073	2,177	2,281	1,814	10,367
		Summer Demand Reduction (MW)	0.2	0.3	0.3	0.3	0.2	1.3
		Winter Demand Reduction (MW)	0.3	0.3	0.3	0.4	0.3	1.7
		Projected Participation ³	6,964	7,142	7,500	7,858	6,250	35,714
<i>Heat Pump Water Heaters</i>	2.3.1	Energy Savings (MWh) ²	780	783	792	801	762	3,918
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	0.1	0.3	0.3	0.3	0.3	1.2
		Projected Participation ³	434	436	441	446	424	2,181
<i>Health & Safety</i>	Audit02	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	390	400	420	440	350	2,000
<i>Health & Safety - Devices</i>	Audit02	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	3,900	4,000	4,200	4,400	3,500	20,000
<i>Advanced Power Strips: Kit</i>	2.5.1	Energy Savings (MWh) ²	1,786	1,786	1,786	1,786	1,786	8,928
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.0
		Winter Demand Reduction (MW)	0.3	0.5	0.5	0.5	0.5	2.4
		Projected Participation ³	24,001	24,001	24,001	24,001	24,001	120,005
<i>Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket: Kit</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	1	1	1	1	1	5
<i>Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep: Kit</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping: Kit</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Smart Water Heater Controls</i>	2.3.10	Energy Savings (MWh) ²	5	5	5	5	5	27
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	151	151	151	151	151	755
<i>ENERGY STAR Air Purifiers</i>	2.4.14	Energy Savings (MWh) ²	34	34	34	34	34	170
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.2
		Projected Participation ³	192	192	192	192	192	960
<i>ECM Circulation Fans</i>	2.2.4	Energy Savings (MWh) ²	2	2	2	2	2	11
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2	0.2	0.2	0.2	0.8
		Projected Participation ³	11	11	11	11	11	55
<i>High Efficiency Equipment: ENERGY STAR Most Efficient Ductless Mini-Split Heat Pump</i>	2.2.3	Energy Savings (MWh) ²	124	124	124	124	124	622
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.2	0.2	0.2	0.2	0.8

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	206	206	206	206	206	1,030
<i>Weather Stripping, Caulking, and Outlet Gaskets: Outlet Gasket</i>	2.6.2	Energy Savings (MWh) ²	7	7	7	7	7	33
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	1,100	1,100	1,100	1,100	1,100	5,500
<i>Weather Stripping, Caulking, and Outlet Gaskets: Door Sweep - LIURP & WRx</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	200	200	200	200	200	1,000
<i>Weather Stripping, Caulking, and Outlet Gaskets: Door Weatherstripping - LIURP & WRx</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	53	53	53	53	53	265
<i>WH LI > 10% UBC \$0.40/kWh</i>	2.7.1	Energy Savings (MWh) ²	300	300	300	300	300	1,500
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	1.2
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Projected Participation ³	400	400	400	400	400	2,000
<i>LED Exit Signs</i>	3.1.4	Energy Savings (MWh) ²	38	39	41	43	34	194
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	131	135	142	149	118	675
<i>Lighting Retrofits - Other Interior Fixtures</i>	3.1.1	Energy Savings (MWh) ²	46	47	50	52	42	237
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	3.1	3.4	3.1	2.6	12.1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	211	216	227	238	189	1,081
<i>Lighting Retrofits - Outdoor floods</i>	3.1.1	Energy Savings (MWh) ²	158	162	170	178	142	809
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	1.6	0.9	0.9	0.9	4.4
		Projected Participation ³	264	270	284	297	237	1,352
<i>Lighting Retrofits - Parking Garage</i>	3.1.1	Energy Savings (MWh) ²	57	59	62	65	52	295
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	79	81	85	90	72	407
<i>Lighting Retrofits - Parking Lot</i>	3.1.1	Energy Savings (MWh) ²	170	174	183	192	153	873
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.1	0.0	0.2
		Projected Participation ³	264	270	284	297	237	1,352
<i>Lighting: Permanent Fixture Removal</i>	3.1.1	Energy Savings (MWh) ²	933	957	1,005	1,053	837	4,786
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.2	0.1	0.7
		Projected Participation ³	2,628	2,695	2,830	2,965	2,358	13,476
<i>Linear LED: Lamp Replacement</i>	3.1.1	Energy Savings (MWh) ²	130	133	140	147	117	666
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	3,942	4,043	4,245	4,447	3,538	20,215
<i>Linear LED: Retrofit Fixture, surface mount</i>	3.1.1	Energy Savings (MWh) ²	47	48	50	53	42	239
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	264	270	284	297	237	1,352
<i>Linear LED: Retrofit Fixture, troffer</i>	3.1.1	Energy Savings (MWh) ²	68	70	74	77	61	351
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	264	270	284	297	237	1,352
<i>Occupancy Sensor</i>	3.1.3	Energy Savings (MWh) ²	8	8	9	9	7	42
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	66	68	72	75	59	340
<i>HVAC Systems: PTAC</i>	2.2.1	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	1	1	1	1	1	5
<i>HVAC Systems: PTHP</i>	2.2.1	Energy Savings (MWh) ²	116	123	123	123	116	600
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.2
		Projected Participation ³	33	35	35	35	33	171
<i>Connected Smart Thermostat</i>	LS002	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.1	0.2
		Winter Demand Reduction (MW)	0.1	2.0	2.1	2.2	2.4	8.8
		Projected Participation ³	945	1,011	1,081	1,157	1,238	5,432
<i>Bring Your Own Thermostat (Enrollment Incentive)</i>	LS001	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	100	-	-	-	-	100
<i>Bring Your Own Thermostat</i>	LS002	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	100	100	100	100	100	500
<i>ASHRAE Level 2 Audit</i>	Audit01	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	4	4	4	4	4	20
<i>Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Residential New Construction</i>	2.7.1	Energy Savings (MWh) ²	2	2	2	2	2	10
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>ENERGY STAR Manufactured Homes</i>	2.7.2	Energy Savings (MWh) ²	2	2	2	2	2	10
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Weather Stripping, Caulking, and Outlet Gaskets: Spray Foam: Kit</i>	2.6.2	Energy Savings (MWh) ²	0	0	0	0	0	0
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	1	1	1	1	1	5
<i>Ceiling/Attic, Wall, Floor and Rim Joist Insulation: Kneewall Insulation</i>	2.6.3	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Lighting Retrofits - Low Bays</i>	3.1.1	Energy Savings (MWh) ²	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	1	1	1	1	1	5
<i>Lighting Retrofits - High Bays</i>	3.1.1	Energy Savings (MWh) ²	1	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Winter Demand Reduction (MW)	0.0	5.3	5.5	4.8	4.4	20.0
		Projected Participation ³	1	1	1	1	1	5

Estimated Program Budget (Total) by Year

Table 22. Residential Low-Income Subprogram Budget

Program Name:		Residential Low-Income					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$10,870	\$11,028	\$11,394	\$11,754	\$10,160	\$55,207
Incentives (\$000)	Rebates	\$534	\$532	\$535	\$538	\$533	\$2,672
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$855	\$855	\$855	\$855	\$855	\$4,273
	Direct-Install Materials & Labor	\$6,442	\$6,589	\$6,926	\$7,256	\$5,787	\$33,000

	Braided Funding Support Labor	\$19	\$19	\$19	\$19	\$19	\$96
	Incentive Total	\$7,850	\$7,995	\$8,334	\$8,667	\$7,194	\$40,040
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,265	\$2,275	\$2,295	\$2,315	\$2,225	\$11,375
	Marketing	\$755	\$758	\$765	\$772	\$742	\$3,792
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$3,020	\$3,033	\$3,060	\$3,087	\$2,966	\$15,167
	Percent Incentives		77%	72%	72%	73%	74%

Estimated Percentage of Sector Budget Attributed to the Program

The Residential Low-Income subprogram components offer incentives to customers in the residential sector. The Residential Low-Income subprogram components account for 34.1% of residential sector spending, as well as 4.0% of SCI and 3.7% of LCI spending exclusive of common cost allocation

Table 23. Residential Low-Income Subprogram Summary of EE&C Costs

Sector	EE&C Subprogram	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM &V	AEPS Registration Support	Other (Describe)				
Residential (incl. Low-Income)	Low-Income Energy Efficiency	\$34,330,888	\$0	\$0	\$0	\$9,219,672	\$3,073,224	\$0	\$0	\$0	\$46,623,784	\$646	\$157	\$3,886,241
SCI	Low-Income Energy Efficiency	\$2,854,674	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574	\$472	\$23	\$3,400,476
LCI	Low-Income Energy Efficiency	\$2,854,674	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574	\$472	\$23	\$3,400,476
Sector Totals	Low-Income Energy Efficiency	\$40,040,235	\$0	\$0	\$0	\$11,375,022	\$3,791,674	\$0	\$0	\$0	\$55,206,931	\$621	\$138	\$3,816,976

Cost-Effectiveness

Table 24. Residential Low-Income Subprogram TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)					
	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Low-Income</i>	<i>PY18</i>	<i>1.00</i>	<i>1.37</i>	<i>\$7,850</i>	<i>\$3,176</i>	<i>\$3,020</i>	<i>\$14,047</i>	<i>\$3,467</i>	<i>\$13,312</i>	<i>\$2,477</i>	<i>\$0</i>	<i>\$19,257</i>
<i>Low-Income</i>	<i>PY19</i>	<i>1.00</i>	<i>1.37</i>	<i>\$7,995</i>	<i>\$3,174</i>	<i>\$3,033</i>	<i>\$14,202</i>	<i>\$3,292</i>	<i>\$13,638</i>	<i>\$2,530</i>	<i>\$0</i>	<i>\$19,460</i>
<i>Low-Income</i>	<i>PY20</i>	<i>1.00</i>	<i>1.36</i>	<i>\$8,334</i>	<i>\$3,124</i>	<i>\$3,060</i>	<i>\$14,519</i>	<i>\$3,301</i>	<i>\$13,777</i>	<i>\$2,612</i>	<i>\$0</i>	<i>\$19,691</i>
<i>Low-Income</i>	<i>PY21</i>	<i>1.00</i>	<i>1.31</i>	<i>\$8,667</i>	<i>\$3,080</i>	<i>\$3,087</i>	<i>\$14,834</i>	<i>\$3,254</i>	<i>\$13,550</i>	<i>\$2,699</i>	<i>\$0</i>	<i>\$19,503</i>
<i>Low-Income</i>	<i>PY22</i>	<i>1.00</i>	<i>1.27</i>	<i>\$7,194</i>	<i>\$3,261</i>	<i>\$2,966</i>	<i>\$13,421</i>	<i>\$2,748</i>	<i>\$11,787</i>	<i>\$2,548</i>	<i>\$0</i>	<i>\$17,083</i>
<i>Low-Income Total</i>		<i>1.00</i>		<i>\$40,040</i>	<i>\$15,816</i>	<i>\$15,167</i>	<i>\$71,023</i>	<i>\$16,063</i>	<i>\$66,064</i>	<i>\$12,867</i>	<i>\$0</i>	<i>\$94,994</i>

Table 25. Residential Low-Income Subprogram TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)					
	Program	Program Year ²	NTGR	Gross TRC	Incremental Measure Cost Paid by EDC	Incremental Measure Cost Paid by Participants	Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits
<i>Low-Income</i>	<i>PY18</i>	<i>1.000</i>	<i>1.37</i>	<i>\$7,850</i>	<i>\$3,176</i>	<i>\$3,020</i>	<i>\$14,047</i>	<i>\$3,467</i>	<i>\$13,312</i>	<i>\$2,477</i>	<i>\$0</i>	<i>\$19,257</i>
<i>Low-Income</i>	<i>PY19</i>	<i>1.000</i>	<i>1.37</i>	<i>\$7,995</i>	<i>\$3,174</i>	<i>\$3,033</i>	<i>\$14,202</i>	<i>\$3,292</i>	<i>\$13,638</i>	<i>\$2,530</i>	<i>\$0</i>	<i>\$19,460</i>
<i>Low-Income</i>	<i>PY20</i>	<i>1.000</i>	<i>1.36</i>	<i>\$8,334</i>	<i>\$3,124</i>	<i>\$3,060</i>	<i>\$14,519</i>	<i>\$3,301</i>	<i>\$13,777</i>	<i>\$2,612</i>	<i>\$0</i>	<i>\$19,691</i>
<i>Low-Income</i>	<i>PY21</i>	<i>1.000</i>	<i>1.31</i>	<i>\$8,667</i>	<i>\$3,080</i>	<i>\$3,087</i>	<i>\$14,834</i>	<i>\$3,254</i>	<i>\$13,550</i>	<i>\$2,699</i>	<i>\$0</i>	<i>\$19,503</i>
<i>Low-Income</i>	<i>PY22</i>	<i>1.000</i>	<i>1.27</i>	<i>\$7,194</i>	<i>\$3,261</i>	<i>\$2,966</i>	<i>\$13,421</i>	<i>\$2,748</i>	<i>\$11,787</i>	<i>\$2,548</i>	<i>\$0</i>	<i>\$17,083</i>
<i>Low-Income Total</i>		<i>1.000</i>		<i>\$40,040</i>	<i>\$15,816</i>	<i>\$15,167</i>	<i>\$71,023</i>	<i>\$16,063</i>	<i>\$66,064</i>	<i>\$12,867</i>	<i>\$0</i>	<i>\$94,994</i>

Summary of Benchmarking Results

As part of its Phase V program design, PECO conducted benchmarking against comparable utilities to validate its program allocation strategy. This process helped determine that the budget distribution between residential and non-residential sectors, as well as the contribution of each sector toward overall savings, was both practical and aligned with achieving mandated targets.

Engagement of Different Housing and Ownership Types

PECO's Phase V strategy includes targeted outreach and tailored program design to engage diverse housing and ownership types, including multifamily properties and rental units. PECO and its CSPs will leverage partnerships with property managers, landlords, and community organizations to overcome common participation barriers and facilitate equitable access to energy efficiency offerings. Additionally, PECO will implement focused marketing and incentive structures to reach historically underserved populations, aligning with Act 129 equity objectives and promoting broad participation across all customer segments.

Other Information Deemed Appropriate

Not applicable.

Residential Low-Income HER Subprogram (2026-2031)

The Residential HER Program includes a specified subprogram for low-income customers. Section 3.2 describes the Residential (market rate) HER program and the Low-Income HER subprogram is described below.

Objectives

The Low-Income HER subprogram objective is to reduce a home's energy use through HERs and online access where customers can view their home energy usage. This program leverages the power of social norming to drive persistent energy savings through smart energy practices.

Target Market

The eligible population and target market for the Low-Income HER subprogram includes all PECO residential electric customers with a household income of less than or equal to 150% of the federal poverty level.

Program Description

The Low-Income HER subprogram involves regularly delivering direct mail or digital HERs that motivate customers to act through contextualized energy-usage information, personal and neighborhood comparisons, and energy savings recommendations (including low- or no-cost tips) based on customers' specific energy-usage patterns and characteristics. HERs will include marketing opportunities for cross-selling other energy efficiency programs.

In addition to the information presented on the mailed or emailed HERs, customers can log onto PECO's website to view their energy usage (energy costs, energy use, neighbor comparison).

The website will also help customers determine what technologies use the most energy in their homes, provide information on how to save energy, and enable sign up for energy usage alerts and notifications. The website's purpose is to encourage customers to learn more about PECO's energy efficiency programs and help them take action to save energy.

The Low-Income HER subprogram will also include the following enhanced offerings:

- **Peak Demand Reduction Education:** The CSP will provide weekly emails to a sample of customers detailing how to shift their energy usage to off-peak times (any why it matters). Communications will include an initial welcome email, weekly emails to compare performance against the previous week, post-bill reports, and seasonal change information.
- **Rate Education:** For eligible non-TOU customers, the CSP will promote the adoption of the TOU rates by educating customers about their rate options, providing personalized estimated monthly and annual costs on each rate option, and helping them understand the benefits of TOU rates.

Program Components

The Low-Income HER subprogram does not contain any components.

Coordination of Participation in other Act 129 programs

See Section 3.2.

Implementation Strategy

A CSP will implement the Low-Income HER subprogram. The CSP will deliver direct mail or digital HERs to customers. It will also manage the website platform.

Program Issues and Risks and Risk Mitigation

The Low-Income HER subprogram will manage risks by implementing a continuous improvement process such that PECO closely monitors program results and adjusts implementation tactics (including marketing approaches, participation guidelines, and program resource allocation) to meet the portfolio level targets. As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Low-Income HER subprogram have anticipated costs of \$0 for Phase V.

Ramp-Up Strategy

Minimal ramp up will be needed for the Low-Income HER subprogram because this program is already operating in Phase IV.

Marketing Strategy

The Low-Income HER subprogram participants are selected by PECO; customers cannot subscribe themselves. Therefore, there is no marketing of the program to encourage participation.

Eligible Measures and Incentive Strategy

Table 26. Residential Low-Income HER Subprogram

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Low-Income Home Energy Reports	per home	Yes	Yes	Phase V TRM	-	4	-

Basis for the Proposed Incentive Levels

Rebates are not applicable to the Low-Income HER subprogram.

Maximum Deadlines for Rebates

Rebates are not applicable to the Low-Income HER subprogram.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.
- **June 1, 2026:** The program will launch.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

If PECO meets the low-income carve-out before the end of the phase, PECO will continue to implement the Low-Income HER subprogram after meeting its low-income carve-out subject to the Commission-approved budget for the Low-Income HER subprogram.

Assumed EM&V

See Residential HER Program Assumed EM&V in Section 3.2

Administrative Requirements

PECO will administer the Low-Income HER subprogram through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have six FTEs dedicated to the residential sector.

Savings Projections

Table 27. Residential Low-Income HER Subprogram Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Low-Income Home Energy Reports</i>	2.7.3	Energy Savings (MWh)	1,813	1,813	1,813	1,813	1,813	9,063
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Projected Participation	3,000	3,000	3,000	3,000	3,000	15,000

Estimated Program Budget (Total) by Year

Table 28. Residential Low-Income HER Subprogram Budget

Sub-Program Name:		Low-Income HER					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$172	\$91	\$95	\$85	\$81	\$524
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$172	\$91	\$95	\$85	\$81	\$524
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total	\$172	\$91	\$95	\$85	\$81	\$524	
Percent Incentives		0%	0%	0%	0%	0%	0%

Estimated Percentage of Sector Budget Attributed to the Program

The Low-Income HER program participates in the residential sector. The Low-Income HER program accounts for 0.4% of residential sector spending exclusive of common cost allocation.

Table 29. Residential Low-Income HER Subprogram Budget

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost (\$/MWh)	Levelized Cost (\$/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)	Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339

Cost-Effectiveness

Table 30. Residential Low-Income HER Subprogram TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)					
	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
Program				Paid by EDC	Paid by Participants							
<i>Low-Income</i>	<i>PY18</i>	<i>1.00</i>	<i>7.78</i>	<i>\$0</i>	<i>\$0</i>	<i>\$172</i>	<i>\$172</i>	<i>\$299</i>	<i>\$1,041</i>	<i>\$0</i>	<i>\$0</i>	<i>\$1,340</i>
<i>Low-Income</i>	<i>PY19</i>	<i>1.00</i>	<i>7.18</i>	<i>\$0</i>	<i>\$0</i>	<i>\$91</i>	<i>\$91</i>	<i>\$139</i>	<i>\$512</i>	<i>\$0</i>	<i>\$0</i>	<i>\$651</i>
<i>Low-Income</i>	<i>PY20</i>	<i>1.00</i>	<i>6.80</i>	<i>\$0</i>	<i>\$0</i>	<i>\$95</i>	<i>\$95</i>	<i>\$130</i>	<i>\$517</i>	<i>\$0</i>	<i>\$0</i>	<i>\$648</i>
<i>Low-Income</i>	<i>PY21</i>	<i>1.00</i>	<i>6.31</i>	<i>\$0</i>	<i>\$0</i>	<i>\$85</i>	<i>\$85</i>	<i>\$109</i>	<i>\$427</i>	<i>\$0</i>	<i>\$0</i>	<i>\$536</i>
<i>Low-Income</i>	<i>PY22</i>	<i>1.00</i>	<i>6.12</i>	<i>\$0</i>	<i>\$0</i>	<i>\$81</i>	<i>\$81</i>	<i>\$94</i>	<i>\$400</i>	<i>\$0</i>	<i>\$0</i>	<i>\$494</i>
<i>Low-Income Total</i>		<i>1.00</i>	<i>7.01</i>	<i>\$0</i>	<i>\$0</i>	<i>\$524</i>	<i>\$524</i>	<i>\$772</i>	<i>\$2,897</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,669</i>

Table 31. Residential Low-Income HER Subprogram TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)					
	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
Program				Paid by EDC	Paid by Participants							
<i>Low-Income HER</i>	<i>PY18</i>	<i>1.000</i>	<i>7.78</i>	<i>\$0</i>	<i>\$0</i>	<i>\$172</i>	<i>\$172</i>	<i>\$299</i>	<i>\$1,041</i>	<i>\$0</i>	<i>\$0</i>	<i>\$1,340</i>
<i>Low-Income HER</i>	<i>PY19</i>	<i>1.000</i>	<i>7.18</i>	<i>\$0</i>	<i>\$0</i>	<i>\$91</i>	<i>\$91</i>	<i>\$139</i>	<i>\$512</i>	<i>\$0</i>	<i>\$0</i>	<i>\$651</i>
<i>Low-Income HER</i>	<i>PY20</i>	<i>1.000</i>	<i>6.80</i>	<i>\$0</i>	<i>\$0</i>	<i>\$95</i>	<i>\$95</i>	<i>\$130</i>	<i>\$517</i>	<i>\$0</i>	<i>\$0</i>	<i>\$648</i>
<i>Low-Income HER</i>	<i>PY21</i>	<i>1.000</i>	<i>6.31</i>	<i>\$0</i>	<i>\$0</i>	<i>\$85</i>	<i>\$85</i>	<i>\$109</i>	<i>\$427</i>	<i>\$0</i>	<i>\$0</i>	<i>\$536</i>
<i>Low-Income HER</i>	<i>PY22</i>	<i>1.000</i>	<i>6.12</i>	<i>\$0</i>	<i>\$0</i>	<i>\$81</i>	<i>\$81</i>	<i>\$94</i>	<i>\$400</i>	<i>\$0</i>	<i>\$0</i>	<i>\$494</i>
<i>Low-Income HER Total</i>		<i>1.000</i>	<i>7.01</i>	<i>\$0</i>	<i>\$0</i>	<i>\$524</i>	<i>\$524</i>	<i>\$772</i>	<i>\$2,897</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,669</i>

Summary of Benchmarking Results

As mentioned in Section 3.20 PECO conducted benchmarking against similar utilities to inform its budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

For the Low-Income HER subprogram, PECO will continue to engage existing customers, enroll additional interested customers, and build on the program success achieved in Phase IV.

Other Information Deemed Appropriate

Not applicable.

Plan to Meet Proportional Number of Measure Requirement

As part of Phase V program design, PECO confirmed that the Phase V Final Order requirement to set low-income measures at 8.8% was incorporated into its CSP plans. Throughout the program, PECO will actively monitor this metric to maintain compliance.

Confirmation That All Low-Income Compliance Savings Will Come From Specific Low-Income Programs or Low-Income Verified Participants in Multifamily Housing Programs

PECO confirms that its low-income compliance savings will either come from the multifamily component, dedicated program components exclusively for low-income customers, or from the Low-Income HER subprogram. PECO will coordinate closely with its Residential CSP to confirm that any low-income compliance savings from the multifamily program component are fully verified with participant eligibility confirmed.

Estimate of Applicable Low-Income Carryover Savings From Phase IV

PECO estimates that the low-income savings carryover is 22,295 MWh. The Phase IV compliance goal is 80,089 MWh, and with actual savings of 92,284 MWh with a remaining forecast of 10,780 MWh in PY17.

3.3 Commercial/Industrial Small Sector

While the SWE separated the C&I sector into small (Section 3.3) and large (Section 3.4) in the Plan template, PECO's Plan has one Non-Residential program in the C&I sector. The Non-Residential program serves both SCI and LCI customers. Section 3.4 includes formatted descriptions of the Non-Residential program components.

3.4 Commercial/Industrial Large Sector

Non-Residential Program (2026-2031)

Objectives

The Non-Residential program objective is to increase energy efficiency for its non-residential customers across the SCI, LCI, and Municipal Lighting²³ rate classes. The program uses the following approaches to achieve this objective including:

Providing customers with easy access to technical support, incentives, and concierge-style services to facilitate program participation and maximize program benefits

Allowing small businesses to realize the economic benefits of energy efficiency through comprehensive energy efficiency solutions

Encouraging Non-Residential program customers to make upgrades where they need them most by providing rebates for a wide range of measures

Target Market

PECO's non-residential electric customers include commercial, industrial, government, education, and nonprofit customers. Below are definitions of PECO's SCI and LCI rate classes. At the time of this Plan development, the SCI market size includes approximately 170,000 customers and the LCI market includes approximately 3,000 customers.

SCI rate classes include:

Rate GS (General Service)

LCI rate classes include:

Rate PD (Primary Distribution Power)

Rate HT (High Tension Power)

Rate EP (Electric Propulsion)

Municipal Lighting rate classes include:

- Rate SL-E (Street Lighting Customer-Owned Facilities)
- Rate SL-C (Smart Lighting Controls Customer-Owned Facilities)
- Rate AL (Alley Lighting in City of Philadelphia)

Program Description

²³ The municipal lighting rate class includes streetlighting measures such as pole/arm-mounted roadway or parking lot lighting measures. These measures may be offered to municipalities and homeowner's associations (HOAs) among others.

The Non-Residential program offers a comprehensive and cross-cutting array of opportunities so non-residential customers can reduce their energy consumption and costs. For additional detail concerning the program's comprehensive design and delivery please see Section 3.1.7.

The following section contains detailed descriptions of program components.

Program Components

- **Strategic Energy Management (SEM):** Implements practices, policies, and processes across an organization or facility that create persistent energy savings. Includes the implementation of employee training, new operational protocols, and other interventions that measurably reduce a facility's energy usage.
- **Existing Buildings:** Provides incentives to customers who install energy efficient equipment. Provides downstream and/or midstream incentives for a variety of equipment types including, but not limited to, lighting, HVAC, compressed air, motors and drives.
- **Building Optimization:** Includes assessments and implementing measures to optimize energy use in an existing building. Includes retrocommissioning (RCx), virtual commissioning (VCx), monitoring-based commissioning (MBCx), building tune-up, and Building Operator Certification (BOC) offerings. Additionally, through these assessments, the non-residential CSP will determine whether a customer could benefit from daily load shifting, and implement this savings pathway through the Building Optimization program component.
- **Distributed Energy Resources (DER):** Incentivizes the installation of energy generation and storage systems at customer sites, either behind the meter or with connection to the local grid. This includes, but is not limited to, solar (PV), combined heat and power (CHP), and fuel cell technologies.
- **Small Business Solutions:** Works with small businesses and trade allies to install a prescribed list of energy-saving measures at small business facilities. Includes trade allies who conduct any needed energy assessments and install the eligible measures at customer sites.
- **New Construction:** Partners with design firms and builders to facilitate construction projects (e.g., new facility builds, additions, significant remodels) that are designed, built, and operated at a high level of efficiency from the start. Offers reviews of design documents and onsite assessments for new construction projects, with the implementation of energy-saving measures based on the results.

Coordination of Participation in other Act 129 programs

The CSP will cross-promote and channel customers to other Non-Residential program components based on their facility needs and energy goals.

Implementation Strategy

The Non-Residential program will be administered by a CSP and a team of partners with a proven record of providing the services offered in this program.

The implementation strategy will vary by program component:

Strategic Energy Management (SEM): Delivered through a 12-month cohort model that fosters peer learning, energy awareness, and demand reduction strategies. The CSP will provide comprehensive support including SEM coaches, engineers, and energy modelers. Participants will work with coaches to achieve energy savings through operational and behavioral measures, with additional benefits such as improved safety, sustainability, and facility responsiveness. Participants will graduate out of the component after the first year into the alumni cohort to sustain and expand savings over time.

- **Virtual SEM (vSEM):** Leverages AMI interval data and analytics to identify savings opportunities remotely and integrate load-shifting strategies to meet peak demand goals.

Existing Buildings: Delivers a comprehensive portfolio of energy efficiency offerings through downstream (including prescriptive and custom offerings) and midstream channels.

- **Downstream:** focuses on direct customer engagement with technical and trade ally support to facilitate smooth project implementation and timely incentives. The prescriptive pathways will offer streamlined participation and incentives for standard measures, serving as an entry point for engagement. The custom pathway will target complex, site-specific projects including process improvements, chiller plant improvements, compressed air upgrades, load shifting, and more.
- **Midstream:** reduces barriers by providing instant incentives at the point of sale through distributor networks, expanding beyond lighting to HVAC, refrigeration, and other technologies.

Building Optimization: Delivers deep, persistent energy savings through technical rigor, customer empowerment, and strategic collaboration.

- **Engineering Support and Audits:** Provides customers with direct access to expert engineering support to help identify, evaluate, and implement energy savings opportunities. Includes ASHRAE Level 2 audits and leverages braided funding opportunities to minimize upfront costs and support customer participation.
- **BOC:** Delivered in partnership with Penn College of Technology, the BOC offering will provide structured Level I and Level II courses for customers to earn nationally recognized credentials and practical skills to manage building energy use. The CSP will conduct post-class facility assessment to reinforce course content and identify additional savings opportunities.
- **Building Commissioning (RCx, VCx, MBCx):** Identifies operational savings opportunities through an analysis of interval meter data and engages pre-qualified accounts. Participants will implement recommended measures independently, with no onsite support or financing incentives and the CSP will verify savings through meter-based measurement and verification.
- **Load Shifting:** Focuses on identifying customers who would benefit from a daily load shifting program outside of PECO's peak hours and engages them through additional outreach. Participating customers will realize savings by enrolling in the program, with performance verified through meter-based measurement and verification methods outlined by the SWE.

Distributed Energy Resources (DER): Focused primarily on solar PV and CHP projects, the CSP will work closely with solar contractors and PECO's interconnection team to implement

the component. The CSP will facilitate AEPS registration for eligible projects, provide guidance, and coordinate with PECO and the PA PUC as needed.

Small Business Solutions: Designed to maximize participation, streamline implementation, and deliver savings, this component will include a vetted trade ally network, direct discount services, localized outreach and engagement, streamlined participation tools, robust QA/quality control (QC), and braided funding. This component includes interest free financing to small and medium sized businesses.

New Construction: Embeds energy efficiency into the design and construction process to support new facility builds, additions, and major renovations across commercial, institutional, and industrial sectors. The CSP will provide design-build services, early engagement with design teams, and technical support such as energy modeling, document reviews, and site assessments.

Program Issues and Risks and Risk Mitigation

Program issues and risks as well as risk mitigation follow the topics outlined in Section 3.2. As additional guidelines and risks present themselves PECO will adjust its planning and portfolio design as needed.

Anticipated Costs to Participating Customers

Customers participating in the Non-Residential program have anticipated costs of \$497,226,292 for Phase V after PECO incentives.

Ramp-Up Strategy

The primary objective is to support a smooth, quick, and seamless transition from Phase IV to Phase V, especially from the perspective of customers and market actors. The CSP will align outreach staff with appropriate customer segments and will capitalize on existing relationships to build on success.

Marketing Strategy

The CSP will be responsible for program marketing, coordinating with PECO's Marketing and Promotions team, E&O CSP, and the Exelon Energy Efficiency Marketing Agency for messaging design and consistency. The CSP will employ a multi-channel strategy and use robust analytics to reach PECO's customer market segments and trade allies with services and measures to meet their specific needs. The CSP will leverage online ads, email, in-person events, existing communication channels, and case studies as some of the primary marketing tactics for the Non-Residential program. In addition to the strategies listed below, the CSP will implement cross-promotion of components to increase customer participation across PECO's Non-Residential program components.

Business Intelligence and Market Segmentation: Looking at past participation by measures and industry, the CSP will create and deploy targeted direct and digital marketing with measure-specific content to industries that have the greatest propensity to participate in PECO's program.

Large Business: The CSP will implement a data-informed marketing approach to engage large business customers by leveraging customer segmentation and behavioral insights to identify and prioritize large business accounts with the highest potential for impact. The CSP will customize messaging informed by large business customers' challenges and goals to increase participation.

Small Business: The CSP will implement a data-informed marketing strategy to engage small business customers by delivering clear, accessible messaging that highlights the value and ease of participation.

Hard-to-Reach and Disadvantaged Small Business Owners: The CSP will leverage localized, relationship-driven outreach to engage hard-to-reach and disadvantaged small business owners. Outreach will address key barriers including trust, language, awareness, and capacity. The CSP will prioritize direct, in-person engagement through on-site assessment and presence at local events and will collaborate with trusted community organizations and culturally competent trade allies and contractors to reach customers.

Trade Allies: The CSP will support trade allies with sales enablement materials that coordinate with measure-focused campaigns. The CSP will engage and support trade allies through coordinated sales enablement materials aligned with measure-focused campaigns. The CSP will actively recruit trade allies and provide scheduled training and ongoing support to ensure they have the skills and resources necessary to promote the Non-Residential program effectively. Trade allies will serve as key program ambassadors, educating customers on program benefits and driving participation. Continuous communication, mentorship, and field support will be provided to help trade allies enhance their capabilities, maintain high customer satisfaction, and maximize program participation.

Eligible Measures and Incentive Strategy

The measure mix includes a comprehensive mix of end-use technologies such as lighting, HVAC, water heating, plug load, refrigeration, motors, and others that span all customer classes and building types. Incentives are based on previous experience and knowledge of the market in PECO's territory.

Table 32. Non-Residential Eligible Measures

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Lighting Retrofits - Street lighting	per lighting equipment	No	No	Phase V TRM	\$276.15	15	\$0.00 - \$276.15
Lighting Retrofits - Outdoor floods	per lighting equipment	No	No	Phase V TRM	\$132.70	15	\$0.00 - \$132.70
Lighting Retrofits - High Bays	per lighting equipment	No	No	Phase V TRM	\$520.03	15	\$0.00 - \$520.03
Lighting Retrofits - Other Interior Fixtures	per lighting equipment	No	No	Phase V TRM	\$104.01	15	\$0.00 - \$104.01
Lighting Controls	per lighting equipment	No	No	Phase V TRM	\$52.67	8	\$0.00 - \$52.67
LED Exit Signs	per sign	No	No	Phase V TRM	\$68.67	15	\$0.00 - \$68.67
LED Refrigeration Display Case Lighting	per case	No	No	Phase V TRM	\$61.00	8	\$0.00 - \$61.00
HVAC Systems: Air Conditioner	per unit	No	No	Phase V TRM	\$6,186.04	15	\$0.00 - \$6,186.04
HVAC Systems: Heat Pump	per unit	No	No	Phase V TRM	\$5,255.65	15	\$0.00 - \$5,255.65
Electric Chillers	per chiller	No	No	Phase V TRM	\$209,116.51	15	\$0.00 - \$209,116.51
Groundwater Source and Ground Source Heat Pumps	per heat pump	No	No	Phase V TRM	\$65,910.57	15	\$0.00 - \$65,910.57
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons	per heat pump	No	No	Phase V TRM	\$1,705.32	15	\$0.00 - \$1,705.32
Small C&I HVAC Refrigerant Charge Correction	per HVAC system	No	No	Phase V TRM	\$374.00	3	\$0.00 - \$374.00
HVAC Tune Up	per HVAC system	No	No	Phase V TRM	\$612.90	3	\$0.00 - \$612.90
Room Air Conditioner	per AC	No	No	Phase V TRM	\$408.37	9	\$0.00 - \$408.37
Controls: Guest Room Occupancy Sensor	per sensor	No	No	Phase V TRM	\$342.24	11	\$0.00 - \$342.24
Controls: Economizer	per economizer	No	No	Phase V TRM	\$2,027.00	3	\$0.00 - \$2,027.00
Computer Room Air Conditioner	per unit	No	No	Phase V TRM	\$350.00	15	\$0.00 - \$350.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans	per unit	No	No	Phase V TRM	\$948.00	15	\$0.00 - \$948.00
Computer Room Air Conditioner/Handler VSD on AC Fan Motors	per HP	No	No	Phase V TRM	\$1,163.00	15	\$0.00 - \$1,163.00
Circulation Fan: High-Volume Low-Speed	per fan	No	No	Phase V TRM	\$4,073.80	15	\$0.00 - \$4,073.80
Demand Controlled Ventilation	per HVAC system	No	No	Phase V TRM	\$1,923.96	15	\$0.00 - \$1,923.96
Advanced Rooftop Controls: Demand Controlled Ventilation (DCV)	per HVAC system	No	No	Phase V TRM	\$1,923.96	10	\$0.00 - \$1,923.96
Advanced Rooftop Controls: DCV with two speed controls	per HVAC system	No	No	Phase V TRM	\$3,339.90	10	\$0.00 - \$3,339.90
Advanced Rooftop Controls: DCV with three speed controls or VFD	per HVAC system	No	No	Phase V TRM	\$3,884.48	10	\$0.00 - \$3,884.48
C&I ENERGY STAR Certified Connected Thermostats	per thermostat	No	No	Phase V TRM	\$168.42	11	\$0.00 - \$168.42
Duct Sealing and Insulation	per project	No	No	Phase V TRM	\$280.64	15	\$0.00 - \$280.64
Chilled Water Pipe Insulation	per insulation project	No	No	Phase V TRM	\$127.76	15	\$0.00 - \$127.76
Premium Efficiency Motors	per motor	No	No	Phase V TRM	\$1,034.00	15	\$0.00 - \$1,034.00
Variable Frequency Drive (VFD) Improvements	per drive	No	No	Phase V TRM	\$1,216.00	15	\$0.00 - \$1,216.00
ECM Circulating Fan	per fan	No	No	Phase V TRM	\$395.48	5	\$0.00 - \$395.48
VSD on Kitchen Exhaust Fan	per unit	No	No	Phase V TRM	\$533.66	15	\$0.00 - \$533.66
ECM Circulator Pump	per pump	No	No	Phase V TRM	\$402.69	15	\$0.00 - \$402.69
High Efficiency Pumps	per pump	No	No	Phase V TRM	\$2,534.53	13.3	\$0.00 - \$2,534.53

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Heat Pump Water Heaters	per water heater	No	No	Phase V TRM	\$1,279.29	10	\$0.00 - \$1,279.29
Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Programs	per sprayer	No	No	Phase V TRM	\$193.00	8	\$0.00 - \$193.00
Domestic Hot Water Pipe Insulation	per insulation project	No	No	Phase V TRM	\$63.00	15	\$0.00 - \$63.00
ENERGY STAR Refrigeration Cases	per case	No	No	Phase V TRM	\$549.40	12	\$0.00 - \$549.40
ENERGY STAR Freezer Cases	per case	No	No	Phase V TRM	\$620.67	12	\$0.00 - \$620.67
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Cooler	per motor	No	No	Phase V TRM	\$501.84	15	\$0.00 - \$501.84
High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Freezer	per motor	No	No	Phase V TRM	\$353.45	15	\$0.00 - \$353.45
Controls: Evaporator Fan Controllers	per controller	No	No	Phase V TRM	\$766.60	15	\$0.00 - \$766.60
Controls: Floating Head Pressure Controls	per control	No	No	Phase V TRM	\$42,514.74	15	\$0.00 - \$42,514.74
Controls: Anti-Sweat Heater Controls	per door	No	No	Phase V TRM	\$1,119.27	12	\$0.00 - \$1,119.27
Controls: Evaporator Coil Defrost Control	per defrost control	No	No	Phase V TRM	\$1,275.66	10	\$0.00 - \$1,275.66
Variable Speed Refrigeration Compressor	per compressor	No	No	Phase V TRM	\$5,632.92	15	\$0.00 - \$5,632.92
Strip Curtains for Walk-In Freezers and Coolers	per door	No	No	Phase V TRM	\$220.33	4	\$0.00 - \$220.33
Night Covers for Display Cases	per case	No	No	Phase V TRM	\$793.14	5	\$0.00 - \$793.14
Auto Closers	per door	No	No	Phase V TRM	\$572.76	8	\$0.00 - \$572.76
Special Doors with Low or No Anti-Sweat Heat for Reach-In Freezers and Coolers	per door	No	No	Phase V TRM	\$2,394.08	12	\$0.00 - \$2,394.08

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Suction Pipe Insulation for Walk-In Coolers and Freezers	per insulation project	No	No	Phase V TRM	\$100.75	11	\$0.00 - \$100.75
Refrigerated Display Cases with Doors Replacing Open Cases	per case	No	No	Phase V TRM	\$2,288.38	12	\$0.00 - \$2,288.38
Adding Doors to Existing Refrigerated Display Cases	per case	No	No	Phase V TRM	\$1,816.25	12	\$0.00 - \$1,816.25
Refrigerated Case Light Occupancy Sensors	per controller	No	No	Phase V TRM	\$35.00	8	\$0.00 - \$35.00
Food Service Equipment Novelty Cooler Shutoff	per controller	No	No	Phase V TRM	\$303.26	10	\$0.00 - \$303.26
ENERGY STAR Clothes Washer	per washer	No	No	Phase V TRM	\$676.89	7.1	\$0.00 - \$676.89
ENERGY STAR Bathroom Ventilation Fan in Commercial Applications	per fan	No	No	Phase V TRM	\$300.13	12	\$0.00 - \$300.13
ENERGY STAR Ice Machines	per machine	No	No	Phase V TRM	\$469.74	10	\$0.00 - \$469.74
Controls: Beverage and Snack Machine Controls	per control	No	No	Phase V TRM	\$234.30	5	\$0.00 - \$234.30
ENERGY STAR Electric Steam Cooker	per cooker	No	No	Phase V TRM	\$441.00	12	\$0.00 - \$441.00
ENERGY STAR Combination Oven	per oven	No	No	Phase V TRM	\$1,898.69	12	\$0.00 - \$1,898.69
ENERGY STAR Commercial Convection Oven - Full Size	per oven	No	No	Phase V TRM	\$1,118.48	12	\$0.00 - \$1,118.48
ENERGY STAR Commercial Fryer	per fryer	No	No	Phase V TRM	\$1,268.80	12	\$0.00 - \$1,268.80
ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	per cabinet	No	No	Phase V TRM	\$549.55	12	\$0.00 - \$549.55

