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File #: 207296

December 1, 2025

VIA ELECTRONIC FILING

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

**Re: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase V
Energy Efficiency and Conservation Plan
Docket No. M-2025-3057329**

Dear Secretary Homsher:

Enclosed for filing is PPL Electric Utilities Corporation's ("PPL Electric" or the "Company") Petition for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan ("Phase V EE&C Plan").

Appended to the Petition are Attachment A, which is a copy of the proposed Phase V EE&C Plan marked as PPL Electric Exhibit 1, and Attachment B, which contains copies of the Company's direct testimony and exhibits. In addition, pursuant to the Pennsylvania Public Utility Commission's Final Implementation Order entered on June 18, 2025, and the Secretarial Letter issued on September 8, 2025, at Docket No. M-2025-3052826, PPL Electric is submitting a complete copy of the Commission's Microsoft Excel template tables and a complete Avoided Costs Calculator.

Also enclosed for filing is the executed **CONFIDENTIAL** Conservation Service Provider ("CSP") Contract between PPL Electric and the Evaluation, Measurement, and Verification ("EM&V") CSP selected for the Phase V EE&C Plan. The enclosed Contract is marked **CONFIDENTIAL** because it contains competitively sensitive and proprietary information, namely details about the compensation schedule under the EM&V CSP Contract. Therefore, PPL Electric respectfully requests that the Commission afford the enclosure proprietary treatment and place it in a non-public folder. Copies of this **CONFIDENTIAL** Contract will only be provided

Matthew L. Homsher, Secretary
December 1, 2025
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to the other parties pursuant to a duly executed Stipulated Protective Agreement or Protective Order entered in this proceeding.

Copies of this filing are being provided as indicated below and on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Enclosures

cc: Joseph Sherrick (via email; w/attachment)
Frank Capasso (via email; w/attachment)

CERTIFICATE OF SERVICE
(Docket No. M-2025-3057329)

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

VIA E-MAIL AND FIRST CLASS MAIL

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VIA FIRST CLASS MAIL

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A handwritten signature in black ink, appearing to read "Megan E. Rulli". The signature is written in a cursive style with a large initial "M".

Dated: December 1, 2025

Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of its Act 129 : Docket No. M-2025-3057329
Phase V Energy Efficiency and :
Conservation Plan :

**PETITION OF PPL ELECTRIC UTILITIES CORPORATION FOR
APPROVAL OF ITS ACT 129
PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN**

Pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa. C.S. §§ 2806.1 and 2806.2, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Petition seeking approval of its Phase V Energy Efficiency and Conservation Plan (“Phase V EE&C Plan”). This filing is being made pursuant to Act 129 and the Implementation Order entered by the Pennsylvania Public Utility Commission (“Commission”) on June 18, 2025.¹ The Phase V EE&C Plan includes a broad portfolio of energy efficiency programs, conservation practices and energy education initiatives. These integrated programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129 and the Commission’s *Implementation Order*.

For the reasons set forth below, PPL Electric respectfully requests that the Commission approve the Phase V EE&C Plan as described herein and attached as **Attachment A** and marked as PPL Electric Exhibit 1. **Attachment B** contains copies of the Company’s direct testimony and exhibits.

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

I. INTRODUCTION

1. PPL Electric is a “public utility” and an “electric distribution company” (“EDC”) as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes electric service to approximately 1.5 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric’s attorneys are:

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PPL Electric’s attorneys are authorized to receive all notices and communications regarding this Petition. If only one PPL Electric attorney is deemed the recipient for service on any formal or

informal service lists in this proceeding, the Company respectfully requests that Megan E. Rulli, Esquire, be the PPL Electric attorney included on any such lists.

3. Act 129, which became effective on October 15, 2008, created, *inter alia*, an energy efficiency and conservation (“EE&C”) program, codified in the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 2806.1, 2806.2. This program required each EDC with at least 100,000 customers to adopt and implement a Commission-approved EE&C Plan. *See* 66 Pa. C.S. § 2806.1(b), (1). EE&C Plans are designed to achieve the Act 129 energy conservation and peak load reduction requirements, by specified dates, within the specified cost cap.

4. On July 1, 2009, in compliance with Section 2806.1(b)(1)(i) of Act 129, PPL Electric filed its Phase I EE&C Plan for the period of June 1, 2009, through May 31, 2013. On October 26, 2009, the Commission entered an Order approving PPL Electric’s Phase I EE&C Plan with certain modifications and requiring PPL Electric to file a revised Phase I EE&C Plan consistent with its Order.² On February 17, 2010, the Commission approved PPL Electric’s revised Phase I EE&C Plan.³ The Commission thereafter approved modifications to PPL Electric’s Phase I EE&C Plan.⁴

5. On November 15, 2012, PPL Electric filed its Phase II EE&C Plan for the period of June 1, 2013, through May 31, 2016. On March 14, 2013, the Commission entered an Order approving PPL Electric’s Phase II EE&C Plan with certain modifications and directing the

² *See Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order entered Oct. 26, 2009).

³ *Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order entered Feb. 17, 2010).

⁴ *See, e.g., Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order entered May 6, 2011).

Company to file a revised Phase II EE&C Plan consistent with that Order.⁵ On July 11, 2013, the Commission entered an Order approving PPL Electric's revised Phase II EE&C Plan.⁶ Further modifications to the Phase II EE&C Plan have since been approved.⁷

6. On November 30, 2015, PPL Electric filed its Phase III EE&C Plan for the period of June 1, 2016, through May 31, 2021. The Commission approved PPL Electric's initial Phase III EE&C Plan, with modifications, on March 17, 2016.⁸ Pursuant to the *March 2016 Order*, PPL Electric submitted a compliance filing on April 22, 2016. The Company subsequently filed an Errata to its compliance filing on May 24, 2016. The Commission issued a Secretarial Letter approving PPL Electric's compliance filing, as amended, on June 27, 2016. Further modifications to the Phase III EE&C Plan have since been approved.⁹

7. On November 30, 2020, PPL Electric filed its Phase IV EE&C Plan for the period of June 1, 2021, through May 31, 2026. The Commission approved PPL Electric's Phase IV EE&C Plan, with modifications, on March 25, 2021, and directing the Company to file a revised

⁵ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered Mar. 14, 2013).