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	per cabinet	No	No	Phase V TRM	\$2,479.45	12	\$0.00 - \$2,479.45
ENERGY STAR Commercial Dishwasher	per dishwasher	No	No	Phase V TRM	\$1,418.00	10	\$0.00 - \$1,418.00
ENERGY STAR Commercial Griddle	per griddle	No	No	Phase V TRM	\$1,289.28	12	\$0.00 - \$1,289.28
Commercial Induction Cooktops	per cooktop	No	No	Phase V TRM	\$1,511.88	10	\$0.00 - \$1,511.88
Wall and Ceiling Insulation	per project	No	No	Phase V TRM	\$9,235.20	20	\$0.00 - \$9,235.20
Advanced Power Strips	per power strip	No	No	Phase V TRM	\$56.50	5	\$0.00 - \$56.50
ENERGY STAR Servers	per data center	No	No	Phase V TRM	\$1,259,232.00	4	\$0.00 - \$1,259,232.00
Server Virtualization	per server	No	No	Phase V TRM	\$895.00	4	\$0.00 - \$895.00
Cycling Refrigerated Thermal Mass Dryer	per dryer	No	No	Phase V TRM	\$196.56	10	\$0.00 - \$196.56
Air-Entraining Air Nozzle	per nozzle	No	No	Phase V TRM	\$159.25	15	\$0.00 - \$159.25
No-Loss Condensate Drains	per drain	No	No	Phase V TRM	\$308.18	10	\$0.00 - \$308.18
Air Tanks for Load/No Load Compressors	per receiver tank addition	No	No	Phase V TRM	\$501.22	15	\$0.00 - \$501.22
Variable-Speed Drive Air Compressor	per compressor	No	No	Phase V TRM	\$12,582.09	14	\$0.00 - \$12,582.09
Compressed Air Controller	per controller	No	No	Phase V TRM	\$177.49	13	\$0.00 - \$177.49
Compressed Air Low Pressure Drop Filters	per filter	No	No	Phase V TRM	\$1,040.00	10	\$0.00 - \$1,040.00
Compressed Air Mist Eliminators	per air mist eliminator	No	No	Phase V TRM	\$37.89	5	\$0.00 - \$37.89
Engine Block Heater Timer	per heater timer	No	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00
High Frequency Battery Chargers	per charger	No	No	Phase V TRM	\$402.48	15	\$0.00 - \$402.48
Uninterruptible Power Supply (UPS)	per UPS	No	No	Phase V TRM	\$46.80	7	\$0.00 - \$46.80
Automatic Milker Takeoffs	per milker takeoff system	No	No	Phase V TRM	\$20,000.00	10	\$0.00 - \$20,000.00
Dairy Scroll Compressors	per compressor	No	No	Phase V TRM	\$1,182.00	15	\$0.00 - \$1,182.00

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
High-Efficiency Ventilation Fans with and without Thermostats	per fan	No	No	Phase V TRM	\$226.20	13	\$0.00 - \$226.20
Heat Reclaimers	per heat reclaimer system	No	No	Phase V TRM	\$5,839.98	15	\$0.00 - \$5,839.98
High Volume Low Speed Fans	per fan	No	No	Phase V TRM	\$5,607.89	15	\$0.00 - \$5,607.89
Livestock Waterer	per livestock waterer system	No	No	Phase V TRM	\$552.98	10	\$0.00 - \$552.98
Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	per dairy vacuum pump VSD	No	No	Phase V TRM	\$6,716.86	15	\$0.00 - \$6,716.86
Low Pressure Irrigation System	per irrigation system	No	No	Phase V TRM	\$3,000.00	5	\$0.00 - \$3,000.00
New Construction Lighting	Per Project	No	No	Phase V TRM	\$188,000.00	15	\$0.00 - \$188,000.00
Indoor Horticultural Lighting	per lighting equipment	No	No	Phase V TRM	\$164.00	7	\$0.00 - \$164.00
High Efficiency Transformer	per transformer	No	No	Phase V TRM	\$468.00	15	\$0.00 - \$468.00
Midstream lighting incentives - Street lighting	per lighting equipment	No	No	Phase V TRM	\$85.86	15	\$0.00 - \$85.86
Midstream lighting incentives: Outdoor floods	per lighting equipment	No	No	Phase V TRM	\$42.75	15	\$0.00 - \$42.75
Midstream lighting incentives: High Bays	per lighting equipment	No	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00
Midstream lighting incentives: Other Interior Fixtures	per lighting equipment	No	No	Phase V TRM	\$76.00	15	\$0.00 - \$76.00
HVAC Systems for Midstream Delivery: Air Conditioner	per unit	No	No	Phase V TRM	\$912.78	15	\$0.00 - \$912.78
HVAC Systems for Midstream Delivery: Heat Pump	per unit	No	No	Phase V TRM	\$4,824.01	15	\$0.00 - \$4,824.01

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons for Midstream Delivery	per heat pump	No	No	Phase V TRM	\$2,273.76	15	\$0.00 - \$2,273.76
Midstream Indoor Horticultural Lighting	per lighting equipment	No	No	Phase V TRM	\$300.00	7	\$0.00 - \$300.00
Midstream Premium Efficiency Motors	per motor	No	No	Phase V TRM	\$1,000.00	15	\$0.00 - \$1,000.00
Midstream Variable Frequency Drive (VFD) Improvements	per drive	No	No	Phase V TRM	\$2,027.14	15	\$0.00 - \$2,027.14
Midstream ENERGY STAR Refrigeration Cases	per case	No	No	Phase V TRM	\$549.40	12	\$0.00 - \$549.40
Midstream ENERGY STAR Freezer Cases	per case	No	No	Phase V TRM	\$620.67	12	\$0.00 - \$620.67
Midstream Controls: Evaporator Fan Controllers	per controller	No	No	Phase V TRM	\$766.60	15	\$0.00 - \$766.60
Midstream Controls: Anti-Sweat Heater Controls	per door	No	No	Phase V TRM	\$1,119.27	12	\$0.00 - \$1,119.27
Midstream Controls: Evaporator Coil Defrost Control	per defrost control	No	No	Phase V TRM	\$1,275.66	10	\$0.00 - \$1,275.66
Midstream ENERGY STAR Ice Machines	per machine	No	No	Phase V TRM	\$469.74	10	\$0.00 - \$469.74
Midstream ENERGY STAR Electric Steam Cooker	per cooker	No	No	Phase V TRM	\$1,500.00	12	\$0.00 - \$1,500.00
Midstream ENERGY STAR Combination Oven	per oven	No	No	Phase V TRM	\$1,898.69	12	\$0.00 - \$1,898.69
Midstream ENERGY STAR Commercial Convection Oven - Full Size	per oven	No	No	Phase V TRM	\$1,118.48	12	\$0.00 - \$1,118.48

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Midstream ENERGY STAR Commercial Fryer	per fryer	No	No	Phase V TRM	\$1,268.80	12	\$0.00 - \$1,268.80
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size	per cabinet	No	No	Phase V TRM	\$549.55	12	\$0.00 - \$549.55
Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size	per cabinet	No	No	Phase V TRM	\$2,479.45	12	\$0.00 - \$2,479.45
Midstream ENERGY STAR Commercial Dishwasher	per dishwasher	No	No	Phase V TRM	\$1,093.46	10	\$0.00 - \$1,093.46
Midstream ENERGY STAR Commercial Griddle	per griddle	No	No	Phase V TRM	\$1,289.28	12	\$0.00 - \$1,289.28
Midstream Air Tanks for Load/No Load Compressors	per receiver tank addition	No	No	Phase V TRM	\$1,750.00	15	\$0.00 - \$1,750.00
Midstream Variable-Speed Drive Air Compressor	per compressor	No	No	Phase V TRM	\$12,582.09	14	\$0.00 - \$12,582.09
Midstream High-Efficiency Ventilation Fans with and without Thermostats	per fan	No	No	Phase V TRM	\$226.20	13	\$0.00 - \$226.20
Midstream Heat Reclaimers	per heat reclaimer system	No	No	Phase V TRM	\$5,839.98	15	\$0.00 - \$5,839.98
Midstream High Volume Low Speed Fans	per fan	No	No	Phase V TRM	\$5,607.89	15	\$0.00 - \$5,607.89
Midstream Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps	per dairy vacuum pump VSD	No	No	Phase V TRM	\$6,716.86	15	\$0.00 - \$6,716.86
Building Operator Certification Training	per building tune up	No	No	Phase V TRM	\$4,298.77	13	\$0.00 - \$4,298.77
Custom:Other - SEM	Per Participant	No	No	Phase V TRM	\$50,000.00	15	\$0.00 - \$50,000.00
Custom:Other - VCx	Per Participant	No	No	Phase V TRM	\$31,282.01	15	\$0.00 - \$31,282.01

Measure	Unit	Low-Income Measure (Yes/No)	Comprehensive Measure (Yes/No)	Eligibility Requirements	Incremental Cost (\$/unit)	Estimated Useful Life	Incentive Amount or Incentive Range (\$/unit)
Custom:Other - vSEM	Per Participant	No	No	Phase V TRM	\$10,000.00	15	\$0.00 - \$10,000.00
Solar	per project	No	No	Phase V TRM	\$297,602.20	15	\$0.00 - \$297,602.20
Custom:Other - Compressed Air	Per Participant	No	No	Phase V TRM	\$151,015.93	15	\$0.00 - \$151,015.93
Custom: Data Center	Per Participant	No	No	Phase V TRM	\$100,000.00	15	\$0.00 - \$100,000.00
Custom:HVAC	Per Participant	No	No	Phase V TRM	\$113,365.00	15	\$0.00 - \$113,365.00
Custom: Motors & Drives	Per Participant	No	No	Phase V TRM	\$151,015.93	15	\$0.00 - \$151,015.93
Custom: Other	Per Participant	No	No	Phase V TRM	\$124,715.00	15	\$0.00 - \$124,715.00
Custom: Process	Per Participant	No	No	Phase V TRM	\$200,000.00	15	\$0.00 - \$200,000.00
Custom: Refrigeration	Per Participant	No	No	Phase V TRM	\$60,585.00	15	\$0.00 - \$60,585.00
Custom: EMS	Per Participant	No	No	Phase V TRM	\$25,000.00	15	\$0.00 - \$25,000.00
Custom: Retrocommissioning	Per Participant	No	No	Phase V TRM	\$173,280.00	15	\$0.00 - \$173,280.00
Custom: CHP	Per Participant	No	No	Phase V TRM	\$5,710,026.00	15	\$0.00 - \$5,710,026.00
ASHRAE Audits/Feasibility Studies	Per Participant	No	No	Phase V TRM	\$18,000.00	5	\$0.00 - \$18,000.00
Incentive Buy Down	Per Participant	No	No	Phase V TRM	\$15,000.00	5	\$0.00 - \$15,000.00
C&I Load Shifting	per unit	No	No	Phase V TRM	\$200,000.00	1	\$0.00 - \$200,000.00
Lighting Retrofits - Street lighting	per lighting equipment	No	No	Phase V TRM	\$276.15	15	\$0.00 - \$276.15

To maximize opportunities for customer energy savings, PECO reserves the right to offer an incentive of up to the incremental measure costs²⁴ for any measure that is not listed in Table 32 but is identified in the TRM or approved as an interim measure protocol.

²⁴ The incremental measure costs is determined through Exhibit 5: 2026 Incremental Measure Cost Database issued by the PUC found here [Total Resource Cost Test | PA PUC](#)

Basis for the Proposed Incentive Levels

Incentives are based on previous experience and knowledge of the market in PECO's territory. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation. Incentives can cover up to 80% of project costs for qualifying measures, reducing ROI periods to 1–5 years and helping overcome financial barriers. Market response will be monitored, and incentive levels adjusted as needed to maintain competitiveness and momentum. Key program components include:

- **Strategic Energy Management:** Lower incentives due to high personal engagement.
- **Small Business Direct Install:** Full funding of installation costs to eliminate financial barriers.
- **New Construction:** Higher upfront incentives to integrate energy efficiency during design.
- **Existing Buildings:** Higher incentives to encourage participation from customers and contractors.
- **Building Optimization:** Lower incentives, similar to SEM, due to personal engagement.
- **Distributed Energy Resources:** Higher incentives due to expensive, complex measure types.

PECO will implement a range of incentive strategies. The incentives may be per unit, or per kWh, per kW saved, or any other suitable structure to drive participation.

Maximum Deadlines for Rebates

PECO requires 180 days as a maximum length of time for an application to be submitted as any longer may affect reporting and reconciliation timeframes.

Key Schedule Milestones

The planned implementation schedule is as follows:

- **March 2026:** PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems, and marketing and outreach is in place.
- **June 1, 2026:** The programs will launch with some components on a ramp-up period for the first 6 months.
- **June 2026–May 2031:** Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.
- **May 31, 2031:** Last day of the Phase V programs.

Assumed EM&V

See Residential Program Assumed EM&V in Section 3.2.

Administrative Requirements

PECO will administer the program through a CSP. PECO will confirm major milestones are met and that the program is delivered according to the program design. Requested external staffing levels will be provided upon the completion of the CSP selection and contracting process. PECO will have five FTEs dedicated to the non-residential sector.

Savings Projections and Participation

Table 33. Non-Residential Estimated Savings and Participation

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Lighting Retrofits - Street lighting</i>	3.1.1	Energy Savings (MWh) ²	6,060	7,483	8,153	7,483	6,060	35,239
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	763.3	942.5	1,026.8	942.5	763.3	4,438.4
		Projected Participation ³	5,990	7,396	8,058	7,396	5,990	34,830
<i>Lighting Retrofits - Outdoor floods</i>	3.1.1	Energy Savings (MWh) ²	6,142	10,940	6,419	6,361	6,142	36,003
		Summer Demand Reduction (MW)	226.1	402.7	236.3	234.2	226.1	1,325.5
		Winter Demand Reduction (MW)	862.4	1,579.9	947.6	941.4	900.9	5,232.3
		Projected Participation ³	6,711	11,953	7,014	6,950	6,711	39,339
<i>Lighting Retrofits - High Bays</i>	3.1.1	Energy Savings (MWh) ²	31,344	38,020	39,387	34,131	31,344	174,226
		Summer Demand Reduction (MW)	5,748.0	6,972.4	7,223.1	6,259.3	5,748.0	31,950.9
		Winter Demand Reduction (MW)	4,387.4	5,322.0	5,513.4	4,777.7	4,387.5	24,388.1
		Projected Participation ³	24,183	29,334	30,389	26,334	24,183	134,423
<i>Lighting Retrofits - Other Interior Fixtures</i>	3.1.1	Energy Savings (MWh) ²	18,299	21,734	24,472	21,734	18,299	104,537
		Summer Demand Reduction (MW)	3,358.4	3,988.8	4,491.4	3,988.8	3,358.4	19,185.8
		Winter Demand Reduction (MW)	2,566.9	3,055.6	3,440.1	3,056.3	2,572.9	14,691.9
		Projected Participation ³	198,080	235,264	264,907	235,264	198,080	1,131,595
<i>Lighting Controls</i>	3.1.3	Energy Savings (MWh) ²	76	153	175	157	127	688
		Summer Demand Reduction (MW)	14.2	28.6	32.7	29.3	23.8	128.6
		Winter Demand Reduction (MW)	10.5	21.2	24.3	21.7	17.7	95.4
		Projected Participation ³	629	1,265	1,449	1,299	1,055	5,697
<i>LED Exit Signs</i>	3.1.4	Energy Savings (MWh) ²	44	41	44	34	24	187
		Summer Demand Reduction (MW)	5.7	5.3	5.7	4.4	3.2	24.2
		Winter Demand Reduction (MW)	4.0	7.5	8.0	7.3	5.6	32.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	152	142	152	118	85	649
<i>LED Refrigeration Display Case Lighting</i>	3.1.5	Energy Savings (MWh) ²	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.2	0.2
		Winter Demand Reduction (MW)	-	-	-	-	0.2	0.2
		Projected Participation ³	-	-	-	-	2	2
<i>HVAC Systems: Air Conditioner</i>	3.2.1	Energy Savings (MWh) ²	15	8	11	8	11	53
		Summer Demand Reduction (MW)	8.6	4.3	6.5	4.3	6.5	30.2
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	8	4	6	4	6	28
<i>HVAC Systems: Heat Pump</i>	3.2.1	Energy Savings (MWh) ²	11	19	37	45	56	168
		Summer Demand Reduction (MW)	4.0	6.7	13.5	16.2	20.2	60.7
		Winter Demand Reduction (MW)	3.2	5.3	10.6	12.7	15.9	47.6
		Projected Participation ³	3	5	10	12	15	45
<i>Electric Chillers</i>	3.2.3	Energy Savings (MWh) ²	110	66	176	44	44	440
		Summer Demand Reduction (MW)	54.8	32.9	87.7	21.9	21.9	219.3
		Winter Demand Reduction (MW)	2.2	1.3	3.5	0.9	0.9	8.8
		Projected Participation ³	5	3	8	2	2	20
<i>Groundwater Source and Ground Source Heat Pumps</i>	3.2.4	Energy Savings (MWh) ²	5	-	2	2	-	9
		Summer Demand Reduction (MW)	3.4	-	1.7	1.7	-	6.8
		Winter Demand Reduction (MW)	2.6	-	1.3	1.3	-	5.2
		Projected Participation ³	2	-	1	1	-	4
<i>Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons</i>	3.2.5	Energy Savings (MWh) ²	292	565	749	624	412	2,640
		Summer Demand Reduction (MW)	212.7	411.4	545.6	454.4	300.0	1,924.0
		Winter Demand Reduction (MW)	162.6	314.5	417.1	347.4	229.3	1,470.9
		Projected Participation ³	168	325	431	359	237	1,520

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Small C&I HVAC Refrigerant Charge Correction</i>	3.2.7	Energy Savings (MWh) ²	7	-	7	-	-	15
		Summer Demand Reduction (MW)	3.8	-	3.8	-	-	7.5
		Winter Demand Reduction (MW)	0.1	-	0.1	-	-	0.3
		Projected Participation ³	2	-	2	-	-	4
<i>HVAC Tune Up</i>	3.2.8	Energy Savings (MWh) ²	64	263	297	263	229	1,115
		Summer Demand Reduction (MW)	32.8	135.0	152.6	135.0	117.9	573.4
		Winter Demand Reduction (MW)	13.1	53.8	60.8	53.8	47.0	228.5
		Projected Participation ³	155	638	721	638	557	2,709
<i>Room Air Conditioner</i>	3.2.9	Energy Savings (MWh) ²	0	0	-	0	-	0
		Summer Demand Reduction (MW)	0.1	0.1	-	0.1	-	0.3
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	2	1	-	1	-	4
<i>Controls: Guest Room Occupancy Sensor</i>	3.2.10	Energy Savings (MWh) ²	1	1	1	0	0	3
		Summer Demand Reduction (MW)	0.2	0.2	0.2	0.1	0.1	0.7
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.1
		Projected Participation ³	4	5	5	3	2	19
<i>Controls: Economizer</i>	3.2.11	Energy Savings (MWh) ²	-	-	-	20	59	79
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	-	1	3	4
<i>Computer Room Air Conditioner</i>	3.2.12	Energy Savings (MWh) ²	-	-	14	-	14	27
		Summer Demand Reduction (MW)	-	-	3.8	-	3.8	7.6
		Winter Demand Reduction (MW)	-	-	3.8	-	3.8	7.6
		Projected Participation ³	-	-	6	-	6	12
	3.2.13	Energy Savings (MWh) ²	-	-	-	-	18	18

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Computer Room Air Conditioner/Handler Electronically Commutated Plug Fans</i>		Summer Demand Reduction (MW)	-	-	-	-	2.3	2.3
		Winter Demand Reduction (MW)	-	-	-	-	2.3	2.3
		Projected Participation ³	-	-	-	-	2	2
<i>Computer Room Air Conditioner/Handler VSD on AC Fan Motors</i>	3.2.14	Energy Savings (MWh) ²	-	-	-	-	23	23
		Summer Demand Reduction (MW)	-	-	-	-	2.8	2.8
		Winter Demand Reduction (MW)	-	-	-	-	2.8	2.8
		Projected Participation ³	-	-	-	-	2	2
<i>Circulation Fan: High-Volume Low-Speed</i>	3.2.15	Energy Savings (MWh) ²	39	44	44	39	29	194
		Summer Demand Reduction (MW)	20.0	22.5	22.5	20.0	15.0	99.8
		Winter Demand Reduction (MW)	8.0	9.0	9.0	8.0	6.0	39.8
		Projected Participation ³	8	9	9	8	6	40
<i>Demand Controlled Ventilation</i>	3.2.16	Energy Savings (MWh) ²	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.5	0.5
		Winter Demand Reduction (MW)	-	-	-	-	0.5	0.5
		Projected Participation ³	-	-	-	-	4	4
<i>Advanced Rooftop Controls: Demand Controlled Ventilation (DCV)</i>	3.2.17	Energy Savings (MWh) ²	2	2	-	-	-	4
		Summer Demand Reduction (MW)	1.1	1.1	-	-	-	2.1
		Winter Demand Reduction (MW)	0.4	0.4	-	-	-	0.8
		Projected Participation ³	1	1	-	-	-	2
<i>Advanced Rooftop Controls: DCV with two speed controls</i>	3.2.17	Energy Savings (MWh) ²	-	6	6	-	-	13
		Summer Demand Reduction (MW)	-	3.3	3.3	-	-	6.5
		Winter Demand Reduction (MW)	-	1.3	1.3	-	-	2.6
		Projected Participation ³	-	1	1	-	-	2
<i>Advanced Rooftop Controls: DCV with three speed controls or VFD</i>	3.2.17	Energy Savings (MWh) ²	-	6	-	-	6	13
		Summer Demand Reduction (MW)	-	3.3	-	-	3.3	6.7

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	1.3	-	-	1.3	2.7
		Projected Participation ³	-	1	-	-	1	2
<i>C&I ENERGY STAR Certified Connected Thermostats</i>	3.2.18	Energy Savings (MWh) ²	1	1	1	1	1	5
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.6
		Winter Demand Reduction (MW)	0.0	0.0	0.0	0.0	0.0	0.0
		Projected Participation ³	4	4	4	4	3	19
<i>Duct Sealing and Insulation</i>	3.2.20	Energy Savings (MWh) ²	2	-	-	2	-	3
		Summer Demand Reduction (MW)	0.9	-	-	0.9	-	1.7
		Winter Demand Reduction (MW)	0.3	-	-	0.3	-	0.7
		Projected Participation ³	1	-	-	1	-	2
<i>Chilled Water Pipe Insulation</i>	3.2.21	Energy Savings (MWh) ²	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Winter Demand Reduction (MW)	-	-	-	-	0.0	0.0
		Projected Participation ³	-	-	-	-	2	2
<i>Premium Efficiency Motors</i>	3.3.1	Energy Savings (MWh) ²	-	10	-	-	101	111
		Summer Demand Reduction (MW)	-	3.2	-	-	32.2	35.4
		Winter Demand Reduction (MW)	-	0.1	-	-	0.9	1.0
		Projected Participation ³	-	1	-	-	10	11
<i>Variable Frequency Drive (VFD) Improvements</i>	3.3.2	Energy Savings (MWh) ²	178	237	285	225	178	1,103
		Summer Demand Reduction (MW)	20.2	26.9	32.3	25.6	20.2	125.2
		Winter Demand Reduction (MW)	41.6	55.5	66.6	52.7	41.6	258.1
		Projected Participation ³	15	20	24	19	15	93
<i>ECM Circulating Fan</i>	3.3.3	Energy Savings (MWh) ²	-	-	0	-	-	0
		Summer Demand Reduction (MW)	-	-	0.2	-	-	0.2
		Winter Demand Reduction (MW)	-	-	0.0	-	-	0.0

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	-	-	2	-	-	2
<i>VSD on Kitchen Exhaust Fan</i>	3.3.4	Energy Savings (MWh) ²	3	12	12	12	9	49
		Summer Demand Reduction (MW)	0.6	2.1	2.1	2.1	1.5	8.2
		Winter Demand Reduction (MW)	0.5	1.7	1.7	1.7	1.3	6.9
		Projected Participation ³	3	11	11	11	8	44
<i>ECM Circulator Pump</i>	3.3.5	Energy Savings (MWh) ²	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	0.2	-	-	0.2
		Winter Demand Reduction (MW)	-	-	0.1	-	-	0.1
		Projected Participation ³	-	-	4	-	-	4
<i>High Efficiency Pumps</i>	3.3.6	Energy Savings (MWh) ²	-	-	24	-	-	24
		Summer Demand Reduction (MW)	-	-	4.5	-	-	4.5
		Winter Demand Reduction (MW)	-	-	3.4	-	-	3.4
		Projected Participation ³	-	-	2	-	-	2
<i>Heat Pump Water Heaters</i>	3.4.1	Energy Savings (MWh) ²	2	-	-	4	5	11
		Summer Demand Reduction (MW)	0.5	-	-	1.0	1.5	3.1
		Winter Demand Reduction (MW)	0.3	-	-	0.6	0.8	1.7
		Projected Participation ³	1	-	-	2	3	6
<i>Low Flow Pre-Rinse Sprayers for Retrofit Programs and Time of Sale Programs</i>	3.4.2	Energy Savings (MWh) ²	6	6	6	6	6	28
		Summer Demand Reduction (MW)	1.6	1.6	1.6	1.6	1.6	7.9
		Winter Demand Reduction (MW)	0.9	0.9	0.9	0.9	0.9	4.4
		Projected Participation ³	3	3	3	3	3	15
<i>Domestic Hot Water Pipe Insulation</i>	3.4.3	Energy Savings (MWh) ²	-	-	-	1	1	2
		Summer Demand Reduction (MW)	-	-	-	0.2	0.3	0.5
		Winter Demand Reduction (MW)	-	-	-	0.1	0.2	0.3
		Projected Participation ³	-	-	-	1	2	3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>ENERGY STAR Refrigeration Cases</i>	3.5.1	Energy Savings (MWh) ²	1	3	3	2	1	9
		Summer Demand Reduction (MW)	0.1	0.3	0.3	0.3	0.1	1.2
		Winter Demand Reduction (MW)	0.1	0.3	0.3	0.3	0.1	1.2
		Projected Participation ³	2	8	8	6	3	27
<i>ENERGY STAR Freezer Cases</i>	3.5.1	Energy Savings (MWh) ²	1	4	5	5	2	18
		Summer Demand Reduction (MW)	0.2	0.5	0.6	0.7	0.3	2.2
		Winter Demand Reduction (MW)	0.2	0.5	0.6	0.7	0.3	2.2
		Projected Participation ³	2	6	7	8	3	26
<i>High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Cooler</i>	3.5.2	Energy Savings (MWh) ²	24	31	31	28	24	138
		Summer Demand Reduction (MW)	3.0	3.9	3.9	3.4	3.0	17.0
		Winter Demand Reduction (MW)	3.0	3.9	3.9	3.4	3.0	17.0
		Projected Participation ³	20	26	26	23	20	115
<i>High-Efficiency Evaporator Fan Motors for Walk-In or Reach-In Refrigerated Cases: Freezer</i>	3.5.2	Energy Savings (MWh) ²	4	5	5	5	4	22
		Summer Demand Reduction (MW)	0.5	0.6	0.6	0.6	0.5	2.7
		Winter Demand Reduction (MW)	0.5	0.6	0.6	0.6	0.5	2.7
		Projected Participation ³	21	24	27	24	20	116
<i>Controls: Evaporator Fan Controllers</i>	3.5.3	Energy Savings (MWh) ²	23	25	27	29	16	119
		Summer Demand Reduction (MW)	2.3	2.5	2.7	2.9	1.7	12.1
		Winter Demand Reduction (MW)	2.3	2.5	2.7	2.9	1.7	12.1
		Projected Participation ³	11	12	13	14	8	58
<i>Controls: Floating Head Pressure Controls</i>	3.5.4	Energy Savings (MWh) ²	-	-	-	-	82	82
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	2.4	2.4
		Projected Participation ³	-	-	-	-	2	2
<i>Controls: Anti-Sweat Heater Controls</i>	3.5.5	Energy Savings (MWh) ²	4	7	9	7	6	33

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.2	0.3	0.3	0.3	0.2	1.2
		Winter Demand Reduction (MW)	0.1	0.2	0.3	0.2	0.2	1.0
		Projected Participation ³	3	5	6	5	4	23
<i>Controls: Evaporator Coil Defrost Control</i>	3.5.6	Energy Savings (MWh) ²	3	6	7	5	2	21
		Summer Demand Reduction (MW)	0.1	0.2	0.2	0.1	0.1	0.7
		Winter Demand Reduction (MW)	0.1	0.2	0.2	0.2	0.1	0.8
		Projected Participation ³	3	6	7	5	2	23
<i>Variable Speed Refrigeration Compressor</i>	3.5.7	Energy Savings (MWh) ²	-	-	-	-	14	14
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	0.4	0.4
		Projected Participation ³	-	-	-	-	2	2
<i>Strip Curtains for Walk-In Freezers and Coolers</i>	3.5.8	Energy Savings (MWh) ²	4	22	44	20	20	109
		Summer Demand Reduction (MW)	0.8	4.2	8.5	3.9	3.9	21.2
		Winter Demand Reduction (MW)	0.8	4.2	8.5	3.9	3.9	21.2
		Projected Participation ³	2	11	22	10	10	55
<i>Night Covers for Display Cases</i>	3.5.9	Energy Savings (MWh) ²	-	-	23	-	-	23
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	4	-	-	4
<i>Auto Closers</i>	3.5.10	Energy Savings (MWh) ²	-	17	27	17	17	77
		Summer Demand Reduction (MW)	-	4.1	6.7	4.1	4.1	19.0
		Winter Demand Reduction (MW)	-	4.1	6.7	4.1	4.1	19.0
		Projected Participation ³	-	8	13	8	8	37
<i>Special Doors with Low or No Anti-Sweat Heat for Reach-In Freezers and Coolers</i>	3.5.11	Energy Savings (MWh) ²	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	0.1	-	-	0.1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	-	0.1	-	-	0.1
		Projected Participation ³	-	-	3	-	-	3
<i>Suction Pipe Insulation for Walk-In Coolers and Freezers</i>	3.5.12	Energy Savings (MWh) ²	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.1	0.1
		Winter Demand Reduction (MW)	-	-	-	-	0.1	0.1
		Projected Participation ³	-	-	-	-	4	4
<i>Refrigerated Display Cases with Doors Replacing Open Cases</i>	3.5.13	Energy Savings (MWh) ²	-	-	-	-	17	17
		Summer Demand Reduction (MW)	-	-	-	-	(0.4)	(0.4)
		Winter Demand Reduction (MW)	-	-	-	-	7.4	7.4
		Projected Participation ³	-	-	-	-	16	16
<i>Adding Doors to Existing Refrigerated Display Cases</i>	3.5.14	Energy Savings (MWh) ²	-	-	-	-	11	11
		Summer Demand Reduction (MW)	-	-	-	-	(0.5)	(0.5)
		Winter Demand Reduction (MW)	-	-	-	-	3.9	3.9
		Projected Participation ³	-	-	-	-	16	16
<i>Refrigerated Case Light Occupancy Sensors</i>	3.5.15	Energy Savings (MWh) ²	-	0	0	-	-	1
		Summer Demand Reduction (MW)	-	0.0	0.1	-	-	0.1
		Winter Demand Reduction (MW)	-	0.0	0.1	-	-	0.1
		Projected Participation ³	-	1	4	-	-	5
<i>Food Service Equipment Novelty Cooler Shutoff</i>	3.5.16	Energy Savings (MWh) ²	-	-	2	-	-	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	2	-	-	2
<i>ENERGY STAR Clothes Washer</i>	3.6.1	Energy Savings (MWh) ²	-	0	1	0	0	1
		Summer Demand Reduction (MW)	-	0.0	0.1	0.0	0.0	0.2
		Winter Demand Reduction (MW)	-	0.0	0.1	0.0	0.0	0.2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	-	2	4	1	2	9
<i>ENERGY STAR Bathroom Ventilation Fan in Commercial Applications</i>	3.6.2	Energy Savings (MWh) ²	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation ³	-	1	1	-	-	2
<i>ENERGY STAR Ice Machines</i>	3.7.1	Energy Savings (MWh) ²	0	1	0	-	-	2
		Summer Demand Reduction (MW)	0.1	0.2	0.1	-	-	0.4
		Winter Demand Reduction (MW)	0.1	0.1	0.1	-	-	0.3
		Projected Participation ³	1	2	1	-	-	4
<i>Controls: Beverage and Snack Machine Controls</i>	3.7.2	Energy Savings (MWh) ²	-	1	1	-	-	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	2	2	-	-	4
<i>ENERGY STAR Electric Steam Cooker</i>	3.7.3	Energy Savings (MWh) ²	-	9	9	-	-	17
		Summer Demand Reduction (MW)	-	1.7	1.7	-	-	3.5
		Winter Demand Reduction (MW)	-	1.1	1.1	-	-	2.2
		Projected Participation ³	-	2	2	-	-	4
<i>ENERGY STAR Combination Oven</i>	3.7.4	Energy Savings (MWh) ²	-	1	1	-	-	1
		Summer Demand Reduction (MW)	-	0.2	0.1	-	-	0.3
		Winter Demand Reduction (MW)	-	0.1	0.1	-	-	0.2
		Projected Participation ³	-	3	2	-	-	5
<i>ENERGY STAR Commercial Convection Oven - Full Size</i>	3.7.5	Energy Savings (MWh) ²	-	2	2	-	-	4
		Summer Demand Reduction (MW)	-	0.4	0.4	-	-	0.8
		Winter Demand Reduction (MW)	-	0.3	0.3	-	-	0.5
		Projected Participation ³	-	2	2	-	-	4

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>ENERGY STAR Commercial Fryer</i>	3.7.6	Energy Savings (MWh) ²	-	7	5	-	-	12
		Summer Demand Reduction (MW)	-	1.4	1.0	-	-	2.4
		Winter Demand Reduction (MW)	-	0.9	0.6	-	-	1.5
		Projected Participation ³	-	3	2	-	-	5
<i>ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size</i>	3.7.7	Energy Savings (MWh) ²	1	1	1	0	1	3
		Summer Demand Reduction (MW)	0.1	0.2	0.1	0.1	0.1	0.7
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.0	0.1	0.4
		Projected Participation ³	2	3	2	1	2	10
<i>ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size</i>	3.7.7	Energy Savings (MWh) ²	-	5	-	5	-	11
		Summer Demand Reduction (MW)	-	1.1	-	1.1	-	2.2
		Winter Demand Reduction (MW)	-	0.7	-	0.7	-	1.4
		Projected Participation ³	-	3	-	3	-	6
<i>ENERGY STAR Commercial Dishwasher</i>	3.7.8	Energy Savings (MWh) ²	14	28	180	14	28	263
		Summer Demand Reduction (MW)	2.8	5.6	36.1	2.8	5.6	52.8
		Winter Demand Reduction (MW)	1.8	3.6	23.1	1.8	3.6	33.8
		Projected Participation ³	1	2	13	1	2	19
<i>ENERGY STAR Commercial Griddle</i>	3.7.9	Energy Savings (MWh) ²	-	3	9	-	-	11
		Summer Demand Reduction (MW)	-	0.6	1.7	-	-	2.3
		Winter Demand Reduction (MW)	-	0.4	1.1	-	-	1.5
		Projected Participation ³	-	1	3	-	-	4
<i>Commercial Induction Cooktops</i>	3.7.10	Energy Savings (MWh) ²	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Winter Demand Reduction (MW)	-	0.0	0.0	-	-	0.0
		Projected Participation ³	-	1	1	-	-	2
<i>Wall and Ceiling Insulation</i>	3.8.1	Energy Savings (MWh) ²	-	-	-	-	3	3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	-	-	-	-	1.2	1.2
		Winter Demand Reduction (MW)	-	-	-	-	1.0	1.0
		Projected Participation ³	-	-	-	-	2	2
<i>Advanced Power Strips</i>	3.9.1	Energy Savings (MWh) ²	-	-	-	0	-	0
		Summer Demand Reduction (MW)	-	-	-	0.0	-	0.0
		Winter Demand Reduction (MW)	-	-	-	0.0	-	0.0
		Projected Participation ³	-	-	-	2	-	2
<i>ENERGY STAR Servers</i>	3.9.2	Energy Savings (MWh) ²	-	-	-	53,822	-	53,822
		Summer Demand Reduction (MW)	-	-	-	6,864.4	-	6,864.4
		Winter Demand Reduction (MW)	-	-	-	7,131.7	-	7,131.7
		Projected Participation ³	-	-	-	6	-	6
<i>Server Virtualization</i>	3.9.3	Energy Savings (MWh) ²	9	-	-	26	-	35
		Summer Demand Reduction (MW)	1.1	-	-	3.2	-	4.3
		Winter Demand Reduction (MW)	1.1	-	-	3.2	-	4.3
		Projected Participation ³	1	-	-	3	-	4
<i>Cycling Refrigerated Thermal Mass Dryer</i>	3.10.1	Energy Savings (MWh) ²	-	0	0	0	0	2
		Summer Demand Reduction (MW)	-	0.1	0.1	0.1	0.1	0.4
		Winter Demand Reduction (MW)	-	0.1	0.1	0.1	0.1	0.5
		Projected Participation ³	-	2	2	2	2	8
<i>Air-Entraining Air Nozzle</i>	3.10.2	Energy Savings (MWh) ²	1	-	2	-	6	9
		Summer Demand Reduction (MW)	0.1	-	0.2	-	0.7	1.1
		Winter Demand Reduction (MW)	0.1	-	0.2	-	0.7	1.1
		Projected Participation ³	1	-	2	-	6	9
<i>No-Loss Condensate Drains</i>	3.10.3	Energy Savings (MWh) ²	2	5	13	5	6	31
		Summer Demand Reduction (MW)	0.5	1.0	2.9	1.0	1.3	6.8

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	0.6	1.3	3.4	1.3	1.6	8.1
		Projected Participation ³	2	4	11	4	5	26
<i>Air Tanks for Load/No Load Compressors</i>	3.10.4	Energy Savings (MWh) ²	-	1	2	1	2	7
		Summer Demand Reduction (MW)	-	0.2	0.5	0.2	0.5	1.5
		Winter Demand Reduction (MW)	-	0.2	0.5	0.2	0.5	1.5
		Projected Participation ³	-	1	2	1	2	6
<i>Variable-Speed Drive Air Compressor</i>	3.10.5	Energy Savings (MWh) ²	290	340	328	290	277	1,525
		Summer Demand Reduction (MW)	62.9	73.8	71.0	62.9	60.1	330.6
		Winter Demand Reduction (MW)	62.9	73.8	71.0	62.9	60.1	330.6
		Projected Participation ³	23	27	26	23	22	121
<i>Compressed Air Controller</i>	3.10.6	Energy Savings (MWh) ²	1	2	2	1	1	6
		Summer Demand Reduction (MW)	0.1	0.4	0.4	0.2	0.2	1.3
		Winter Demand Reduction (MW)	0.1	0.4	0.4	0.2	0.2	1.3
		Projected Participation ³	1	3	3	2	2	11
<i>Compressed Air Low Pressure Drop Filters</i>	3.10.7	Energy Savings (MWh) ²	-	2	2	2	2	8
		Summer Demand Reduction (MW)	-	0.4	0.4	0.5	0.4	1.7
		Winter Demand Reduction (MW)	-	0.4	0.4	0.5	0.4	1.7
		Projected Participation ³	-	18	17	19	17	71
<i>Compressed Air Mist Eliminators</i>	3.10.8	Energy Savings (MWh) ²	0	1	1	1	1	3
		Summer Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Winter Demand Reduction (MW)	0.0	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	1	10	10	10	13	44
<i>Engine Block Heater Timer</i>	3.11.2	Energy Savings (MWh) ²	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	-	-	2	-	-	2
<i>High Frequency Battery Chargers</i>	3.11.3	Energy Savings (MWh) ²	9	10	11	10	6	46
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	7	8	9	8	5	37
<i>Uninterruptible Power Supply (UPS)</i>	3.11.4	Energy Savings (MWh) ²	-	-	1	-	0	1
		Summer Demand Reduction (MW)	-	-	0.1	-	0.0	0.1
		Winter Demand Reduction (MW)	-	-	0.1	-	0.0	0.1
		Projected Participation ³	-	-	5	-	1	6
<i>Automatic Milker Takeoffs</i>	4.1.1	Energy Savings (MWh) ²	3	-	3	-	-	6
		Summer Demand Reduction (MW)	0.5	-	0.5	-	-	1.1
		Winter Demand Reduction (MW)	0.5	-	0.5	-	-	1.1
		Projected Participation ³	1	-	1	-	-	2
<i>Dairy Scroll Compressors</i>	4.1.2	Energy Savings (MWh) ²	12	12	23	-	-	46
		Summer Demand Reduction (MW)	2.1	2.1	4.2	-	-	8.5
		Winter Demand Reduction (MW)	2.1	2.1	4.2	-	-	8.5
		Projected Participation ³	1	1	2	-	-	4
<i>High-Efficiency Ventilation Fans with and without Thermostats</i>	4.1.3	Energy Savings (MWh) ²	-	-	2	-	-	2
		Summer Demand Reduction (MW)	-	-	0.5	-	-	0.5
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	4	-	-	4
<i>Heat Reclaimers</i>	4.1.4	Energy Savings (MWh) ²	2	-	7	-	-	9
		Summer Demand Reduction (MW)	0.4	-	1.2	-	-	1.6
		Winter Demand Reduction (MW)	0.4	-	1.3	-	-	1.7
		Projected Participation ³	1	-	3	-	-	4

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>High Volume Low Speed Fans</i>	4.1.5	Energy Savings (MWh) ²	108	149	166	149	116	689
		Summer Demand Reduction (MW)	40.0	55.4	61.5	55.4	43.1	255.4
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	13	18	20	18	14	83
<i>Livestock Waterer</i>	4.1.6	Energy Savings (MWh) ²	-	-	1	-	0	2
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	1.3	-	0.4	1.7
		Projected Participation ³	-	-	3	-	1	4
<i>Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps</i>	4.1.7	Energy Savings (MWh) ²	-	5	5	-	5	15
		Summer Demand Reduction (MW)	-	0.8	0.8	-	0.8	2.3
		Winter Demand Reduction (MW)	-	0.8	0.8	-	0.8	2.3
		Projected Participation ³	-	1	1	-	1	3
<i>Low Pressure Irrigation System</i>	4.1.8	Energy Savings (MWh) ²	-	0	0	-	-	0
		Summer Demand Reduction (MW)	-	0.5	0.5	-	-	1.0
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	1	1	-	-	2
<i>New Construction Lighting</i>	3.1.2	Energy Savings (MWh) ²	3,691	5,625	10,020	9,668	6,680	35,684
		Summer Demand Reduction (MW)	652.2	993.9	1,770.4	1,708.3	1,180.3	6,305.1
		Winter Demand Reduction (MW)	652.2	993.9	1,770.4	1,708.3	1,180.3	6,305.1
		Projected Participation ³	21	32	57	55	38	203
<i>Indoor Horticultural Lighting</i>	3.1.7	Energy Savings (MWh) ²	3	5	7	8	10	33
		Summer Demand Reduction (MW)	0.5	0.8	1.0	1.3	1.5	5.2
		Winter Demand Reduction (MW)	0.4	0.6	0.9	1.1	1.3	4.3
		Projected Participation ³	2	3	4	5	6	20
<i>High Efficiency Transformer</i>	3.11.1	Energy Savings (MWh) ²	2	4	3	3	2	15

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Summer Demand Reduction (MW)	0.3	0.5	0.4	0.4	0.3	1.9
		Winter Demand Reduction (MW)	0.3	0.5	0.4	0.4	0.3	1.9
		Projected Participation ³	2	4	3	3	2	14
<i>Midstream lighting incentives - Street lighting</i>	3.1.6	Energy Savings (MWh) ²	1,537	1,676	1,751	1,676	1,537	8,178
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	206.9	225.6	235.7	225.6	206.9	1,100.7
		Projected Participation ³	3,270	3,565	3,724	3,565	3,270	17,394
<i>Midstream lighting incentives: Outdoor floods</i>	3.1.6	Energy Savings (MWh) ²	1,180	1,309	1,745	1,309	1,180	6,722
		Summer Demand Reduction (MW)	57.3	63.5	84.7	63.5	57.3	326.3
		Winter Demand Reduction (MW)	307.4	341.1	454.9	341.1	307.4	1,751.9
		Projected Participation ³	3,213	3,565	4,754	3,565	3,213	18,310
<i>Midstream lighting incentives: High Bays</i>	3.1.6	Energy Savings (MWh) ²	3,029	3,271	3,428	3,271	3,029	16,029
		Summer Demand Reduction (MW)	829.6	895.9	938.8	895.9	829.6	4,389.8
		Winter Demand Reduction (MW)	789.7	852.9	893.8	852.9	789.7	4,179.1
		Projected Participation ³	4,237	4,576	4,795	4,576	4,237	22,421
<i>Midstream lighting incentives: Other Interior Fixtures</i>	3.1.6	Energy Savings (MWh) ²	855	968	1,013	921	855	4,612
		Summer Demand Reduction (MW)	234.6	265.8	278.1	252.7	234.6	1,265.8
		Winter Demand Reduction (MW)	222.9	252.6	264.3	240.2	222.9	1,203.0
		Projected Participation ³	17,951	20,341	21,285	19,341	17,951	96,869
<i>HVAC Systems for Midstream Delivery: Air Conditioner</i>	3.2.2	Energy Savings (MWh) ²	-	30	30	30	30	120
		Summer Demand Reduction (MW)	-	15.5	15.5	15.5	15.5	61.9
		Winter Demand Reduction (MW)	-	6.2	6.2	6.2	6.2	24.7
		Projected Participation ³	-	40	40	40	40	160
<i>HVAC Systems for Midstream Delivery: Heat Pump</i>	3.2.2	Energy Savings (MWh) ²	-	30	30	30	30	122
		Summer Demand Reduction (MW)	-	15.6	15.6	15.6	15.6	62.5

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	-	6.2	6.2	6.2	6.2	24.9
		Projected Participation ³	-	40	40	40	40	160
<i>Ductless Mini-Split Heat Pumps - Commercial < 5.4 Tons for Midstream Delivery</i>	3.2.6	Energy Savings (MWh) ²	-	75	77	77	77	305
		Summer Demand Reduction (MW)	-	54.7	55.8	55.8	55.8	222.1
		Winter Demand Reduction (MW)	-	41.8	42.7	42.7	42.7	169.8
		Projected Participation ³	-	49	50	50	50	199
<i>Midstream Indoor Horticultural Lighting</i>	3.1.7	Energy Savings (MWh) ²	2	2	3	3	2	12
		Summer Demand Reduction (MW)	0.3	0.3	0.5	0.5	0.3	1.8
		Winter Demand Reduction (MW)	0.2	0.2	0.4	0.4	0.2	1.5
		Projected Participation ³	1	1	2	2	1	7
<i>Midstream Premium Efficiency Motors</i>	3.3.1	Energy Savings (MWh) ²	20	20	20	20	20	101
		Summer Demand Reduction (MW)	6.4	6.4	6.4	6.4	6.4	32.2
		Winter Demand Reduction (MW)	0.2	0.2	0.2	0.2	0.2	0.9
		Projected Participation ³	2	2	2	2	2	10
<i>Midstream Variable Frequency Drive (VFD) Improvements</i>	3.3.2	Energy Savings (MWh) ²	47	47	47	47	47	237
		Summer Demand Reduction (MW)	5.4	5.4	5.4	5.4	5.4	26.9
		Winter Demand Reduction (MW)	11.1	11.1	11.1	11.1	11.1	55.5
		Projected Participation ³	4	4	4	4	4	20
<i>Midstream ENERGY STAR Refrigeration Cases</i>	3.5.1	Energy Savings (MWh) ²	-	-	-	-	1	1
		Summer Demand Reduction (MW)	-	-	-	-	0.2	0.2
		Winter Demand Reduction (MW)	-	-	-	-	0.2	0.2
		Projected Participation ³	-	-	-	-	4	4
<i>Midstream ENERGY STAR Freezer Cases</i>	3.5.1	Energy Savings (MWh) ²	-	-	-	-	3	3
		Summer Demand Reduction (MW)	-	-	-	-	0.3	0.3
		Winter Demand Reduction (MW)	-	-	-	-	0.3	0.3

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	-	-	-	-	4	4
<i>Midstream Controls: Evaporator Fan Controllers</i>	3.5.3	Energy Savings (MWh) ²	-	-	-	-	4	4
		Summer Demand Reduction (MW)	-	-	-	-	0.4	0.4
		Winter Demand Reduction (MW)	-	-	-	-	0.4	0.4
		Projected Participation ³	-	-	-	-	2	2
<i>Midstream Controls: Anti-Sweat Heater Controls</i>	3.5.5	Energy Savings (MWh) ²	3	3	3	3	3	14
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.4
		Projected Participation ³	2	2	2	2	2	10
<i>Midstream Controls: Evaporator Coil Defrost Control</i>	3.5.6	Energy Savings (MWh) ²	-	-	-	-	2	2
		Summer Demand Reduction (MW)	-	-	-	-	0.1	0.1
		Winter Demand Reduction (MW)	-	-	-	-	0.1	0.1
		Projected Participation ³	-	-	-	-	2	2
<i>Midstream ENERGY STAR Ice Machines</i>	3.7.1	Energy Savings (MWh) ²	0	0	0	0	0	2
		Summer Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.5
		Winter Demand Reduction (MW)	0.1	0.1	0.1	0.1	0.1	0.3
		Projected Participation ³	1	1	1	1	1	5
<i>Midstream ENERGY STAR Electric Steam Cooker</i>	3.7.3	Energy Savings (MWh) ²	4	4	4	4	4	21
		Summer Demand Reduction (MW)	0.9	0.9	0.9	0.9	0.9	4.3
		Winter Demand Reduction (MW)	0.6	0.6	0.6	0.6	0.6	2.8
		Projected Participation ³	1	1	1	1	1	5
<i>Midstream ENERGY STAR Combination Oven</i>	3.7.4	Energy Savings (MWh) ²	2	0	1	0	1	4
		Summer Demand Reduction (MW)	0.3	0.1	0.3	0.1	0.2	0.9
		Winter Demand Reduction (MW)	0.2	0.0	0.2	0.0	0.1	0.6
		Projected Participation ³	6	1	5	1	4	17

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Midstream ENERGY STAR Commercial Convection Oven - Full Size</i>	3.7.5	Energy Savings (MWh) ²	6	-	1	-	1	8
		Summer Demand Reduction (MW)	1.3	-	0.2	-	0.2	1.7
		Winter Demand Reduction (MW)	0.8	-	0.1	-	0.1	1.1
		Projected Participation ³	6	-	1	-	1	8
<i>Midstream ENERGY STAR Commercial Fryer</i>	3.7.6	Energy Savings (MWh) ²	14	7	7	7	7	43
		Summer Demand Reduction (MW)	2.9	1.4	1.4	1.4	1.4	8.6
		Winter Demand Reduction (MW)	1.8	0.9	0.9	0.9	0.9	5.5
		Projected Participation ³	6	3	3	3	3	18
<i>Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Half Size</i>	3.7.7	Energy Savings (MWh) ²	1	-	-	-	-	1
		Summer Demand Reduction (MW)	0.1	-	-	-	-	0.1
		Winter Demand Reduction (MW)	0.1	-	-	-	-	0.1
		Projected Participation ³	2	-	-	-	-	2
<i>Midstream ENERGY STAR Commercial Hot Food Holding Cabinet: Full Size</i>	3.7.7	Energy Savings (MWh) ²	4	-	-	-	-	4
		Summer Demand Reduction (MW)	0.7	-	-	-	-	0.7
		Winter Demand Reduction (MW)	0.5	-	-	-	-	0.5
		Projected Participation ³	2	-	-	-	-	2
<i>Midstream ENERGY STAR Commercial Dishwasher</i>	3.7.8	Energy Savings (MWh) ²	28	28	124	41	28	249
		Summer Demand Reduction (MW)	5.6	5.6	25.0	8.3	5.6	50.0
		Winter Demand Reduction (MW)	3.6	3.6	16.0	5.3	3.6	32.0
		Projected Participation ³	2	2	9	3	2	18
<i>Midstream ENERGY STAR Commercial Griddle</i>	3.7.9	Energy Savings (MWh) ²	-	-	6	-	-	6
		Summer Demand Reduction (MW)	-	-	1.2	-	-	1.2
		Winter Demand Reduction (MW)	-	-	0.7	-	-	0.7
		Projected Participation ³	-	-	2	-	-	2
	3.10.4	Energy Savings (MWh) ²	-	-	-	-	2	2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Midstream Air Tanks for Load/No Load Compressors</i>		Summer Demand Reduction (MW)	-	-	-	-	0.5	0.5
		Winter Demand Reduction (MW)	-	-	-	-	0.5	0.5
		Projected Participation ³	-	-	-	-	2	2
<i>Midstream Variable-Speed Drive Air Compressor</i>	3.10.5	Energy Savings (MWh) ²	25	25	25	25	25	126
		Summer Demand Reduction (MW)	5.5	5.5	5.5	5.5	5.5	27.3
		Winter Demand Reduction (MW)	5.5	5.5	5.5	5.5	5.5	27.3
		Projected Participation ³	2	2	2	2	2	10
<i>Midstream High-Efficiency Ventilation Fans with and without Thermostats</i>	4.1.3	Energy Savings (MWh) ²	-	-	1	-	-	1
		Summer Demand Reduction (MW)	-	-	0.3	-	-	0.3
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	-	-	2	-	-	2
<i>Midstream Heat Reclaimers</i>	4.1.4	Energy Savings (MWh) ²	-	-	4	-	-	4
		Summer Demand Reduction (MW)	-	-	0.8	-	-	0.8
		Winter Demand Reduction (MW)	-	-	0.8	-	-	0.8
		Projected Participation ³	-	-	2	-	-	2
<i>Midstream High Volume Low Speed Fans</i>	4.1.5	Energy Savings (MWh) ²	307	307	307	307	307	1,536
		Summer Demand Reduction (MW)	113.9	113.9	113.9	113.9	113.9	569.3
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	37	37	37	37	37	185
<i>Midstream Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps</i>	4.1.7	Energy Savings (MWh) ²	-	-	10	-	-	10
		Summer Demand Reduction (MW)	-	-	1.5	-	-	1.5
		Winter Demand Reduction (MW)	-	-	1.5	-	-	1.5
		Projected Participation ³	-	-	2	-	-	2
<i>Building Operator Certification Training</i>	3.11.5	Energy Savings (MWh) ²	1,296	1,729	1,729	2,161	2,161	9,075
		Summer Demand Reduction (MW)	97.3	129.7	129.7	162.1	162.1	680.8

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Winter Demand Reduction (MW)	68.7	91.7	91.7	114.6	114.6	481.2
		Projected Participation ³	6	8	8	10	10	42
<i>Custom:Other - SEM</i>	0.0.6	Energy Savings (MWh) ²	2,108	4,005	6,008	6,956	8,010	27,088
		Summer Demand Reduction (MW)	466.5	886.4	1,329.6	1,539.5	1,772.8	5,994.8
		Winter Demand Reduction (MW)	466.5	886.4	1,329.6	1,539.5	1,515.1	5,737.1
		Projected Participation ³	10	19	29	33	38	129
<i>Custom:Other - VCx</i>	0.0.7	Energy Savings (MWh) ²	7,500	7,500	7,500	7,500	7,500	37,500
		Summer Demand Reduction (MW)	1,246.1	1,246.1	1,246.1	1,246.1	1,246.1	6,230.3
		Winter Demand Reduction (MW)	1,246.1	1,246.1	1,246.1	1,246.1	1,246.1	6,230.3
		Projected Participation ³	75	75	75	75	75	375
<i>Custom:Other - vSEM</i>	0.0.9	Energy Savings (MWh) ²	-	2,000	2,000	2,000	5,000	11,000
		Summer Demand Reduction (MW)	-	332.3	332.3	332.3	830.7	1,827.5
		Winter Demand Reduction (MW)	-	332.3	332.3	332.3	830.7	1,827.5
		Projected Participation ³	-	20	20	20	50	110
<i>Solar</i>	0.0.2	Energy Savings (MWh) ²	14,455	17,006	16,368	10,204	2,551	60,583
		Summer Demand Reduction (MW)	5,031.5	5,919.4	5,697.4	3,551.6	887.9	21,087.8
		Winter Demand Reduction (MW)	784.3	922.8	888.2	553.7	138.4	3,287.3
		Projected Participation ³	68	80	77	48	12	285
<i>Custom:Other - Compressed Air</i>	0.0.10	Energy Savings (MWh) ²	1,367	1,641	1,914	3,829	3,829	12,580
		Summer Demand Reduction (MW)	136.8	164.2	191.6	383.2	383.2	1,258.9
		Winter Demand Reduction (MW)	136.8	164.2	191.6	383.2	383.2	1,258.9
		Projected Participation ³	5	6	7	14	14	46
<i>Custom: Data Center</i>	0.0.11	Energy Savings (MWh) ²	420	420	630	630	630	2,730
		Summer Demand Reduction (MW)	32.0	32.0	48.1	48.1	48.1	208.2
		Winter Demand Reduction (MW)	32.0	32.0	48.1	48.1	48.1	208.2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
		Projected Participation ³	2	2	3	3	3	13
<i>Custom:HVAC</i>	0.0.12	Energy Savings (MWh) ²	6,628	10,116	13,081	13,081	13,081	55,985
		Summer Demand Reduction (MW)	2,033.6	3,103.9	4,013.6	4,013.6	4,013.6	17,178.3
		Winter Demand Reduction (MW)	2,033.6	3,103.9	4,013.6	4,013.6	4,013.6	17,178.3
		Projected Participation ³	38	58	75	75	75	321
<i>Custom: Motors & Drives</i>	0.0.13	Energy Savings (MWh) ²	3,155	4,207	4,908	4,908	4,908	22,085
		Summer Demand Reduction (MW)	566.7	755.6	881.5	881.5	881.5	3,966.8
		Winter Demand Reduction (MW)	566.7	755.6	881.5	881.5	881.5	3,966.8
		Projected Participation ³	9	12	14	14	14	63
<i>Custom: Other</i>	0.0.14	Energy Savings (MWh) ²	20,530	25,903	29,356	29,356	16,501	121,647
		Summer Demand Reduction (MW)	2,241.1	2,827.5	3,204.5	3,204.5	1,801.2	13,278.9
		Winter Demand Reduction (MW)	2,241.1	2,827.5	3,204.5	3,204.5	1,801.2	13,278.9
		Projected Participation ³	107	135	153	153	86	634
<i>Custom: Process</i>	0.0.15	Energy Savings (MWh) ²	1,555	2,000	2,222	2,222	2,888	10,887
		Summer Demand Reduction (MW)	370.0	475.7	528.6	528.6	687.2	2,590.1
		Winter Demand Reduction (MW)	370.0	475.7	528.6	528.6	687.2	2,590.1
		Projected Participation ³	7	9	10	10	13	49
<i>Custom: Refrigeration</i>	0.0.16	Energy Savings (MWh) ²	2,144	2,703	3,076	3,076	3,076	14,074
		Summer Demand Reduction (MW)	247.8	312.4	355.5	355.5	355.5	1,626.9
		Winter Demand Reduction (MW)	247.8	312.4	355.5	355.5	355.5	1,626.9
		Projected Participation ³	23	29	33	33	33	151
<i>Custom: EMS</i>	0.0.17	Energy Savings (MWh) ²	891	1,188	1,336	1,336	1,336	6,088
		Summer Demand Reduction (MW)	35.2	46.9	52.7	52.7	52.7	240.2
		Winter Demand Reduction (MW)	35.2	46.9	52.7	52.7	52.7	240.2
		Projected Participation ³	6	8	9	9	9	41

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
<i>Custom: Retrocommissioning</i>	0.0.18	Energy Savings (MWh) ²	7,198	9,064	10,130	10,130	10,130	46,652
		Summer Demand Reduction (MW)	3,320.7	4,181.6	4,673.6	4,673.6	4,673.6	21,523.2
		Winter Demand Reduction (MW)	3,320.7	4,181.6	4,673.6	4,673.6	4,673.6	21,523.2
		Projected Participation ³	27	34	38	38	38	175
<i>Custom: CHP</i>	0.0.19	Energy Savings (MWh) ²	2,470	9,549	16,154	10,769	10,769	49,710
		Summer Demand Reduction (MW)	242.8	485.5	728.3	485.5	485.5	2,427.6
		Winter Demand Reduction (MW)	242.8	485.5	728.3	485.5	485.5	2,427.6
		Projected Participation ³	1	2	3	2	2	10
<i>Ashre Audits/Feasibility Studies</i>	0.0.20	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	10	10	10	10	10	50
<i>Incentive Buy Down</i>	0.0.21	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	-	-	-	-	-	-
		Winter Demand Reduction (MW)	-	-	-	-	-	-
		Projected Participation ³	30	35	40	45	50	200
<i>C&I Load Shifting</i>	3.12.1	Energy Savings (MWh) ²	-	-	-	-	-	-
		Summer Demand Reduction (MW)	43.2	86.4	108.0	129.6	129.6	496.8
		Winter Demand Reduction (MW)	43.2	86.4	108.0	129.6	129.6	496.8
		Projected Participation ³	2	4	5	6	6	23

Estimated Program Budget (Total) by Year

Table 34. Non-Residential Program Budget

Program Name:		Non-Residential					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$34,181	\$41,904	\$47,195	\$51,004	\$39,614	\$213,898
Incentives (\$000)²⁵	Rebates	\$16,170	\$21,372	\$23,975	\$27,619	\$19,062	\$108,198
	Upstream/Midstream Buydown	\$913	\$1,062	\$1,159	\$1,040	\$973	\$5,148
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct-Install Materials & Labor	\$4,022	\$4,534	\$4,825	\$4,546	\$4,077	\$22,004
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$21,105	\$26,968	\$29,959	\$33,205	\$24,112	\$135,349
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$12,434	\$14,453	\$16,748	\$17,310	\$15,012	\$75,957
	Marketing	\$626	\$461	\$469	\$476	\$488	\$2,519
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$17	\$22	\$19	\$14	\$2	\$73
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$13,076	\$14,936	\$17,236	\$17,799	\$15,502	\$78,549
Percent Incentives		62%	64%	63%	65%	61%	63%

²⁵ Incentive totals include interest-free financing options for qualified small commercial customers in addition to traditional incentive offerings. These financing options fall within the incentive definition outlined in the TRC Order of “transfer payments intended to offset the IMC of efficient equipment.”

Estimated Percentage of Sector Budget Attributed to the Program

The Non-Residential program offers incentives to customers in the SCI and LCI sectors. The Non-Residential program accounts for 95.6% of SCI and 95.9% of LCI sector spending exclusive of common cost allocation.

Table 35. Non-Residential Summary of EE&C Costs

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost(\$/MWh)	Levelized Cost (\$/MWh)	Expected Acquisition Cost (\$/MW)
		Incentives	Program Design	Administrative	EDC Delivery Costs	CSP Delivery Fees	Marketing	EM&V	AEPS Registration Support	Other (Describe)				
Non-Residential Portfolio	Small C&I	\$66,587,232	\$0	\$0	\$0	\$34,814,665	\$1,155,777	\$0	\$33,423	\$0	\$102,591,096	\$232	\$70	\$1,458,638
	Large C&I	\$68,761,645	\$0	\$0	\$0	\$41,142,531	\$1,363,220	\$0	\$39,327	\$0	\$111,306,722	\$209	\$69	\$1,157,362
	Sector Total	\$135,348,877	\$0	\$0	\$0	\$75,957,195	\$2,518,996	\$0	\$72,750	\$0	\$213,897,819	\$220	\$70	\$1,308,000

Cost Effectiveness

Table 36. Non-Residential TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)					
	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Non-Residential</i>	<i>PY18</i>	<i>1.00</i>	<i>1.56</i>	<i>\$21,105</i>	<i>\$78,457</i>	<i>\$13,076</i>	<i>\$112,638</i>	<i>\$52,133</i>	<i>\$116,672</i>	<i>\$36</i>	<i>\$7,072</i>	<i>\$175,913</i>
<i>Non-Residential</i>	<i>PY19</i>	<i>1.00</i>	<i>1.57</i>	<i>\$26,968</i>	<i>\$101,443</i>	<i>\$14,936</i>	<i>\$143,347</i>	<i>\$64,384</i>	<i>\$152,603</i>	<i>\$104</i>	<i>\$8,550</i>	<i>\$225,640</i>
<i>Non-Residential</i>	<i>PY20</i>	<i>1.00</i>	<i>1.40</i>	<i>\$29,959</i>	<i>\$129,049</i>	<i>\$17,236</i>	<i>\$176,244</i>	<i>\$71,161</i>	<i>\$166,875</i>	<i>\$172</i>	<i>\$9,338</i>	<i>\$247,546</i>
<i>Non-Residential</i>	<i>PY21</i>	<i>1.00</i>	<i>1.47</i>	<i>\$33,205</i>	<i>\$109,050</i>	<i>\$17,799</i>	<i>\$160,055</i>	<i>\$68,362</i>	<i>\$158,497</i>	<i>\$56</i>	<i>\$8,303</i>	<i>\$235,217</i>
<i>Non-Residential</i>	<i>PY22</i>	<i>1.00</i>	<i>1.57</i>	<i>\$24,112</i>	<i>\$79,227</i>	<i>\$15,502</i>	<i>\$118,840</i>	<i>\$54,697</i>	<i>\$125,133</i>	<i>\$75</i>	<i>\$7,072</i>	<i>\$186,977</i>
<i>Non-Residential Total</i>		<i>1.00</i>	<i>1.51</i>	<i>\$135,349</i>	<i>\$497,226</i>	<i>\$78,549</i>	<i>\$711,124</i>	<i>\$310,737</i>	<i>\$719,780</i>	<i>\$443</i>	<i>\$40,333</i>	<i>\$1,071,293</i>

Table 37. Non-Residential TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)					
	Program	Program Year ²	NTGR	Gross TRC ¹	Incremental Measure Cost Paid by EDC	Incremental Measure Cost Paid by Participants	Program Administration Cost	Total TRC Costs	Capacity Benefits ⁴	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits
Non-Residential	PY18	0.684	1.48	\$21,105	\$47,005	\$13,076	\$81,187	\$35,664	\$79,815	\$25	\$4,838	\$120,342
Non-Residential	PY19	0.684	1.50	\$26,968	\$60,878	\$14,936	\$102,782	\$44,045	\$104,396	\$71	\$5,849	\$154,360
Non-Residential	PY20	0.684	1.34	\$29,959	\$78,819	\$17,236	\$126,013	\$48,681	\$114,159	\$118	\$6,388	\$169,346
Non-Residential	PY21	0.684	1.40	\$33,205	\$64,112	\$17,799	\$115,116	\$46,766	\$108,428	\$38	\$5,680	\$160,912
Non-Residential	PY22	0.684	1.48	\$24,112	\$46,582	\$15,502	\$86,196	\$37,418	\$85,604	\$52	\$4,838	\$127,911
Non-Residential Total		0.684		\$135,349	\$297,396	\$78,549	\$511,294	\$212,575	\$492,401	\$303	\$27,592	\$732,872

Summary of Benchmarking Results

As mentioned in Section 3.2 PECO conducted benchmarking against similar utilities to inform its budget and savings split in Phase V.

Engagement of Different Housing and Ownership Types

PECO's engagement strategy reflects the distinct needs of large and small C&I customers. Large businesses often have complex operations and longer decision-making cycles, requiring data-driven targeting, customized solutions, and detailed cost-benefit analyses. Small businesses, by contrast, prioritize simplicity and quick payback, so PECO focuses on streamlined program designs, clear communication, and minimal administrative burden. Additionally, PECO plans to offer small businesses 0% financing to help overcome capital constraints and implement impactful projects. By tailoring approaches to these differences, PECO ensures broad participation in its program design.

Other Information Deemed Appropriate

Not applicable.

3.5 Government/Nonprofit/Institutional Sector

Municipal government, nonprofits, and institutions will have a specific assigned outreach representative for engagement in the prescriptive and custom components of the Non-Residential program. Outreach will coordinate with PECO's economic development, large customer services team and government affairs to work collaboratively to engage and educate these customers on the value of energy efficiency and participation in PECO programs. The CSP will tailor marketing and outreach to reflect the priorities of GNI customers, such as sustainability goals and budget constraints and will implement sector-specific messaging where appropriate. For example, many municipal governments use energy master planning to better understand how they use and manage energy. PECO's outreach team will directly support implementation of those plans using its Non-Residential program incentives.

4. Program Management and Implementation Strategies

This section provides a detailed description of how PECO plans to manage and implement programs, including the approach to, and use of, CSPs. Section 4.1 discusses an overview of PECO's management and implementation strategies, including the organization with CSPs, constraints, milestones, and risks. Section 4.2 includes the executive management structure and the basis for costs. Section 4.3 describes the selected CSPs and the activities they will carry out for Act 129 implementation. Section 4.4 speaks to coordination with other state conservation programs, discussing health and safety, AEPS registration, and collaboration with programs such as the IRA 50121 and 50122 programs.

4.1 Overview of PECO Management and Implementation Strategies

Led by PECO's program management team, each CSP will work closely with the PECO Marketing and Promotions Team, the E&O CSP, and the Exelon Energy Efficiency Marketing Agency to make PECO's energy efficiency programs successful. The responsibilities of each role are described below.

4.1.1 Services to be Provided by PECO, Consultants, Trade Allies, and CSPs

This section describes the services to be provided by key program stakeholders, including PECO Program Managers, PECO's Marketing Team, CSPs, Data Vendors, Evaluators, Trade Allies, and Market Actors.

PECO Program Managers

Oversee the CSP's performance and service obligations and make sure the CSP's delivery aligns with the approved EE&C Plan.

Oversee and actively manage the CSP's performance.

Approve CSP payments (non-incentive payments) on a monthly and annual basis and incentive payments on a weekly or otherwise basis.

Manage the overall CSP contract.

Oversee program-level marketing with the CSP in coordination with the PECO marketing and promotions team.

Work with CSPs to manage and direct the sales process and approach.

Engage with customers as needed when issues are escalated by the customer, trade ally, and/or CSP.

PECO Marketing and Promotions Team

Manage the portfolio's broad awareness campaign with the Exelon Energy Efficiency Marketing Agency and coordinate the implementation CSPs and E&O CSP on advertising and marketing participant engagement strategies.

Coordinate the education outreach strategy, content, and community event participation.

Manage and track customer awareness and satisfaction studies.

Facilitate delivery of premium customer/participant experiences by providing oversight of customer support infrastructure.

Exelon Energy Efficiency Marketing Agency

The Exelon Energy Efficiency Marketing Agency will design and lead the overall advertising plan for all programs. This will include the programs' look and feel, messaging, and advertising channels. The Exelon Energy Efficiency Marketing Agency will coordinate through the PECO senior marketing specialists and CSPs on program-specific materials. (Note: The advertising vendor will not be responsible for identifying and tracking leads. CSPs will identify, follow up with, and track leads).

CSPs

- Deliver energy efficiency savings and associated peak demand reductions on time and on budget while making it easy for customers to participate.
- Maintain high customer satisfaction.
- Develop and adjust program implementation strategies in collaboration with PECO program managers.
- Develop, maintain and support market actor networks (retailers, distributors, contractors, manufacturers, builders, raters, project developers).
- Develop program marketing and coordinate with the PECO Marketing and Promotions team and Exelon Energy Efficiency Marketing Agency for design and consistency in messaging.
- Program outreach and lead generation (including development and distribution of program materials, neighborhood canvassing, trade ally and association networking, customer support infrastructure/lead conversion).
- Manage audits (including customer screening, hiring, training and monitoring of auditors and contractors, measure direct installation, and customer audit reports).
- Distribute efficient measure giveaways or energy kits, if applicable.
- Pick up and recycle appliances (and other equipment), if applicable.
- Process incentives (receive, review, and verify applications and pay rebates).
- Track program performance and implement continuous improvement.
- Report program activities while adhering to PECO and regulatory data reporting requirements and responding to internal or external requests.
- Continuously improve forecasting accuracy.
- Achieve low-income carve-out targets.
- Coordinate with other related activities and partnerships.
- Support any program amendment process should program goals or budget need adjustment to suit the portfolio.

- Provide weekly transactional data to PECO for execution of customer satisfaction survey tools.
- Adapt program implementation strategies to continue program operations and achieve program goals through market disruptions such as changing codes and standards, removal of federal programs such as ENERGY STAR, etc.

Facilitate AEPS registration process.

Data Vendor

The database vendor will develop and maintain an appropriate tracking system for the programs to compile and aggregate data from PECO and CSPs, using generally accepted data input and validation techniques. The data vendor will also collaborate with PECO, CSPs, and evaluators to develop and provide summary and detailed reports.

Evaluator

The independent evaluation contractor is responsible for the portfolio's EM&V and will verify that programs meet goals and are operated consistently with the approved Plan. They will interface with the SWE to confirm measurement and verification protocols are aligned with the state's requirements and periodically provide PECO feedback on the identified areas where delivery performance could be improved. The independent evaluation contractors will also support PECO with semiannual and annual compliance reports.

Trade Allies

Through the right combination of trade ally management, marketing, education, data analytics, and outreach, trade ally networks will be motivated to increase performance and provide valuable feedback for program design and implementation. CSPs will engage existing trade allies and reach out to potential new trade ally participants prior to the start of Phase V to provide a portfolio-wide trade ally database focused on:

Maintaining active trade ally participation requirement status

Identifying underperformers to focus campaigns for increased production

Engaging contractors to participate

Providing all participating trade allies with program information and announcements

Trade ally outreach may also include monthly program newsletters with updates, quarterly trade ally report cards with metrics, and annual trade ally events to provide education on programs and technologies, sales training, and networking opportunities for those with complementary business models.

Market Actors

The CSPs will engage market actors as partners in program outreach and marketing. Specific market actors and their roles include:

- **Influencers:** Community organizations, associations and influencers that customers follow, join, or rely on for advice. They are trusted partners with unique connections to

their constituents – targeted PECO customers. Examples include condominium boards for multifamily tenants and property managers, home care services, community Weatherization Assistance program agencies and food banks serving low-income customers, and HERS Raters and Home Builders Associations for new construction.

- **Contractors and design firms:** Professionals who specify energy and demand savings equipment, sell and install planned or emergency replacement high-efficiency equipment.
- **Distributors and manufacturers:** Stakeholders who stock and price-to-move high-efficiency equipment as well as participants in a residential and non-residential midstream or upstream program component. CSPs will build relationships through national distribution and manufacturer networks, associations, and organizations.
- **Multicultural alliances and neighborhood associations:** Partners that can assist with reaching customers with English as a second language, providing content and collateral that resonate given the nuances of their language and cultural norms; access to neighborhood meetings to present the value proposition of multiple programs; potential workforce development partners to recruit local contractors and individual program staff.
- **Government agencies:** Local township sponsored community events enabling direct customer engagement for cross promotion of multiple programs; recycling centers and township websites encouraging PECO refrigerator and freezer recycling programs; and financial assistance programs that can aid customers along the energy efficiency continuum.

4.1.2 Risk Categories and Risk Mitigation Strategies

Section 3 includes risks for individual programs. There are also risks inherent in the delivery of any energy efficiency portfolio. PECO is taking several key steps to manage those risks:

Selecting programs that are diversified in design and implementation strategy including some program components that are relatively simple, flexible, and have a history of delivering results in Pennsylvania and other states (e.g., upstream and midstream retail programs) combined with comprehensive program offerings that strive for deeper energy savings.

Developing a Plan with multiple program components and a broad mix of measures to avoid over-reliance on any single measure.

Forecasting to exceed the overall energy and demand savings targets to hedge unknown performance across the entire portfolio.

4.1.2.1 Performance Risk

PECO managed performance risk by using a robust CSP RFP process for selecting CSPs with proven experience to implement the approved Plan. PECO used a disciplined RFP evaluation and selection process to support the engagement of experienced CSPs in the delivery of the programs (requiring CSP proposals to demonstrate a proven track record of performance). CSP contracts, where possible, will include performance clauses to establish that CSPs have a strong financial incentive to succeed.

PECO program managers will be responsible for continual oversight of CSP performance against the Plan and will promptly implement corrective actions if goals are not being met. Lastly, PECO will continue to meet with stakeholders and other Pennsylvania EDCs to share learnings and draw on program experience across the state to continuously improve the programs in its portfolio.

4.1.2.2 Technology Risk

The EE&C Plan incentivizes customers for purchasing and installing known technologies and products with established TRM energy and demand savings. The TRM provides the standards for determining the prescriptive or deemed energy savings. Using this approach removes much of the technology risk from the Plan's prescriptive energy efficiency measures and results in a more cost-effective measurement and verification process.

PECO's CSPs will calculate custom project savings on an individual project basis, using the existing (or code-required) equipment as the baseline of energy use. CSPs will conduct pre- and post-inspections, where appropriate, to verify equipment and operating conditions. Incentive payment estimates will be based on standard engineering and energy calculation principles and final payments will be based on the confirmed savings.

An additional technology risk is related to data sharing and cybersecurity. Coordination with external entities and complementary programs introduces the potential for sensitive customer information to be exposed without consistent or clearly defined guidance. As data exchanges become more frequent and complex, particularly when integrating with statewide initiatives with third-party platforms, such as the IRA programs, the risk of unauthorized access or misuse grows.

Mitigation strategies focus on proactive governance and secure practices. PECO will adopt robust, industry-standard data-sharing protocols that prioritize encryption, authentication, and customer consent at every stage of the process. Clear procedures will be implemented to ensure compliance with applicable privacy regulations and internal security policies. Additionally, PECO will actively participate in the PUC working group on data sharing and cybersecurity to align with statewide best practices, anticipate emerging threats, and continuously refine its approach to safeguarding customer information.

4.1.2.3 Market Risk

PECO worked diligently to develop a strong portfolio of programs, benchmarked for success in comparable jurisdictions, and developed with input from key stakeholders. Uncovering barriers to participation and developing approaches that address these barriers facilitates program success. PECO has gained significant experience and market connections in the process of delivering its Phase I-IV programs. Informed by this experience, some of PECO's strategies to reduce market risk include the following:

CSP Collaboration: PECO developed the Plan collaboratively with CSPs to reduce the risk that the Plan is not achievable in the market environment.

Customer Education: Education and awareness are an integral component of every program. This will include program awareness and the benefits of becoming more energy efficient.

Trade Ally Coordination: All trade allies will be offered training opportunities and provided appropriate materials and technical support. The intent is to facilitate program awareness and knowledge, provide strategies for selling energy efficiency and peak demand reduction to their customers, and educate the trade allies.

Program Promotion: PECO and its contractors will implement a strong promotional advertising campaign to drive awareness and call on customers to act.

Product Promotion: Point-of-purchase materials will be placed in participating retail stores; customers will be able to easily participate using instant rebates.

Streamlined Participation: Program eligibility and streamlined application processes will make participation as easy as possible for customers.

4.1.2.4 Evaluation Risk

PECO will use several strategies to minimize evaluation risk. Eliminating evaluation risk begins with program design to establish that all assumptions and EM&V protocols are agreed upon in advance. PECO will work closely with the SWE to maintain consistent assumptions and processes throughout implementation.

However, there are emerging risks that could impact evaluation outcomes. Changes to regulatory guidance or updates to the TRM may affect claimable savings, introducing uncertainty in compliance verification. Additionally, the potential elimination of the ENERGY STAR program could make verifying the efficiency of certain equipment more challenging, as ENERGY STAR has historically provided a widely accepted benchmark for qualifying products.

To mitigate these risks, PECO's independent EM&V contractor will continue to conduct disciplined verification activities for each program, ensuring that measures receiving incentives are properly installed. PECO and its EM&V contractor will rely on industry standards and state-approved methods for measurement and verification, while adapting processes as needed to address any changes in guidance or program requirements.

4.1.3 Human Resource and Contractor Resource Constraints

Flexibility in resource staffing is needed to effectively implement the EE&C Plan. PECO will manage human resource and contractor resource constraints through deliberate staffing and training. Each CSP has laid out a succession plan in the event of staff changes, including backups for staff roles.

Internally, the organization will be overseen by PECO's Energy and Marketing Services team and will be further broken out in the marketing department by the following groups: Residential Energy Efficiency programs, C&I programs, Measurement and Verification, Business Planning and Promotions.

4.1.4 Early Warning Systems To Indicate Progress Towards Goals and Process for Adjustment

PECO has several methods for monitoring progress toward goals and ensuring that corrective actions are taken:

- Program managers will closely monitor the programs through direct interface with the CSPs and through the demand side management program tracking database. PECO will develop and monitor performance indicators for each program monthly. Regular review of performance metrics and feedback from CSPs will allow program managers to identify potential issues and take prompt corrective actions.
- Regular program evaluation will identify issues that may impede a program's ability to effectively reach its goals. The EM&V contractor will conduct evaluations to make sure that issues are identified early in the program cycle. It will be the PECO EM&V team's responsibility to confirm that program managers consider recommended improvements and incorporate them into the program design as warranted.
- As part of PECO's ongoing review of program performance, PECO will regularly assess budget distribution to establish that funds are allocated effectively. If monitoring shows adjustments are needed, PECO will take proactive steps, including amending its EE&C Plan as done in Phase IV, to keep program dollars aligned with compliance objectives and customer needs.
- PECO will monitor efforts to update building and appliance codes that may affect the building or equipment baselines and develop strategies to adapt these changes into any affected program's design. Whether there are changes due to codes and standards or evaluation results, PECO will quickly react to actual or potential changes in the TRM to confirm that programs are claiming appropriate energy savings. In addition, changes to TRM measures through IMPs will be actively monitored by PECO and the PECO EM&V team to determine that savings remain accurate and are verified using the most up-to-date guidance.

4.1.5 Implementation Schedule with Milestones

The planned implementation schedule follows:

January through March 2026: PECO and the CSPs will kick off the program pre-launch process. During pre-launch, CSPs will assign key staff and confirm all customer support systems and marketing and outreach is in place.

June 1, 2026: The programs will launch with some components on a ramp-up period for the first 6 months.

June 2026–May 2031: Programs will operate and adjust to market changes. Savings and budget compared to goals will be reviewed on a regular basis.

May 31, 2031: Last day of the Phase V programs.