⁶ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered July 11, 2013).

⁷ *See Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered Mar. 6, 2014); *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered May 19, 2015).

⁸ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515642 (Order entered Mar. 17, 2016).

⁹ *See Petition of PPL Electric Utilities Corporation for Approval of a Minor Plan Change to its Act 129 Phase III Energy and Conservation Plan*, Docket No. M-2015-2515642 (Order entered Jan. 26, 2017); *Petition of PPL Electric Utilities Corporation for Approval of Major and Minor Plan Changes to its Act 129 Phase III Energy and Conservation Plan*, Docket No. M-2015-2515642 (Order entered Nov. 21, 2017); *Petition of PPL Electric Utilities Corporation for Approval of Major and Minor Plan Changes to its Act 129 Phase III Energy and Conservation Plan*, Docket No. M-2015-2515642 (Order entered July 20, 2018).

Phase IV EE&C Plan consistent with that Order.¹⁰ Pursuant to the *March 2025 Order*, PPL Electric submitted a compliance filing on May 24, 2021. Further modifications to the Phase IV EE&C Plan have since been approved.¹¹

8. By November 30, 2013, and every five years thereafter, the Commission must assess the cost-effectiveness of the EDCs' EE&C Plans and set additional reductions in energy consumption and peak demand if the benefits of the EDCs' EE&C Plans exceed their costs. 66 Pa. C.S. §§ 2806.1(c)(3), (d)(2).¹²

9. On June 18, 2025, the Commission issued the *Implementation Order*, which determined the required energy consumption and peak demand reduction targets for each EDC subject to Act 129 and established guidelines for implementing Phase V (*i.e.*, June 1, 2026 – May 31, 2031) of the EE&C program. To establish the EDCs' required energy consumption and peak demand reduction targets, the Commission relied on the findings of the Statewide Evaluator's ("SWE") Energy Efficiency and Demand Response Market Potential Studies. *See, e.g., Implementation Order* at 11-19. The Commission specified the following overall targets for PPL Electric to reduce energy consumption and peak demand:

¹⁰ *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020824 (Order entered Mar. 25, 2021).

¹¹ *See Petition of PPL Electric Utilities Corporation for Approval of Changes to Its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020824 (Orders entered Apr. 27 and Aug. 24, 2023); *Petition of PPL Electric Utilities Corporation for Approval of a Change to Its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020824 (Order entered Apr. 25, 2024); *Petition of PPL Electric Utilities Corporation for Approval of a Minor Change to its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020824 (Order entered Mar. 27, 2025).

¹² Although subsection (d)(2) does not contain the "every five years thereafter" language that appears in subsection (c)(3), the Commission found that it must evaluate the cost-effectiveness of peak demand reduction every five years and may mandate additional peak demand reduction targets beyond November 30, 2013, if they are found to be cost-effective. *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411, M-2008-2069887, at 17 (Order Entered Feb. 20, 2014).

- Energy reduction compliance target = 828,231 MWh.
- Peak demand reduction compliance target = 151 MW.

Implementation Order at 12.

10. On September 8, 2025, the Commission issued a Secretarial Letter at Docket No. M-2025-3052826 establishing the template for the EDCs' Phase V EE&C Plans.

11. PPL Electric prepared its Phase V EE&C Plan in accordance with the Commission's *Implementation Order* and the Phase V EE&C Plan Template.

12. PPL Electric respectfully requests that the Commission approve its proposed Phase V EE&C Plan.

II. LEGAL REQUIREMENTS

13. Consistent with the requirements set forth in the Act 129 and the Commission's *Implementation Order*, PPL Electric's Phase V EE&C Plan:

- a. Specifies a budget showing total planned expenditures by program and customer class;
- b. Describes PPL Electric's method for monitoring and verifying plan results;
- c. Includes measures designed to achieve or exceed the required reductions and states the manner in which the consumption reductions will be achieved or exceeded;
- d. Complies with the designated expenditure cap of 2% of 2006 Annual Revenues for each year of the five-year plan, which equates to an average of approximately \$61.5 million per year for five years and approximately \$307.5 million¹³ for the Phase V. The five-year Plan will start on June 1, 2026, and conclude on May 31, 2031;
- e. Achieves a total overall gross verified energy reduction of at least 828,231 MWh by May 31, 2031;
- f. Achieves a minimum of 7.9% (i.e., 65,678 MWh) of the consumption reduction requirements from programs solely directed at low-income

¹³ This funding cap excludes \$5 million estimated cost for SWE.

customers (*i.e.*, customers at or below 150% of Federal Poverty Income Guidelines)¹⁴;

- g. Achieves a total overall gross verified demand reduction of at least 151 MW by May 31, 2031;
- h. Acquires at least 75% of the proposed peak demand reduction in both the summer and winter peak demand periods;
- i. Achieves at least 15% of the peak demand reduction target in each program year;
- j. Demonstrates that the proportion of measures available to the low-income sector is at least 9.95% of the total measures available to all customer sectors;
- k. Offers at least one program for each rate class and offers a reasonable mix of programs for all customers;
- l. Offers at least one comprehensive measure for residential customers and at least one comprehensive measure for non-residential customers;
- m. Includes contracts with one or more conservation service providers (“CSPs”) necessary to implement the Phase V EE&C Plan¹⁵;
- n. Allocates at least 50% of the costs of the overall Phase V EE&C Plan to incentives at the portfolio level;
- o. Includes a proposed reconcilable cost-recovery mechanism, in accordance with 66 Pa. C.S. § 1307;
- p. Demonstrates that the Phase V EE&C Plan is cost-effective based on the Commission’s Total Resource Cost (“TRC”) Test; and
- q. Includes an analysis of the Company’s administrative costs.

III. PPL ELECTRIC’S PROPOSED PHASE V EE&C PLAN

A. OVERVIEW OF THE PHASE V EE&C PLAN

14. PPL Electric’s Phase V EE&C Plan is attached hereto as Attachment A and marked as PPL Electric Exhibit 1. PPL Electric’s Phase V EE&C Plan, as more fully described below, includes a broad portfolio of energy efficiency and energy education initiatives. PPL Electric’s portfolio of programs is designed to meet the Company’s Phase V energy consumption and peak

¹⁴For compliance purposes, savings from multifamily housing, up to the percentage of verified low-income households living in the multifamily housing, are eligible for the low-income carve-out. *See Implementation Order* at 53.

¹⁵ The CSP contract for the evaluation, measurement, and verification (“EM&V”) services to be provided under the EE&C Plan was filed concurrently with the Phase V Plan on December 1, 2025.

demand reduction targets and to comply with the other requirements set forth in the Commission's *Implementation Order*. The Phase V EE&C Plan includes a range of energy efficiency programs geared toward all customer classes in PPL Electric's service territory. These programs are the key components of an electric energy efficiency initiative designed to achieve both the required 828,231 MWh of reduced energy consumption and 151 MW of peak demand reduction.

15. The proposed Phase V EE&C Plan follows the template provided in the September 8, 2025 Secretarial Letter at Docket No. M-2025-3052826. The Phase V EE&C Plan is divided into the following nine sections: (1) Overview of the Plan; (2) Energy Efficiency Portfolio/Program Summary Tables and Charts; (3) Program and Component Descriptions; (4) Program Management and Implementation Strategies; (5) Reporting and Tracking System; (6) Quality Assurance and Control; (7) Cost Recovery Mechanism; (8) Cost-Effectiveness; and (9) Plan Compliance and Other Key Issues.

16. Attached to Katelyn Arnold's direct testimony (PPL Electric Statement No. 3) as PPL Electric Exhibit KA-1 is the proposed *pro forma* tariff supplement for the Phase V Act 129 Compliance Rider ("ACR-5"), which is designed to fully recover all applicable EE&C-related costs. The ACR-5 is fully reconcilable and will be applied on a non-bypassable basis to charges for electricity supplied to customers who receive electric distribution service from the Company.

B. PLAN DEVELOPMENT PROCESS

17. The requirements of Act 129 and the Commission's *Implementation Order* formed the basis for development of the Phase V EE&C Plan. The Company carefully evaluated Act 129 and the *Implementation Order* to determine the broad requirements and allowable annual expenditures for PPL Electric. Actual amounts paid to PPL Electric for generation, transmission, distribution and surcharges by retail customers, including revenues collected by PPL Electric for an electric generation supplier for the 12 months ended December 31, 2006, were used to

determine the 2% expenditure cap established by Act 129. The maximum allowable budget identified in the *Implementation Order* for PPL Electric is \$307,506,880.¹⁶ *Implementation Order* at 232 (specifying an annual budget of \$61,501,376 for Phase V).

18. The process for developing the Phase V EE&C Plan consisted of establishing a set of guiding principles, including: (1) focus on customer satisfaction; (2) programs designed for customers; (3) a path for all customers; (4) seamless administration; (5) CSP partnerships; (6) overarching marketing support; and (7) engaging stakeholders. *See* Phase V EE&C Plan, Section 1.2.1 (also identifying additional key strategies to ensure success during Phase V).

19. The programs included in PPL Electric's Phase V EE&C Plan were designed as a portfolio and include options for all customer sectors. The Phase V EE&C Plan is designed to provide customers with a cost-effective, equitable, flexible, and wide-ranging set of programmatic choices, incentive options, information, and educational opportunities.

20. PPL Electric Utilities developed the portfolio as a multiyear, comprehensive, and collaborative undertaking. The Company utilized a data science approach, leveraging existing program data elements, to determine preliminary sector budgets. The budgets, cost estimates, and participation data were used to create an initial portfolio model that was compared to the information available within the SWE's Phase V studies and supporting documentation. Through the request for proposal ("RFP") process, CSPs were invited to submit program and/or portfolio builds as part of their submissions that outlined how each CSP intended to meet verified gross energy savings and coincident peak demand targets within the available budget for direct program costs, while ensuring total portfolio cost-effectiveness. The CSP submissions were compared to the Company's baseline portfolio model for alignment, and their portfolio approach was analyzed

¹⁶ Funding cap excludes \$5 million estimated cost for SWE. *See Implementation Order* at 123.

to ensure it met PPL Electric Utilities' stated core and new strategies and guiding principles. Other requirements for the CSPs include a customer satisfaction target where at least 90% of customers rate themselves as satisfied or very satisfied and capture at least 15% of the total cumulative savings each program year. All CSP assumptions, estimates, and forecasts were required to have supporting documentation or references to ensure feasibility. *See* Phase V EE&C Plan, Section 1.2.2.

21. During the preparation of the Phase V EE&C Plan, PPL Electric pursued opportunities to solicit input from and inform stakeholders of the Company's progress.¹⁷ The Company held several direct meetings with key stakeholders during the development of the EE&C Plan to acquire feedback on stakeholder priorities for the Plan.