4.1.6 Stakeholder Engagement Overview

PECO plans to regularly engage with stakeholders, including community organizations, groups, and individuals serving low-income populations to help establish that the Plan design is implemented consistently with the vision presented in this Plan. PECO will continue to be an active and engaged participant in PUC-sponsored meetings and activities and will initiate stakeholder input sessions with PECO's customer groups and partners.

The CSPs will also engage a variety of organizations such as:

- **Multicultural alliances and neighborhood associations:** Partners that can assist with reaching customers with English as a second language, providing content and collateral that resonate given the nuances of their language and cultural norms; access to neighborhood meetings to present the value proposition of multiple programs; potential workforce development partners to recruit local contractors and individual program staff.
- **Local community-based organizations:** Bucks County Opportunity Council, Delaware and Philadelphia County Housing Authorities, government organizations like Philadelphia Energy Authority, and advocates such as the Housing Alliance.
- **Business and Diversity Networks:** African American Chamber of Commerce of PA, NJ & DE; U.S. Black Chambers / National Black Chamber of Commerce; National Association of Women Business Owners (NAWBO); Small Business Diversity Network (SBDN); Brown Skin Brunchin’.
- **Local and Regional Business Support Organizations:** Penn State Smeal Minority-Owned Business Network; Pennsylvania Events & Small Business Network; Service Corps of Retired Executives (SCORE); Accion U.S. Network. Partners that offer mentoring, workshops, and procurement opportunities; provide access to small business communities and events; and support workforce development through coaching and training resources.

4.2 Executive Management Structure

This section describes PECO’s 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 QA/QC. Figure 3 includes the management team responsible for implementing PECO’s EE&C Plan.

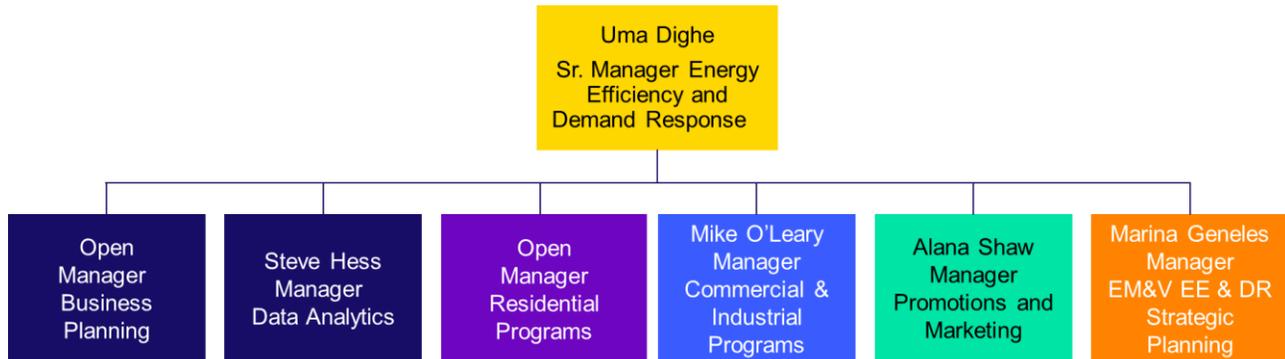
4.2.1 PECO Structure for Addressing Portfolio Strategy

Responsibility for the entire portfolio of programs resides within a single organization, with executive-level leadership provided by the Senior Manager of the Energy Efficiency Portfolio. Individual Managers are assigned responsibility for each market sector and key functional support areas. This executive team is responsible for overall portfolio strategy and planning.

Primary program management is organized by market sector: C&I and residential. Individual program managers are assigned to each program and have overall responsibility for the programs with support from the functional support groups: promotions and marketing, data analytics, business planning, and EM&V. They provide specialized support services to the program managers in the following areas:

- Promotions and marketing coordinates all internal and external communications.
- Business planning is responsible for all financial aspects of the portfolio. This responsibility includes budget and financial management as well as maintaining the portfolio tracking database to provide performance tracking and reporting.
- EM&V oversees the evaluation contractor and interfaces with the SWE.

Figure 3. PECO Proposed EE&C Organization



4.2.2 Approach for Overseeing the Performance of CSPs and Other Providers

PECO will oversee CSPs through a comprehensive management, compensation, and evaluation framework designed to facilitate achievement of Act 129 goals and continuous program improvement.

Performance-Based Compensation: A portion of CSP compensation will be tied to verified MWh and MW savings that contribute to achieving regulatory targets (\$/verified MWh and \$/verified MW).

Key Performance Metrics and Monitoring: PECO will incorporate key performance metrics into CSPs contracts including participation, costs, savings, adherence to plan, participant experience, and more. PECO program managers will maintain regular communication with CSPs to review progress, address challenges, and implement changes as needed to support program success.

- **Regular Reporting by CSPs to PECO:** CSPs will share program participation and project status updates with PECO on a regular basis.

Independent Evaluation and Customer Feedback: PECO will assess customer and market actor satisfaction through each program's EM&V process. Independent evaluation contractors will provide PECO with feedback on CSP performance. PECO will use this feedback to inform program adjustment and help the CSPs deliver high-quality programs.

Continuous Improvement and Accountability: PECO's program management approach emphasizes transparency, accountability, and ongoing improvement. CSPs are required to report lessons learned, propose enhancements, and response to evolving market and regulatory requirements. This structure will support CSPs in delivering programs that maximize benefits for PECO customers.

4.2.3 Basis for Administrative Budget (non-incentive costs)

Administrative costs (non-incentive costs) in PY18–PY22 will be factored into the overall portfolio benefit-cost analysis. These costs include all non-incentive costs and are aligned with the budget categories in Table 9 for each program. To determine the administrative budget, PECO followed the PUC's Phase V Final Order to have a minimum of 50% of the total budget

go to incentives, including direct-install. PECO then benchmarked the Phase IV budget to determine PECO and non-PECO administrative budget. Administrative cost categories include:

Program Design: Includes all costs related to designing the Phase VI program, assuming there will be a Phase VI, including updating avoided costs and load shape research. Additionally, program design costs will include research and development (R&D) efforts including those for pilots.

Administrative: Represents costs required to develop, oversee, and execute all programs in the portfolio. These costs include the data vendor contract, PECO legal, IT support, administrative costs related to the data sharing workgroup, and costs related to braided funding support.

EDC Delivery Costs: Represents labor costs for PECO staff to run the programs.

CSP Delivery Fees: Includes all fixed costs to implement the Plan for the Residential Energy Efficiency, HER, and Non-Residential Energy Efficiency programs, as well as costs associated with facilitating AEPS registration.

Marketing: Represents broad marketing, education, and outreach efforts to promote the overall portfolio of energy efficiency and peak demand reduction programs as well as specific and targeted marketing strategies for specific programs and solutions. This will include expenditures on radio, newspaper, social media, and sponsorships promoting the program portfolio.

EM&V: Represents costs associated with third-party independent EM&V for the full portfolio process and impact evaluation activities, including continuous improvement activities.

AEPS Registration Support: Represents costs for the CSP to facilitate the AEPS registration process.

Other: Includes PECO staff training, Conferences such as eSource related to energy efficiency programs, licenses required for successful program implementation and unforeseen circumstances which are possible but cannot be predicted at the time of developing this Plan.

4.3 CSPs

4.3.1 Selected CSPs

PECO issued RFPs and is in the process of selecting and contracting CSPs for implementing and evaluating the Phase V programs. The selected implementation CSPs and independent evaluator, their qualifications, and basis for selection will be shared with the PUC. Each CSP and evaluation contract is deemed confidential and proprietary; each will be filed with the PUC separately. No CSP contract will be effective until approved by the PUC.

4.3.2 Describe the Work and Measures Being Performed by CSPs

CSPs will implement the energy efficiency programs using their experience and capabilities from implementing previous PECO programs and other programs across the country. Each of the selected CSPs will be responsible for implementation services detailed in the individual program descriptions in Section 3.

4.3.3 Describe Any Pending RFPs to Be Issued for Additional CSPs

PECO does not plan to issue any additional RFPs at the time of developing this Plan.

Exelon will look to hire an Energy Efficiency Marketing Agency. This vendor will design and lead the overall advertising plan for Energy Efficiency programs across the Exelon Operating Companies. This will include look and feel, messaging, and advertising channels. The vendor will coordinate with PECO's Promotions Team and CSPs on program-specific materials. The vendor will not be responsible for identifying and tracking leads.

4.4 Coordination with Other State Conservation Programs

As part of its Phase V program plans, PECO will actively collaborate with other state conservation initiatives to maximize impact. These partnerships are essential for delivering the greatest possible value in energy savings and improving customer experience for ratepayers across PECO's service territory.

4.4.1 Collaboration with Other State or Federal Programs to Achieve Savings

Refer to Section 3.1.5 for details about collaboration with non-Act 129 programs.

4.4.2 PECO's Plan to Highlight the Availability of Multiple Funding Sources

PECO's Phase V Plan highlights the availability of multiple funding sources to help customers maximize participation and project impact. To facilitate awareness and accessibility, PECO will engage contractors through targeted outreach and provide education. These strategies are designed to reduce barriers, enhance affordability, and deliver greater value across PECO's service territory.

4.4.3 Process to Facilitate Alternative Energy Portfolio Standards Registration for C&I Participants of Act 129 Programs

PECO is committed to establishing a clear and collaborative process to help C&I participants meet Alternative Energy Portfolio Standards (AEPS) within Act 129 programs. This approach will focus on alignment with regulatory objectives, streamlined participation, and enhanced customer support, with additional details to be defined as program design evolves.

Current planning considerations, active June 1, 2026, include:

- Identifying eligible projects and informing customers of AEPS registration requirements and benefits

- Providing guidance to facilitate AEPS registration

- Coordinating with the PUC, as needed, to enable timely and accurate registration

- Tracking and reporting AEPS-related activities and costs to facilitate transparency and alignment with regulatory obligations

4.4.4 Plans to Address Health and Safety Issues that Arise in the Delivery of Act 129 Services

PECO recognizes the importance of addressing health and safety barriers to ensure equitable access to energy efficiency programs for residential customers. As part of the broader Phase V Residential Energy Efficiency portfolio, the program will allocate up to \$3,000,000 to fund health and safety measures for low-income households.

The program will take proactive steps during a customer's in-home appointment. Energy advisors will identify any obstacles that could prevent the installation of energy efficiency measures such as electrical safety concerns, combustion issues, mold, or asbestos and may install safety devices, such as a smoke/carbon monoxide detector, when appropriate. By addressing these issues, the program ensures that homes are not deferred from participation due to such barriers.

To make participation accessible for all, the program will provide bilingual energy advisors and translation services when needed, assisting customers whose primary language is not English. Additionally, to support individuals with different abilities, the program will confirm during scheduling that customers with special needs have a trusted friend or relative present during service. This approach ensures every customer receives the full benefits of the program.

4.4.5 Strategies to Collect Information about Dual Participation to Facilitate Accurate Reporting on Braided Funding Opportunities and Calculation of the "Leverage Ratio" by Program.

In alignment with the Phase V Final Order, PECO will implement strategies to accurately capture and report instances of dual participation across programs. This effort is critical for identifying braided funding opportunities and ensuring compliance with reporting requirements. PECO's approach will include enhanced data-sharing protocols, coordination with state agencies, and stakeholder engagement to support transparent calculation of the "Leverage Ratio" by program.

5. Reporting and Tracking Systems

This section describes the reporting and critical data management and tracking systems PECO will use to implement programs, and which the PUC and PECO's evaluation contractor will need to access. Section 5.1 will include reporting done by PECO to the SWE, including an example proposed schedule for PY18 and PY19. Section 5.2 details the proposed project management tracking systems, such as how data will be handled, how CSPs will integrate with the tracking system, how the Commission and SWE would access this data, and what protocols are in place for handling personal identifiable information (PII).

5.1 Reporting

The evaluation contractor will be responsible for interfacing with the SWE to determine the required data collection and reporting requirements and confirm that all data collection and reporting requirements are satisfied by the data vendor and CSPs.

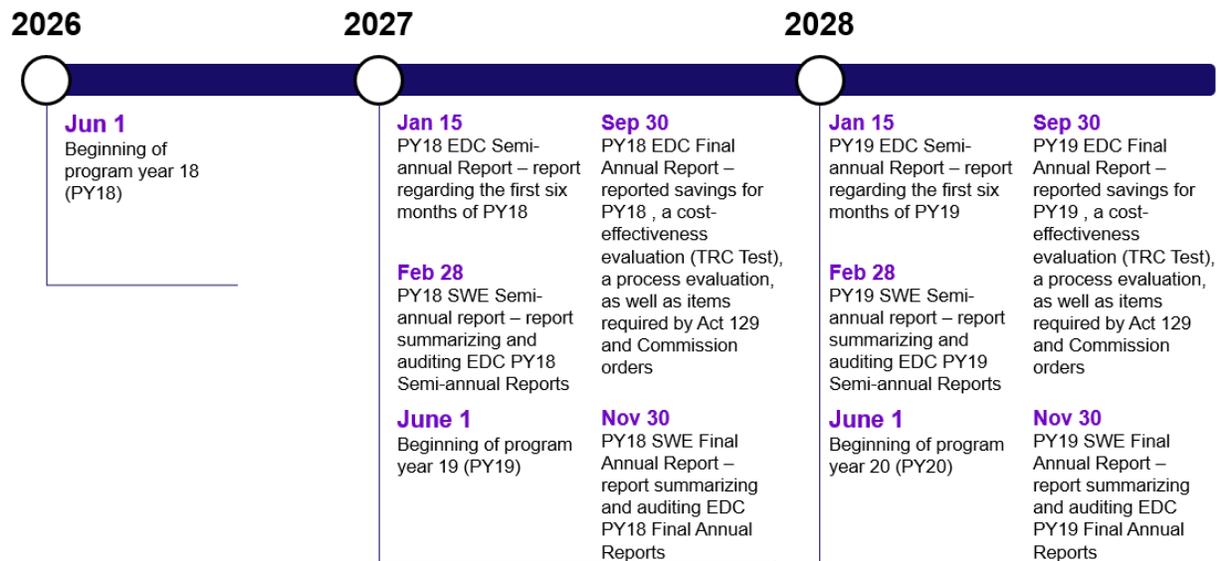
The evaluation contractor will support development of PECO's semiannual and annual reports as prescribed in the Phase V Final Order for each program year of Phase V:

Semiannual Reports: These reports capture program activity for the first half of each program year and are filed by January 15 of each year.

Annual Reports: These final annual reports will be filed no later than September 30th, 120 days after the end of each full program year. Final annual reports for each program year will include reported and verified savings, a cost-effectiveness evaluation (total resource cost [TRC] test), process evaluation results, and items required by Act 129 and PUC orders.

Reporting Schedule: All PECO Act 129 EE&C Phase V reports will be filed with the PUC's Secretary's Bureau, with a copy provided to the SWE. Further, all reports will be posted to the PECO website. Reporting for each program year of Phase V will follow the example proposed schedule for PY18 and PY19 outlined in the Phase V Final Order:

Figure 4. Proposed Schedule for PY18 and PY19



5.2 Project Management Tracking Systems

This section presents the data management system requirements that PECO anticipates will meet internal and external (SWE) needs.

5.2.1 Data Tracking System Overview

PECO’s data tracking system collects and stores comprehensive and consistent program and invoice data from CSPs. The data management system will track metrics that facilitate effective project tracking and regulatory reporting. This data will also support PECO’s QA process and EM&V requirements. Protecting sensitive data, personally identifiable information, personal information, intellectual property, and data from theft and damage is integrated into PECO’s data management process.

The data tracking system includes a user interface for entering, reviewing, and extracting program and invoice data. The data tracking system will support PECO’s tracking of:

- Incentives paid
- Reported kilowatt-hours and kilowatts achieved
- Implementation costs
- Administrative costs

PECO’s data management tracking system and approach to data management will facilitate consistent data inputs across the different CSPs throughout Phase V. There are four key contributors/users involved with data tracking, each with an important role in ensuring tracking data quality:

Database Vendor: The database vendor will develop and maintain an appropriate tracking system for the programs to compile and aggregate data from PECO and CSPs, using generally accepted data input and validation techniques.

CSPs: CSPs will be responsible for inputting program data into the tracking database in accordance with the data protocols.

PECO Program Managers: PECO program managers will track and review data for their individual programs.

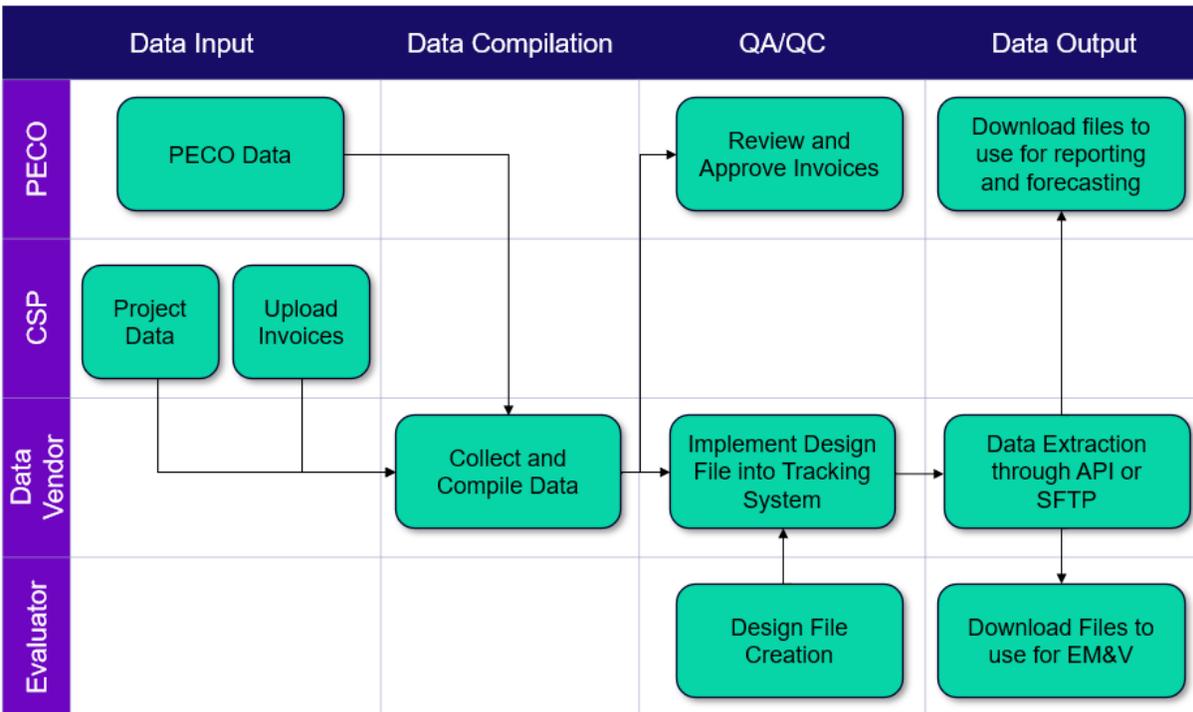
Evaluator: The evaluation contractor will conduct process and impact evaluations for each program. These evaluations will review the tracking data inputs for accuracy and adherence to data protocols, produce verified savings estimates and provide recommendations for program improvement. The evaluation contractor will provide a design file to the data vendor ahead of Phase V with data completeness, consistency, and accuracy checks. CSPs are required to update data that does not pass the design file criteria.

Figure 5 depicts the data management, QA, and evaluation processes that PECO, the data vendor, CSPs, and independent evaluation contractor will use to facilitate accurate data tracking.

5.2.2 Software Format, Data Exchange Format, and Database Structure

The data tracking system will interact with PECO's existing systems. PECO will provide an initial population of customer, premises, and account data that will be used to qualify customers for programs. Additional data will be entered by the implementation CSP or PECO to complete the application process. PECO will provide a full set of customer data information on a regular basis to update implementation CSP records.

Figure 5. Program Documentation and EM&V



PECO's approach addresses five areas critical to ensuring program implementation quality:

1. **Selection of CSPs that implement programs:** PECO is in the process of selecting and contracting CSPs with demonstrated experience implementing data management protocols and a commitment to maintaining data quality and integrity. Contracts will be awarded based on a pay for performance contracting mechanism.
2. **Program implementation and documentation protocols:** PECO and the CSPs will develop specific protocols and procedures for each program. These will govern all aspects of the program implementation, from procedures for conducting site visits to data input.
3. **Verification and documentation of activities and savings:** Verification of project eligibility and actual installation of measures is important. Documentation of purchases and installations will confirm that programs are implemented in top quality fashion and will provide the basis for defensible program evaluations.
4. **Program evaluation:** PECO will contract an experienced EM&V vendor to conduct an independent assessment of each program's performance. This contractor will develop a comprehensive evaluation plan for conducting process and impact evaluations. The EM&V contractor will work with the SWE to confirm that the evaluations are conducted according to state requirements.
5. **Evaluation-based program adjustments:** PECO will use the findings and recommendations resulting from the impact and process evaluations to adjust program

implementation as necessary to confirm the programs are implemented in accordance with recognized best practices, maintain participant satisfaction, and contribute to PECO's successful attainment of its portfolio savings goals.

5.2.3 Describe How CSPs Will Integrate with the Tracking System

CSPs will have a secure log-in to access the tracking system. After logging in, the CSP can enter and submit projects (with required data) for PECO's review, approval, or request for additional information or modifications. Following any required revisions and PECO's approval of a submitted project, projects are maintained within the tracking system.

CSPs will enter information into the tracking system for individual projects and through batch-methods for several projects. Project batches will typically be associated with monthly invoices. CSPs will interact with the tracking system on a monthly basis or more frequently.

The project data submitted and updated by CSPs includes but is not limited to:

- Measure information and equipment specifications
- Inputs for deemed or partially deemed TRM calculations
- Reported savings
- Project status
- Invoices, including project costs and incentives
- Other project details stored in files and not directly entered into a tracking system (e.g., PDFs for custom C&I projects)
- Customer data from PECO's internal customer care and billing system

5.2.4 Access for Commission and SWE

PECO's energy efficiency information will be available for review by the PUC and SWE upon request. As part of the customer validation process for application enrollment, PECO will provide select customer account data to the data management system vendor. This data is highly confidential and must be protected against unauthorized access or disclosure. In addition, all data collected from CSPs related to PECO's programs will be considered confidential and subject to the same protections. Security processes and protocols will be established to secure all data from unauthorized access. PECO and the data management system vendor will jointly develop processes for data backup and disaster recovery.

5.2.5 PECO Cybersecurity Procedures to Protect Program Participant Personally Identifiable Information

As part of Phase V cybersecurity planning, PECO is actively participating in the Act 129 Phase V Data Sharing Working Group, convened by the Pennsylvania PUC under the Phase V Final Order. The group addresses critical topics related to secure data sharing among program administrators, including:

- Inventorying current data-sharing processes
- Identifying data types and associated benefits
- Establishing customer consent requirements
- Developing guidelines for third-party CSPs
- Drafting a standardized Memorandum of Understanding
- Recommending secure storage and exchange protocols (e.g., push vs. pull methods)
- Determining allocation of administrative costs

The initial meeting on July 23, 2025, focused on understanding data needs and sharing expectations among EDCs, the PA DEP, and Commission staff. These discussions also explore safeguarding participant PII, leveraging categorical eligibility, and best practices for collaboration with the PA DEP and Home Energy Rebates programs. PECO will incorporate guidance from the Working Group into its Phase V cybersecurity procedures to support robust data protection and compliance.

6. QA and EM&V

This section explains PECO's approach to EM&V and QA/QC, and how these processes align with SWE activities. Section 6.1 outlines the overall QA/QC strategy and actions for continuous improvement. Section 6.2 details procedures for installation verification, savings documentation, and QC. Section 6.3 describes how PECO will incorporate feedback from participants, contractors, and trade allies. Section 6.4 covers market and process evaluations to assess program effectiveness. Section 6.5 addresses coordination of EM&V activities with the SWE, and Section 6.6 explains how PECO integrates changes to codes and standards into program operations.

6.1 Overall Approach to QA/QC

To implement the programs and solutions in this Plan, PECO will leverage the experience of program implementation professionals by selecting CSPs with the following qualifications:

- Demonstrated experience implementing programs for the specific target market associated with the program.
- Demonstrated understanding of the measures and features of the program and solutions the CSP will implement.
- Existing relationships and experience establishing relationships with upstream equipment suppliers and contractors, as appropriate for the program.
- Experience in providing or coordinating training by other qualified providers about the program, solutions, and measures to delivery channels (e.g., equipment suppliers, contractors, auditors) and the target participant market.
- Capabilities for processing incentives.

The CSPs' approach to QC and continuous improvement will include:

Program tracking: Scorecards, weekly and monthly forecasting reports, and operations meetings will be used to monitor and track program progress against program goals and metrics. The scorecards will be reviewed monthly to provide updates and identify action items to keep the program on track.

Responding to customers: Contractor and trade ally feedback is important. CSPs will have a tiered response procedure to facilitate delivery of the highest level of customer support. Any suggestions or complaints are logged into their customer contact log and resolved at the appropriate level. Complaints are escalated as required following a deliberate and documented process.

Equipment installation inspections: CSPs will conduct random targeted in-process and post inspections while ensuring the quantity of inspections are distributed fairly among the program segments according to their most recent performance. Post inspections will include client interviews and a methodical visual inspection (where possible and feasible) to verify that measures have been installed correctly and as reported. Post inspections will also confirm that those measures comply with program specifications and that those measures are serving their intended function. This enables personnel to understand and comply with

program requirements and provides an opportunity to address any deficiencies early on. Post inspections will be performed as soon as possible after completion of work in a home or building. Prompt QA/QC follow-up creates a greater likelihood of customer cooperation, identify missed opportunities for further improvements, and reinforces the importance of quality and customer satisfaction in the programs. Finally, inspectors will review the appropriateness and accuracy of recommendations made by energy advisors and others.

PECO will also use the experience of an independent EM&V contractor who will conduct unbiased estimations of verified gross energy impacts on all programs. Estimations of verified gross energy impacts will be based on statistically significant verified savings measured as described in the EM&V contractor's EM&V plan, developed prior to Phase IV program implementation.

The contractor's EM&V plan will contain a detailed evaluation methodology for each program, including definition of the impact and process evaluation methods, and the data needed to support them (design file). The EM&V plan will provide the implementation CSP with the data to track and the Database Vendor with the data to house. Having the evaluation plan completed and available to PECO and CSP staff for each program will help establish that the implementers maintain appropriate and high-quality records so that savings can be verified.

6.2 Procedures for Measure and Project Installation Verification, QA/QC, and Savings Documentation

Although the procedures for measure and project installation verification, QA and QC, and savings documentation will vary by program and measures, PECO anticipates independent evaluation contractors applying the following process to impact evaluations:

1. Choose a random sample of participants for evaluations, using statistical methods consistent with established state protocols.
2. Conduct verifications onsite, by phone, or via online survey instrument, tailored to the measure and program type.
3. Gather pre-evaluation data and prepare data collection documents.
4. Verify measure and project installation and collect pertinent data such as equipment nameplate.
5. Cross-reference equipment data with customer application data contained in the data management system for accuracy.
6. Observe and note equipment operational tests and quality of the equipment installation:
 - a. For prescriptive measures, calculate measure savings using the methodologies and algorithms detailed in the TRM.
 - b. For custom measures, use energy simulation modeling (such as eQuest or DOE-2) or pre-/post-measure metering to determine measure savings.

6.3 Process for Collecting and Addressing Participant, Contractor, and Trade Ally Feedback

PECO anticipates applying the following general process to collect participant, contractor, and trade ally feedback:

- Independent evaluation contractors will interview contractors, trade allies, and other market actors to gauge their satisfaction with PECO's programs and identify areas for improvement.
- Independent evaluation contractors will identify the appropriate survey mode (e.g., telephone, in-person, or online) for capturing participant feedback.
- Independent evaluation contractors will survey a random sample of participants to gather fast program feedback and assess satisfaction with the program.
- Independent evaluation contractors will follow all guidelines outlined in the existing daily load shifting guidance provided as well as the SWE Evaluation Framework for Phase V.

6.4 Market and Process Evaluations

CSPs will regularly evaluate their programs to help maintain best practices and continually improve. Additionally, PECO's independent evaluation contractors will conduct annual market and process evaluations for each program throughout the program's entirety. Market and process evaluations may include program materials review, tracking database analysis, implementation team interviews, surveys or interviews with participating and nonparticipating customers, contractors, and trade allies.

- Market and process evaluations will examine:
 - Program design
 - Implementation protocols and procedures
 - Marketing materials and strategies
 - Outreach and recruitment activities
 - Documentation and compliance with incentive eligibility requirements
 - Processing and timely payment of incentives
 - Market characteristics
 - Net energy and demand savings

PECO will use process evaluation results to improve program design (e.g., modify measures offered, eligibility requirements) and implementation procedures (e.g., modify recruitment, advertising methods, monitoring, database maintenance). The frequency and schedule of the process evaluations will be determined for each program individually.

6.5 Strategy for Coordinating with SWE

PECO's EM&V manager and its independent evaluation contractor will engage with the SWE through scheduled working group meetings and through ad hoc meetings and communications. Throughout Phases I-IV, PECO worked with the SWE to determine that its program evaluations aligned with PUC requirements, clarified policy questions, and contributed data and recommendations to assist the SWE and the PUC to establish policy. PECO anticipates extending this productive relationship in Phase IV.

To the extent feasible and appropriate, PECO will consult with the SWE to establish that its data management system contains information relevant and needed for evaluation of the programs. It also will confirm that PECO's EM&V contractor uses the most appropriate methods for determining the impacts of the EE&C Plan's programs.

6.6 Approach to Incorporating Changes to Codes and Standards

PECO recognizes that changes to federal, state, and local codes and standards can significantly impact the calculation of energy savings and the design of energy efficiency programs. As such, throughout Phase V, PECO and its CSPs will proactively monitor regulatory developments and updates to codes and standards as feasible that may influence baseline assumptions, measure eligibility, or program effectiveness.

7. Cost Recovery Mechanism

The objective of this section is to provide detailed descriptions and estimated values for the cost recovery mechanism. Section 7.1 summarizes total annual revenues for Phase V. Section 7.2 discusses Phase V in accordance with Pennsylvania cost recovery laws. Section 7.3 includes relevant data tables supporting the cost recovery analysis. Section 7.4 addresses tariffs and the Section 1307 cost recovery mechanism. Finally, Section 7.5 discusses ensuring that recovery of Act-129 activities align to the customer class receiving the benefit and Section 7.6 outlines how PECO aims to account for Phase V costs versus prior phase costs, ensuring transparency and compliance with regulatory requirements.

7.1 Total Annual Revenues for Phase V

PECO's annual retail revenue as of December 31, 2006, totals \$4,273,858,275. Applying the 2% annual limit set forth in Act 129 to this amount produces a total allowable annual level of expenditures of \$85,477,166 per year or \$427,385,828 over the five program years of the Phase V Plan.

Figure 6 details how the total 2006 annual retail revenues were derived.²⁶ The electricity sales from all of PECO's customers (FERC Accounts 440.0 through 446.0) and other operating income (FERC Accounts 450.0 through 456.1) were summed. In addition, as required by the Phase V Final Order, the total annual retail revenue was adjusted to include "...generation revenues collected by an EDC for an electric generation supplier (EGS) that use consolidated billing." The revenues thus derived were then adjusted to remove several "non-retail" (i.e., wholesale) revenue items, which include, sales for resales (447.0), other electric revenues (456.0) and revenues from wholesale transmission (456.1).

Figure 6. Calculation of 2006 Annual Revenue

Amount	Description
\$4,371,215,020*	Total revenue as of 12/31/06
\$92,390,366†	Adjustment for "shopping" customers
\$(189,747,111)‡	Wholesale revenue adjustment
\$4,273,858,275§	Total retail revenue
\$85,477,166	Annual spend (2% of revenue)
\$427,385,828#	Five-year total spend

*Source: PUC Annual Report-400 Income Statement

† Source: PECO records

‡ Source: PUC AR Accounts 447, 456.0, 456.1

§ Sum of total revenue, adjustment for "shopping" customers, and wholesale revenue adjustment

|| Total retail revenue times 0.02

Annual spend times five program years

²⁶ The calculation is based on Schedule 400 - Income Statement contained in PECO's 2006 Electric Annual Revenue Report to the PUC.

7.2 Description of Phase V Plan in Accordance with 66 Pa. C.S. § 1307 and 2806.1

Act 129 requires that the EE&C Plan include a cost recovery mechanism to fund EE&C measures and to facilitate the recovery of prudent and reasonable costs, including administrative costs. See 66 Pa.C.S. § 2806.1(b)(1)(i)(H). Act 129 also requires an analysis of administrative costs. See 66 Pa.C.S. § 2806.1(b)(1)(i)(K). The Phase V Final Order defines administrative costs as including but are not limited to, costs relating to plan and program development, CSP non-incentive program delivery fees, cost-benefit analysis, measurement and verification and reporting.²⁷ Based on this definition, PECO's EE&C Phase IV administrative costs (e.g., non-incentive costs) include those as described in Section 4.2.3.

²⁷ EE&C Phase V Final Order, p. 233.

7.3 Data Tables

Table 38. Budget by Program and Subprogram

Program Name:		Residential Energy Efficiency					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$14,738	\$15,015	\$15,321	\$15,580	\$15,840	\$76,493
Incentives (\$000)	Rebates	\$4,976	\$5,199	\$5,467	\$5,741	\$6,037	\$27,419
	Upstream/Midstream Buydown	\$1,787	\$1,837	\$1,887	\$1,887	\$1,887	\$9,285
	Kits	\$758	\$758	\$758	\$758	\$758	\$3,791
	Direct Install Materials & Labor	\$567	\$572	\$559	\$544	\$510	\$2,753
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$8,089.0	\$8,366.4	\$8,671.1	\$8,929.3	\$9,192.4	\$43,248
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$5,046	\$5,161	\$5,016	\$4,920	\$4,769	\$24,912
	Marketing	\$1,603	\$1,488	\$1,634	\$1,730	\$1,878	\$8,333
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total	\$6,649	\$6,649	\$6,650	\$6,650	\$6,647	\$33,245	
Percent Incentives		56%	55%	56%	57%	57%	58%

Program Name:		Residential Home Energy Reports					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0

	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$2,342	\$3,639	\$2,634	\$2,783	\$2,590	\$13,989
Percent Incentives		0%	0%	0%	0%	0%	0%

Program Name:		Low-Income Energy Efficiency					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$10,870	\$11,028	\$11,394	\$11,754	\$10,160	\$55,207
Incentives (\$000)	Rebates	\$534	\$532	\$535	\$538	\$533	\$2,672
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$855	\$855	\$855	\$855	\$855	\$4,273
	Direct Install Materials & Labor	\$6,442	\$6,589	\$6,926	\$7,256	\$5,787	\$33,000
	Braided Funding Support Labor	\$19	\$19	\$19	\$19	\$19	\$96
	Incentive Total	\$7,850	\$7,995	\$8,334	\$8,667	\$7,194	\$40,040
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$2,265	\$2,275	\$2,295	\$2,315	\$2,225	\$11,375
	Marketing	\$755	\$758	\$765	\$772	\$742	\$3,792
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total	\$3,020	\$3,033	\$3,060	\$3,087	\$2,966	\$15,167	
Percent Incentives		72%	72%	73%	74%	71%	73%

Program Name:		Income-Eligible Home Energy Reports					
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$172	\$91	\$95	\$85	\$81	\$524
Incentives (\$000)	Rebates	\$0	\$0	\$0	\$0	\$0	\$0
	Upstream/Midstream Buydown	\$0	\$0	\$0	\$0	\$0	\$0
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$172	\$91	\$95	\$85	\$81	\$524
	Marketing	\$0	\$0	\$0	\$0	\$0	\$0

	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$0	\$0	\$0	\$0	\$0	\$0
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
	Non-Incentive Total	\$172	\$91	\$95	\$85	\$81	\$524
Percent Incentives		0%	0%	0%	0%	0%	0%

Program Name:		Non-Residential Energy Efficiency		Total			
Cost Element		PY18	PY19	PY20	PY21	PY22	Phase V Total
Total Budget (\$000)		\$34,181	\$41,904	\$47,195	\$51,004	\$39,614	\$213,898
Incentives (\$000)	Rebates	\$16,170	\$21,372	\$23,975	\$27,619	\$19,062	\$108,198
	Upstream/Midstream Buydown	\$913	\$1,062	\$1,159	\$1,040	\$973	\$5,148
	Kits	\$0	\$0	\$0	\$0	\$0	\$0
	Direct Install Materials & Labor	\$4,022	\$4,534	\$4,825	\$4,546	\$4,077	\$22,004
	Braided Funding Support Labor	\$0	\$0	\$0	\$0	\$0	\$0
	Incentive Total	\$21,105	\$26,968	\$29,959	\$33,205	\$24,112	\$135,349
Non-Incentives (\$000)	Program Design	\$0	\$0	\$0	\$0	\$0	\$0
	Administrative	\$0	\$0	\$0	\$0	\$0	\$0
	EDC Delivery Costs	\$0	\$0	\$0	\$0	\$0	\$0
	CSP Delivery Fees	\$12,434	\$14,453	\$16,748	\$17,310	\$15,012	\$75,957
	Marketing	\$626	\$461	\$469	\$476	\$488	\$2,519
	EM&V	\$0	\$0	\$0	\$0	\$0	\$0
	AEPS Registration Support	\$17	\$22	\$19	\$14	\$2	\$73
	Other (Describe)	\$0	\$0	\$0	\$0	\$0	\$0
Non-Incentive Total	\$13,076	\$14,936	\$17,236	\$17,799	\$15,502	\$78,549	
Percent Incentives		62%	64%	63%	65%	61%	63%

Table 39. Summary of EE&C Costs by Sector and Program

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost ³ (\$/MWh)	Levelized Cost ⁴ (\$/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)	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$163	\$1,510,591
	Residential Home Energy Reports	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512
	Low-Income Energy Efficiency	\$34,330,888	\$0	\$0	\$0	\$9,219,672	\$3,073,224	\$0	\$0	\$0	\$46,623,784	\$646	\$157	\$3,886,241
	Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339
	Sector Total⁵	\$77,172,235	\$0	\$0	\$0	\$48,223,069	\$11,265,135	\$0	\$0	\$0	\$136,660,438	\$296	\$138	\$1,434,589
Small C&I	Non-Residential Energy Efficiency	\$66,587,232	\$0	\$0	\$0	\$34,814,665	\$1,155,777	\$0	\$33,423	\$0	\$102,591,096	\$232	\$70	\$1,458,638
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Low-Income Energy Efficiency	\$2,854,674	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574	\$472	\$23	\$3,400,476
	Sector Total	\$69,645,338	\$0	\$0	\$0	\$36,103,112	\$1,585,504	\$0	\$33,423	\$0	\$107,367,377	\$237	\$69	\$1,497,440

Large C&I	<i>Non-Residential Energy Efficiency</i>	\$68,761,645	\$0	\$0	\$0	\$41,142,531	\$1,363,220	\$0	\$39,327	\$0	\$111,306,722	\$209	\$69	\$1,157,362
	<i>Residential Energy Efficiency</i>	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	<i>Low-Income Energy Efficiency</i>	\$2,854,674	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574	\$472	\$23	\$3,400,476
	Sector Total	\$71,819,751	\$0	\$0	\$0	\$42,430,978	\$1,792,947	\$0	\$39,327	\$0	\$116,083,003	\$214	\$69	\$1,190,108

Table 40. Allocation of Common Costs to Applicable Customer Sector

Common Cost Element	Total Cost (\$)	Basis for Cost Allocation	Sector Cost Allocation (\$)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Marketing	\$20,400,000	Sector allocations based fraction of PY18 MWh Savings	\$7,592,659	\$6,379,070	\$6,428,271
Administrative	\$4,700,000	Sector allocations based fraction of PY18 MWh Savings	\$1,749,289	\$1,469,688	\$1,481,023
Program Design	\$8,540,000	Sector allocations based fraction of PY18 MWh Savings	\$3,178,496	\$2,670,454	\$2,691,051
EM&V	\$19,600,000	Sector allocations based fraction of PY18 MWh Savings	\$7,294,908	\$6,128,911	\$6,176,182
EDC Delivery Costs	\$11,035,012	Sector allocations based fraction of PY18 MWh Savings	\$4,107,112	\$3,450,643	\$3,477,257
Other (Describe)	\$3,000,000	Sector allocations based fraction of PY18 MWh Savings	\$1,116,568	\$938,099	\$945,334
Totals	\$67,275,012		\$25,039,032	\$21,036,864	\$21,199,117
SWE Cost	\$0		\$0	\$0	\$0

Table 41. Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs	Total Common Costs	Total of All Costs
Residential (Including Low-Income)	\$136,660,438	\$25,039,032	\$161,699,470
Small C&I	\$107,322,978	\$21,036,864	\$128,359,841
Large C&I	\$116,127,403	\$21,199,117	\$137,326,519
Totals	\$360,110,819	\$67,275,012	\$427,385,831