22. PPL Electric anticipates that this collaborative process will increase the likelihood of success in implementing the portfolio. Information about stakeholder participation is summarized in Section 4.1.6 of the Phase V EE&C Plan. PPL Electric intends to meet with stakeholders as needed (but not less than twice annually) until May 31, 2031, and use their input to help identify modifications that would improve the efficiency or cost-effectiveness of the Phase V EE&C Plan (subject to regulatory approval where required). This process should assist the review of the Phase V EE&C Plan by the stakeholders and the Commission and should hopefully

¹⁷ PPL Electric's stakeholder group includes, but is not limited to, representatives from: registered and other potential CSPs; environmental advocacy groups; Chambers of Commerce; public and private economic development organizations; trade allies, including contractors, higher education organizations, trade associations, energy services companies, and vendors; market partners that deliver or promote energy-efficiency programs, including the Housing Alliance of Pennsylvania, Keystone HELP, Pennsylvania Housing Finance Agency, SEDA-Council of Governments, Community Committee of the Lehigh Valley, Schuylkill Community Action, Community Action Program of Lancaster, other Community Action Groups, and property/facilities management companies; Pennsylvania Public Utility Law Project; the Sustainable Energy Fund; statutory advocates; the Pennsylvania Department of Environmental Protection; municipal and local government groups;; the EFMR Monitoring Group; the Pennsylvania Department of Community & Economic Development;; and the PP&L Industrial Customer Alliance.

serve to expedite the Plan's approval, thereby allowing more time to prepare for implementation and expanding the opportunities for consumer savings.

C. DESCRIPTION OF THE PHASE V EE&C PLAN

23. PPL Electric's primary objective is to deliver a portfolio of cost-effective programs that will meet customers' needs, fulfill the Company's Phase V EE&C Plan objectives, as defined in Section 1.1.1 of the Phase V EE&C Plan, and achieve the results required by Act 129 and the Commission's *Implementation Order*.

24. PPL Electric's portfolio reflects a strategic approach that is targeted, yet flexible enough to adjust and expand, as warranted, to meet changing market conditions and progress toward the Phase V EE&C Plan goals.

25. The proposed Phase V EE&C Plan, as noted above, includes a portfolio of energy efficiency and energy education initiatives. Specifically, the proposed portfolio consists of three programs: (1) Residential Program; (2) Resource Constrained (Low-Income) Program; and (3) Business (Non-Residential) Program. Each of these programs contains components, which are summarized below:

- a. Residential Program
 - i. Energy Efficient Homes Component
 - ii. Appliance Recycling Component
 - iii. Student Energy Education Component
 - iv. Persistent Demand Response Component
- b. Resource Constrained (Low-Income) Program
 - i. Energy Efficient Homes Component
 - ii. Appliance Recycling Component
 - iii. Student Energy Education Component

- c. Business (Non-Residential) Program
 - i. Small C&I Business Solutions
 - ii. Large C&I Business Solutions

All of the Company's programs are voluntary and, subject to the budget limitations for each program, customers can elect to participate in any program for which they are eligible.

26. Full descriptions of the programs are set forth in Sections 3.2 to 3.4 of the Phase V EE&C Plan. These programs include a range of energy-efficiency programs targeted to every customer sector in PPL Electric's service territory.

27. PPL Electric has differentiated its programs according to four customer sectors: (1) Residential; (2) Low-Income; (3) Small C&I; and (4) Large C&I. *See* Phase V EE&C Plan, Section 3. PPL Electric defines Residential customers as those customers served under Rate Schedules RS and RTS (R). PPL Electric defines Large C&I customers as those customers served at primary and transmission voltage levels (Rate Schedules LP-4, LP-5, and LPEP). Small C&I customers include all non-residential accounts served at secondary voltage levels (Rate Schedules GS-1, GS-3, BL, SA, SM (R), SHS, SLE, SE, TS (R), and GH-2 (R)). The Low-Income sector includes all residential customers whose household income is at or below 150% of the Federal Poverty Income Guidelines ("FPIG"). 66 Pa. C.S. § 2806.1(b)(1)(i)(G).

28. PPL Electric's portfolio of programs is designed to provide customer benefits and to meet the Company's Phase V energy consumption and peak demand reduction targets as well as other program requirements set forth in Act 129 and the *Implementation Order*, all within the designated expenditure cap of 2% of 2006 annual revenues for each year of the five-year EE&C Plan, which equates to approximately \$307.5 million (plus PPL Electric's share of the SWE costs, estimated at \$5 million).

29. In addition, the Commission directed that PPL Electric obtain a minimum of 7.9% of its total required consumption reduction from low-income customers. *Implementation Order* at 12, 69. These savings may only be obtained from “programs solely directed at low-income customers or low-income-verified participants in multifamily housing programs.” *Implementation Order* at 69.

30. As required in the Commission’s *Implementation Order*, PPL Electric has designed its EE&C Plan to achieve at least 7.9% of its required energy consumption from the Low-Income sector (*i.e.*, 65,678 MWh) and to provide the required proportion of measures for the Low-Income sector. *See* Phase V EE&C Plan, Sections 1.3, 9.1.3; *see Implementation Order* at 73. These programs will be available to customers that are at or below 150% of the FPIG. Phase V EE&C Plan, Section 3.3. In addition, the Company has expanded the scope of its low-income EE&C programs by aligning measure and channel delivery with the Residential Program, which keeps the existing participation pathways while expanding options for income-eligible customers. *See* Phase V EE&C Plan, Section 3.3.

31. Furthermore, the Commission’s *Implementation Order* requires that PPL Electric’s EE&C Plan include at least one comprehensive program for residential customers and one comprehensive program for non-residential customers. *Implementation Order* at 52. To satisfy this requirement for residential customers, PPL Electric will offer two programs: (1) the Residential Program targeting its non-low-income customers; and (2) the Resource Constrained (Low-Income) Program targeting its low-income customers. Both programs will provide a comprehensive mix of cost-effective energy efficiency measures for all building types (single-family, multifamily, and manufactured homes and existing and new construction). Both programs will offer in-home energy audits that assess end uses, including weatherization, water heating,

lighting, HVAC, and appliances. The Resource Constrained (Low-Income) Program will also provide up to \$1.5 million for health and safety to resolve issues preventing comprehensive measures. All residential customers will receive energy efficiency and peak demand education and be encouraged to implement multiple measures and to take a comprehensive approach to energy efficiency. The Resource Constrained (Low-Income) Program will also target master metered low-income multifamily buildings, with sector costs tracked and recovered appropriately.