Table 42. TRC Benefits Table (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Program/Subprogram	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	1.00	0.93	\$8,089	\$47,656	\$6,649	\$62,393	\$15,882	\$31,653	\$10,180	\$0	\$57,715	
Residential Energy Efficiency	PY19	1.00	0.91	\$8,366	\$48,063	\$6,649	\$63,078	\$15,383	\$31,552	\$10,422	\$0	\$57,357	
Residential Energy Efficiency	PY20	1.00	0.77	\$8,671	\$58,374	\$6,650	\$73,695	\$15,376	\$30,815	\$10,777	\$0	\$56,968	
Residential Energy Efficiency	PY21	1.00	0.75	\$8,929	\$58,413	\$6,650	\$73,992	\$15,267	\$29,260	\$11,003	\$0	\$55,531	
Residential Energy Efficiency	PY22	1.00	0.74	\$9,192	\$58,452	\$6,647	\$74,292	\$14,917	\$29,034	\$11,269	\$0	\$55,220	
Residential Energy Efficiency Total		1.00	0.81	\$43,248	\$270,957	\$33,245	\$347,450	\$76,825	\$152,315	\$53,652	\$0	\$282,792	
Residential Home Energy Reports	PY18	1.00	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622	
Residential Home Energy Reports	PY19	1.00	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692	
Residential Home Energy Reports	PY20	1.00	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631	
Residential Home Energy Reports	PY21	1.00	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801	
Residential Home Energy Reports	PY22	1.00	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116	
Residential Home Energy Reports Total		1.00	4.49	\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862	
Low-Income Energy Efficiency	PY18	1.00	1.37	\$7,850	\$3,176	\$3,020	\$14,047	\$3,467	\$13,312	\$2,477	\$0	\$19,257	
Low-Income Energy Efficiency	PY19	1.00	1.37	\$7,995	\$3,174	\$3,033	\$14,202	\$3,292	\$13,638	\$2,530	\$0	\$19,460	
Low-Income Energy Efficiency	PY20	1.00	1.36	\$8,334	\$3,124	\$3,060	\$14,519	\$3,301	\$13,777	\$2,612	\$0	\$19,691	
Low-Income Energy Efficiency	PY21	1.00	1.31	\$8,667	\$3,080	\$3,087	\$14,834	\$3,254	\$13,550	\$2,699	\$0	\$19,503	

<i>Low-Income Energy Efficiency</i>	<i>PY22</i>	1.00	1.27	\$7,194	\$3,261	\$2,966	\$13,421	\$2,748	\$11,787	\$2,548	\$0	\$17,083
<i>Low-Income Energy Efficiency Total</i>		1.00	1.34	\$40,040	\$15,816	\$15,167	\$71,023	\$16,063	\$66,064	\$12,867	\$0	\$94,994
<i>Low-Income Home Energy Reports</i>	<i>PY18</i>	1.00	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
<i>Low-Income Home Energy Reports</i>	<i>PY19</i>	1.00	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
<i>Low-Income Home Energy Reports</i>	<i>PY20</i>	1.00	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
<i>Low-Income Home Energy Reports</i>	<i>PY21</i>	1.00	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
<i>Low-Income Home Energy Reports</i>	<i>PY22</i>	1.00	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
<i>Low-Income Home Energy Reports Total</i>		1.00	7.01	\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
<i>Non-Residential Energy Efficiency</i>	<i>PY18</i>	1.00	1.56	\$21,105	\$78,457	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$7,072	\$175,913
<i>Non-Residential Energy Efficiency</i>	<i>PY19</i>	1.00	1.57	\$26,968	\$101,443	\$14,936	\$143,347	\$64,384	\$152,603	\$104	\$8,550	\$225,640
<i>Non-Residential Energy Efficiency</i>	<i>PY20</i>	1.00	1.40	\$29,959	\$129,049	\$17,236	\$176,244	\$71,161	\$166,875	\$172	\$9,338	\$247,546
<i>Non-Residential Energy Efficiency</i>	<i>PY21</i>	1.00	1.47	\$33,205	\$109,050	\$17,799	\$160,055	\$68,362	\$158,497	\$56	\$8,303	\$235,217
<i>Non-Residential Energy Efficiency</i>	<i>PY22</i>	1.00	1.57	\$24,112	\$79,227	\$15,502	\$118,840	\$54,697	\$125,133	\$75	\$7,072	\$186,977
<i>Non-Residential Energy Efficiency Total</i>		1.00	1.51	\$135,349	\$497,226	\$78,549	\$711,124	\$310,737	\$719,780	\$443	\$40,333	\$1,071,293
Total		1.00		\$218,637	\$783,999	\$141,473	\$1,144,110	\$427,081	\$981,233	\$66,962	\$40,333	\$1,515,610

Table 43. TRC Benefits Table (Net)

Portfolio	NTGR & TRC Ratio	TRC Costs By Program Per Year (\$000)	TRC Benefits By Program Per Year (\$000)
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Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
<i>Residential Energy Efficiency</i>	<i>PY18</i>	<i>0.655</i>	<i>0.88</i>	<i>\$8,089</i>	<i>\$28,435</i>	<i>\$6,649</i>	<i>\$43,173</i>	<i>\$10,406</i>	<i>\$20,739</i>	<i>\$6,670</i>	<i>\$0</i>	<i>\$37,815</i>
<i>Residential Energy Efficiency</i>	<i>PY19</i>	<i>0.655</i>	<i>0.86</i>	<i>\$8,366</i>	<i>\$28,606</i>	<i>\$6,649</i>	<i>\$43,621</i>	<i>\$10,079</i>	<i>\$20,673</i>	<i>\$6,829</i>	<i>\$0</i>	<i>\$37,580</i>
<i>Residential Energy Efficiency</i>	<i>PY20</i>	<i>0.655</i>	<i>0.74</i>	<i>\$8,671</i>	<i>\$35,257</i>	<i>\$6,650</i>	<i>\$50,577</i>	<i>\$10,074</i>	<i>\$20,190</i>	<i>\$7,061</i>	<i>\$0</i>	<i>\$37,325</i>
<i>Residential Energy Efficiency</i>	<i>PY21</i>	<i>0.655</i>	<i>0.72</i>	<i>\$8,929</i>	<i>\$35,193</i>	<i>\$6,650</i>	<i>\$50,773</i>	<i>\$10,003</i>	<i>\$19,171</i>	<i>\$7,209</i>	<i>\$0</i>	<i>\$36,384</i>
<i>Residential Energy Efficiency</i>	<i>PY22</i>	<i>0.655</i>	<i>0.71</i>	<i>\$9,192</i>	<i>\$35,128</i>	<i>\$6,647</i>	<i>\$50,968</i>	<i>\$9,774</i>	<i>\$19,023</i>	<i>\$7,383</i>	<i>\$0</i>	<i>\$36,180</i>
<i>Residential Energy Efficiency Total</i>		<i>0.655</i>		<i>\$43,248</i>	<i>\$162,619</i>	<i>\$33,245</i>	<i>\$239,112</i>	<i>\$50,336</i>	<i>\$99,797</i>	<i>\$35,153</i>	<i>\$0</i>	<i>\$185,285</i>
<i>Residential Home Energy Reports</i>	<i>PY18</i>	<i>1.000</i>	<i>4.96</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,342</i>	<i>\$2,342</i>	<i>\$3,400</i>	<i>\$8,222</i>	<i>\$0</i>	<i>\$0</i>	<i>\$11,622</i>
<i>Residential Home Energy Reports</i>	<i>PY19</i>	<i>1.000</i>	<i>5.14</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,639</i>	<i>\$3,639</i>	<i>\$7,135</i>	<i>\$11,557</i>	<i>\$0</i>	<i>\$0</i>	<i>\$18,692</i>
<i>Residential Home Energy Reports</i>	<i>PY20</i>	<i>1.000</i>	<i>4.80</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,634</i>	<i>\$2,634</i>	<i>\$5,028</i>	<i>\$7,602</i>	<i>\$0</i>	<i>\$0</i>	<i>\$12,631</i>
<i>Residential Home Energy Reports</i>	<i>PY21</i>	<i>1.000</i>	<i>3.88</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,783</i>	<i>\$2,783</i>	<i>\$4,006</i>	<i>\$6,795</i>	<i>\$0</i>	<i>\$0</i>	<i>\$10,801</i>
<i>Residential Home Energy Reports</i>	<i>PY22</i>	<i>1.000</i>	<i>3.52</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,590</i>	<i>\$2,590</i>	<i>\$3,115</i>	<i>\$6,000</i>	<i>\$0</i>	<i>\$0</i>	<i>\$9,116</i>
<i>Residential Home Energy Reports Total</i>		<i>1.000</i>		<i>\$0</i>	<i>\$0</i>	<i>\$13,989</i>	<i>\$13,989</i>	<i>\$22,684</i>	<i>\$40,177</i>	<i>\$0</i>	<i>\$0</i>	<i>\$62,862</i>
<i>Low-Income Energy Efficiency</i>	<i>PY18</i>	<i>1.000</i>	<i>1.37</i>	<i>\$7,850</i>	<i>\$3,176</i>	<i>\$3,020</i>	<i>\$14,047</i>	<i>\$3,467</i>	<i>\$13,312</i>	<i>\$2,477</i>	<i>\$0</i>	<i>\$19,257</i>
<i>Low-Income Energy Efficiency</i>	<i>PY19</i>	<i>1.000</i>	<i>1.37</i>	<i>\$7,995</i>	<i>\$3,174</i>	<i>\$3,033</i>	<i>\$14,202</i>	<i>\$3,292</i>	<i>\$13,638</i>	<i>\$2,530</i>	<i>\$0</i>	<i>\$19,460</i>
<i>Low-Income Energy Efficiency</i>	<i>PY20</i>	<i>1.000</i>	<i>1.36</i>	<i>\$8,334</i>	<i>\$3,124</i>	<i>\$3,060</i>	<i>\$14,519</i>	<i>\$3,301</i>	<i>\$13,777</i>	<i>\$2,612</i>	<i>\$0</i>	<i>\$19,691</i>
<i>Low-Income Energy Efficiency</i>	<i>PY21</i>	<i>1.000</i>	<i>1.31</i>	<i>\$8,667</i>	<i>\$3,080</i>	<i>\$3,087</i>	<i>\$14,834</i>	<i>\$3,254</i>	<i>\$13,550</i>	<i>\$2,699</i>	<i>\$0</i>	<i>\$19,503</i>
<i>Low-Income Energy Efficiency</i>	<i>PY22</i>	<i>1.000</i>	<i>1.27</i>	<i>\$7,194</i>	<i>\$3,261</i>	<i>\$2,966</i>	<i>\$13,421</i>	<i>\$2,748</i>	<i>\$11,787</i>	<i>\$2,548</i>	<i>\$0</i>	<i>\$17,083</i>
<i>Low-Income Energy Efficiency Total</i>		<i>1.000</i>		<i>\$40,040</i>	<i>\$15,816</i>	<i>\$15,167</i>	<i>\$71,023</i>	<i>\$16,063</i>	<i>\$66,064</i>	<i>\$12,867</i>	<i>\$0</i>	<i>\$94,994</i>
<i>Low-Income Home Energy Reports</i>	<i>PY18</i>	<i>1.000</i>	<i>7.78</i>	<i>\$0</i>	<i>\$0</i>	<i>\$172</i>	<i>\$172</i>	<i>\$299</i>	<i>\$1,041</i>	<i>\$0</i>	<i>\$0</i>	<i>\$1,340</i>

<i>Low-Income Home Energy Reports</i>	<i>PY19</i>	1.000	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
<i>Low-Income Home Energy Reports</i>	<i>PY20</i>	1.000	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
<i>Low-Income Home Energy Reports</i>	<i>PY21</i>	1.000	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
<i>Low-Income Home Energy Reports</i>	<i>PY22</i>	1.000	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
<i>Low-Income Home Energy Reports Total</i>		1.000		\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
<i>Non-Residential Energy Efficiency</i>	<i>PY18</i>	0.684	1.48	\$21,105	\$47,005	\$13,076	\$81,187	\$35,664	\$79,815	\$25	\$4,838	\$120,342
<i>Non-Residential Energy Efficiency</i>	<i>PY19</i>	0.684	1.50	\$26,968	\$60,878	\$14,936	\$102,782	\$44,045	\$104,396	\$71	\$5,849	\$154,360
<i>Non-Residential Energy Efficiency</i>	<i>PY20</i>	0.684	1.34	\$29,959	\$78,819	\$17,236	\$126,013	\$48,681	\$114,159	\$118	\$6,388	\$169,346
<i>Non-Residential Energy Efficiency</i>	<i>PY21</i>	0.684	1.40	\$33,205	\$64,112	\$17,799	\$115,116	\$46,766	\$108,428	\$38	\$5,680	\$160,912
<i>Non-Residential Energy Efficiency</i>	<i>PY22</i>	0.684	1.48	\$24,112	\$46,582	\$15,502	\$86,196	\$37,418	\$85,604	\$52	\$4,838	\$127,911
<i>Non-Residential Energy Efficiency Total</i>		0.684		\$135,349	\$297,396	\$78,549	\$511,294	\$212,575	\$492,401	\$303	\$27,592	\$732,872
Total		0.73		\$218,637	\$475,831	\$141,473	\$835,941	\$302,430	\$701,337	\$48,323	\$27,592	\$1,079,682

7.4 Tariffs and Section 1307 Cost Recovery Mechanism for Phase V Plan

As part of the implementation of PECO's Phase V EE&C Plan, PECO proposes to use a cost recovery mechanism similar to the one it used to recover the cost of its Phase IV Plan. See PECO Statement No. 4, Exhibit MAM-1, for a copy of the proposed supplement to PECO's Electric Service Tariff that contains the tariff provisions designed to implement the cost recovery mechanism for PECO's proposed Phase V EE&C Plan.

A high-level summary description of the Phase V cost recovery mechanism was provided in Section 1.9. Additional details on the Phase V cost recovery mechanism, calculations of the charge, and supporting cost documentation are provided in this section.

7.4.1 Cost Recovery Mechanism

PECO proposes to recover the cost of its Phase V EE&C Plan through an Energy Efficiency & Conservation Program Charge (EEPC) similar to the one used in Phase IV. The Phase IV EEPC was designed to comply with Section 1307 of the Public Utility Code and, as the Commission required, was reconcilable and non-bypassable. As required by the Commission in PECO's previous EE&C final implementation orders, the EEPC was not to be a separate line item on residential customers' bills and not included in the price to compare. Instead, residential customers' distribution rates were adjusted by the amount of the EEPC charge calculated for each rate class. For SCI customers, the EEPC was based on energy use or kWh. For large commercial customers, the charge was based on a PJM Peak Load Contribution (PLC). The EEPC was listed as a separate item on SCI and LCI customers' bills and was not included in the price to compare. For the Phase V EE&C Plan, PECO proposes to follow the same format as used in Phase IV.

The cost recovery mechanism for Phase V is shown in the proposed supplement to PECO's Electric Service Tariff submitted as PECO Exhibit MAM-1. The tariff language describes the cost recovery method, the formula for calculating the charge, and the charges specific to each rate class.

The Phase V EEPC will recover all of the fixed capital costs (depreciation and pre-tax return) and operating expenses, not otherwise recovered in base rates, to design and implement the EE&C programs incorporated in its Phase V EE&C Plan. These costs include, among others, the cost of information technology (IT) needed to design and implement the EE&C programs; the costs of customer outreach and program promotion; incremental labor costs incurred to manage and administer the EE&C programs on an ongoing basis; the cost to measure and verify EE&C program results; and the cost of incentives offered to customers to participate in the approved EE&C programs. PECO Exhibit MAM-2 contains a summary of the projected expenditures for each of the programs across these rate classes.

In accordance with the Phase V Final Order, PECO is required to establish a cost recovery methodology for Phase V that is designed to recover, on an annual basis, projected program costs that it anticipates will be incurred over each surcharge application year. In addition, PECO is required to reconcile actual expenses incurred with actual revenues received for the

reconciliation period. For PY18 (2026/27), the cost recovery rates are being calculated based on the projected total program expenditures allocated to each rate class for that program year plus the reconciliation amount for PY17 (2025/26) and any costs remaining from previous periods. To develop the recovery charge for each rate class for PY18 (2026/27), the total expenditure for that class was divided by the appropriate projected class billing units for the period from June 1, 2026, through May 31, 2027. Subsequently, PECO will develop Phase V recovery rates annually based on the projected program expenditures for that program year plus reconciliation amounts for previous periods. The charge that was calculated per billing unit for each rate class was grossed up to provide for recovery of Pennsylvania Gross Receipts Tax. This calculation produces a charge that, net of Pennsylvania Gross Receipts Tax, will recover the projected total expenditures over the recovery period.

The Phase V Final Order also requires PECO to remove the SWE costs from the EE&C Phase V budget in the same manner as was done in Phase IV. PECO will, therefore, track the Phase V SWE costs separately from its EE&C costs but will still recover such costs through its Phase V EEPC.

The Phase V SWE costs will be determined through an RFP bidding process. Until the final SWE costs are known, PECO has included an estimate. PECO Exhibit MAM-3 contains the detailed calculations for the development of the EEPC charges for each class as well as the SWE costs, which are reflected as a separate line item.

7.5.2 True-Up

As noted earlier, PECO's Phase V EEPC will be reconciled on an annual basis to account for any under- or over-recovery from the prior year. As the Phase V Final Order specifies, PECO will reconcile its total actual recoverable EE&C Plan expenditures incurred through March 31, 2026, with its actual EE&C Plan revenues received through March 31, 2026. The net over- or under-recovery shall be reflected (without interest) as a separate line item of the E factor calculation of the Phase V rates to become effective June 1, 2026. These rates will also include, as a separate line item, PECO's projection of its expenses related to Phase IV program implementation incurred in April and May 2026, including projected expenses to finalize any measures installed and commercially operable on or before May 31, 2026; projected expenses to finalize any contracts; and other Phase IV administrative obligations. The difference between PECO's projected and actual expenses and EEPC revenue for the months of April and May 2026 will be presented as clearly identified, separate line items in the reconciliation statement for the period April 1, 2026, through March 31, 2027.

7.5 Ensuring Recovery Alignment with Benefitting Customer Classes

PECO's cost recovery mechanism for its EE&C Plan is designed to ensure that measures are paid for by the same customer class(es) that receive the associated measures' EE&C benefits. This is accomplished by creating separate EE&C charges for the residential class, SCI class, LCI class, and Municipal Lighting class.²⁸ Incentives and program costs are tracked independently for each class to maintain transparency and accurate allocation. Project

²⁸ For Municipal Lighting, charges were developed in accordance with the Opinion and Order of Petition of PECO Energy Company for Approval of Changes to its Act 129 Phase IV Energy Efficiency and Conservation Plan, at Docket No. M-2020-3020830, adopted on May 23, 2024.

management and data systems monitor cost flows and compliance, integrating with CSP reporting for oversight.

See PECO Exhibits MAM-2 and MAM-3, which list the program costs by rate class and for the spreadsheet that shows how the EEPC was developed for each customer class according to the method just described. PECO proposes to start the recovery period for Phase V with bills sent to customers during July 2026 (June usage) and will continue through bills sent to customers in June 2031 (May usage).

7.6 Accounting for Phase V Costs versus Prior Phase Costs

In accordance with the Phase V Filing Template provided with the Commission's Secretarial Letter dated September 8, 2025, at Docket No. M-2025-3052826, PECO must provide a description of how it will account for Phase V costs separately from costs incurred in prior phases.²⁹ To satisfy this requirement, PECO will do the following:

- Account for the Phase V costs and revenues on its books separately from prior phases by setting up new general ledger accounts for Phase V costs and revenues so that there will be no comingling of prior phase costs and Phase V costs or funds in PECO's accounting records.
- Clearly and separately identify and track prior phase costs and revenues in the EEPC cost recovery and reconciliation mechanism so that Phase V costs will be reconciled against the Phase V funds collected. See the description of the cost recovery mechanism in the proposed supplement to PECO's Electric Service Tariff provided as PECO Exhibit MAM-1.

²⁹ EE&C Phase V Filing Template Secretarial Letter, issued September 8, 2025.

8. Cost-Effectiveness

This section provides an overview of the cost-effectiveness framework for Phase V. Section 8.1 details avoided costs. Section 8.2 confirms the values used for the real discount rate and nominal discount rate. Section 8.3 discusses the cost-effectiveness analysis approach. Section 8.3 provides cost-effectiveness information for Phase V, including supporting data tables.

8.1 Avoided Costs

The following sections report on the avoided capacity and energy costs that were used to conduct the cost-effectiveness analysis. PECO developed data inputs to support the avoided cost analysis based on direction from the PUC in the TRC Order.

PECO used the SWE's Avoided Cost Calculator to develop avoided cost inputs as directed in the PUC TRC Order. The final PECO Avoided Cost Calculator is included in Appendix E.

8.2 Confirm Use of 3% Real Discount Rate and 5% Nominal Discount Rate

PECO used a real discount of 3% for cost test modeling as directed in the PUC TRC Order.

8.3 Cost-Effectiveness Analysis Approach

The cost-effectiveness results in this Plan follow PUC specifications outlined in the 2026 TRC Order issued November 7, 2024. PECO calculates the TRC test at the measure, program, and portfolio levels. Key elements of the TRC Order include:

Measure life capped at 15 years

Use of gross and net energy and demand savings for benefit-cost purposes

Inclusion of quantifiable savings in fossil fuels, water consumption, and operations and maintenance (O&M) benefits

At the measure level, the TRC test compares lifetime benefits—calculated by multiplying annual savings by avoided costs for each year and discounting to present value—with lifetime costs, including incremental capital, installation, and O&M. Program-level TRC adds CSP and PECO delivery costs, while portfolio-level TRC includes all program costs plus portfolio-wide common costs. A ratio of benefits to costs ≥ 1 indicates cost-effectiveness.

PECO also screens the proposed measure mix economically using the TRC test. Although not all measures must pass individually, the overall portfolio must meet cost-effectiveness requirements. This approach supports a comprehensive mix of energy and demand savings measures for all customers while maintaining compliance.

8.4 Data Tables

Table 44 and Table 45 contains data tables as required by the PUC EE&C Plan template.

Table 44. TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)					TRC Benefits By Program Per Year (\$000)					
	Program	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	1.0	0.93	\$8,089	\$47,656	\$6,649	\$62,393	\$15,882	\$31,653	\$10,180	\$0	\$57,715	
Residential Energy Efficiency	PY19	1.0	0.91	\$8,366	\$48,063	\$6,649	\$63,078	\$15,383	\$31,552	\$10,422	\$0	\$57,357	
Residential Energy Efficiency	PY20	1.0	0.77	\$8,671	\$58,374	\$6,650	\$73,695	\$15,376	\$30,815	\$10,777	\$0	\$56,968	
Residential Energy Efficiency	PY21	1.0	0.75	\$8,929	\$58,413	\$6,650	\$73,992	\$15,267	\$29,260	\$11,003	\$0	\$55,531	
Residential Energy Efficiency	PY22	1.0	0.74	\$9,192	\$58,452	\$6,647	\$74,292	\$14,917	\$29,034	\$11,269	\$0	\$55,220	
Residential Energy Efficiency Total				\$43,248	\$270,957	\$33,245	\$347,450	\$76,825	\$152,315	\$53,652	\$0	\$282,792	
Residential Home Energy Reports	PY18	1.0	4.96	\$0	\$0	\$2,342	\$2,342	\$3,400	\$8,222	\$0	\$0	\$11,622	
Residential Home Energy Reports	PY19	1.0	5.14	\$0	\$0	\$3,639	\$3,639	\$7,135	\$11,557	\$0	\$0	\$18,692	
Residential Home Energy Reports	PY20	1.0	4.80	\$0	\$0	\$2,634	\$2,634	\$5,028	\$7,602	\$0	\$0	\$12,631	
Residential Home Energy Reports	PY21	1.0	3.88	\$0	\$0	\$2,783	\$2,783	\$4,006	\$6,795	\$0	\$0	\$10,801	
Residential Home Energy Reports	PY22	1.0	3.52	\$0	\$0	\$2,590	\$2,590	\$3,115	\$6,000	\$0	\$0	\$9,116	
Residential Home Energy Reports Total				\$0	\$0	\$13,989	\$13,989	\$22,684	\$40,177	\$0	\$0	\$62,862	
Low-Income Energy Efficiency	PY18	1.0	1.37	\$7,850	\$3,176	\$3,020	\$14,047	\$3,467	\$13,312	\$2,477	\$0	\$19,257	
Low-Income Energy Efficiency	PY19	1.0	1.37	\$7,995	\$3,174	\$3,033	\$14,202	\$3,292	\$13,638	\$2,530	\$0	\$19,460	
Low-Income Energy Efficiency	PY20	1.0	1.36	\$8,334	\$3,124	\$3,060	\$14,519	\$3,301	\$13,777	\$2,612	\$0	\$19,691	

<i>Low-Income Energy Efficiency</i>	<i>PY21</i>	1.0	1.31	\$8,667	\$3,080	\$3,087	\$14,834	\$3,254	\$13,550	\$2,699	\$0	\$19,503
<i>Low-Income Energy Efficiency</i>	<i>PY22</i>	1.0	1.27	\$7,194	\$3,261	\$2,966	\$13,421	\$2,748	\$11,787	\$2,548	\$0	\$17,083
<i>Low-Income Energy Efficiency Total</i>				\$40,040	\$15,816	\$15,167	\$71,023	\$16,063	\$66,064	\$12,867	\$0	\$94,994
<i>Low-Income Home Energy Reports</i>	<i>PY18</i>	1.0	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
<i>Low-Income Home Energy Reports</i>	<i>PY19</i>	1.0	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
<i>Low-Income Home Energy Reports</i>	<i>PY20</i>	1.0	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
<i>Low-Income Home Energy Reports</i>	<i>PY21</i>	1.0	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
<i>Low-Income Home Energy Reports</i>	<i>PY22</i>	1.0	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
<i>Low-Income Home Energy Reports Total</i>				\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
<i>Non-Residential Energy Efficiency</i>	<i>PY18</i>	1.0	1.56	\$21,105	\$78,457	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$7,072	\$175,913
<i>Non-Residential Energy Efficiency</i>	<i>PY19</i>	1.0	1.57	\$26,968	\$101,443	\$14,936	\$143,347	\$64,384	\$152,603	\$104	\$8,550	\$225,640
<i>Non-Residential Energy Efficiency</i>	<i>PY20</i>	1.0	1.40	\$29,959	\$129,049	\$17,236	\$176,244	\$71,161	\$166,875	\$172	\$9,338	\$247,546
<i>Non-Residential Energy Efficiency</i>	<i>PY21</i>	1.0	1.47	\$33,205	\$109,050	\$17,799	\$160,055	\$68,362	\$158,497	\$56	\$8,303	\$235,217
<i>Non-Residential Energy Efficiency</i>	<i>PY22</i>	1.0	1.57	\$24,112	\$79,227	\$15,502	\$118,840	\$54,697	\$125,133	\$75	\$7,072	\$186,977
<i>Non-Residential Energy Efficiency Total</i>				\$135,349	\$497,226	\$78,549	\$711,124	\$310,737	\$719,780	\$443	\$40,333	\$1,071,293
Total		1.0		\$218,637	\$783,999	\$141,473	\$1,144,110	\$427,081	\$981,233	\$66,962	\$40,333	\$1,515,610

Table 45. TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
<i>Residential Energy Efficiency</i>	<i>PY18</i>	<i>0.655</i>	<i>0.85</i>	<i>\$8,247</i>	<i>\$28,288</i>	<i>\$6,491</i>	<i>\$43,026</i>	<i>\$10,520</i>	<i>\$19,629</i>	<i>\$6,581</i>	<i>\$0</i>	<i>\$36,730</i>	
<i>Residential Energy Efficiency</i>	<i>PY19</i>	<i>0.655</i>	<i>0.83</i>	<i>\$8,524</i>	<i>\$28,459</i>	<i>\$6,491</i>	<i>\$43,474</i>	<i>\$10,221</i>	<i>\$19,279</i>	<i>\$6,748</i>	<i>\$0</i>	<i>\$36,248</i>	
<i>Residential Energy Efficiency</i>	<i>PY20</i>	<i>0.655</i>	<i>0.71</i>	<i>\$8,830</i>	<i>\$35,110</i>	<i>\$6,491</i>	<i>\$50,430</i>	<i>\$10,249</i>	<i>\$18,458</i>	<i>\$6,989</i>	<i>\$0</i>	<i>\$35,696</i>	
<i>Residential Energy Efficiency</i>	<i>PY21</i>	<i>0.655</i>	<i>0.68</i>	<i>\$9,088</i>	<i>\$35,046</i>	<i>\$6,491</i>	<i>\$50,626</i>	<i>\$10,213</i>	<i>\$17,107</i>	<i>\$7,149</i>	<i>\$0</i>	<i>\$34,469</i>	
<i>Residential Energy Efficiency</i>	<i>PY22</i>	<i>0.655</i>	<i>0.69</i>	<i>\$9,349</i>	<i>\$34,981</i>	<i>\$6,491</i>	<i>\$50,821</i>	<i>\$10,022</i>	<i>\$17,886</i>	<i>\$7,335</i>	<i>\$0</i>	<i>\$35,243</i>	
<i>Residential Energy Efficiency Total</i>		<i>0.655</i>		<i>\$44,038</i>	<i>\$161,884</i>	<i>\$32,456</i>	<i>\$238,377</i>	<i>\$51,225</i>	<i>\$92,360</i>	<i>\$34,801</i>	<i>\$0</i>	<i>\$178,386</i>	
<i>Residential Home Energy Reports</i>	<i>PY18</i>	<i>1.000</i>	<i>4.95</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,267</i>	<i>\$2,267</i>	<i>\$3,402</i>	<i>\$7,820</i>	<i>\$0</i>	<i>\$0</i>	<i>\$11,223</i>	
<i>Residential Home Energy Reports</i>	<i>PY19</i>	<i>1.000</i>	<i>5.80</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,061</i>	<i>\$3,061</i>	<i>\$7,148</i>	<i>\$10,613</i>	<i>\$0</i>	<i>\$0</i>	<i>\$17,761</i>	
<i>Residential Home Energy Reports</i>	<i>PY20</i>	<i>1.000</i>	<i>3.82</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,061</i>	<i>\$3,061</i>	<i>\$5,046</i>	<i>\$6,637</i>	<i>\$0</i>	<i>\$0</i>	<i>\$11,683</i>	
<i>Residential Home Energy Reports</i>	<i>PY21</i>	<i>1.000</i>	<i>3.11</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,061</i>	<i>\$3,061</i>	<i>\$4,032</i>	<i>\$5,476</i>	<i>\$0</i>	<i>\$0</i>	<i>\$9,508</i>	
<i>Residential Home Energy Reports</i>	<i>PY22</i>	<i>1.000</i>	<i>2.84</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,061</i>	<i>\$3,061</i>	<i>\$3,148</i>	<i>\$5,540</i>	<i>\$0</i>	<i>\$0</i>	<i>\$8,688</i>	
<i>Residential Home Energy Reports Total</i>		<i>1.000</i>		<i>\$0</i>	<i>\$0</i>	<i>\$14,513</i>	<i>\$14,513</i>	<i>\$22,776</i>	<i>\$36,087</i>	<i>\$0</i>	<i>\$0</i>	<i>\$58,863</i>	
<i>Low-Income Energy Efficiency</i>	<i>PY18</i>	<i>1.000</i>	<i>1.52</i>	<i>\$8,372</i>	<i>\$2,655</i>	<i>\$2,499</i>	<i>\$13,525</i>	<i>\$3,494</i>	<i>\$14,642</i>	<i>\$2,456</i>	<i>\$0</i>	<i>\$20,592</i>	
<i>Low-Income Energy Efficiency</i>	<i>PY19</i>	<i>1.000</i>	<i>1.52</i>	<i>\$8,529</i>	<i>\$2,640</i>	<i>\$2,499</i>	<i>\$13,668</i>	<i>\$3,327</i>	<i>\$14,939</i>	<i>\$2,511</i>	<i>\$0</i>	<i>\$20,776</i>	
<i>Low-Income Energy Efficiency</i>	<i>PY20</i>	<i>1.000</i>	<i>1.49</i>	<i>\$8,896</i>	<i>\$2,563</i>	<i>\$2,499</i>	<i>\$13,957</i>	<i>\$3,345</i>	<i>\$14,875</i>	<i>\$2,594</i>	<i>\$0</i>	<i>\$20,815</i>	

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
Low-Income Energy Efficiency	PY21	1.000	1.44	\$9,256	\$2,492	\$2,499	\$14,246	\$3,309	\$14,523	\$2,683	\$0	\$20,516	
Low-Income Energy Efficiency	PY22	1.000	1.42	\$7,662	\$2,793	\$2,499	\$12,953	\$2,808	\$13,015	\$2,537	\$0	\$18,360	
Low-Income Energy Efficiency Total		1.000		\$42,714	\$13,142	\$12,493	\$68,349	\$16,284	\$71,994	\$12,781	\$0	\$101,058	
Low-Income Home Energy Reports	PY18	1.000	18.31	\$0	\$0	\$72	\$72	\$299	\$1,011	\$0	\$0	\$1,310	
Low-Income Home Energy Reports	PY19	1.000	8.04	\$0	\$0	\$78	\$78	\$139	\$489	\$0	\$0	\$628	
Low-Income Home Energy Reports	PY20	1.000	7.85	\$0	\$0	\$78	\$78	\$131	\$482	\$0	\$0	\$613	
Low-Income Home Energy Reports	PY21	1.000	6.35	\$0	\$0	\$78	\$78	\$110	\$387	\$0	\$0	\$496	
Low-Income Home Energy Reports	PY22	1.000	6.15	\$0	\$0	\$78	\$78	\$95	\$385	\$0	\$0	\$480	
Low-Income Home Energy Reports Total		1.000		\$0	\$0	\$384	\$384	\$774	\$2,754	\$0	\$0	\$3,528	
Non-Residential Energy Efficiency	PY18	0.684	1.44	\$21,105	\$47,005	\$13,076	\$81,187	\$36,127	\$75,768	\$25	\$4,838	\$116,757	
Non-Residential Energy Efficiency	PY19	0.684	1.45	\$26,968	\$60,878	\$14,936	\$102,782	\$44,762	\$97,937	\$70	\$5,849	\$148,618	
Non-Residential Energy Efficiency	PY20	0.684	1.28	\$29,959	\$78,819	\$17,236	\$126,013	\$49,639	\$105,590	\$117	\$6,388	\$161,734	
Non-Residential Energy Efficiency	PY21	0.684	1.31	\$33,205	\$64,112	\$17,799	\$115,116	\$47,817	\$97,719	\$38	\$5,680	\$151,254	
Non-Residential Energy Efficiency	PY22	0.684	1.44	\$24,112	\$46,582	\$15,502	\$86,196	\$38,461	\$80,966	\$51	\$4,838	\$124,316	
Non-Residential Energy Efficiency Total		0.684		\$135,349	\$297,396	\$78,549	\$511,294	\$216,806	\$457,980	\$301	\$27,592	\$702,679	
Total		0.73		\$222,100	\$472,422	\$138,394	\$832,917	\$307,866	\$661,175	\$47,882	\$27,592	\$1,044,515	

9. Plan Compliance Information and Other Key Issues

This section contains additional required compliance items and addresses key issues in EE&C Plan, portfolio, and program design. Section 9.1 includes how PECO will comply with Plan requirements, including low-income requirements, spending on pilots, and the midstream delivery documentation process. Section 9.2 discusses other key issues such as long-term sustainability impacts, how customer education will be carried out, and how public reporting of Act 129 activities will be handled.

9.1 Plan Compliance Considerations

9.1.1 Description of Plan

As Section 3 of this document details, PECO's EE&C Plan provides energy efficiency programs to each of its customer classes, including two specific programs for low-income households.³⁰ PECO's programs are equitably provided across its customer classes consistent with the Phase V Final Order.

9.1.2 Statement Delineating the EE&C Plan

PECO's Plan (Section 1), is projected to achieve at least 1,111,685 MWh and 194.8 MW by the end of Phase V. The EE&C Plan is projected to achieve Phase V's energy and demand savings requirements through a broad array of financial incentives. These incentives will be provided to PECO's customers through CSPs, installation companies, and trade allies (e.g., HVAC contractors and retail stores).

9.1.3 Low-Income Requirements

PECO's EE&C Plan will meet the low-income requirements by building on its low-income programs in Phase IV. The Phase V Final Order highlights the importance of collaboration between LIURP and Act 129 for all utilities. The CSP for the Residential program will continue its existing partnerships with the LIURP, Philadelphia Gas Works, and Philadelphia Water Department. To meet the required demand reduction targets, PECO envisions a much higher participation level of electrically heated homes in Phase V. The Plan includes free energy checkups with no cost install measures and free electric heat assessments with no cost measures. PECO's Plan is designed to exceed the minimum requirement that 74,456 MWh come from the two dedicated low-income subprograms and the low-income portion of multifamily through the Residential program.³¹

³⁰ Consistent with Act 129, PECO's low-income household definition is households at or below 150% of the Federal poverty income guidelines. See 66 Pa.C.S. 2806.1(b)(1)(i)(B).

³¹ See PECO's discussion in Sections 3 and 4 of this document for a detailed description of its EE&C programs and its implementation strategy.

9.1.4 Spending on Experimental Equipment or Devices Limited to 2% of Funds

PECO confirms that spending on experimental equipment and devices, including pilot projects, will be capped at 2% of the overall budget. As part of this filing, PECO proposes a residential pilot program to test hybrid heat pump load-shifting capabilities.

PECO is uniquely positioned as a dual-fuel utility and seeks to leverage natural gas resources within its service territory to achieve PDRs. As PECO’s system is primarily summer peaking, the Company recognizes that achieving meaningful winter peak demand reductions presents unique challenges.

This pilot program focuses on customers utilizing hybrid heat pump systems that integrate both electric and gas heating capabilities. The objective is to evaluate the feasibility of time-based control strategies for winter peak daily load shifting. Specifically, the program will transition heating operation from the electric system to the gas system during PECO’s peak hours. This approach will provide valuable insights into the operational effectiveness of time-based controls for hybrid systems as a demand-side management tool and inform future strategies for optimizing these resources. Further details on this pilot are provided in Table 46.

Table 46. Hybrid Heat Pump Load Shifting Pilot

Pilot Design	Hybrid heat pump systems present an opportunity to serve as a daily load-shifting resource. During peak demand periods, these systems can be controlled to temporarily disable the electric heat pump and rely solely on the gas furnace for heating.
Hypothesis Being Tested	Are time-based controls for hybrid heat pumps an effective method to reduce electric peak demand reduction during winter peak hours?
Budget	\$1.6 million
Participation Estimates	200 customers ³²
Estimated Savings	600 kW ³³
Estimated Timeline	Fall 2027 – Fall 2028

9.1.5 Competitively Neutral to All Electric Distribution Customers

PECO’s EE&C program suite will be available to all PECO customers, regardless of whether they receive generation supply from PECO as a default service provider or from an EGS. To ensure equitable access to program benefits and prudent use of ratepayer funds, PECO may establish maximum incentive limits for individual projects. These limits are designed to prevent any single project from disproportionately utilizing available funding, while maintaining compliance with Act 129 objectives and supporting broad participation across customer classes.

³² PECO’s Residential CSP will source these customers from heating and cooling system data that is available through smart thermostat data in collaboration with manufacturing partners.

³³ Value estimated based on a typical heat pump power draw in the winter for a typical system during peak hours

9.1.6 Midstream Delivery Documentation Process

PECO will work with its non-residential CSP to confirm that midstream delivery of lighting minimizes like-for-like LED replacements. Participating distributors will be required to:

- **Confirm at the point of sale** that the replaced equipment is non-LED and certify installation within 90 days, in alignment with current program standards.
- **Provide mandatory baseline documentation** through the midstream upload template, including details such as existing fixture type, to confirm accurate data capture.
- **Undergo compliance verification**, which includes randomized post-installation checks—both phone and onsite—within 90 days of purchase. Sample sizes will be adjusted based on risk factors such as distributor performance or anomalies in transaction data.
- **Follow enhanced QA/QC protocols**, including automated flags for duplicate projects or missing baseline data, and annual compliance audits.
- **Complete mandatory training** on documentation requirements and program rules, reinforced through periodic refreshers and performance reviews.

The midstream platform will track transactions and verification status, providing transparency and reporting to PECO and evaluators. Distributors that fail to meet compliance standards will be subject to corrective action plans or removal from the program. This multi-layered approach to combine front-end controls, back-end verification, and ongoing distributor engagement facilitates midstream lighting incentives that deliver real, attributable savings and supports program integrity.

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

PECO's EE&C Plan was developed to meet or exceed the requirements of Act 129 and the Phase V Final Order. In developing the Phase V EE&C Plan, PECO combined its own experience implementing programs in Phases I - IV with lessons learned from utility demand side management programs in other jurisdictions around the country and worked with CSPs to design the programs. The proposed Plan includes a variety of proven programs and components effective across all customer classes. PECO believes that providing programs along with comprehensive education will lead to long-term sustainability through ongoing customer participation.

9.2.2 Describe, by Sector, How the EDC Will Address Customer Education for Its Programs

To educate customers on energy efficiency, PECO will conduct outreach to schools, work with community partners, speak with groups, staff tables at events, and reach diverse communities. It also will send emails to customers, distribute program materials, and canvas neighborhoods.

PECO has strong relationships with numerous community organizations who, through annual sponsorships and other partner-specific programs, help spread the word to their constituents about energy efficiency.

To help educate customers about heat pumps, PECO will include heat pump-specific technology content within its customer newsletter (bill insert) twice a year as part of seasonal readiness communications. Content will include the benefits of heat pump technology and proper maintenance instructions. PECO will provide a post-installation email to customers with instructions on proper temperature settings and an overview of how heat pump technology works with tips regarding minimization of auxiliary heat systems and proper maintenance (sourced by ENERGY STAR).

9.2.3 Describe How the EDC Will Provide the Public with Information about the Results from the Programs

PECO will periodically issue press releases to inform the public of the progress of its EE&C Plan and refer the public to where reports about PECO's Act 129 results are posted on the PUC's website. PECO will only provide information to the public after the SWE completes its review and approves PECO's annual reports.