32. To meet the requirement for non-residential customers, PPL Electric will offer the Business (Non-Residential) Program, which will target business customers of all sizes and in every segment, as well as government and educational institutions, with a comprehensive range of prescriptive measures (including HVAC, lighting, and water heating) as well as opportunities to implement a custom efficiency project for measures not included in the TRM. Custom component measures cover a comprehensive set of non-residential needs, including combined heat and power (“CHP”), advanced controls, compressed air, and other projects that result in cost-effective energy efficiency savings.

33. In addition, the *Implementation Order* requires that PPL Electric’s EE&C Plan: (1) achieves at least 15% of the peak demand reduction target in each program year; (2) acquires at least 75% of the proposed peak demand reduction in each both the summer and winter peak demand periods; and (3) allocates at least 50% of the costs of the overall Phase V EE&C Plan to incentives at the portfolio level. *See Implementation Order* at 48, 143, 237.

34. To meet the 15% demand reduction target, PPL Electric will monitor program and channel performance and, if necessary, adjust marketing and communications, incentive levels, eligibility requirements, sector and program budgets, and/or measure offerings to manage participation. *See Phase V EE&C Plan, Section 1.5.* To meet the 75% peak demand reduction in

each season, the Company has worked closely with the selected CSPs to develop a selection of measures that offer benefits in both seasons and will offer its demand response activities in each season. *See* Phase V EE&C Plan, Section 1.6. The Company's proposed budgets for the Phase V EE&C Plan also meet the threshold of allocating at least 50% of funds allocated to incentives at the portfolio level. PPL Electric designed its Phase V EE&C Plan to meet or exceed these requirements. *See* Phase V EE&C Plan, Section 1.1.1.

35. The EE&C Plan further includes procedures to measure, evaluate, and verify performance of the programs and the Plan as a whole. *See* Phase V EE&C Plan, Section 6. PPL Electric also will conduct an annual cost-effectiveness evaluation of the EE&C Plan and report the results of that evaluation in its final annual report in accordance with the Commission's *2026 TRC Test Order*. *See 2026 TRC Test Order* at 12-14; Phase V EE&C Plan, Section 5.1.

36. For each program in the EE&C Plan, cost-effectiveness was estimated in accordance with the Commission's *2026 TRC Test Order*.

37. PPL Electric's proposed EE&C Plan is cost-effective based on a TRC criterion. *See* Phase V EE&C Plan, Section 8. Cost-effectiveness of the EE&C Plan is demonstrated in the data tables presented in Section 8.4 of the Phase V EE&C Plan. PPL Electric determined the life-cycle costs, savings, and avoided cost benefits for each measure to compute the measure's cost-effectiveness from a TRC perspective. Application of the TRC identified that all programs (and specific customer sectors within a program) are expected to meet the cost-effectiveness threshold.

38. PPL Electric's programs are designed to support Residential, Low-Income, Small C&I, and Large C&I customers through a logical continuum of energy efficiency actions, starting with building or facility review and analysis and ending with implementation, verification, and evaluation. Marketing and education functions, customer care and quality assurance, program

tracking, and EM&V will be common features of all programs. The EE&C Plan is supported by financial incentives and a delivery approach focused on providing customers with the support they need to achieve their energy efficiency objectives. Implementation activities range from simple, common energy efficiency measures that can be installed with minimal oversight or administrative burdens to more complex measures that are vetted through a technical analysis and may (but are not required to) be part of a facility-wide energy management strategy.

39. PPL Electric has increased the variety of measures available to income-eligible customers through the Resource Constrained (Low Income) Energy Efficiency Program, with approximately 32% of all measures available to this sector. This meets the Commission's requirement that the proportion of measures available to the low-income sector is at least 9.95% of the total measures available to all customer sectors.

D. CONSIDERING THE ROLE OF RISK AND UNCERTAINTY IN THE EE&C PLAN

40. There are several risks and uncertainties associated with PPL Electric's ability to achieve these targets within the constraints outlined in Act 129 and the Commission's *Implementation Order*. The EE&C Plan's program descriptions outline these risks and uncertainties and explain PPL Electric's strategies to manage these risks. *See* Phase V EE&C Plan, Section 3.

41. Further, PPL Electric has developed its EE&C Plan to exceed its Phase V energy consumption targets and peak demand reduction target by approximately 29% and 20%, respectively, to provide a reasonable margin for risks and uncertainties. Phase V EE&C Plan, Sections 1.1, 9.1.2.

42. The Phase V EE&C Plan also was designed to provide the Company with flexibility to address risks and uncertainties. *See* Phase V EE&C Plan, Section 1.1.2. For instance, the Phase

V EE&C Plan contains several program options and controls that will help the Company manage the pace of programs (*i.e.*, the savings and costs in the EE&C Plan) while reducing the frequency of formal EE&C Plan changes. *See* Phase V EE&C Plan, Section 3. These include modifying marketing tactics, adjusting incentive levels within the ranges detailed in the Phase V EE&C Plan, offering different measures at certain times, and offering multiple delivery channels. *See* Phase V EE&C Plan, Section 3.

43. In addition, the ability to meet the projected targets ultimately is a function of consumers' ability and willingness to participate in specific programs. To address the state of the economy and customers' ability to make investments in energy efficiency, PPL Electric has included various incentive levels for customers and will educate them about the benefits of implementing EE&C measures offered under the Phase V EE&C Plan.