10. Appendices

Appendix A. CSP Contracts

PECO has bid out all CSP contracts. Each winning CSP resulting in a signed contract will be filed with the PUC as required. No CSP contract will be effective until it is approved by the PUC.

Appendix B. Calculation Methods and Assumptions

Total Resource Cost Test Calculation Methods

Benefit-cost analysis of PECO's portfolio of energy efficiency programs was conducted through the use of a comprehensive benefit-cost screening tool. The tool uses the most recent savings values and inputs from the 2026 TRM. The tool uses inputs at the individual measure level (electric savings, incremental cost, participation levels, avoided costs, and energy costs) to calculate measure level savings and cost-effectiveness. The savings at the measure-level are subtotaled for each program and sector and finally for the portfolio. At the program and sector level the model calculates program level cost-effectiveness, program incentive and non-incentive costs, total program costs. The outputs are compared against target savings goals, spending caps, and cost-effectiveness limits.

The TRC test was the primary test used to analyze the cost-effectiveness of PECO's energy efficiency portfolio. The TRC test measures the total net resource expenditures of an energy efficiency program from the point of view of the utility and its ratepayers. Resource costs include changes in supply and participant costs. A program that passes this test (i.e., a ratio greater than 1.0) is viewed as beneficial to the utility and its customers because the savings in electric costs outweigh the costs incurred by the utility and its customers. Of particular note, per the PA PUC guidelines, measure lifetime is capped at 15 years, and non-electric benefits are included in the savings calculations (e.g. complementary natural gas savings from an electric efficiency measure). The following section outlines Guidehouse's methodology for conducting the cost-effectiveness analysis including an explanation of key inputs and assumptions.

Incremental Measure Costs

Estimates of incremental measure costs were developed using the 2026 SWE IMC Database. Additionally, expert judgement from PECO's implementation contractors were used to refine saving and cost estimates where appropriate, such as for direct install measures where actual costs may be used.

Incentive Costs

Incentive amounts for each measure were developed using industry standards benchmarks. These initial estimates were further refined based on careful consideration of the market for each measure or set of measures.

Administrative Costs

To determine the administrative costs, PECO followed the PUC's Phase V Final Order to have a minimum of 50% of the total budget go to incentives, including direct-install. PECO then benchmarked the Phase IV budget to determine PECO and non-PECO administrative budget. Administrative cost categories include program design, administrative spending, EDC delivery costs, CSP delivery fees, marketing, EM&V, AEPS registration support and other expenditures.

Appendix C. Program by Program Savings, Costs, and TRC Results

Table 47. Summary of EE&C Costs by Sector and Program

Sector	EE&C Program	Cost Elements (\$)									Total Cost	Expected Acquisition Cost ³ (\$/MWh)	Levelized Cost ⁴ (\$/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)	Residential Energy Efficiency	\$42,841,347	\$0	\$0	\$0	\$24,490,397	\$8,191,911	\$0	\$0	\$0	\$75,523,655	\$312	\$163	\$1,510,591
	Residential Home Energy Reports	\$0	\$0	\$0	\$0	\$13,989,327	\$0	\$0	\$0	\$0	\$13,989,327	\$98	\$26	\$434,512
	Low-Income Energy Efficiency	\$34,330,888	\$0	\$0	\$0	\$9,219,672	\$3,073,224	\$0	\$0	\$0	\$46,623,784	\$646	\$157	\$3,886,241
	Low-Income Home Energy Reports	\$0	\$0	\$0	\$0	\$523,673	\$0	\$0	\$0	\$0	\$523,673	\$97	\$26	\$488,339
	Sector Total⁵	\$77,172,235	\$0	\$0	\$0	\$48,223,069	\$11,265,135	\$0	\$0	\$0	\$136,660,438	\$296	\$138	\$1,434,589
Small C&I	Non-Residential Energy Efficiency	\$66,587,232	\$0	\$0	\$0	\$34,814,665	\$1,155,777	\$0	\$33,423	\$0	\$102,591,096	\$232	\$70	\$1,458,638
	Residential Energy Efficiency	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	Low-Income Energy Efficiency	\$2,854,674	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574	\$472	\$23	\$3,400,476
	Sector Total	\$69,645,338	\$0	\$0	\$0	\$36,103,112	\$1,585,504	\$0	\$33,423	\$0	\$107,367,377	\$237	\$69	\$1,497,440
Large C&I	Non-Residential	\$68,761,645	\$0	\$0	\$0	\$41,142,531	\$1,363,220	\$0	\$39,327	\$0	\$111,306,722	\$209	\$69	\$1,157,362

	<i>Energy Efficiency</i>													
	<i>Residential Energy Efficiency</i>	\$203,432	\$0	\$0	\$0	\$210,773	\$70,502	\$0	\$0	\$0	\$484,707	\$642	\$54	\$4,612,577
	<i>Low-Income Energy Efficiency</i>	\$2,854,674	\$0	\$0	\$0	\$1,077,675	\$359,225	\$0	\$0	\$0	\$4,291,574	\$472	\$23	\$3,400,476
	Sector Total	\$71,819,751	\$0	\$0	\$0	\$42,430,978	\$1,792,947	\$0	\$39,327	\$0	\$116,083,003	\$214	\$69	\$1,190,108

Table 48. Allocation of Common Costs to Applicable Customer Sector

Common Cost Element	Total Cost (\$)	Basis for Cost Allocation	Sector Cost Allocation (\$)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Marketing	\$20,400,000	First Year MWh Savings	\$7,592,659	\$6,379,070	\$6,428,271
Administrative	\$4,700,000	First Year MWh Savings	\$1,749,289	\$1,469,688	\$1,481,023
Program Design	\$8,540,000	First Year MWh Savings	\$3,178,496	\$2,670,454	\$2,691,051
EM&V	\$19,600,000	First Year MWh Savings	\$7,294,908	\$6,128,911	\$6,176,182
EDC Delivery Costs	\$11,035,012	First Year MWh Savings	\$4,107,112	\$3,450,643	\$3,477,257
Other (Describe)	\$3,000,000	First Year MWh Savings	\$1,116,568	\$938,099	\$945,334
Totals	\$67,275,012		\$25,039,032	\$21,036,864	\$21,199,117
SWE Cost	\$0		\$0	\$0	\$0

Table 49. Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs	Total Common Costs	Total of All Costs
Residential (Including Low-Income)	\$136,660,438	\$25,039,032	\$161,699,470
Small C&I	\$107,322,978	\$21,036,864	\$128,359,841
Large C&I	\$116,127,403	\$21,199,117	\$137,326,519
Totals	\$360,110,819	\$67,275,012	\$427,385,831

Table 50. TRC Benefits (Gross)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)					TRC Benefits By Program Per Year (\$000)					
	Program	Program Year	NTGR	Gross TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
<i>Residential Energy Efficiency</i>	<i>PY18</i>	<i>1.0</i>	<i>0.93</i>	<i>\$8,089</i>	<i>\$47,656</i>	<i>\$6,649</i>	<i>\$62,393</i>	<i>\$15,882</i>	<i>\$31,653</i>	<i>\$10,180</i>	<i>\$0</i>	<i>\$57,715</i>	
<i>Residential Energy Efficiency</i>	<i>PY19</i>	<i>1.0</i>	<i>0.91</i>	<i>\$8,366</i>	<i>\$48,063</i>	<i>\$6,649</i>	<i>\$63,078</i>	<i>\$15,383</i>	<i>\$31,552</i>	<i>\$10,422</i>	<i>\$0</i>	<i>\$57,357</i>	
<i>Residential Energy Efficiency</i>	<i>PY20</i>	<i>1.0</i>	<i>0.77</i>	<i>\$8,671</i>	<i>\$58,374</i>	<i>\$6,650</i>	<i>\$73,695</i>	<i>\$15,376</i>	<i>\$30,815</i>	<i>\$10,777</i>	<i>\$0</i>	<i>\$56,968</i>	
<i>Residential Energy Efficiency</i>	<i>PY21</i>	<i>1.0</i>	<i>0.75</i>	<i>\$8,929</i>	<i>\$58,413</i>	<i>\$6,650</i>	<i>\$73,992</i>	<i>\$15,267</i>	<i>\$29,260</i>	<i>\$11,003</i>	<i>\$0</i>	<i>\$55,531</i>	
<i>Residential Energy Efficiency</i>	<i>PY22</i>	<i>1.0</i>	<i>0.74</i>	<i>\$9,192</i>	<i>\$58,452</i>	<i>\$6,647</i>	<i>\$74,292</i>	<i>\$14,917</i>	<i>\$29,034</i>	<i>\$11,269</i>	<i>\$0</i>	<i>\$55,220</i>	
<i>Residential Energy Efficiency Total</i>				<i>\$43,248</i>	<i>\$270,957</i>	<i>\$33,245</i>	<i>\$347,450</i>	<i>\$76,825</i>	<i>\$152,315</i>	<i>\$53,652</i>	<i>\$0</i>	<i>\$282,792</i>	
<i>Residential Home Energy Reports</i>	<i>PY18</i>	<i>1.0</i>	<i>4.96</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,342</i>	<i>\$2,342</i>	<i>\$3,400</i>	<i>\$8,222</i>	<i>\$0</i>	<i>\$0</i>	<i>\$11,622</i>	
<i>Residential Home Energy Reports</i>	<i>PY19</i>	<i>1.0</i>	<i>5.14</i>	<i>\$0</i>	<i>\$0</i>	<i>\$3,639</i>	<i>\$3,639</i>	<i>\$7,135</i>	<i>\$11,557</i>	<i>\$0</i>	<i>\$0</i>	<i>\$18,692</i>	
<i>Residential Home Energy Reports</i>	<i>PY20</i>	<i>1.0</i>	<i>4.80</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,634</i>	<i>\$2,634</i>	<i>\$5,028</i>	<i>\$7,602</i>	<i>\$0</i>	<i>\$0</i>	<i>\$12,631</i>	
<i>Residential Home Energy Reports</i>	<i>PY21</i>	<i>1.0</i>	<i>3.88</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,783</i>	<i>\$2,783</i>	<i>\$4,006</i>	<i>\$6,795</i>	<i>\$0</i>	<i>\$0</i>	<i>\$10,801</i>	
<i>Residential Home Energy Reports</i>	<i>PY22</i>	<i>1.0</i>	<i>3.52</i>	<i>\$0</i>	<i>\$0</i>	<i>\$2,590</i>	<i>\$2,590</i>	<i>\$3,115</i>	<i>\$6,000</i>	<i>\$0</i>	<i>\$0</i>	<i>\$9,116</i>	
<i>Residential Home Energy Reports Total</i>				<i>\$0</i>	<i>\$0</i>	<i>\$13,989</i>	<i>\$13,989</i>	<i>\$22,684</i>	<i>\$40,177</i>	<i>\$0</i>	<i>\$0</i>	<i>\$62,862</i>	
<i>Low-Income Energy Efficiency</i>	<i>PY18</i>	<i>1.0</i>	<i>1.37</i>	<i>\$7,850</i>	<i>\$3,176</i>	<i>\$3,020</i>	<i>\$14,047</i>	<i>\$3,467</i>	<i>\$13,312</i>	<i>\$2,477</i>	<i>\$0</i>	<i>\$19,257</i>	
<i>Low-Income Energy Efficiency</i>	<i>PY19</i>	<i>1.0</i>	<i>1.37</i>	<i>\$7,995</i>	<i>\$3,174</i>	<i>\$3,033</i>	<i>\$14,202</i>	<i>\$3,292</i>	<i>\$13,638</i>	<i>\$2,530</i>	<i>\$0</i>	<i>\$19,460</i>	
<i>Low-Income Energy Efficiency</i>	<i>PY20</i>	<i>1.0</i>	<i>1.36</i>	<i>\$8,334</i>	<i>\$3,124</i>	<i>\$3,060</i>	<i>\$14,519</i>	<i>\$3,301</i>	<i>\$13,777</i>	<i>\$2,612</i>	<i>\$0</i>	<i>\$19,691</i>	

<i>Low-Income Energy Efficiency</i>	<i>PY21</i>	1.0	1.31	\$8,667	\$3,080	\$3,087	\$14,834	\$3,254	\$13,550	\$2,699	\$0	\$19,503
<i>Low-Income Energy Efficiency</i>	<i>PY22</i>	1.0	1.27	\$7,194	\$3,261	\$2,966	\$13,421	\$2,748	\$11,787	\$2,548	\$0	\$17,083
<i>Low-Income Energy Efficiency Total</i>				\$40,040	\$15,816	\$15,167	\$71,023	\$16,063	\$66,064	\$12,867	\$0	\$94,994
<i>Low-Income Home Energy Reports</i>	<i>PY18</i>	1.0	7.78	\$0	\$0	\$172	\$172	\$299	\$1,041	\$0	\$0	\$1,340
<i>Low-Income Home Energy Reports</i>	<i>PY19</i>	1.0	7.18	\$0	\$0	\$91	\$91	\$139	\$512	\$0	\$0	\$651
<i>Low-Income Home Energy Reports</i>	<i>PY20</i>	1.0	6.80	\$0	\$0	\$95	\$95	\$130	\$517	\$0	\$0	\$648
<i>Low-Income Home Energy Reports</i>	<i>PY21</i>	1.0	6.31	\$0	\$0	\$85	\$85	\$109	\$427	\$0	\$0	\$536
<i>Low-Income Home Energy Reports</i>	<i>PY22</i>	1.0	6.12	\$0	\$0	\$81	\$81	\$94	\$400	\$0	\$0	\$494
<i>Low-Income Home Energy Reports Total</i>				\$0	\$0	\$524	\$524	\$772	\$2,897	\$0	\$0	\$3,669
<i>Non-Residential Energy Efficiency</i>	<i>PY18</i>	1.0	1.56	\$21,105	\$78,457	\$13,076	\$112,638	\$52,133	\$116,672	\$36	\$7,072	\$175,913
<i>Non-Residential Energy Efficiency</i>	<i>PY19</i>	1.0	1.57	\$26,968	\$101,443	\$14,936	\$143,347	\$64,384	\$152,603	\$104	\$8,550	\$225,640
<i>Non-Residential Energy Efficiency</i>	<i>PY20</i>	1.0	1.40	\$29,959	\$129,049	\$17,236	\$176,244	\$71,161	\$166,875	\$172	\$9,338	\$247,546
<i>Non-Residential Energy Efficiency</i>	<i>PY21</i>	1.0	1.47	\$33,205	\$109,050	\$17,799	\$160,055	\$68,362	\$158,497	\$56	\$8,303	\$235,217
<i>Non-Residential Energy Efficiency</i>	<i>PY22</i>	1.0	1.57	\$24,112	\$79,227	\$15,502	\$118,840	\$54,697	\$125,133	\$75	\$7,072	\$186,977
<i>Non-Residential Energy Efficiency Total</i>				\$135,349	\$497,226	\$78,549	\$711,124	\$310,737	\$719,780	\$443	\$40,333	\$1,071,293
Total		1.0		\$218,637	\$783,999	\$141,473	\$1,144,110	\$427,081	\$981,233	\$66,962	\$40,333	\$1,515,610

Table 51. TRC Benefits (Net)

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
Residential Energy Efficiency	PY18	0.655	0.85	\$8,247	\$28,288	\$6,491	\$43,026	\$10,520	\$19,629	\$6,581	\$0	\$36,730	
Residential Energy Efficiency	PY19	0.655	0.83	\$8,524	\$28,459	\$6,491	\$43,474	\$10,221	\$19,279	\$6,748	\$0	\$36,248	
Residential Energy Efficiency	PY20	0.655	0.71	\$8,830	\$35,110	\$6,491	\$50,430	\$10,249	\$18,458	\$6,989	\$0	\$35,696	
Residential Energy Efficiency	PY21	0.655	0.68	\$9,088	\$35,046	\$6,491	\$50,626	\$10,213	\$17,107	\$7,149	\$0	\$34,469	
Residential Energy Efficiency	PY22	0.655	0.69	\$9,349	\$34,981	\$6,491	\$50,821	\$10,022	\$17,886	\$7,335	\$0	\$35,243	
Residential Energy Efficiency Total		0.655		\$44,038	\$161,884	\$32,456	\$238,377	\$51,225	\$92,360	\$34,801	\$0	\$178,386	
Residential Home Energy Reports	PY18	1.000	4.95	\$0	\$0	\$2,267	\$2,267	\$3,402	\$7,820	\$0	\$0	\$11,223	
Residential Home Energy Reports	PY19	1.000	5.80	\$0	\$0	\$3,061	\$3,061	\$7,148	\$10,613	\$0	\$0	\$17,761	
Residential Home Energy Reports	PY20	1.000	3.82	\$0	\$0	\$3,061	\$3,061	\$5,046	\$6,637	\$0	\$0	\$11,683	
Residential Home Energy Reports	PY21	1.000	3.11	\$0	\$0	\$3,061	\$3,061	\$4,032	\$5,476	\$0	\$0	\$9,508	
Residential Home Energy Reports	PY22	1.000	2.84	\$0	\$0	\$3,061	\$3,061	\$3,148	\$5,540	\$0	\$0	\$8,688	
Residential Home Energy Reports Total		1.000		\$0	\$0	\$14,513	\$14,513	\$22,776	\$36,087	\$0	\$0	\$58,863	
Low-Income Energy Efficiency	PY18	1.000	1.52	\$8,372	\$2,655	\$2,499	\$13,525	\$3,494	\$14,642	\$2,456	\$0	\$20,592	
Low-Income Energy Efficiency	PY19	1.000	1.52	\$8,529	\$2,640	\$2,499	\$13,668	\$3,327	\$14,939	\$2,511	\$0	\$20,776	
Low-Income Energy Efficiency	PY20	1.000	1.49	\$8,896	\$2,563	\$2,499	\$13,957	\$3,345	\$14,875	\$2,594	\$0	\$20,815	

Portfolio	NTGR & TRC Ratio		TRC Costs By Program Per Year (\$000)				TRC Benefits By Program Per Year (\$000)						
	Program/Subprogram	Program Year	NTGR	Net TRC	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits	Energy Benefits ⁵	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
					Paid by EDC	Paid by Participants							
Low-Income Energy Efficiency	PY21	1.000	1.44	\$9,256	\$2,492	\$2,499	\$14,246	\$3,309	\$14,523	\$2,683	\$0	\$20,516	
Low-Income Energy Efficiency	PY22	1.000	1.42	\$7,662	\$2,793	\$2,499	\$12,953	\$2,808	\$13,015	\$2,537	\$0	\$18,360	
Low-Income Energy Efficiency Total		1.000		\$42,714	\$13,142	\$12,493	\$68,349	\$16,284	\$71,994	\$12,781	\$0	\$101,058	
Low-Income Home Energy Reports	PY18	1.000	18.31	\$0	\$0	\$72	\$72	\$299	\$1,011	\$0	\$0	\$1,310	
Low-Income Home Energy Reports	PY19	1.000	8.04	\$0	\$0	\$78	\$78	\$139	\$489	\$0	\$0	\$628	
Low-Income Home Energy Reports	PY20	1.000	7.85	\$0	\$0	\$78	\$78	\$131	\$482	\$0	\$0	\$613	
Low-Income Home Energy Reports	PY21	1.000	6.35	\$0	\$0	\$78	\$78	\$110	\$387	\$0	\$0	\$496	
Low-Income Home Energy Reports	PY22	1.000	6.15	\$0	\$0	\$78	\$78	\$95	\$385	\$0	\$0	\$480	
Low-Income Home Energy Reports Total		1.000		\$0	\$0	\$384	\$384	\$774	\$2,754	\$0	\$0	\$3,528	
Non-Residential Energy Efficiency	PY18	0.684	1.44	\$21,105	\$47,005	\$13,076	\$81,187	\$36,127	\$75,768	\$25	\$4,838	\$116,757	
Non-Residential Energy Efficiency	PY19	0.684	1.45	\$26,968	\$60,878	\$14,936	\$102,782	\$44,762	\$97,937	\$70	\$5,849	\$148,618	
Non-Residential Energy Efficiency	PY20	0.684	1.28	\$29,959	\$78,819	\$17,236	\$126,013	\$49,639	\$105,590	\$117	\$6,388	\$161,734	
Non-Residential Energy Efficiency	PY21	0.684	1.31	\$33,205	\$64,112	\$17,799	\$115,116	\$47,817	\$97,719	\$38	\$5,680	\$151,254	
Non-Residential Energy Efficiency	PY22	0.684	1.44	\$24,112	\$46,582	\$15,502	\$86,196	\$38,461	\$80,966	\$51	\$4,838	\$124,316	
Non-Residential Energy Efficiency Total		0.684		\$135,349	\$297,396	\$78,549	\$511,294	\$216,806	\$457,980	\$301	\$27,592	\$702,679	
Total		0.73		\$222,100	\$472,422	\$138,394	\$832,917	\$307,866	\$661,175	\$47,882	\$27,592	\$1,044,515	

Appendix D. Avoided Cost Calculator

PECO created the avoided costs after gathering publicly available data sets as inputs to support the avoided cost analysis. PECO followed direction from the PUC in the TRC Order. We have organized the information according to the tabs in the PUC's Excel avoided cost calculator.

General Instructions

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator

This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references.

For Phase V, the start year shall be set to Program Year 18 (6/1/2026 - 5/31/2027).

The user shall gather publicly available data sets as inputs.

This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

Data Needed	TRC Test Order Section	Input Tab
EDC Name		General Inputs
Start Year		General Inputs
Inflation Rate	A.7 Page 8	General Inputs
Plant Heat Rates	B.2.b.v Page 18	General Inputs
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15	Elec Futures
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15	Elec Futures
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16	NG Futures
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16	NG Futures
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16	Adjustments
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18	BLS Input
PJM Base Residual Auction Results	B.7 Page 21	Generation Capacity
Transmission and Distribution Capacity Costs	B.8 Page 22	T&D Capacity
AEPS Avoided Costs	B.9 Page 24	AEPS
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25	DRIPE
Benefits Incurreced Through Reduced Arrearages Activity	B.12 Page 29	Arrearages

Monetary Issues:	All output dollars are nominal
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

General Inputs

General			Calendar			
Company Name	PECO		Act 129 PY	PY Start	PY End	Avoided Energy YR
Start Year (Program)	18	2027	18	2026	2027	2027
Discount Rate	5%	TRC Test Order A.4 page 10	19	2027	2028	2028
Inflation Rate	2%	TRC Test Order B.4 page 18	20	2028	2029	2029
Plant Specifications			21	2029	2030	2030
	Heat Rate (Btu/kWh)		22	2030	2031	2031
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23	2031	2032	2032
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24	2032	2033	2033
EDC Natural Gas Futures Source			25	2033	2034	2034
Electric Distribution Companies	EDC Abbreviation	NYMEX NG Futures Source	26	2034	2035	2035
Duquesne Light Co	DLC	Tetco M-3	27	2035	2036	2036
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28	2036	2037	2037
PECO Energy Co	PECO	Transco 6 (Non-NY)	29	2037	2038	2038
Pennsylvania Electric Co	Penelec	Tetco M-3	30	2038	2039	2039
Pennsylvania Power Co	Penn Power	Tetco M-3	31	2039	2040	2040
PPL Utilities	PPL	Transco 6 (Non-NY)	32	2040	2041	2041
West Penn Power Co	West Penn	Tetco M-3	33	2041	2042	2042
Seasonal Definitions			34	2042	2043	2043
Jan	Winter		35	2043	2044	2044
Feb	Winter		36	2044	2045	2045
Mar	Shoulder		37	2045	2046	2046
Apr	Shoulder		38	2046	2047	2047
May	Summer		39	2047	2048	2048
Jun	Summer		40	2048	2049	2049
Jul	Summer		41	2049	2050	2050
Aug	Summer		42	2050	2051	2051
Sep	Summer		43	2051	2052	2052
Oct	Shoulder		44	2052	2053	2053
Nov	Shoulder		45	2053	2054	2054
Dec	Winter		46	2054	2055	2055
			47	2055	2056	2056

Outputs

PA ACT 129 Program Year	Year	PECO Zone Summer (\$/MWh)		PECO Zone Winter (\$/MWh)		PECO DLC Zone Shoulder (\$/MWh)		PECO Generation Capacity (\$/kW/year)		PECO Transmission Capacity (\$/kW/year)		PECO Distribution Capacity (\$/kW/year)		Avoided Natural Gas Fuel Costs (\$/MMBTU)	
		Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2027	\$79.44	\$58.18	\$94.46	\$83.19	\$72.51	\$61.06	\$93.84	\$93.84	\$22.48	\$0.00	\$39.61	\$10.26	\$4.07	Segment 1
19	2028	\$91.75	\$70.15	\$107.40	\$96.45	\$84.44	\$73.01	\$66.38	\$66.38	\$22.94	\$0.00	\$47.21	\$5.67	\$3.90	
20	2029	\$101.74	\$79.21	\$117.92	\$106.30	\$94.21	\$82.14	\$65.69	\$65.69	\$23.42	\$0.00	\$49.64	\$5.54	\$3.78	
21	2030	\$63.14	\$55.29	\$102.46	\$82.37	\$66.40	\$57.53	\$67.02	\$67.02	\$23.90	\$0.00	\$51.04	\$5.08	\$3.68	
22	2031	\$55.63	\$38.33	\$76.67	\$64.52	\$50.84	\$41.06	\$31.83	\$31.83	\$24.40	\$0.00	\$50.53	\$7.16	\$3.51	Segment 2
23	2032	\$55.81	\$38.50	\$78.16	\$65.59	\$51.17	\$41.34	\$32.49	\$32.49	\$24.90	\$0.00	\$51.57	\$7.31	\$3.54	
24	2033	\$57.99	\$40.04	\$81.71	\$68.08	\$53.28	\$42.84	\$33.17	\$33.17	\$25.42	\$0.00	\$52.64	\$7.46	\$3.76	
25	2034	\$60.45	\$41.79	\$85.93	\$71.04	\$55.91	\$44.70	\$33.85	\$33.85	\$25.95	\$0.00	\$53.73	\$7.62	\$4.01	
26	2035	\$62.74	\$43.41	\$89.83	\$73.77	\$58.49	\$46.52	\$34.56	\$34.56	\$26.48	\$0.00	\$54.85	\$7.78	\$4.25	
27	2036	\$64.89	\$44.94	\$93.66	\$76.46	\$60.67	\$48.08	\$35.27	\$35.27	\$27.03	\$0.00	\$55.98	\$7.94	\$4.47	
28	2037	\$65.88	\$45.68	\$94.92	\$77.38	\$61.71	\$48.84	\$36.00	\$36.00	\$27.59	\$0.00	\$57.14	\$8.10	\$4.55	Segment 3
29	2038	\$65.29	\$45.33	\$93.25	\$76.28	\$61.04	\$48.43	\$36.75	\$36.75	\$28.16	\$0.00	\$58.33	\$8.27	\$4.46	
30	2039	\$64.89	\$45.10	\$92.04	\$75.50	\$60.57	\$48.17	\$37.51	\$37.51	\$28.75	\$0.00	\$59.53	\$8.44	\$4.38	
31	2040	\$65.31	\$45.45	\$92.80	\$76.08	\$61.02	\$48.53	\$38.29	\$38.29	\$29.34	\$0.00	\$60.77	\$8.62	\$4.41	
32	2041	\$66.60	\$46.39	\$95.67	\$78.11	\$62.43	\$49.55	\$39.08	\$39.08	\$29.95	\$0.00	\$62.03	\$8.80	\$4.55	
33	2042	\$68.02	\$47.42	\$98.85	\$80.36	\$63.98	\$50.68	\$39.89	\$39.89	\$30.57	\$0.00	\$63.31	\$8.98	\$4.71	
34	2043	\$69.48	\$48.48	\$102.13	\$82.67	\$65.59	\$51.84	\$40.72	\$40.72	\$31.20	\$0.00	\$64.62	\$9.16	\$4.87	
35	2044	\$70.47	\$49.23	\$104.28	\$84.21	\$66.68	\$52.65	\$41.56	\$41.56	\$31.85	\$0.00	\$65.96	\$9.35	\$4.97	
36	2045	\$71.24	\$49.82	\$105.86	\$85.37	\$67.51	\$53.29	\$42.42	\$42.42	\$32.51	\$0.00	\$67.33	\$9.55	\$5.05	
37	2046	\$31.50	\$22.51	\$9.19	\$18.85	\$23.29	\$22.90	\$43.30	\$43.30	\$33.18	\$0.00	\$68.72	\$9.75	\$0.00	

LI Outputs

PA ACT 129 Program Year	Year	PECO Zone Summer (\$/MWh)		PECO Zone Winter (\$/MWh)		PECO DLC Zone Shoulder (\$/MWh)		PECO Generation Capacity (\$/kW/year)		PECO Transmission Capacity (\$/kW/year)		PECO Distribution Capacity (\$/kW/year)		Avoided Natural Gas Fuel Costs (\$/MMBTU)	
		Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter		
18	2027	\$137.58	\$116.32	\$152.60	\$141.33	\$130.65	\$119.20	\$93.84	\$93.84	\$22.48	\$0.00	\$39.61	\$10.26	\$4.07	Segment 1
19	2028	\$151.05	\$129.45	\$166.70	\$155.75	\$143.74	\$132.31	\$66.38	\$66.38	\$22.94	\$0.00	\$47.21	\$5.67	\$3.90	
20	2029	\$162.23	\$139.70	\$178.41	\$166.79	\$154.70	\$142.63	\$65.69	\$65.69	\$23.42	\$0.00	\$49.64	\$5.54	\$3.78	
21	2030	\$124.83	\$116.99	\$164.16	\$144.07	\$128.10	\$119.23	\$67.02	\$67.02	\$23.90	\$0.00	\$51.04	\$5.08	\$3.68	
22	2031	\$118.57	\$101.26	\$139.60	\$127.45	\$113.77	\$104.00	\$31.83	\$31.83	\$24.40	\$0.00	\$50.53	\$7.16	\$3.51	Segment 2
23	2032	\$120.01	\$102.69	\$142.35	\$129.78	\$115.36	\$105.53	\$32.49	\$32.49	\$24.90	\$0.00	\$51.57	\$7.31	\$3.54	
24	2033	\$123.46	\$105.52	\$147.18	\$133.56	\$118.76	\$108.32	\$33.17	\$33.17	\$25.42	\$0.00	\$52.64	\$7.46	\$3.76	
25	2034	\$127.23	\$108.57	\$152.72	\$137.82	\$122.70	\$111.49	\$33.85	\$33.85	\$25.95	\$0.00	\$53.73	\$7.62	\$4.01	
26	2035	\$130.86	\$111.53	\$157.95	\$141.89	\$126.61	\$114.64	\$34.56	\$34.56	\$26.48	\$0.00	\$54.85	\$7.78	\$4.25	
27	2036	\$134.37	\$114.43	\$163.14	\$145.94	\$130.15	\$117.56	\$35.27	\$35.27	\$27.03	\$0.00	\$55.98	\$7.94	\$4.47	
28	2037	\$136.75	\$116.55	\$165.79	\$148.25	\$132.58	\$119.71	\$36.00	\$36.00	\$27.59	\$0.00	\$57.14	\$8.10	\$4.55	Segment 3
29	2038	\$137.58	\$117.62	\$165.54	\$148.57	\$133.33	\$120.72	\$36.75	\$36.75	\$28.16	\$0.00	\$58.33	\$8.27	\$4.46	
30	2039	\$138.63	\$118.84	\$165.77	\$149.23	\$134.31	\$121.90	\$37.51	\$37.51	\$28.75	\$0.00	\$59.53	\$8.44	\$4.38	
31	2040	\$140.52	\$120.66	\$168.01	\$151.29	\$136.23	\$123.74	\$38.29	\$38.29	\$29.34	\$0.00	\$60.77	\$8.62	\$4.41	
32	2041	\$143.31	\$123.10	\$172.38	\$154.82	\$139.14	\$126.27	\$39.08	\$39.08	\$29.95	\$0.00	\$62.03	\$8.80	\$4.55	
33	2042	\$146.27	\$125.67	\$177.10	\$158.61	\$142.23	\$128.93	\$39.89	\$39.89	\$30.57	\$0.00	\$63.31	\$8.98	\$4.71	
34	2043	\$149.29	\$128.30	\$181.94	\$162.49	\$145.40	\$131.66	\$40.72	\$40.72	\$31.20	\$0.00	\$64.62	\$9.16	\$4.87	
35	2044	\$151.88	\$130.64	\$185.69	\$165.62	\$148.09	\$134.06	\$41.56	\$41.56	\$31.85	\$0.00	\$65.96	\$9.35	\$4.97	
36	2045	\$154.28	\$132.86	\$188.90	\$168.40	\$150.55	\$136.32	\$42.42	\$42.42	\$32.51	\$0.00	\$67.33	\$9.55	\$5.05	
37	2046	\$116.20	\$107.21	\$93.89	\$103.55	\$107.99	\$107.59	\$43.30	\$43.30	\$33.18	\$0.00	\$68.72	\$9.75	\$0.00	

Elec Futures

Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal \$/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal \$/MWh)	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)
1	Jan-26	\$82.25	\$66.70	\$73.22	\$59.38
2	Feb-26	\$72.35	\$62.30	\$64.41	\$55.46
3	Mar-26	\$53.00	\$47.25	\$47.18	\$42.07
4	Apr-26	\$50.75	\$38.50	\$45.18	\$34.28
5	May-26	\$55.90	\$38.15	\$49.77	\$33.96
6	Jun-26	\$57.35	\$36.90	\$51.06	\$32.85
7	Jul-26	\$78.35	\$44.20	\$69.75	\$39.35
8	Aug-26	\$69.50	\$41.30	\$61.87	\$36.77
9	Sep-26	\$58.65	\$36.40	\$52.21	\$32.41
10	Oct-26	\$53.00	\$38.30	\$47.18	\$34.10
11	Nov-26	\$56.80	\$44.95	\$50.57	\$40.02
12	Dec-26	\$69.90	\$58.90	\$62.23	\$52.44
13	Jan-27	\$92.85	\$76.50	\$82.66	\$68.11
14	Feb-27	\$81.80	\$69.85	\$72.82	\$62.19
15	Mar-27	\$61.70	\$50.75	\$54.93	\$45.18
16	Apr-27	\$55.50	\$40.70	\$49.41	\$36.23
17	May-27	\$56.80	\$39.85	\$50.57	\$35.48
18	Jun-27	\$58.35	\$38.60	\$51.95	\$34.36
19	Jul-27	\$79.80	\$45.90	\$71.04	\$40.86
20	Aug-27	\$70.60	\$42.55	\$62.85	\$37.88
21	Sep-27	\$59.65	\$38.90	\$53.10	\$34.63
22	Oct-27	\$53.95	\$39.85	\$48.03	\$35.48
23	Nov-27	\$57.90	\$46.30	\$51.55	\$41.22
24	Dec-27	\$71.10	\$61.40	\$63.30	\$54.66
25	Jan-28	\$97.00	\$80.75	\$86.36	\$71.89
26	Feb-28	\$85.35	\$73.80	\$75.98	\$65.70
27	Mar-28	\$64.35	\$53.85	\$57.29	\$47.94
28	Apr-28	\$57.90	\$43.40	\$51.55	\$38.64
29	May-28	\$59.35	\$42.20	\$52.84	\$37.57
30	Jun-28	\$60.95	\$41.00	\$54.26	\$36.50
31	Jul-28	\$83.35	\$48.70	\$74.20	\$43.36
32	Aug-28	\$73.80	\$45.15	\$65.70	\$40.20
33	Sep-28	\$62.30	\$41.40	\$55.46	\$36.86
34	Oct-28	\$56.35	\$42.20	\$50.17	\$37.57
35	Nov-28	\$60.35	\$48.15	\$53.73	\$42.87
36	Dec-28	\$74.25	\$65.15	\$66.10	\$58.00
37	Jan-29	\$100.35	\$83.20	\$89.34	\$74.07
38	Feb-29	\$88.35	\$76.00	\$78.66	\$67.66
39	Mar-29	\$66.60	\$55.45	\$59.29	\$49.37
40	Apr-29	\$60.05	\$44.65	\$53.46	\$39.75
41	May-29	\$61.40	\$43.55	\$54.66	\$38.77
42	Jun-29	\$63.10	\$42.25	\$56.18	\$37.61
43	Jul-29	\$86.30	\$50.15	\$76.83	\$44.65
44	Aug-29	\$76.30	\$46.50	\$67.93	\$41.40
45	Sep-29	\$64.50	\$42.65	\$57.42	\$37.97
46	Oct-29	\$58.25	\$43.55	\$51.86	\$38.77
47	Nov-29	\$62.55	\$49.60	\$55.69	\$44.16
48	Dec-29	\$76.80	\$67.15	\$68.37	\$59.78
49	Jan-30	\$87.20	\$60.05	\$77.63	\$53.46
50	Feb-30	\$74.70	\$51.44	\$66.50	\$45.80
51	Mar-30	\$38.06	\$26.21	\$33.88	\$23.33
52	Apr-30	\$29.59	\$20.38	\$26.35	\$18.14
53	May-30	\$26.86	\$18.50	\$23.91	\$16.47
54	Jun-30	\$28.40	\$19.56	\$25.28	\$17.41
55	Jul-30	\$30.15	\$20.76	\$26.84	\$18.48
56	Aug-30	\$29.72	\$20.47	\$26.46	\$18.22
57	Sep-30	\$26.46	\$18.22	\$23.55	\$16.22
58	Oct-30	\$25.18	\$17.34	\$22.42	\$15.44
59	Nov-30	\$35.10	\$24.17	\$31.24	\$21.52
60	Dec-30	\$55.56	\$38.26	\$49.46	\$34.06
End of Segment I					

Real-Time, Load-Weighted LMPs (\$/MWh)

EDC	2020	2021	2022	2023	2024	Basis Factor
Western Hub	\$ 20.92	\$ 38.88	\$ 77.53	\$ 31.78	\$ 30.84	
PECO	\$ 19.29	\$ 33.55	\$ 71.67	\$ 23.63	\$ 29.87	89%

Source: PJM State of the Market Report, Tables in chapter 11

NG Futures

EIA AEO Mid-Atlantic Data
(Electric Power, Natural Gas 20XX Dollars)
[\$/MMBTU]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Real	\$2.72	\$2.78	\$2.64	\$2.58	\$2.64	\$2.77	\$2.87	\$3.22	\$3.48	\$3.60	\$3.63	\$3.61	\$3.52	\$3.38	\$3.26	\$3.22	\$3.25	\$3.30	\$3.34	\$3.35	\$3.33
Nominal	\$2.78	\$2.89	\$2.80	\$2.79	\$2.92	\$3.12	\$3.29	\$3.78	\$4.16	\$4.39	\$4.52	\$4.58	\$4.55	\$4.46	\$4.38	\$4.41	\$4.55	\$4.71	\$4.87	\$4.97	\$5.05

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
1	Jan-26	Jan	2026	\$4.28	\$7.61	\$6.03	\$7.61
2	Feb-26	Feb	2026	\$4.05	\$6.55	\$5.16	\$6.55
3	Mar-26	Mar	2026	\$3.69	\$3.56	\$2.69	\$3.56
4	Apr-26	Apr	2026	\$3.60	\$3.19	\$2.15	\$3.19
5	May-26	May	2026	\$3.62	\$3.00	\$1.97	\$3.00
6	Jun-26	Jun	2026	\$3.78	\$3.16	\$2.07	\$3.16
7	Jul-26	Jul	2026	\$3.97	\$3.36	\$2.20	\$3.36
8	Aug-26	Aug	2026	\$4.03	\$3.31	\$2.17	\$3.31
9	Sep-26	Sep	2026	\$3.99	\$3.01	\$1.96	\$3.01
10	Oct-26	Oct	2026	\$4.04	\$2.88	\$1.87	\$2.88
11	Nov-26	Nov	2026	\$4.25	\$3.76	\$2.53	\$3.76
12	Dec-26	Dec	2026	\$4.67	\$5.59	\$3.91	\$5.59
13	Jan-27	Jan	2027	\$4.90	\$8.24	\$5.83	\$8.24
14	Feb-27	Feb	2027	\$4.58	\$7.09	\$5.00	\$7.09
15	Mar-27	Mar	2027	\$3.92	\$3.79	\$2.60	\$3.79
16	Apr-27	Apr	2027	\$3.51	\$3.10	\$2.08	\$3.10
17	May-27	May	2027	\$3.49	\$2.87	\$1.90	\$2.87
18	Jun-27	Jun	2027	\$3.61	\$2.99	\$2.01	\$2.99
19	Jul-27	Jul	2027	\$3.77	\$3.15	\$2.13	\$3.15
20	Aug-27	Aug	2027	\$3.83	\$3.12	\$2.10	\$3.12
21	Sep-27	Sep	2027	\$3.80	\$2.82	\$1.89	\$2.82
22	Oct-27	Oct	2027	\$3.86	\$2.71	\$1.81	\$2.71
23	Nov-27	Nov	2027	\$4.06	\$3.58	\$2.44	\$3.58
24	Dec-27	Dec	2027	\$4.48	\$5.40	\$3.78	\$5.40
25	Jan-28	Jan	2028	\$4.76	\$8.09	\$5.81	\$8.09
26	Feb-28	Feb	2028	\$4.38	\$6.89	\$4.98	\$6.89
27	Mar-28	Mar	2028	\$3.75	\$3.62	\$2.59	\$3.62
28	Apr-28	Apr	2028	\$3.32	\$2.91	\$2.07	\$2.91
29	May-28	May	2028	\$3.30	\$2.68	\$1.90	\$2.68
30	Jun-28	Jun	2028	\$3.43	\$2.81	\$2.00	\$2.81
31	Jul-28	Jul	2028	\$3.60	\$2.98	\$2.12	\$2.98
32	Aug-28	Aug	2028	\$3.66	\$2.94	\$2.10	\$2.94
33	Sep-28	Sep	2028	\$3.63	\$2.66	\$1.89	\$2.66
34	Oct-28	Oct	2028	\$3.69	\$2.54	\$1.81	\$2.54
35	Nov-28	Nov	2028	\$3.88	\$3.40	\$2.44	\$3.40
36	Dec-28	Dec	2028	\$4.31	\$5.23	\$3.77	\$5.23
37	Jan-29	Jan	2029	\$4.58	\$7.91	\$6.08	\$7.91
38	Feb-29	Feb	2029	\$4.29	\$6.80	\$5.21	\$6.80
39	Mar-29	Mar	2029	\$3.59	\$3.46	\$2.71	\$3.46
40	Apr-29	Apr	2029	\$3.16	\$2.75	\$2.17	\$2.75
41	May-29	May	2029	\$3.14	\$2.52	\$1.99	\$2.52
42	Jun-29	Jun	2029	\$3.30	\$2.68	\$2.09	\$2.68
43	Jul-29	Jul	2029	\$3.49	\$2.87	\$2.22	\$2.87
44	Aug-29	Aug	2029	\$3.56	\$2.84	\$2.19	\$2.84
45	Sep-29	Sep	2029	\$3.54	\$2.56	\$1.98	\$2.56
46	Oct-29	Oct	2029	\$3.61	\$2.45	\$1.89	\$2.45
47	Nov-29	Nov	2029	\$3.80	\$3.32	\$2.55	\$3.32
48	Dec-29	Dec	2029	\$4.24	\$5.17	\$3.94	\$5.17
49	Jan-30	Jan	2030	\$4.51	\$7.91	\$6.51	\$7.91
50	Feb-30	Feb	2030	\$4.22	\$6.77	\$5.58	\$6.77

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
51	Mar-30	Mar	2030	\$3.58	\$3.45	\$2.90	\$3.45
52	Apr-30	Apr	2030	\$3.10	\$2.68	\$2.32	\$2.68
53	May-30	May	2030	\$3.07	\$2.43	\$2.13	\$2.43
54	Jun-30	Jun	2030	\$3.21	\$2.57	\$2.24	\$2.57
55	Jul-30	Jul	2030	\$3.36	\$2.73	\$2.38	\$2.73
56	Aug-30	Aug	2030	\$3.42	\$2.69	\$2.35	\$2.69
57	Sep-30	Sep	2030	\$3.40	\$2.40	\$2.11	\$2.40
58	Oct-30	Oct	2030	\$3.46	\$2.28	\$2.02	\$2.28
59	Nov-30	Nov	2030	\$3.67	\$3.18	\$2.73	\$3.18
60	Dec-30	Dec	2030	\$4.09	\$5.04	\$4.22	\$5.04
61	Jan-31	Jan	2031	\$4.32	\$7.78	\$6.86	\$7.65
62	Feb-31	Feb	2031	\$4.04	\$6.65	\$5.88	\$6.54
63	Mar-31	Mar	2031	\$3.42	\$3.29	\$3.06	\$3.26
64	Apr-31	Apr	2031	\$2.95	\$2.53	\$2.44	\$2.51
65	May-31	May	2031	\$2.94	\$2.29	\$2.24	\$2.28
66	Jun-31	Jun	2031	\$3.08	\$2.43	\$2.36	\$2.42
67	Jul-31	Jul	2031	\$3.24	\$2.60	\$2.51	\$2.59
68	Aug-31	Aug	2031	\$3.31	\$2.57	\$2.48	\$2.55
69	Sep-31	Sep	2031	\$3.28	\$2.26	\$2.23	\$2.26
70	Oct-31	Oct	2031	\$3.34	\$2.14	\$2.13	\$2.14
71	Nov-31	Nov	2031	\$3.54	\$3.04	\$2.88	\$3.01
72	Dec-31	Dec	2031	\$3.97	\$4.93	\$4.45	\$4.86
73	Jan-32	Jan	2032	\$4.26	\$7.79	\$7.87	\$7.82
74	Feb-32	Feb	2032	\$3.95	\$6.61	\$6.74	\$6.65
75	Mar-32	Mar	2032	\$3.29	\$3.16	\$3.51	\$3.26
76	Apr-32	Apr	2032	\$2.83	\$2.40	\$2.80	\$2.52
77	May-32	May	2032	\$2.82	\$2.16	\$2.57	\$2.28
78	Jun-32	Jun	2032	\$2.97	\$2.31	\$2.71	\$2.42
79	Jul-32	Jul	2032	\$3.14	\$2.49	\$2.87	\$2.60
80	Aug-32	Aug	2032	\$3.21	\$2.45	\$2.84	\$2.56
81	Sep-32	Sep	2032	\$3.18	\$2.14	\$2.56	\$2.26
82	Oct-32	Oct	2032	\$3.26	\$2.03	\$2.44	\$2.15
83	Nov-32	Nov	2032	\$3.49	\$2.98	\$3.30	\$3.07
84	Dec-32	Dec	2032	\$3.92	\$4.90	\$5.10	\$4.96
85	Jan-33	Jan	2033	\$4.17	\$7.77	\$8.68	\$8.16
86	Feb-33	Feb	2033	\$3.90	\$6.61	\$7.43	\$6.97
87	Mar-33	Mar	2033	\$3.28	\$3.14	\$3.87	\$3.45
88	Apr-33	Apr	2033	\$2.83	\$2.39	\$3.09	\$2.69
89	May-33	May	2033	\$2.86	\$2.19	\$2.83	\$2.47
90	Jun-33	Jun	2033	\$3.00	\$2.33	\$2.98	\$2.61
91	Jul-33	Jul	2033	\$3.17	\$2.50	\$3.17	\$2.79
92	Aug-33	Aug	2033	\$3.22	\$2.45	\$3.13	\$2.74
93	Sep-33	Sep	2033	\$3.20	\$2.14	\$2.82	\$2.43
94	Oct-33	Oct	2033	\$3.24	\$2.00	\$2.69	\$2.29
95	Nov-33	Nov	2033	\$3.50	\$2.98	\$3.64	\$3.26
96	Dec-33	Dec	2033	\$3.90	\$4.91	\$5.63	\$5.22
97	Jan-34	Jan	2034	\$4.16	\$7.84	\$9.14	\$8.58
98	Feb-34	Feb	2034	\$3.92	\$6.69	\$7.83	\$7.34
99	Mar-34	Mar	2034	\$3.32	\$3.18	\$4.07	\$3.69
100	Apr-34	Apr	2034	\$2.92	\$2.47	\$3.26	\$2.92

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
101	May-34	May	2034	\$2.95	\$2.26	\$2.99	\$2.68
102	Jun-34	Jun	2034	\$3.08	\$2.39	\$3.14	\$2.82
103	Jul-34	Jul	2034	\$3.22	\$2.55	\$3.34	\$3.00
104	Aug-34	Aug	2034	\$3.26	\$2.47	\$3.30	\$2.94
105	Sep-34	Sep	2034	\$3.28	\$2.20	\$2.97	\$2.64
106	Oct-34	Oct	2034	\$3.33	\$2.05	\$2.84	\$2.50
107	Nov-34	Nov	2034	\$3.57	\$3.03	\$3.83	\$3.49
108	Dec-34	Dec	2034	\$3.97	\$4.99	\$5.93	\$5.53
109	Jan-35	Jan	2035	\$4.19	\$7.94	\$9.41	\$8.99
110	Feb-35	Feb	2035	\$3.95	\$6.77	\$8.06	\$7.69
111	Mar-35	Mar	2035	\$3.52	\$3.37	\$4.19	\$3.96
112	Apr-35	Apr	2035	\$3.19	\$2.73	\$3.35	\$3.17
113	May-35	May	2035	\$3.16	\$2.47	\$3.07	\$2.90
114	Jun-35	Jun	2035	\$3.20	\$2.50	\$3.24	\$3.03
115	Jul-35	Jul	2035	\$3.24	\$2.55	\$3.44	\$3.18
116	Aug-35	Aug	2035	\$3.28	\$2.47	\$3.39	\$3.13
117	Sep-35	Sep	2035	\$3.29	\$2.19	\$3.06	\$2.81
118	Oct-35	Oct	2035	\$3.34	\$2.04	\$2.92	\$2.67
119	Nov-35	Nov	2035	\$3.54	\$3.00	\$3.94	\$3.67
120	Dec-35	Dec	2035	\$3.94	\$4.99	\$6.10	\$5.78
121	Jan-36	Jan	2036	\$4.53	\$8.36	\$9.54	\$9.38
122	Feb-36	Feb	2036	\$4.24	\$7.12	\$8.18	\$8.03
123	Mar-36	Mar	2036	\$3.63	\$3.48	\$4.25	\$4.14
124	Apr-36	Apr	2036	\$3.21	\$2.74	\$3.40	\$3.31
125	May-36	May	2036	\$3.21	\$2.50	\$3.12	\$3.03
126	Jun-36	Jun	2036	\$3.35	\$2.64	\$3.28	\$3.19
127	Jul-36	Jul	2036	\$3.50	\$2.79	\$3.49	\$3.39
128	Aug-36	Aug	2036	\$3.56	\$2.74	\$3.44	\$3.34
129	Sep-36	Sep	2036	\$3.54	\$2.42	\$3.10	\$3.00
130	Oct-36	Oct	2036	\$3.60	\$2.27	\$2.96	\$2.87
131	Nov-36	Nov	2036	\$3.82	\$3.27	\$4.00	\$3.90
132	Dec-36	Dec	2036	\$4.25	\$5.32	\$6.19	\$6.06
133	Jan-37	Jan	2037	\$4.44	\$8.35	\$9.49	\$9.49
134	Feb-37	Feb	2037	\$4.15	\$7.09	\$8.13	\$8.13
135	Mar-37	Mar	2037	\$3.55	\$3.40	\$4.23	\$4.23
136	Apr-37	Apr	2037	\$3.15	\$2.68	\$3.38	\$3.38
137	May-37	May	2037	\$3.14	\$2.41	\$3.10	\$3.10
138	Jun-37	Jun	2037	\$3.28	\$2.55	\$3.26	\$3.26
139	Jul-37	Jul	2037	\$3.43	\$2.71	\$3.46	\$3.46
140	Aug-37	Aug	2037	\$3.49	\$2.65	\$3.42	\$3.42
141	Sep-37	Sep	2037	\$3.47	\$2.33	\$3.08	\$3.08
142	Oct-37	Oct	2037	\$3.53	\$2.18	\$2.95	\$2.95
143	Nov-37	Nov	2037	\$3.74	\$3.18	\$3.98	\$3.98
144	Dec-37	Dec	2037	\$4.17	\$5.26	\$6.15	\$6.15
145	Jan-38	Jan	2038			\$9.29	\$9.29
146	Feb-38	Feb	2038			\$7.96	\$7.96
147	Mar-38	Mar	2038			\$4.14	\$4.14
148	Apr-38	Apr	2038			\$3.31	\$3.31
149	May-38	May	2038			\$3.03	\$3.03
150	Jun-38	Jun	2038			\$3.19	\$3.19

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
151	Jul-38	Jul	2038			\$3.39	\$3.39
152	Aug-38	Aug	2038			\$3.35	\$3.35
153	Sep-38	Sep	2038			\$3.02	\$3.02
154	Oct-38	Oct	2038			\$2.88	\$2.88
155	Nov-38	Nov	2038			\$3.89	\$3.89
156	Dec-38	Dec	2038			\$6.02	\$6.02
157	Jan-39	Jan	2039			\$9.14	\$9.14
158	Feb-39	Feb	2039			\$7.83	\$7.83
159	Mar-39	Mar	2039			\$4.07	\$4.07
160	Apr-39	Apr	2039			\$3.25	\$3.25
161	May-39	May	2039			\$2.98	\$2.98
162	Jun-39	Jun	2039			\$3.14	\$3.14
163	Jul-39	Jul	2039			\$3.34	\$3.34
164	Aug-39	Aug	2039			\$3.30	\$3.30
165	Sep-39	Sep	2039			\$2.97	\$2.97
166	Oct-39	Oct	2039			\$2.84	\$2.84
167	Nov-39	Nov	2039			\$3.83	\$3.83
168	Dec-39	Dec	2039			\$5.92	\$5.92
169	Jan-40	Jan	2040			\$9.20	\$9.20
170	Feb-40	Feb	2040			\$7.88	\$7.88
171	Mar-40	Mar	2040			\$4.10	\$4.10
172	Apr-40	Apr	2040			\$3.28	\$3.28
173	May-40	May	2040			\$3.00	\$3.00
174	Jun-40	Jun	2040			\$3.16	\$3.16
175	Jul-40	Jul	2040			\$3.36	\$3.36
176	Aug-40	Aug	2040			\$3.32	\$3.32
177	Sep-40	Sep	2040			\$2.99	\$2.99
178	Oct-40	Oct	2040			\$2.86	\$2.86
179	Nov-40	Nov	2040			\$3.86	\$3.86
180	Dec-40	Dec	2040			\$5.96	\$5.96
181	Jan-41	Jan	2041			\$9.49	\$9.49
182	Feb-41	Feb	2041			\$8.13	\$8.13
183	Mar-41	Mar	2041			\$4.23	\$4.23
184	Apr-41	Apr	2041			\$3.38	\$3.38
185	May-41	May	2041			\$3.10	\$3.10
186	Jun-41	Jun	2041			\$3.26	\$3.26
187	Jul-41	Jul	2041			\$3.47	\$3.47
188	Aug-41	Aug	2041			\$3.42	\$3.42
189	Sep-41	Sep	2041			\$3.08	\$3.08
190	Oct-41	Oct	2041			\$2.95	\$2.95
191	Nov-41	Nov	2041			\$3.98	\$3.98
192	Dec-41	Dec	2041			\$6.15	\$6.15
193	Jan-42	Jan	2042			\$9.82	\$9.82
194	Feb-42	Feb	2042			\$8.41	\$8.41
195	Mar-42	Mar	2042			\$4.37	\$4.37
196	Apr-42	Apr	2042			\$3.50	\$3.50
197	May-42	May	2042			\$3.21	\$3.21
198	Jun-42	Jun	2042			\$3.38	\$3.38
199	Jul-42	Jul	2042			\$3.59	\$3.59
200	Aug-42	Aug	2042			\$3.54	\$3.54

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
201	Sep-42	Sep	2042			\$3.19	\$3.19
202	Oct-42	Oct	2042			\$3.05	\$3.05
203	Nov-42	Nov	2042			\$4.11	\$4.11
204	Dec-42	Dec	2042			\$6.37	\$6.37
205	Jan-43	Jan	2043			\$10.15	\$10.15
206	Feb-43	Feb	2043			\$8.70	\$8.70
207	Mar-43	Mar	2043			\$4.52	\$4.52
208	Apr-43	Apr	2043			\$3.62	\$3.62
209	May-43	May	2043			\$3.32	\$3.32
210	Jun-43	Jun	2043			\$3.49	\$3.49
211	Jul-43	Jul	2043			\$3.71	\$3.71
212	Aug-43	Aug	2043			\$3.66	\$3.66
213	Sep-43	Sep	2043			\$3.30	\$3.30
214	Oct-43	Oct	2043			\$3.15	\$3.15
215	Nov-43	Nov	2043			\$4.26	\$4.26
216	Dec-43	Dec	2043			\$6.58	\$6.58
217	Jan-44	Jan	2044			\$10.37	\$10.37
218	Feb-44	Feb	2044			\$8.88	\$8.88
219	Mar-44	Mar	2044			\$4.62	\$4.62
220	Apr-44	Apr	2044			\$3.69	\$3.69
221	May-44	May	2044			\$3.39	\$3.39
222	Jun-44	Jun	2044			\$3.56	\$3.56
223	Jul-44	Jul	2044			\$3.79	\$3.79
224	Aug-44	Aug	2044			\$3.74	\$3.74
225	Sep-44	Sep	2044			\$3.37	\$3.37
226	Oct-44	Oct	2044			\$3.22	\$3.22
227	Nov-44	Nov	2044			\$4.34	\$4.34
228	Dec-44	Dec	2044			\$6.72	\$6.72
229	Jan-45	Jan	2045			\$10.52	\$10.52
230	Feb-45	Feb	2045			\$9.01	\$9.01
231	Mar-45	Mar	2045			\$4.69	\$4.69
232	Apr-45	Apr	2045			\$3.75	\$3.75
233	May-45	May	2045			\$3.44	\$3.44
234	Jun-45	Jun	2045			\$3.62	\$3.62
235	Jul-45	Jul	2045			\$3.84	\$3.84
236	Aug-45	Aug	2045			\$3.79	\$3.79
237	Sep-45	Sep	2045			\$3.42	\$3.42
238	Oct-45	Oct	2045			\$3.27	\$3.27
239	Nov-45	Nov	2045			\$4.41	\$4.41
240	Dec-45	Dec	2045			\$6.82	\$6.82
241	Jan-46	Jan	2046			\$0.00	\$0.00
242	Feb-46	Feb	2046			\$0.00	\$0.00
243	Mar-46	Mar	2046			\$0.00	\$0.00
244	Apr-46	Apr	2046			\$0.00	\$0.00
245	May-46	May	2046			\$0.00	\$0.00
246	Jun-46	Jun	2046			\$0.00	\$0.00
247	Jul-46	Jul	2046			\$0.00	\$0.00
248	Aug-46	Aug	2046			\$0.00	\$0.00
249	Sep-46	Sep	2046			\$0.00	\$0.00
250	Oct-46	Oct	2046			\$0.00	\$0.00

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal \$/MMBTU)	NYMEX: PECO Natural Gas Price (Nominal \$/MMBTU)	EIA AEO Gas Prices (Nominal \$/MMBTU)	PECO Natural Gas Price (Nominal \$/MMBTU)
251	Nov-46	Nov	2046			\$0.00	\$0.00
252	Dec-46	Dec	2046			\$0.00	\$0.00
253	Jan-47	Jan	2047			\$0.00	\$0.00
254	Feb-47	Feb	2047			\$0.00	\$0.00
255	Mar-47	Mar	2047			\$0.00	\$0.00
256	Apr-47	Apr	2047			\$0.00	\$0.00
257	May-47	May	2047			\$0.00	\$0.00
258	Jun-47	Jun	2047			\$0.00	\$0.00
259	Jul-47	Jul	2047			\$0.00	\$0.00
260	Aug-47	Aug	2047			\$0.00	\$0.00
261	Sep-47	Sep	2047			\$0.00	\$0.00
262	Oct-47	Oct	2047			\$0.00	\$0.00
263	Nov-47	Nov	2047			\$0.00	\$0.00
264	Dec-47	Dec	2047			\$0.00	\$0.00

Avoided AC

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
1	Jan-26	Jan	2026	Winter	\$73.22	\$59.38	\$83.93	\$57.80	-\$10.70	\$158	\$73.22	\$59.38
2	Feb-26	Feb	2026	Winter	\$64.41	\$55.46	\$72.27	\$49.77	-\$7.86	\$5.69	\$64.41	\$55.46
3	Mar-26	Mar	2026	Shoulder	\$47.18	\$42.07	\$39.29	\$27.06	\$7.89	\$15.01	\$47.18	\$42.07
4	Apr-26	Apr	2026	Shoulder	\$45.18	\$34.28	\$35.20	\$24.24	\$9.98	\$10.04	\$45.18	\$34.28
5	May-26	May	2026	Summer	\$49.77	\$33.96	\$33.13	\$22.81	\$16.64	\$11.15	\$49.77	\$33.96
6	Jun-26	Jun	2026	Summer	\$51.06	\$32.85	\$34.88	\$24.02	\$16.18	\$8.83	\$51.06	\$32.85
7	Jul-26	Jul	2026	Summer	\$69.75	\$39.35	\$37.01	\$25.49	\$32.74	\$13.86	\$69.75	\$39.35
8	Aug-26	Aug	2026	Summer	\$61.87	\$36.77	\$36.55	\$25.17	\$25.32	\$11.59	\$61.87	\$36.77
9	Sep-26	Sep	2026	Summer	\$52.21	\$32.41	\$33.23	\$22.89	\$18.98	\$9.52	\$52.21	\$32.41
10	Oct-26	Oct	2026	Shoulder	\$47.18	\$34.10	\$31.81	\$21.91	\$15.37	\$12.19	\$47.18	\$34.10
11	Nov-26	Nov	2026	Shoulder	\$50.57	\$40.02	\$41.52	\$28.59	\$9.05	\$11.42	\$50.57	\$40.02
12	Dec-26	Dec	2026	Winter	\$62.23	\$52.44	\$61.70	\$42.49	\$0.53	\$9.95	\$62.23	\$52.44
13	Jan-27	Jan	2027	Winter	\$62.86	\$68.11	\$50.95	\$62.67	-\$9.19	\$5.54	\$62.86	\$68.11
14	Feb-27	Feb	2027	Winter	\$72.82	\$62.19	\$78.15	\$53.82	-\$5.33	\$8.37	\$72.82	\$62.19
15	Mar-27	Mar	2027	Shoulder	\$54.93	\$45.18	\$41.78	\$28.77	\$13.15	\$16.41	\$54.93	\$45.18
16	Apr-27	Apr	2027	Shoulder	\$49.41	\$36.23	\$34.24	\$23.58	\$15.17	\$12.66	\$49.41	\$36.23
17	May-27	May	2027	Summer	\$50.57	\$35.48	\$31.62	\$21.77	\$18.95	\$13.71	\$50.57	\$35.48
18	Jun-27	Jun	2027	Summer	\$51.95	\$34.36	\$32.96	\$22.70	\$18.99	\$11.67	\$51.95	\$34.36
19	Jul-27	Jul	2027	Summer	\$71.04	\$40.86	\$34.78	\$23.95	\$36.26	\$16.91	\$71.04	\$40.86
20	Aug-27	Aug	2027	Summer	\$62.85	\$37.88	\$34.37	\$23.67	\$28.48	\$14.21	\$62.85	\$37.88
21	Sep-27	Sep	2027	Summer	\$53.10	\$34.63	\$31.09	\$21.41	\$22.01	\$13.22	\$53.10	\$34.63
22	Oct-27	Oct	2027	Shoulder	\$48.03	\$35.48	\$29.86	\$20.56	\$18.17	\$14.91	\$48.03	\$35.48
23	Nov-27	Nov	2027	Shoulder	\$51.55	\$41.22	\$39.47	\$27.18	\$12.08	\$14.04	\$51.55	\$41.22
24	Dec-27	Dec	2027	Winter	\$63.30	\$54.66	\$59.60	\$41.04	\$3.70	\$13.62	\$63.30	\$54.66
25	Jan-28	Jan	2028	Winter	\$86.36	\$71.89	\$89.29	\$61.49	-\$2.93	\$10.40	\$86.36	\$71.89
26	Feb-28	Feb	2028	Winter	\$75.98	\$65.70	\$75.96	\$52.31	\$0.03	\$13.39	\$75.98	\$65.70
27	Mar-28	Mar	2028	Shoulder	\$57.29	\$47.94	\$39.95	\$27.51	\$17.34	\$20.43	\$57.29	\$47.94
28	Apr-28	Apr	2028	Shoulder	\$51.55	\$38.64	\$32.10	\$22.10	\$19.45	\$16.53	\$51.55	\$38.64
29	May-28	May	2028	Summer	\$52.84	\$37.57	\$29.53	\$20.34	\$23.31	\$17.23	\$52.84	\$37.57
30	Jun-28	Jun	2028	Summer	\$54.26	\$36.50	\$30.98	\$21.34	\$23.28	\$15.16	\$54.26	\$36.50
31	Jul-28	Jul	2028	Summer	\$74.20	\$43.36	\$32.31	\$22.66	\$41.30	\$20.69	\$74.20	\$43.36
32	Aug-28	Aug	2028	Summer	\$65.70	\$40.20	\$32.46	\$22.36	\$33.24	\$17.84	\$65.70	\$40.20
33	Sep-28	Sep	2028	Summer	\$55.46	\$36.86	\$29.31	\$20.18	\$26.16	\$16.67	\$55.46	\$36.86
34	Oct-28	Oct	2028	Shoulder	\$50.17	\$37.57	\$27.98	\$19.27	\$22.18	\$18.30	\$50.17	\$37.57
35	Nov-28	Nov	2028	Shoulder	\$53.73	\$42.87	\$37.47	\$25.81	\$16.25	\$17.06	\$53.73	\$42.87
36	Dec-28	Dec	2028	Winter	\$66.10	\$58.00	\$57.72	\$39.75	\$8.38	\$18.25	\$66.10	\$58.00
37	Jan-29	Jan	2029	Winter	\$89.34	\$74.07	\$87.25	\$60.08	\$2.09	\$13.99	\$89.34	\$74.07
38	Feb-29	Feb	2029	Winter	\$78.66	\$67.66	\$74.96	\$51.62	\$3.69	\$16.04	\$78.66	\$67.66
39	Mar-29	Mar	2029	Shoulder	\$59.29	\$49.37	\$38.21	\$26.31	\$21.08	\$23.05	\$59.29	\$49.37
40	Apr-29	Apr	2029	Shoulder	\$53.46	\$39.75	\$30.34	\$20.90	\$23.12	\$18.85	\$53.46	\$39.75
41	May-29	May	2029	Summer	\$54.66	\$38.77	\$27.81	\$19.15	\$26.95	\$19.62	\$54.66	\$38.77
42	Jun-29	Jun	2029	Summer	\$56.18	\$37.61	\$29.59	\$20.37	\$26.59	\$17.24	\$56.18	\$37.61
43	Jul-29	Jul	2029	Summer	\$76.83	\$44.65	\$31.67	\$21.81	\$45.16	\$22.83	\$76.83	\$44.65
44	Aug-29	Aug	2029	Summer	\$67.93	\$41.40	\$31.35	\$21.59	\$36.58	\$19.81	\$67.93	\$41.40
45	Sep-29	Sep	2029	Summer	\$57.42	\$37.97	\$28.27	\$19.47	\$23.15	\$18.50	\$57.42	\$37.97
46	Oct-29	Oct	2029	Shoulder	\$51.66	\$38.77	\$27.07	\$18.64	\$24.79	\$20.13	\$51.66	\$38.77
47	Nov-29	Nov	2029	Shoulder	\$55.69	\$44.16	\$36.57	\$25.18	\$19.12	\$18.97	\$55.69	\$44.16
48	Dec-29	Dec	2029	Winter	\$68.37	\$59.78	\$57.00	\$39.25	\$11.98	\$20.53	\$68.37	\$59.78
49	Jan-30	Jan	2030	Winter	\$77.63	\$53.46	\$67.20	\$60.05	-\$9.57	-\$6.59	\$77.63	\$53.46
50	Feb-30	Feb	2030	Winter	\$66.50	\$45.80	\$74.70	\$51.44	-\$8.20	-\$5.64	\$66.50	\$45.80

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
51	Mar-30	Mar	2030	Shoulder	\$33.88	\$23.33	\$38.06	\$26.21	-\$4.18	-\$2.88	\$33.88	\$23.33
52	Apr-30	Apr	2030	Shoulder	\$26.35	\$18.14	\$29.59	\$20.38	-\$3.25	-\$2.24	\$26.35	\$18.14
53	May-30	May	2030	Summer	\$23.91	\$16.47	\$26.86	\$18.50	-\$2.95	-\$2.03	\$23.91	\$16.47
54	Jun-30	Jun	2030	Summer	\$25.28	\$17.41	\$28.40	\$19.56	-\$3.12	-\$2.15	\$25.28	\$17.41
55	Jul-30	Jul	2030	Summer	\$26.84	\$18.48	\$30.15	\$20.76	-\$3.31	-\$2.28	\$26.84	\$18.48
56	Aug-30	Aug	2030	Summer	\$26.46	\$18.22	\$29.72	\$20.47	-\$3.26	-\$2.25	\$26.46	\$18.22
57	Sep-30	Sep	2030	Summer	\$23.55	\$16.22	\$26.46	\$18.22	-\$2.90	-\$2.00	\$23.55	\$16.22
58	Oct-30	Oct	2030	Shoulder	\$22.42	\$15.44	\$25.18	\$17.34	-\$2.76	-\$1.90	\$22.42	\$15.44
59	Nov-30	Nov	2030	Shoulder	\$31.24	\$21.52	\$35.10	\$24.17	-\$3.85	-\$2.65	\$31.24	\$21.52
60	Dec-30	Dec	2030	Winter	\$49.46	\$34.06	\$55.56	\$38.26	-\$6.10	-\$4.20	\$49.46	\$34.06
61	Jan-31	Jan	2031	Winter	\$0.00	\$0.00	\$84.41	\$58.13	-\$4.55	\$5.95	\$79.86	\$64.09
62	Feb-31	Feb	2031	Winter	\$0.00	\$0.00	\$72.12	\$49.67	-\$2.40	\$8.20	\$69.72	\$57.87
63	Mar-31	Mar	2031	Shoulder	\$0.00	\$0.00	\$35.90	\$24.73	\$12.09	\$14.55	\$48.00	\$39.27
64	Apr-31	Apr	2031	Shoulder	\$0.00	\$0.00	\$27.74	\$19.10	\$13.90	\$11.69	\$41.64	\$30.79
65	May-31	May	2031	Summer	\$0.00	\$0.00	\$25.18	\$17.34	\$16.88	\$12.38	\$42.07	\$29.73
66	Jun-31	Jun	2031	Summer	\$0.00	\$0.00	\$26.73	\$18.41	\$16.78	\$10.70	\$43.51	\$29.11
67	Jul-31	Jul	2031	Summer	\$0.00	\$0.00	\$28.54	\$19.65	\$30.47	\$14.84	\$59.01	\$34.49
68	Aug-31	Aug	2031	Summer	\$0.00	\$0.00	\$28.17	\$19.40	\$24.25	\$12.66	\$52.42	\$32.06
69	Sep-31	Sep	2031	Summer	\$0.00	\$0.00	\$24.91	\$17.16	\$18.99	\$11.84	\$43.90	\$28.99
70	Oct-31	Oct	2031	Shoulder	\$0.00	\$0.00	\$23.59	\$16.25	\$15.92	\$13.13	\$39.51	\$29.37
71	Nov-31	Nov	2031	Shoulder	\$0.00	\$0.00	\$33.25	\$22.90	\$11.13	\$12.10	\$44.38	\$35.00
72	Dec-31	Dec	2031	Winter	\$0.00	\$0.00	\$53.65	\$36.95	\$4.43	\$12.30	\$58.08	\$49.24
73	Jan-32	Jan	2032	Winter	\$0.00	\$0.00	\$86.21	\$59.37	-\$4.55	\$5.95	\$81.66	\$65.32
74	Feb-32	Feb	2032	Winter	\$0.00	\$0.00	\$73.30	\$50.48	-\$2.40	\$8.20	\$70.90	\$58.68
75	Mar-32	Mar	2032	Shoulder	\$0.00	\$0.00	\$35.92	\$24.74	\$12.09	\$14.55	\$48.01	\$39.28
76	Apr-32	Apr	2032	Shoulder	\$0.00	\$0.00	\$27.75	\$19.11	\$13.90	\$11.69	\$41.66	\$30.80
77	May-32	May	2032	Summer	\$0.00	\$0.00	\$25.11	\$17.29	\$16.88	\$12.38	\$41.99	\$29.67
78	Jun-32	Jun	2032	Summer	\$0.00	\$0.00	\$26.74	\$18.42	\$16.78	\$10.70	\$43.52	\$29.12
79	Jul-32	Jul	2032	Summer	\$0.00	\$0.00	\$28.67	\$19.74	\$30.47	\$14.84	\$59.14	\$34.58
80	Aug-32	Aug	2032	Summer	\$0.00	\$0.00	\$28.23	\$19.44	\$24.25	\$12.66	\$52.48	\$32.10
81	Sep-32	Sep	2032	Summer	\$0.00	\$0.00	\$24.95	\$17.18	\$18.99	\$11.84	\$43.94	\$29.02
82	Oct-32	Oct	2032	Shoulder	\$0.00	\$0.00	\$23.71	\$16.33	\$15.92	\$13.13	\$39.62	\$29.45
83	Nov-32	Nov	2032	Shoulder	\$0.00	\$0.00	\$33.84	\$23.31	\$11.13	\$12.10	\$44.37	\$35.41
84	Dec-32	Dec	2032	Winter	\$0.00	\$0.00	\$54.70	\$37.67	\$4.43	\$12.30	\$59.12	\$49.97
85	Jan-33	Jan	2033	Winter	\$0.00	\$0.00	\$90.02	\$61.99	-\$4.55	\$5.95	\$85.47	\$67.95
86	Feb-33	Feb	2033	Winter	\$0.00	\$0.00	\$76.83	\$52.91	-\$2.40	\$8.20	\$74.43	\$61.12
87	Mar-33	Mar	2033	Shoulder	\$0.00	\$0.00	\$38.09	\$26.23	\$12.09	\$14.55	\$50.18	\$40.78
88	Apr-33	Apr	2033	Shoulder	\$0.00	\$0.00	\$29.69	\$20.44	\$13.90	\$11.69	\$43.59	\$32.13
89	May-33	May	2033	Summer	\$0.00	\$0.00	\$27.20	\$18.73	\$16.88	\$12.38	\$44.09	\$31.12
90	Jun-33	Jun	2033	Summer	\$0.00	\$0.00	\$28.79	\$19.83	\$16.78	\$10.70	\$45.57	\$30.53
91	Jul-33	Jul	2033	Summer	\$0.00	\$0.00	\$30.76	\$21.18	\$30.47	\$14.84	\$61.23	\$36.02
92	Aug-33	Aug	2033	Summer	\$0.00	\$0.00	\$30.23	\$20.82	\$24.25	\$12.66	\$54.48	\$33.48
93	Sep-33	Sep	2033	Summer	\$0.00	\$0.00	\$26.81	\$18.46	\$18.99	\$11.84	\$45.80	\$30.30
94	Oct-33	Oct	2033	Shoulder	\$0.00	\$0.00	\$25.31	\$17.43	\$15.92	\$13.13	\$41.23	\$30.56
95	Nov-33	Nov	2033	Shoulder	\$0.00	\$0.00	\$36.00	\$24.79	\$11.13	\$12.10	\$47.12	\$36.89
96	Dec-33	Dec	2033	Winter	\$0.00	\$0.00	\$57.53	\$39.62	\$4.43	\$12.30	\$61.96	\$51.92
97	Jan-34	Jan	2034	Winter	\$0.00	\$0.00	\$94.68	\$65.20	-\$4.55	\$5.95	\$90.13	\$71.16
98	Feb-34	Feb	2034	Winter	\$0.00	\$0.00	\$80.97	\$56.76	-\$2.40	\$8.20	\$78.57	\$63.97
99	Mar-34	Mar	2034	Shoulder	\$0.00	\$0.00	\$40.70	\$28.03	\$12.09	\$14.55	\$52.79	\$42.58
100	Apr-34	Apr	2034	Shoulder	\$0.00	\$0.00	\$32.20	\$22.18	\$13.90	\$11.69	\$46.11	\$33.87

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
101	May-34	May	2034	Summer	\$0.00	\$0.00	\$29.52	\$20.33	\$16.88	\$12.38	\$46.41	\$32.72
102	Jun-34	Jun	2034	Summer	\$0.00	\$0.00	\$31.12	\$21.43	\$16.78	\$10.70	\$47.90	\$32.13
103	Jul-34	Jul	2034	Summer	\$0.00	\$0.00	\$33.08	\$22.78	\$20.47	\$14.84	\$63.55	\$37.62
104	Aug-34	Aug	2034	Summer	\$0.00	\$0.00	\$32.48	\$22.37	\$24.25	\$12.66	\$56.73	\$35.03
105	Sep-34	Sep	2034	Summer	\$0.00	\$0.00	\$23.11	\$20.05	\$18.99	\$11.84	\$48.10	\$31.89
106	Oct-34	Oct	2034	Shoulder	\$0.00	\$0.00	\$27.59	\$19.00	\$15.92	\$13.13	\$43.50	\$32.12
107	Nov-34	Nov	2034	Shoulder	\$0.00	\$0.00	\$38.49	\$26.51	\$11.13	\$12.10	\$49.62	\$38.61
108	Dec-34	Dec	2034	Winter	\$0.00	\$0.00	\$60.94	\$41.97	\$4.43	\$12.30	\$65.37	\$54.27
109	Jan-35	Jan	2035	Winter	\$0.00	\$0.00	\$99.17	\$68.30	-\$4.55	\$5.95	\$94.62	\$74.25
110	Feb-35	Feb	2035	Winter	\$0.00	\$0.00	\$84.85	\$58.44	-\$2.40	\$8.20	\$82.45	\$66.64
111	Mar-35	Mar	2035	Shoulder	\$0.00	\$0.00	\$42.67	\$30.07	\$12.09	\$14.55	\$55.76	\$44.62
112	Apr-35	Apr	2035	Shoulder	\$0.00	\$0.00	\$35.01	\$24.11	\$13.90	\$11.69	\$48.91	\$35.80
113	May-35	May	2035	Summer	\$0.00	\$0.00	\$31.99	\$22.03	\$16.88	\$12.38	\$48.87	\$34.41
114	Jun-35	Jun	2035	Summer	\$0.00	\$0.00	\$33.37	\$22.96	\$16.78	\$10.70	\$50.15	\$33.68
115	Jul-35	Jul	2035	Summer	\$0.00	\$0.00	\$35.11	\$24.18	\$20.47	\$14.84	\$65.58	\$39.02
116	Aug-35	Aug	2035	Summer	\$0.00	\$0.00	\$34.54	\$23.79	\$24.25	\$12.66	\$59.79	\$36.45
117	Sep-35	Sep	2035	Summer	\$0.00	\$0.00	\$30.98	\$21.34	\$18.99	\$11.84	\$49.97	\$33.18
118	Oct-35	Oct	2035	Shoulder	\$0.00	\$0.00	\$29.45	\$20.29	\$15.92	\$13.13	\$45.37	\$33.41
119	Nov-35	Nov	2035	Shoulder	\$0.00	\$0.00	\$40.52	\$27.91	\$11.13	\$12.10	\$51.65	\$40.01
120	Dec-35	Dec	2035	Winter	\$0.00	\$0.00	\$63.78	\$43.93	\$4.43	\$12.30	\$68.21	\$56.22
121	Jan-36	Jan	2036	Winter	\$0.00	\$0.00	\$103.41	\$71.22	-\$4.55	\$5.95	\$98.86	\$77.17
122	Feb-36	Feb	2036	Winter	\$0.00	\$0.00	\$88.53	\$60.96	-\$2.40	\$8.20	\$86.13	\$69.17
123	Mar-36	Mar	2036	Shoulder	\$0.00	\$0.00	\$45.70	\$31.47	\$12.09	\$14.55	\$57.79	\$46.02
124	Apr-36	Apr	2036	Shoulder	\$0.00	\$0.00	\$36.46	\$25.11	\$13.90	\$11.69	\$50.37	\$36.80
125	May-36	May	2036	Summer	\$0.00	\$0.00	\$33.41	\$23.01	\$16.88	\$12.38	\$50.29	\$35.39
126	Jun-36	Jun	2036	Summer	\$0.00	\$0.00	\$35.18	\$24.23	\$16.78	\$10.70	\$51.96	\$34.93
127	Jul-36	Jul	2036	Summer	\$0.00	\$0.00	\$37.36	\$25.73	\$20.47	\$14.84	\$67.83	\$40.57
128	Aug-36	Aug	2036	Summer	\$0.00	\$0.00	\$36.87	\$25.39	\$24.25	\$12.66	\$61.12	\$38.05
129	Sep-36	Sep	2036	Summer	\$0.00	\$0.00	\$33.11	\$22.80	\$18.99	\$11.84	\$52.10	\$34.64
130	Oct-36	Oct	2036	Shoulder	\$0.00	\$0.00	\$31.60	\$21.76	\$15.92	\$13.13	\$47.52	\$34.89
131	Nov-36	Nov	2036	Shoulder	\$0.00	\$0.00	\$42.97	\$29.59	\$11.13	\$12.10	\$54.09	\$41.69
132	Dec-36	Dec	2036	Winter	\$0.00	\$0.00	\$66.88	\$46.06	\$4.43	\$12.30	\$71.31	\$58.36
133	Jan-37	Jan	2037	Winter	\$0.00	\$0.00	\$104.63	\$72.05	-\$4.55	\$5.95	\$100.08	\$78.01
134	Feb-37	Feb	2037	Winter	\$0.00	\$0.00	\$89.63	\$61.73	-\$2.40	\$8.20	\$87.23	\$69.93
135	Mar-37	Mar	2037	Shoulder	\$0.00	\$0.00	\$46.62	\$32.11	\$12.09	\$14.55	\$58.72	\$46.66
136	Apr-37	Apr	2037	Shoulder	\$0.00	\$0.00	\$37.26	\$25.66	\$13.90	\$11.69	\$51.16	\$37.35
137	May-37	May	2037	Summer	\$0.00	\$0.00	\$34.17	\$23.53	\$16.88	\$12.38	\$51.06	\$35.92
138	Jun-37	Jun	2037	Summer	\$0.00	\$0.00	\$35.97	\$24.77	\$16.78	\$10.70	\$52.75	\$35.47
139	Jul-37	Jul	2037	Summer	\$0.00	\$0.00	\$38.22	\$26.32	\$20.47	\$14.84	\$68.69	\$41.16
140	Aug-37	Aug	2037	Summer	\$0.00	\$0.00	\$37.74	\$25.99	\$24.25	\$12.66	\$61.99	\$38.85
141	Sep-37	Sep	2037	Summer	\$0.00	\$0.00	\$33.97	\$23.39	\$18.99	\$11.84	\$52.96	\$35.23
142	Oct-37	Oct	2037	Shoulder	\$0.00	\$0.00	\$32.49	\$22.37	\$15.92	\$13.13	\$48.40	\$35.50
143	Nov-37	Nov	2037	Shoulder	\$0.00	\$0.00	\$43.85	\$30.20	\$11.13	\$12.10	\$54.98	\$42.30
144	Dec-37	Dec	2037	Winter	\$0.00	\$0.00	\$67.83	\$45.71	\$4.43	\$12.30	\$72.26	\$59.01
145	Jan-38	Jan	2038	Winter	\$0.00	\$0.00	\$102.44	\$70.54	-\$4.55	\$5.95	\$97.89	\$76.50
146	Feb-38	Feb	2038	Winter	\$0.00	\$0.00	\$87.75	\$60.43	-\$2.40	\$8.20	\$85.35	\$68.84
147	Mar-38	Mar	2038	Shoulder	\$0.00	\$0.00	\$45.64	\$31.43	\$12.09	\$14.55	\$57.74	\$45.98
148	Apr-38	Apr	2038	Shoulder	\$0.00	\$0.00	\$36.49	\$25.12	\$13.90	\$11.69	\$50.38	\$36.81
149	May-38	May	2038	Summer	\$0.00	\$0.00	\$33.46	\$23.04	\$16.88	\$12.38	\$50.34	\$35.42
150	Jun-38	Jun	2038	Summer	\$0.00	\$0.00	\$35.22	\$24.25	\$16.78	\$10.70	\$52.00	\$34.95