44. PPL Electric also has designed its Phase V EE&C Plan to use the savings assumptions from the Commission's 2026 TRM, which the Commission has adopted for the entirety of Phase V. *Implementation Order* at 207.¹⁸

45. Finally, PPL Electric will continue to use the protocols established in Phases I, II, III, and IV to effectively monitor progress toward meeting the Phase V EE&C Plan goals, to detect problems quickly and take corrective action, and to adjust the Phase V EE&C Plan prospectively over time if necessary.

E. COSTS AND COST ALLOCATION

46. Section 2806.1(g) of Act 129 requires that the total cost of any EE&C Plan not exceed 2% of the EDC's total annual revenues as of December 31, 2006. 66 Pa. C.S. § 2806.1(g). PPL Electric's total annual revenues for calendar year 2006 were \$3,075,068,824. Accordingly,

¹⁸ The Commission has reserved the right to implement a mid-phase TRM as it deems necessary. *Implementation Order* at 207.

the designated expenditure cap of 2% of 2006 Annual Revenues for each year of the five-year plan, equates to an average of approximately \$61.5 million per year for five years and approximately \$307.5 million for the Phase V EE&C Plan. Phase V EE&C Plan, Section 7.1. Counting the estimated \$5 million in costs for the SWE, PPL Electric's total budget for Phase V is \$312.5 million. *See* Phase V EE&C Plan, Table 8 (Pa PUC Table 5).

47. PPL Electric will spend most of the \$312.5 million to implement its Phase V EE&C Plan. Phase V EE&C Plan, Section 7.2. This total cost also will include the costs that PPL Electric incurred to develop its EE&C Plan. Phase V EE&C Plan, Section 7.2. In the *Implementation Order*, the Commission again found that EDCs should be permitted to recover the incremental costs incurred to design, create, and obtain Commission approval of a plan. *Implementation Order* at 232-36.

48. In addition, Section 2806.1(a)(11) of Act 129 mandates that EE&C measures be paid for by the same customer class that receives the energy and conservation benefits of those measures. 66 Pa. C.S. § 2806.1(a)(11). The Phase V EE&C Plan estimates the costs and savings for each of the four customer sectors (i.e., Residential, Low-Income, Small C&I, and Large C&I). Phase V EE&C Plan, Section 2. However, for cost-recovery purposes, the Company must assign and allocate costs to each customer class. To that end, PPL Electric will: (1) directly assign costs to customer classes; and (2) allocate costs that are applicable to more than one customer class or that provide system-wide benefits using an allocation factor. Phase V EE&C Plan, Section 7.5. The allocation factor is a percentage equal to the actual EE&C costs directly assigned to each customer class divided by the actual EE&C costs assigned to all customer classes. Phase V EE&C Plan, Section 7.5.

F. COST RECOVERY TARIFF MECHANISM

49. Act 129 directs each EDC to establish a reconcilable cost recovery tariff mechanism in accordance with 66 Pa. C.S. § 1307 and include this mechanism in its Phase V EE&C Plan. 66 Pa. C.S. § 2806.1(b)(1)(i)(H), (k)(1); *see Implementation Order* at 247-49. Attached to Katelyn Arnold's direct testimony (PPL Electric Statement No. 3) as PPL Electric Exhibit KA-1 is the *pro forma* tariff supplement for the Company's proposed ACR-5, which is a reconcilable adjustment clause under Section 1307 of the Public Utility Code that will be set to recover the forecasted program costs PPL Electric expects to incur each program year to achieve its energy consumption and peak demand reduction targets for that program year. Phase V EE&C Plan, Section 7.4. The ACR-5 will be filed by May 1 of each year and will set forth the rates that will be charged to each customer depending on the customer's rate schedule. For each program year, PPL Electric will annually reconcile the actual expenses incurred for each customer class as a whole with the actual revenues it recovers through ACR-5 for that customer class as a whole. Phase V EE&C Plan, Section 7.4. In addition to the annual reconciliation, upon determination by the Company that the ACR-5 rate (if left unchanged) would result in a material over- or under-collection of Phase V costs incurred or expected to be incurred during the current 12-month period, the Company may file with the Commission for an interim revision of the ACR V rate. Phase V EE&C Plan, Section 7.4.

50. Section 2806.1(h) of Act 129 also provides that the Commission can recover program implementation costs from EDCs. *See Implementation Order* at 235. Consequently, it follows that PPL Electric can recover those costs from customers, and the Company will recover such costs through the ACR V. However, PPL Electric observes that the costs for the SWE are

not included under the Company's 2% cost cap, in accordance with the *Implementation Order*.¹⁹ See *Implementation Order* at 235.

51. Further, the Commission's *Implementation Order* requires EDCs to combine their Phase IV and Phase V surcharges²⁰ into a single surcharge and tariff for Phase V using the Commission's specified transition plan. *Implementation Order* at 248-49. In accordance with the *Implementation Order*, PPL Electric will reconcile the actual costs incurred through March 31, 2026, with the actual revenues received through March 31, 2026. *Implementation Order* at 248. The revenues and expenses of the remaining two months of Phase IV (*i.e.*, April 2026 and May 2026); expenses to finalize any measures installed and commercially operable on or before May 31, 2026; expenses to finalize any contracts; and other Phase IV administrative obligations should be included, as clearly identified separate line items, in the reconciliation for the period April 1, 2025 through March 31, 2026. *Implementation Order* at 248-49. Additional details of how PPL Electric's ACR-5 for Phase V will accomplish this transition are provided in PPL Electric Exhibit KA-1 attached to Katelyn Arnold's direct testimony (PPL Electric Statement No. 3).

G. IMPLEMENTATION SCHEDULE AND STRATEGY

52. The proposed Phase V EE&C Plan includes a five-year implementation schedule to achieve its Phase V energy consumption and peak demand reduction targets. See Phase V EE&C Plan, Section 1.4. The Phase V EE&C Plan also includes detailed budgets, milestones, and anticipated delivery dates for each program. See Phase V EE&C Plan, Section 3.