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (Nominal \$/MWh)	PECO Zone Adjusted Off-Peak (Nominal \$/MWh)	PECO Zone NG Converted On-Peak (Nominal \$/MWh)	PECO Zone NG Converted Off-Peak (Nominal \$/MWh)	PECO Zone Spark Spread On-Peak (Nominal \$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal \$/MWh)	PECO Zone On-Peak (Nominal \$/MWh)	PECO Zone Off-Peak (Nominal \$/MWh)
151	Jul-38	Jul	2038	Summer	\$0.00	\$0.00	\$37.41	\$25.77	\$30.47	\$14.84	\$67.88	\$40.61
152	Aug-38	Aug	2038	Summer	\$0.00	\$0.00	\$36.95	\$25.45	\$24.25	\$12.66	\$61.20	\$38.11
153	Sep-38	Sep	2038	Summer	\$0.00	\$0.00	\$33.26	\$22.90	\$8.99	\$11.84	\$52.25	\$34.74
154	Oct-38	Oct	2038	Shoulder	\$0.00	\$0.00	\$31.81	\$21.90	\$15.92	\$13.13	\$47.72	\$35.03
155	Nov-38	Nov	2038	Shoulder	\$0.00	\$0.00	\$42.93	\$29.57	\$11.13	\$12.10	\$54.06	\$41.67
156	Dec-38	Dec	2038	Vinter	\$0.00	\$0.00	\$66.41	\$45.73	\$4.43	\$12.30	\$70.84	\$58.03
157	Jan-39	Jan	2039	Vinter	\$0.00	\$0.00	\$100.77	\$69.40	-\$4.55	\$5.95	\$96.22	\$75.35
158	Feb-39	Feb	2039	Vinter	\$0.00	\$0.00	\$96.33	\$59.45	-\$2.40	\$8.20	\$83.93	\$67.66
159	Mar-39	Mar	2039	Shoulder	\$0.00	\$0.00	\$44.90	\$30.92	\$12.09	\$14.55	\$57.00	\$45.47
160	Apr-39	Apr	2039	Shoulder	\$0.00	\$0.00	\$35.89	\$24.71	\$13.90	\$11.69	\$49.79	\$36.40
161	May-39	May	2039	Summer	\$0.00	\$0.00	\$32.91	\$22.67	\$16.88	\$12.38	\$44.80	\$35.05
162	Jun-39	Jun	2039	Summer	\$0.00	\$0.00	\$34.65	\$23.86	\$16.78	\$10.70	\$51.43	\$34.56
163	Jul-39	Jul	2039	Summer	\$0.00	\$0.00	\$36.81	\$25.35	\$30.47	\$14.84	\$67.28	\$40.19
164	Aug-39	Aug	2039	Summer	\$0.00	\$0.00	\$36.35	\$25.03	\$24.25	\$12.66	\$60.60	\$37.69
165	Sep-39	Sep	2039	Summer	\$0.00	\$0.00	\$32.72	\$22.53	\$16.99	\$11.84	\$51.71	\$34.37
166	Oct-39	Oct	2039	Shoulder	\$0.00	\$0.00	\$31.29	\$21.55	\$15.92	\$13.13	\$47.21	\$34.67
167	Nov-39	Nov	2039	Shoulder	\$0.00	\$0.00	\$42.23	\$29.09	\$11.13	\$12.10	\$53.36	\$41.19
168	Dec-39	Dec	2039	Vinter	\$0.00	\$0.00	\$65.33	\$44.99	\$4.43	\$12.30	\$63.76	\$57.29
169	Jan-40	Jan	2040	Vinter	\$0.00	\$0.00	\$101.48	\$69.89	-\$4.55	\$5.95	\$96.93	\$75.94
170	Feb-40	Feb	2040	Vinter	\$0.00	\$0.00	\$96.94	\$59.87	-\$2.40	\$8.20	\$84.54	\$68.08
171	Mar-40	Mar	2040	Shoulder	\$0.00	\$0.00	\$45.22	\$31.14	\$12.09	\$14.55	\$57.31	\$45.69
172	Apr-40	Apr	2040	Shoulder	\$0.00	\$0.00	\$36.14	\$24.89	\$13.90	\$11.69	\$50.04	\$36.58
173	May-40	May	2040	Summer	\$0.00	\$0.00	\$33.14	\$22.83	\$16.88	\$12.38	\$50.03	\$35.21
174	Jun-40	Jun	2040	Summer	\$0.00	\$0.00	\$34.93	\$24.03	\$16.78	\$10.70	\$51.67	\$34.73
175	Jul-40	Jul	2040	Summer	\$0.00	\$0.00	\$37.07	\$25.53	\$30.47	\$14.84	\$67.54	\$40.37
176	Aug-40	Aug	2040	Summer	\$0.00	\$0.00	\$36.60	\$25.21	\$24.25	\$12.66	\$60.86	\$37.87
177	Sep-40	Sep	2040	Summer	\$0.00	\$0.00	\$32.95	\$22.69	\$18.99	\$11.84	\$51.94	\$34.53
178	Oct-40	Oct	2040	Shoulder	\$0.00	\$0.00	\$31.51	\$21.70	\$15.92	\$13.13	\$47.43	\$34.83
179	Nov-40	Nov	2040	Shoulder	\$0.00	\$0.00	\$42.53	\$29.29	\$11.13	\$12.10	\$53.66	\$41.39
180	Dec-40	Dec	2040	Vinter	\$0.00	\$0.00	\$65.79	\$45.31	\$4.43	\$12.30	\$70.22	\$57.61
181	Jan-41	Jan	2041	Vinter	\$0.00	\$0.00	\$104.70	\$72.10	-\$4.55	\$5.95	\$100.15	\$78.06
182	Feb-41	Feb	2041	Vinter	\$0.00	\$0.00	\$99.69	\$61.77	-\$2.40	\$8.20	\$97.29	\$69.97
183	Mar-41	Mar	2041	Shoulder	\$0.00	\$0.00	\$46.65	\$32.13	\$12.09	\$14.55	\$58.75	\$46.68
184	Apr-41	Apr	2041	Shoulder	\$0.00	\$0.00	\$37.28	\$25.68	\$13.90	\$11.69	\$51.19	\$37.37
185	May-41	May	2041	Summer	\$0.00	\$0.00	\$34.20	\$23.95	\$16.88	\$12.38	\$51.08	\$35.93
186	Jun-41	Jun	2041	Summer	\$0.00	\$0.00	\$36.00	\$24.79	\$16.78	\$10.70	\$52.78	\$35.49
187	Jul-41	Jul	2041	Summer	\$0.00	\$0.00	\$38.24	\$26.34	\$30.47	\$14.84	\$68.71	\$41.18
188	Aug-41	Aug	2041	Summer	\$0.00	\$0.00	\$37.77	\$26.01	\$24.25	\$12.66	\$62.02	\$38.67
189	Sep-41	Sep	2041	Summer	\$0.00	\$0.00	\$33.99	\$23.41	\$18.99	\$11.84	\$52.98	\$35.25
190	Oct-41	Oct	2041	Shoulder	\$0.00	\$0.00	\$32.51	\$22.39	\$15.92	\$13.13	\$48.43	\$35.51
191	Nov-41	Nov	2041	Shoulder	\$0.00	\$0.00	\$43.88	\$30.22	\$11.13	\$12.10	\$55.00	\$42.32
192	Dec-41	Dec	2041	Vinter	\$0.00	\$0.00	\$67.88	\$46.74	\$4.43	\$12.30	\$72.31	\$54.04
193	Jan-42	Jan	2042	Vinter	\$0.00	\$0.00	\$108.29	\$74.58	-\$4.55	\$5.95	\$103.74	\$80.53
194	Feb-42	Feb	2042	Vinter	\$0.00	\$0.00	\$92.77	\$63.89	-\$2.40	\$8.20	\$90.37	\$72.09
195	Mar-42	Mar	2042	Shoulder	\$0.00	\$0.00	\$48.26	\$33.23	\$12.09	\$14.55	\$60.35	\$47.78
196	Apr-42	Apr	2042	Shoulder	\$0.00	\$0.00	\$38.56	\$26.56	\$13.90	\$11.69	\$52.47	\$38.25
197	May-42	May	2042	Summer	\$0.00	\$0.00	\$35.37	\$24.36	\$16.88	\$12.38	\$52.25	\$36.74
198	Jun-42	Jun	2042	Summer	\$0.00	\$0.00	\$37.23	\$25.64	\$16.78	\$10.70	\$54.01	\$36.34
199	Jul-42	Jul	2042	Summer	\$0.00	\$0.00	\$39.56	\$27.24	\$30.47	\$14.84	\$70.02	\$42.08
200	Aug-42	Aug	2042	Summer	\$0.00	\$0.00	\$39.06	\$26.90	\$24.25	\$12.66	\$63.32	\$39.56

Record Field	Period	Month	Year	Season	PECO Zone Adjusted On-Peak (\$/MWh)	PECO Zone Adjusted Off-Peak (\$/MWh)	PECO Zone NG Converted On-Peak (Nominal)	PECO Zone NG Converted Off-Peak (Nominal) (\$/MWh)	PECO Zone Spark Spread On-Peak (Nominal) (\$/MWh)	PECO Zone Spark Spread Off-Peak (Nominal) (\$/MWh)	PECO Zone On-Peak (Nominal) (\$/MWh)	PECO Zone Off-Peak (Nominal) (\$/MWh)
200	Aug-42	Aug	2042	Summer	\$0.00	\$0.00	\$39.06	\$26.30	\$24.25	\$12.66	\$63.32	\$39.56
201	Sep-42	Sep	2042	Summer	\$0.00	\$0.00	\$35.16	\$24.21	\$18.39	\$11.84	\$54.15	\$36.05
202	Oct-42	Oct	2042	Shoulder	\$0.00	\$0.00	\$33.62	\$23.16	\$15.92	\$13.13	\$49.54	\$36.28
203	Nov-42	Nov	2042	Shoulder	\$0.00	\$0.00	\$45.39	\$31.26	\$11.13	\$12.10	\$56.51	\$43.36
204	Dec-42	Dec	2042	Winter	\$0.00	\$0.00	\$70.21	\$48.35	\$4.43	\$12.30	\$74.64	\$60.65
205	Jan-43	Jan	2043	Winter	\$0.00	\$0.00	\$112.00	\$77.13	-\$4.55	\$5.95	\$107.44	\$83.08
206	Feb-43	Feb	2043	Winter	\$0.00	\$0.00	\$95.95	\$66.07	-\$2.40	\$8.20	\$93.55	\$74.28
207	Mar-43	Mar	2043	Shoulder	\$0.00	\$0.00	\$49.31	\$34.37	\$12.09	\$14.55	\$62.00	\$48.92
208	Apr-43	Apr	2043	Shoulder	\$0.00	\$0.00	\$39.88	\$27.47	\$13.90	\$11.63	\$53.79	\$39.16
209	May-43	May	2043	Summer	\$0.00	\$0.00	\$36.58	\$25.19	\$16.88	\$12.38	\$53.46	\$37.57
210	Jun-43	Jun	2043	Summer	\$0.00	\$0.00	\$38.51	\$26.52	\$16.78	\$10.70	\$55.29	\$37.22
211	Jul-43	Jul	2043	Summer	\$0.00	\$0.00	\$40.91	\$28.17	\$30.47	\$14.84	\$71.38	\$43.01
212	Aug-43	Aug	2043	Summer	\$0.00	\$0.00	\$40.40	\$27.82	\$24.25	\$12.66	\$64.65	\$40.48
213	Sep-43	Sep	2043	Summer	\$0.00	\$0.00	\$36.36	\$25.04	\$18.39	\$11.84	\$55.35	\$36.88
214	Oct-43	Oct	2043	Shoulder	\$0.00	\$0.00	\$34.77	\$23.35	\$15.92	\$13.13	\$50.69	\$37.07
215	Nov-43	Nov	2043	Shoulder	\$0.00	\$0.00	\$46.94	\$32.32	\$11.13	\$12.10	\$58.06	\$44.43
216	Dec-43	Dec	2043	Winter	\$0.00	\$0.00	\$72.61	\$50.00	\$4.43	\$12.30	\$77.04	\$62.30
217	Jan-44	Jan	2044	Winter	\$0.00	\$0.00	\$114.35	\$78.75	-\$4.55	\$5.95	\$109.79	\$84.70
218	Feb-44	Feb	2044	Winter	\$0.00	\$0.00	\$97.96	\$67.46	-\$2.40	\$8.20	\$95.56	\$75.66
219	Mar-44	Mar	2044	Shoulder	\$0.00	\$0.00	\$50.95	\$35.09	\$12.09	\$14.55	\$63.05	\$49.64
220	Apr-44	Apr	2044	Shoulder	\$0.00	\$0.00	\$40.72	\$28.04	\$13.90	\$11.63	\$54.62	\$39.73
221	May-44	May	2044	Summer	\$0.00	\$0.00	\$37.35	\$25.72	\$16.88	\$12.38	\$54.23	\$38.10
222	Jun-44	Jun	2044	Summer	\$0.00	\$0.00	\$39.32	\$27.08	\$16.78	\$10.70	\$56.09	\$37.77
223	Jul-44	Jul	2044	Summer	\$0.00	\$0.00	\$41.77	\$28.76	\$30.47	\$14.84	\$72.23	\$43.60
224	Aug-44	Aug	2044	Summer	\$0.00	\$0.00	\$41.25	\$28.40	\$24.25	\$12.66	\$65.50	\$41.07
225	Sep-44	Sep	2044	Summer	\$0.00	\$0.00	\$37.13	\$25.57	\$18.39	\$11.84	\$56.12	\$37.41
226	Oct-44	Oct	2044	Shoulder	\$0.00	\$0.00	\$35.50	\$24.45	\$15.92	\$13.13	\$51.42	\$37.58
227	Nov-44	Nov	2044	Shoulder	\$0.00	\$0.00	\$47.92	\$33.00	\$11.13	\$12.10	\$59.05	\$45.10
228	Dec-44	Dec	2044	Winter	\$0.00	\$0.00	\$74.13	\$51.05	\$4.43	\$12.30	\$78.56	\$63.35
229	Jan-45	Jan	2045	Winter	\$0.00	\$0.00	\$116.02	\$79.90	-\$4.55	\$5.95	\$111.46	\$85.85
230	Feb-45	Feb	2045	Winter	\$0.00	\$0.00	\$99.39	\$68.45	-\$2.40	\$8.20	\$96.99	\$76.65
231	Mar-45	Mar	2045	Shoulder	\$0.00	\$0.00	\$51.70	\$35.60	\$12.09	\$14.55	\$63.79	\$50.15
232	Apr-45	Apr	2045	Shoulder	\$0.00	\$0.00	\$41.31	\$28.45	\$13.90	\$11.63	\$55.22	\$40.14
233	May-45	May	2045	Summer	\$0.00	\$0.00	\$37.89	\$26.10	\$16.88	\$12.38	\$54.78	\$38.48
234	Jun-45	Jun	2045	Summer	\$0.00	\$0.00	\$39.89	\$27.47	\$16.78	\$10.70	\$56.67	\$38.17
235	Jul-45	Jul	2045	Summer	\$0.00	\$0.00	\$42.38	\$29.18	\$30.47	\$14.84	\$72.84	\$44.02
236	Aug-45	Aug	2045	Summer	\$0.00	\$0.00	\$41.85	\$28.82	\$24.25	\$12.66	\$66.10	\$41.48
237	Sep-45	Sep	2045	Summer	\$0.00	\$0.00	\$37.67	\$25.94	\$18.39	\$11.84	\$56.66	\$37.78
238	Oct-45	Oct	2045	Shoulder	\$0.00	\$0.00	\$36.02	\$24.81	\$15.92	\$13.13	\$51.94	\$37.93
239	Nov-45	Nov	2045	Shoulder	\$0.00	\$0.00	\$48.62	\$33.48	\$11.13	\$12.10	\$59.75	\$45.59
240	Dec-45	Dec	2045	Winter	\$0.00	\$0.00	\$75.21	\$51.80	\$4.43	\$12.30	\$79.64	\$64.10
241	Jan-46	Jan	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$4.55	\$5.95	-\$4.55	\$5.95
242	Feb-46	Feb	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$2.40	\$8.20	-\$2.40	\$8.20
243	Mar-46	Mar	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$14.55	\$12.09	\$14.55
244	Apr-46	Apr	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$13.90	\$11.63	\$13.90	\$11.63
245	May-46	May	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.88	\$12.38	\$16.88	\$12.38
246	Jun-46	Jun	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.78	\$10.70	\$16.78	\$10.70
247	Jul-46	Jul	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$30.47	\$14.84	\$30.47	\$14.84
248	Aug-46	Aug	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$24.25	\$12.66	\$24.25	\$12.66
249	Sep-46	Sep	2046	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$18.39	\$11.84	\$18.39	\$11.84
250	Oct-46	Oct	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$15.92	\$13.13	\$15.92	\$13.13
251	Nov-46	Nov	2046	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$11.13	\$12.10	\$11.13	\$12.10
252	Dec-46	Dec	2046	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$4.43	\$12.30	\$4.43	\$12.30
253	Jan-47	Jan	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$4.55	\$5.95	-\$4.55	\$5.95
254	Feb-47	Feb	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	-\$2.40	\$8.20	-\$2.40	\$8.20
255	Mar-47	Mar	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$12.09	\$14.55	\$12.09	\$14.55
256	Apr-47	Apr	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$13.90	\$11.63	\$13.90	\$11.63
257	May-47	May	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.88	\$12.38	\$16.88	\$12.38
258	Jun-47	Jun	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$16.78	\$10.70	\$16.78	\$10.70
259	Jul-47	Jul	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$30.47	\$14.84	\$30.47	\$14.84
260	Aug-47	Aug	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$24.25	\$12.66	\$24.25	\$12.66
261	Sep-47	Sep	2047	Summer	\$0.00	\$0.00	\$0.00	\$0.00	\$18.39	\$11.84	\$18.39	\$11.84
262	Oct-47	Oct	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$15.92	\$13.13	\$15.92	\$13.13
263	Nov-47	Nov	2047	Shoulder	\$0.00	\$0.00	\$0.00	\$0.00	\$11.13	\$12.10	\$11.13	\$12.10
264	Dec-47	Dec	2047	Winter	\$0.00	\$0.00	\$0.00	\$0.00	\$4.43	\$12.30	\$4.43	\$12.30

Generation Capacity

Note: The 2027/2028 PJM Capacity Auction did not occur before the date of filing. Per discussion with the SWE, the established floor price of \$175/MW-day was used in the calculator in place of a settled value.

PJM BRA Results (Real \$/MW-day)											
EDC	Zone	Summer					Winter				
		2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028
PECO	PECO	\$34.13	\$28.92	\$269.92	\$329.17	\$175.00	\$34.13	\$28.92	\$269.92	\$329.17	\$175.00

Seasonally Adjusted BRA Results (Real \$/MW-day)											
EDC	Zone	Summer					Winter				
		2025/2026	2025/2026	2025/2026	2026/2027	2027/2028	2021/2021	2021/2022	2025/2026	2026/2027	2027/2028
PECO	PECO	\$17.07	\$14.46	\$134.96	\$164.59	\$87.50	\$17.07	\$14.46	\$134.96	\$164.59	\$87.50

Seasonally Adjusted PJM BRA Results (Real \$/kW-year)													
		Summer					Winter						
		2020/2021	2021/2022	2025/2026	2026/2027	2027/2028	5-Year Average	2020/2021	2021/2022	2025/2026	2026/2027	2027/2028	5-Year Average
		\$6.23	\$5.28	\$49.26	\$60.07	\$31.94	\$30.56	\$6.23	\$5.28	\$49.26	\$60.07	\$31.94	\$30.56

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal \$/kW-year)																			
Act 129 PY	DYIPY Start	DYIPY End	Summer							Winter							Inflation Flag	Input Flag	
			DLC	Met-Ed	PECO	Penelac	Penn Power	PPL	West Penn	DLC	Met-Ed	PECO	Penelac	Penn Power	PPL	West Penn			
18	2026	2027	\$0.00	\$0.00	\$60.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$60.07	\$0.00	\$0.00	\$0.00	\$0.00	0	annual
19	2027	2028	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	0	annual
20	2028	2029	\$0.00	\$0.00	\$30.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$30.56	\$0.00	\$0.00	\$0.00	\$0.00	0	average
21	2029	2030	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	1	average
22	2030	2031	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31.94	\$0.00	\$0.00	\$0.00	\$0.00	1	average
23	2031	2032	\$0.00	\$0.00	\$32.49	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$32.49	\$0.00	\$0.00	\$0.00	\$0.00	1	average
24	2032	2033	\$0.00	\$0.00	\$33.17	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$33.17	\$0.00	\$0.00	\$0.00	\$0.00	1	average
25	2033	2034	\$0.00	\$0.00	\$33.95	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$33.95	\$0.00	\$0.00	\$0.00	\$0.00	1	average
26	2034	2035	\$0.00	\$0.00	\$34.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$34.56	\$0.00	\$0.00	\$0.00	\$0.00	1	average
27	2035	2036	\$0.00	\$0.00	\$35.27	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$35.27	\$0.00	\$0.00	\$0.00	\$0.00	1	average
28	2036	2037	\$0.00	\$0.00	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00	1	average
29	2037	2038	\$0.00	\$0.00	\$36.75	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$36.75	\$0.00	\$0.00	\$0.00	\$0.00	1	average
30	2038	2039	\$0.00	\$0.00	\$37.51	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$37.51	\$0.00	\$0.00	\$0.00	\$0.00	1	average
31	2039	2040	\$0.00	\$0.00	\$38.29	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$38.29	\$0.00	\$0.00	\$0.00	\$0.00	1	average
32	2040	2041	\$0.00	\$0.00	\$39.08	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39.08	\$0.00	\$0.00	\$0.00	\$0.00	1	average
33	2041	2042	\$0.00	\$0.00	\$39.89	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39.89	\$0.00	\$0.00	\$0.00	\$0.00	1	average
34	2042	2043	\$0.00	\$0.00	\$40.72	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$40.72	\$0.00	\$0.00	\$0.00	\$0.00	1	average
35	2043	2044	\$0.00	\$0.00	\$41.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$41.56	\$0.00	\$0.00	\$0.00	\$0.00	1	average
36	2044	2045	\$0.00	\$0.00	\$42.42	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$42.42	\$0.00	\$0.00	\$0.00	\$0.00	1	average
37	2045	2046	\$0.00	\$0.00	\$43.30	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$43.30	\$0.00	\$0.00	\$0.00	\$0.00	1	average
38	2046	2047	\$0.00	\$0.00	\$44.20	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$44.20	\$0.00	\$0.00	\$0.00	\$0.00	1	average
39	2047	2048	\$0.00	\$0.00	\$45.11	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$45.11	\$0.00	\$0.00	\$0.00	\$0.00	1	average

Avoided Transmission Capacity Forecast in Nominal Dollars (\$/kW-year) - Summer									
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
18	2026	2027	\$61.07	\$58.92	\$22.48	\$44.19	\$77.10	\$48.00	\$8.83
19	2027	2028	\$62.33	\$60.14	\$22.94	\$45.10	\$78.69	\$48.99	\$9.01
20	2028	2029	\$63.62	\$61.38	\$23.42	\$46.04	\$80.32	\$50.00	\$9.20
21	2029	2030	\$64.94	\$62.66	\$23.90	\$46.99	\$81.99	\$51.04	\$9.39
22	2030	2031	\$66.29	\$63.95	\$24.40	\$47.97	\$83.69	\$52.10	\$9.58
23	2031	2032	\$67.66	\$65.28	\$24.90	\$48.96	\$85.42	\$53.18	\$9.78
24	2032	2033	\$69.06	\$66.63	\$25.42	\$49.97	\$87.19	\$54.28	\$9.98
25	2033	2034	\$70.49	\$68.01	\$25.95	\$51.01	\$88.99	\$55.40	\$10.19
26	2034	2035	\$71.95	\$69.42	\$26.48	\$52.07	\$90.84	\$56.55	\$10.40
27	2035	2036	\$73.44	\$70.86	\$27.03	\$53.14	\$92.72	\$57.72	\$10.62
28	2036	2037	\$74.96	\$72.33	\$27.59	\$54.24	\$94.64	\$58.92	\$10.84
29	2037	2038	\$76.52	\$73.82	\$28.16	\$55.37	\$96.60	\$60.14	\$11.06
30	2038	2039	\$78.10	\$75.35	\$28.75	\$56.52	\$98.60	\$61.38	\$11.29
31	2039	2040	\$79.72	\$76.92	\$29.34	\$57.69	\$100.64	\$62.66	\$11.53
32	2040	2041	\$81.37	\$78.51	\$29.95	\$58.88	\$102.73	\$63.95	\$11.76
33	2041	2042	\$83.06	\$80.13	\$30.57	\$60.10	\$104.86	\$65.28	\$12.01
34	2042	2043	\$84.78	\$81.79	\$31.20	\$61.35	\$107.03	\$66.63	\$12.26
35	2043	2044	\$86.53	\$83.49	\$31.85	\$62.62	\$109.25	\$68.01	\$12.51
36	2044	2045	\$88.33	\$85.22	\$32.51	\$63.91	\$111.51	\$69.42	\$12.77
37	2045	2046	\$90.16	\$86.98	\$33.18	\$65.24	\$113.82	\$70.86	\$13.03

Avoided Distribution Capacity Forecast in Nominal Dollars (\$/kW-year) - Summer						
DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
\$59.28	\$52.46	\$39.61	\$37.18	\$43.52	\$25.11	\$41.25
\$64.43	\$55.82	\$47.21	\$42.64	\$45.52	\$26.68	\$46.27
\$69.93	\$58.95	\$49.64	\$47.98	\$45.17	\$29.00	\$51.89
\$76.21	\$62.16	\$51.04	\$53.05	\$45.79	\$31.55	\$56.92
\$81.30	\$65.41	\$50.53	\$57.97	\$45.98	\$33.94	\$62.19
\$82.99	\$66.77	\$51.57	\$59.17	\$46.93	\$34.64	\$63.48
\$84.71	\$68.15	\$52.64	\$60.39	\$47.91	\$35.36	\$64.80
\$86.46	\$69.56	\$53.73	\$61.65	\$48.90	\$36.09	\$66.14
\$88.25	\$71.00	\$54.85	\$62.92	\$49.91	\$36.84	\$67.51
\$90.08	\$72.47	\$55.98	\$64.23	\$50.94	\$37.60	\$68.91
\$91.95	\$73.97	\$57.14	\$65.56	\$52.00	\$38.38	\$70.34
\$93.85	\$75.51	\$58.33	\$66.91	\$53.08	\$39.17	\$71.79
\$95.80	\$77.07	\$59.53	\$68.30	\$54.18	\$39.99	\$73.28
\$97.78	\$78.67	\$60.77	\$69.72	\$55.30	\$40.81	\$74.80
\$99.81	\$80.30	\$62.03	\$71.16	\$56.44	\$41.66	\$76.35
\$101.87	\$81.96	\$63.31	\$72.63	\$57.61	\$42.52	\$77.93
\$103.98	\$83.66	\$64.62	\$74.14	\$58.81	\$43.40	\$79.54
\$106.14	\$85.39	\$65.96	\$75.67	\$60.03	\$44.30	\$81.19
\$108.34	\$87.16	\$67.33	\$77.24	\$61.27	\$45.22	\$82.87
\$110.58	\$88.97	\$68.72	\$78.84	\$62.54	\$46.16	\$84.59

Avoided Transmission Capacity Forecast in Nominal Dollars (\$/kW-year) - Winter									
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
18	2026	2027	\$0.00	\$0.00	\$0.00	\$14.73	\$0.00	\$48.00	\$8.83
19	2027	2028	\$0.00	\$0.00	\$0.00	\$15.03	\$0.00	\$48.99	\$9.01
20	2028	2029	\$0.00	\$0.00	\$0.00	\$15.35	\$0.00	\$50.00	\$9.20
21	2029	2030	\$0.00	\$0.00	\$0.00	\$15.66	\$0.00	\$51.04	\$9.39
22	2030	2031	\$0.00	\$0.00	\$0.00	\$15.99	\$0.00	\$52.10	\$9.58
23	2031	2032	\$0.00	\$0.00	\$0.00	\$16.32	\$0.00	\$53.18	\$9.78
24	2032	2033	\$0.00	\$0.00	\$0.00	\$16.66	\$0.00	\$54.28	\$9.98
25	2033	2034	\$0.00	\$0.00	\$0.00	\$17.00	\$0.00	\$55.40	\$10.19
26	2034	2035	\$0.00	\$0.00	\$0.00	\$17.36	\$0.00	\$56.55	\$10.40
27	2035	2036	\$0.00	\$0.00	\$0.00	\$17.71	\$0.00	\$57.72	\$10.62
28	2036	2037	\$0.00	\$0.00	\$0.00	\$18.08	\$0.00	\$58.92	\$10.84
29	2037	2038	\$0.00	\$0.00	\$0.00	\$18.46	\$0.00	\$60.14	\$11.06
30	2038	2039	\$0.00	\$0.00	\$0.00	\$18.84	\$0.00	\$61.38	\$11.29
31	2039	2040	\$0.00	\$0.00	\$0.00	\$19.23	\$0.00	\$62.66	\$11.53
32	2040	2041	\$0.00	\$0.00	\$0.00	\$19.63	\$0.00	\$63.95	\$11.76
33	2041	2042	\$0.00	\$0.00	\$0.00	\$20.03	\$0.00	\$65.28	\$12.01
34	2042	2043	\$0.00	\$0.00	\$0.00	\$20.45	\$0.00	\$66.63	\$12.26
35	2043	2044	\$0.00	\$0.00	\$0.00	\$20.87	\$0.00	\$68.01	\$12.51
36	2044	2045	\$0.00	\$0.00	\$0.00	\$21.30	\$0.00	\$69.42	\$12.77
37	2045	2046	\$0.00	\$0.00	\$0.00	\$21.75	\$0.00	\$70.86	\$13.03

Avoided Distribution Capacity Forecast in Nominal Dollars (\$/kW-year) - Winter						
DLC	Met-Ed	PECO	Penelec	Penn Power	PPL	West Penn
\$0.21	\$6.70	\$10.26	\$5.79	\$16.27	\$32.44	\$5.05
\$0.12	\$7.21	\$5.67	\$5.97	\$16.76	\$36.48	\$6.06
\$0.18	\$8.16	\$5.54	\$6.24	\$19.33	\$39.40	\$7.01
\$0.18	\$8.64	\$5.08	\$6.58	\$20.57	\$41.88	\$7.93
\$0.29	\$9.68	\$7.16	\$7.24	\$22.70	\$44.30	\$9.02
\$0.29	\$9.88	\$7.31	\$7.39	\$23.17	\$45.22	\$9.21
\$0.30	\$10.09	\$7.46	\$7.54	\$23.65	\$46.16	\$9.40
\$0.30	\$10.30	\$7.62	\$7.69	\$24.14	\$47.12	\$9.59
\$0.31	\$10.51	\$7.78	\$7.85	\$24.64	\$48.09	\$9.79
\$0.32	\$10.73	\$7.94	\$8.02	\$25.15	\$49.09	\$9.99
\$0.32	\$10.95	\$8.10	\$8.18	\$25.67	\$50.10	\$10.20
\$0.33	\$11.18	\$8.27	\$8.35	\$26.20	\$51.14	\$10.41
\$0.34	\$11.41	\$8.44	\$8.53	\$26.74	\$52.20	\$10.63
\$0.34	\$11.65	\$8.62	\$8.70	\$27.30	\$53.28	\$10.85
\$0.35	\$11.89	\$8.80	\$8.88	\$27.86	\$54.39	\$11.07
\$0.36	\$12.13	\$8.98	\$9.07	\$28.44	\$55.51	\$11.30
\$0.37	\$12.39	\$9.16	\$9.25	\$29.03	\$56.66	\$11.53
\$0.37	\$12.64	\$9.35	\$9.45	\$29.63	\$57.84	\$11.77
\$0.38	\$12.90	\$9.55	\$9.64	\$30.25	\$59.04	\$12.02
\$0.39	\$13.17	\$9.75	\$9.84	\$30.87	\$60.26	\$12.27

Summer Transmission (\$/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	\$22.48	PECO
PPL	\$48.00	PPL
Duquesne Light	\$61.07	DLC
FE: Met-Ed	\$58.92	Met-Ed
FE: Penelec	\$44.19	Penelec
FE: Penn Power	\$77.10	Penn Power
FE: West Penn Power	\$8.83	West Penn

Summer Distribution (\$/kW-year Nominal)						
EDC	2026	2027	2028	2029	2030	Tool Lookup
PECO	\$39.61	\$47.21	\$49.64	\$51.04	\$50.53	PECO
PPL	\$25.11	\$26.68	\$29.00	\$31.55	\$33.94	PPL
Duquesne Light	\$59.28	\$64.43	\$69.93	\$76.21	\$81.30	DLC
FE: Met-Ed	\$52.46	\$55.82	\$58.95	\$62.16	\$65.41	Met-Ed
FE: Penelec	\$37.18	\$42.64	\$47.98	\$53.05	\$57.97	Penelec
FE: Penn Power	\$43.52	\$45.52	\$45.17	\$45.79	\$45.98	Penn Power
FE: West Penn Power	\$41.25	\$46.27	\$51.89	\$56.92	\$62.19	West Penn

Winter Transmission (\$/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	\$0.00	PECO
PPL	\$48.00	PPL
Duquesne Light	\$0.00	DLC
FE: Met-Ed	\$0.00	Met-Ed
FE: Penelec	\$14.73	Penelec
FE: Penn Power	\$0.00	Penn Power
FE: West Penn Power	\$8.83	West Penn

Winter Distribution (\$/kW-year Nominal)						
EDC	2026	2027	2028	2029	2030	Tool Lookup
PECO	\$10.26	\$5.67	\$5.54	\$5.08	\$7.16	PECO
PPL	\$32.44	\$36.48	\$39.40	\$41.88	\$44.30	PPL
Duquesne Light	\$0.21	\$0.12	\$0.18	\$0.18	\$0.29	DLC
FE: Met-Ed	\$6.70	\$7.21	\$8.16	\$8.64	\$9.68	Met-Ed
FE: Penelec	\$5.79	\$5.97	\$6.24	\$6.58	\$7.24	Penelec
FE: Penn Power	\$16.27	\$16.76	\$19.33	\$20.57	\$22.70	Penn Power
FE: West Penn Power	\$5.05	\$6.06	\$7.01	\$7.93	\$9.02	West Penn

Adjustments

Record Field	Period	Month	Year	Transco 6 (Non-NY)	Locational Gas Adjustment (\$/MMBtu)
1	Jan-26	Jan	2026	\$7.51	\$3.233
2	Feb-26	Feb	2026	\$6.39	\$2.343
3	Mar-26	Mar	2026	\$3.43	-\$0.263
4	Apr-26	Apr	2026	\$3.02	-\$0.580
5	May-26	May	2026	\$2.82	-\$0.806
6	Jun-26	Jun	2026	\$3.01	-\$0.778
7	Jul-26	Jul	2026	\$3.33	-\$0.642
8	Aug-26	Aug	2026	\$3.32	-\$0.713
9	Sep-26	Sep	2026	\$2.83	-\$1.155
10	Oct-26	Oct	2026	\$2.73	-\$1.308
11	Nov-26	Nov	2026	\$3.49	-\$0.756
12	Dec-26	Dec	2026	\$5.37	\$0.705
13	Jan-27	Jan	2027	\$8.06	\$3.154
14	Feb-27	Feb	2027	\$6.93	\$2.357
15	Mar-27	Mar	2027	\$3.64	-\$0.273
16	Apr-27	Apr	2027	\$3.07	-\$0.439
17	May-27	May	2027	\$2.74	-\$0.743
18	Jun-27	Jun	2027	\$2.94	-\$0.674
19	Jul-27	Jul	2027	\$3.14	-\$0.623
20	Aug-27	Aug	2027	\$3.10	-\$0.731
21	Sep-27	Sep	2027	\$2.77	-\$1.024
22	Oct-27	Oct	2027	\$2.66	-\$1.204
23	Nov-27	Nov	2027	\$3.69	-\$0.365
24	Dec-27	Dec	2027	\$5.51	\$1.039
25	Jan-28	Jan	2028	\$8.23	\$3.466
26	Feb-28	Feb	2028	\$7.04	\$2.658
27	Mar-28	Mar	2028	\$3.76	\$0.011
28	Apr-28	Apr	2028	\$2.90	-\$0.414
29	May-28	May	2028	\$2.73	-\$0.572
30	Jun-28	Jun	2028	\$2.80	-\$0.626
31	Jul-28	Jul	2028	\$2.89	-\$0.709
32	Aug-28	Aug	2028	\$2.84	-\$0.819
33	Sep-28	Sep	2028	\$2.67	-\$0.969
34	Oct-28	Oct	2028	\$2.54	-\$1.151
35	Nov-28	Nov	2028	\$3.52	-\$0.357
36	Dec-28	Dec	2028	\$5.36	\$1.050
37	Jan-29	Jan	2029	\$8.06	\$3.483
38	Feb-29	Feb	2029	\$6.96	\$2.672
39	Mar-29	Mar	2029	\$3.61	\$0.018
40	Apr-29	Apr	2029	\$2.97	-\$0.187
41	May-29	May	2029	\$2.78	-\$0.358
42	Jun-29	Jun	2029	\$2.90	-\$0.407
43	Jul-29	Jul	2029	\$3.00	-\$0.483
44	Aug-29	Aug	2029	\$2.96	-\$0.597
45	Sep-29	Sep	2029	\$2.78	-\$0.760
46	Oct-29	Oct	2029	\$2.66	-\$0.953
47	Nov-29	Nov	2029	\$3.35	-\$0.445
48	Dec-29	Dec	2029	\$5.16	\$0.920

Month	Locational Adjustment (\$/MMBtu)	Load Shape	Spark Spread On-Peak (\$/MWh)	Spark Spread Off-Peak (\$/MWh)	
Jan	\$3.33	208.4%	-\$4.65	\$5.83	<p>Commentary: In some cases, the spark spread may be a negative monetary value. In the marketplace, this may occur for a short period, but usually for an entire month. However, this factor accounts for differences in the heat rate assumptions and the real market values. Escalation is later applied in a positive manner as not to devalue future spark spreads.</p>
Feb	\$2.51	178.6%	-\$2.45	\$8.04	
Mar	-\$0.13	92.9%	\$11.85	\$14.25	
Apr	-\$0.40	74.2%	\$13.62	\$11.45	
May	-\$0.62	68.1%	\$16.54	\$12.13	
Jun	-\$0.62	71.7%	\$16.44	\$10.48	
Jul	-\$0.61	76.1%	\$29.85	\$14.54	
Aug	-\$0.71	75.2%	\$23.76	\$12.40	
Sep	-\$0.98	67.7%	\$18.60	\$11.60	
Oct	-\$1.15	64.7%	\$15.59	\$12.86	
Nov	-\$0.48	87.4%	\$10.90	\$11.85	
Dec	\$0.93	135.1%	\$4.34	\$12.05	

AEPS

Year	2026
Load (MWh)	1,000

Credit	Tier Req (weight)	Price
Solar	0.5%	\$37.25
Tier I	8.0%	\$34.20
Tier II	10.0%	\$39.63

Required Credits	Cost
5	\$186
80	\$2,736
100	\$3,963
Total	185
	\$6,885

Weighted Avg. Price (Per Credit)
\$37.21

Weighted Avg. Price (Per MWh)
\$6.88

Tier	Reporting Year	Marex (Bid price)	Marex (Offer price)	Avg Price
Solar	2024	\$34.50	\$35.50	\$35.00
	2025	\$37.00	\$38.00	\$37.50
	2026	\$36.75	\$37.75	\$37.25
	2027	\$36.50	\$37.50	\$37.00
Tier I	2023	\$34.55	\$35.05	\$34.80
	2024	\$34.50	\$35.00	\$34.75
	2025	\$34.55	\$35.05	\$34.80
	2026	\$33.95	\$34.45	\$34.20
Tier II	2023	\$33.50	\$34.25	\$33.88
	2024	\$35.00	\$35.75	\$35.38
	2025	\$38.50	\$39.25	\$38.88
	2026	\$39.25	\$40.00	\$39.63