¹⁹ In establishing the 2% cost cap, Section 2806.1(g) of the Public Utility Code specifically characterizes the cap as a limitation on the "total costs of any plan required under this section." 66 Pa. C.S. § 2806.1(g). Because the costs of the SWE are not the costs of PPL Electric's Phase V EE&C Plan, they are not subject to the limitation set forth in Section 2806.1(g).

²⁰ PPL Electric notes that its current cost recovery tariff mechanism for Phase IV is the Phase IV Act 129 Compliance Rider ("ACR-4"), which will remain effective through May 31, 2026. See Electric Pa. P.U.C. No. 201, Supp. No. 208, Original Page No. 19Z.10D; *Implementation Order* at 248.

53. PPL Electric Utilities will partner with highly qualified, Pennsylvania-registered CSPs with a local presence and knowledge of the Commonwealth to provide all program implementation in Phase V. The Company will also leverage and grow existing partner networks, which include contractors, trade allies, distributors, raters, builders, and other critical market actors to educate customers, install measures, and ensure program success. The Company, where possible, will support the market through training, economic development, and educational opportunities to foster market transformation. In addition to program implementation CSPs, the Company will utilize a separate, independent third-party EM&V consultant to ensure accurate program reporting. See Phase V EE&C Plan, Section 4.1.1.

IV. CUSTOMER NOTICE

54. The Company proposes to provide notice of this filing consistent with the notice provided by the Company for its Phase I, Phase II, Phase III, and Phase IV EE&C Plans. First, PPL Electric will serve copies of the filing on the Office of Consumer Advocate, the Office of Small Business Advocate, the Commission's Bureau of Investigation and Enforcement, all parties of record in PPL Electric's Phase IV EE&C Plan proceeding, and interested stakeholders. Second, the filing will be posted on PPL Electric's Act 129 web site at <https://www.pplelectric.com/site/Ways-to-Save/Rebates-and-Savings-Programs/Act-129-Stakeholders>. Third, the Company understands that the Commission will publish notice of this filing in the *Pennsylvania Bulletin*. PPL Electric believes that these various communications initiatives will provide all interested parties with full notice of the Company's proposals and an opportunity to participate in the Commission proceeding addressing those proposals.

V. THE PROPOSED EE&C PLAN IS IN THE PUBLIC INTEREST

55. PPL Electric believes that the proposed Phase V EE&C Plan is in the public interest and in compliance with the requirements of Act 129 and all of the Commission's applicable Orders.

56. First, the Phase V EE&C Plan includes a range of cost-effective energy efficiency programs that are available to all customer sectors in PPL Electric's electric service territory. As seen in the Phase V EE&C Plan, these programs include a variety of measures and education and behavior components. Phase V EE&C Plan, Section 3. Therefore, a variety of measures will be applied equitably and non-discriminatorily to all customer classes.

57. Second, these programs are designed to achieve the energy consumption and peak demand reductions required by the Commission's *Implementation Order* within the 2% cost cap established by Act 129.

58. Third, PPL Electric's energy efficiency programs provide a cohesive structure intended to support the Residential, Low-Income, Small C&I, and Large C&I customer sectors through a logical continuum of energy efficiency actions, starting with facility review and analysis and ending with implementation, verification, and evaluation. Marketing and education functions, customer care and quality assurance, program tracking, and EM&V will be common features of all programs in the Phase V EE&C Plan. Furthermore, the programs are supported by financial incentives and a delivery approach focused on providing customers with the support they need to achieve their efficiency objectives.

59. Fourth, the Phase V EE&C Plan contains a proposed tariff mechanism for full cost recovery. As part of this filing, PPL Electric's proposes the ACR-5 that is designed to recover all of the costs for energy efficiency and conservation measures incurred by the customer class that received the benefit of those measures. To the extent that PPL Electric over- or under-recovers

costs from customers, those funds will be refunded or recovered through the ACR-5 as part of the Company's annual reconciliation process.

VI. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the Phase V EE&C Plan, as set forth in this Petition and the attachments hereto.

Respectfully submitted,



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Date: December 1, 2025

Attorneys for PPL Electric Utilities Corporation

Attachment A

(PPL Electric Exhibit 1 – Phase V EE&C Plan)

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation

Energy Efficiency and Conservation Plan

Act 129 Phase V

Docket No. M-2025-3057329

Filed December 1, 2025

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Acronyms and Abbreviations

| Acronym | Definition |
|----------------------|--|
| Act 129 | Act 129 of 2008, P.L. 1592, 66 Pa. C.S. §§ 2806.1, 2806.2 |
| ACR | Act 129 Compliance Rider |
| BOC | Builder Operator Certification |
| C&I | Commercial and industrial |
| CHP | Combined heat and power |
| Commission | Pennsylvania Public Utility Commission |
| CSP | Conservation service provider |
| CVR | Conservation Voltage Reduction |
| EDC | Electric distribution company |
| EE&C Plan | Act 129 Phase IV Energy Efficiency and Conservation Plan |
| EE&C Plan Template | EE&C Plan Template issued by the Commission on September 8, 2025, at Docket No. M-2025-3052826 |
| EM&V | Evaluation, measurement, and verification |
| EUL | Effective useful life |
| EV | Electric Vehicle |
| FTE | Full-time employ |
| FTM | Front-of-the-meter |
| GNI | Government, nonprofit, and institutional |
| HEAR | Home Electrification and Appliance Rebates (HEAR) |
| HER | Home Efficiency Rebates (program) |
| Implementation Order | Pennsylvania Public Utility Commission's Final Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826 |
| IRA | Inflation Reduction Act |
| kW | Kilowatt |
| kWh | Kilowatt-hour |
| LED | Light Emitting Diode |
| LIURP | Low-Income Usage Reduction Program |
| MW | Megawatt |
| MWh | Megawatt-hour |
| MWh/year | MWh credited toward the compliance target in the year a measure is installed |
| OEM | Original Equipment Manufacturer |
| Pa PUC | Pennsylvania Public Utility Commission |
| Pa TRM | Pennsylvania Technical Reference Manual |
| Phase V Plan | Act 129 Phase V Energy Efficiency and Conservation Plan |
| PTR | Peak Time Rebates |
| PV | Photovoltaic |
| PY | Program year |

| Acronym | Definition |
|---------|---------------------------------------|
| QA/QC | Quality assurance and quality control |
| RFP | Request for proposals |
| SEM | Strategic energy management |
| SWE | Statewide Evaluator |
| TOU | Time of use |
| UBC | Uniform Building Code |
| TRC | Total resource cost |

1. Overview of PPL Electric Utilities’ Act 129 Phase V Plan

1.1. Summary Description of the Plan

PPL Electric Utilities Corporation (“PPL Electric Utilities” or the “Company”) hereby submits its Act 129 Phase V Energy Efficiency and Conservation Plan (“EE&C Plan,” “Plan,” or “Phase V Plan”) in compliance with Act 129 of 2008, P.L. 1592, 66 Pa. C.S. §§ 2806.1, 2806.2 (“Act 129”). This Plan is being filed pursuant to the Pennsylvania Public Utility Commission’s (“Pa PUC” or the “Commission”) Final Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826 (“Phase V Implementation Order”). The proposed portfolio comprises three programs, with the nine associated components listed in Table 1.

Table 1. PPL Electric Utilities’ Phase V Programs and Components

| Program | Components | Incentive Tiers |
|---|--|---|
| Residential Energy Efficiency Program | <ul style="list-style-type: none"> ▪ Energy Efficient Homes ▪ Appliance Recycling ▪ Student Education ▪ Persistent Peak Demand | <ul style="list-style-type: none"> ▪ Standard ▪ Moderate Income |
| Business Energy Efficiency Program | <ul style="list-style-type: none"> ▪ Small C&I Business Solutions ▪ Large C&I Business Solutions | <ul style="list-style-type: none"> ▪ Standard |
| Resource Constrained Energy Efficiency Program (Low-Income) | <ul style="list-style-type: none"> ▪ Energy Efficient Homes ▪ Appliance Recycling ▪ Student Education | <ul style="list-style-type: none"> ▪ Low-Income |

The portfolio of programs and components meets the goals set forth in the Phase V Implementation Order, including cost-effectively achieving all savings objectives within the required budget caps with a savings buffer to counteract any potential market uncertainty, federal changes to codes and standards, evaluation issues, and/or new program offerings to ensure the portfolio is successful. The Phase V forecast is shown in Table 2.

Table 2. Summary of Compliance Targets

| Type | Target | EE&C Plan Forecast | |
|--|---------------|--|--------------------------|
| Overall Energy Reduction (MWh) ¹ | 828,231 | 1,066,059 | |
| Overall Peak Demand Reductions (MW) ² | 151.00 | Coincident Peak Demand from Energy Efficiency Measures 167.60 | Demand Response 12.99 |
| Low-Income Energy Reductions (MWh) | 65,678 | 75,623 | |
| Budget Cap (excluding Statewide Evaluator [SWE] costs) | \$307,506,880 | \$307,506,880 | |
| Total Resource Cost Test | 1.0 | 1.67 | |

¹ Energy savings (MWh) are on a gross-verified basis at the meter level.

² Peak demand savings (MW) are on a gross-verified basis at the system level.

1.1.1. Portfolio Objectives

The PPL Electric Utilities Phase V EE&C Plan is designed to meet the requirements set forth in the Phase V Implementation Order, which includes offering cost-effective programs for a five-year period beginning on June 1, 2026, and concluding May 31, 2031, which achieve all targets shown in Table 2. The Company’s Plan complies with the 2% expenditure cap of 2006 annual revenues, also shown in Table 2, allocating costs to each benefiting customer class with a cost recovery tariff mechanism. The PPL Electric Utilities Phase V EE&C Plan offers comprehensive measures for all sectors and through all programs, while meeting the threshold of at least 50% of funds allocated to incentives at the portfolio level.

1.1.2. Overall Strategy to Achieve Compliance Targets

PPL Electric Utilities is prepared to meet our customers’ needs and the targets set forth by the Commission by providing measures and an opportunity to participate for every customer in all parts of our territory. PPL Electric Utilities will supplement our already successful approach to program delivery and build on prior phase infrastructure, best practices, and high customer satisfaction. The Company will maintain effective strategic administration while partnering with highly qualified Conservation Service Providers (“CSPs”) to implement the programs. Key new strategies to meet the Commission’s compliance targets include removing barriers to participation, ensuring program equity, providing new services, allowing flexibility and innovation, and enhancing our supply chain engagement.

1.2. Plan Development Process, Key Assumptions, and Addressing Uncertainty

PPL Electric Utilities’ EE&C Plan is designed around the Phase V Implementation Order requirements and adheres to other key supporting documentation, including the 2026 Pa Technical Reference Manual (“Pa TRM”) and Final Total Resource Cost (“TRC”) Test Order. In determining measure feasibility, the Company relied upon prior phase implementation data, the Pa PUCs Market Potential Study, as well as CSP input. In addition, the Company maintains an ongoing research and development cycle that allows program examples and best practices to be analyzed for the potential benefit of our customers. This

research also includes surveys of customers from all sectors, trade allies, and other market actors. All available information was synthesized into a cohesive Plan that is realistic, achievable, and meets all compliance requirements.

Act 129 energy efficiency programs are mature and have experienced success in driving changes in the market related to behavior, equipment, and product purchases, as well as updated efficiency standards. Compounding the challenges brought through the change in the market are higher upfront costs for comprehensive measures, fewer low-cost, high-impact measures, and diminishing returns for some measures. There are also uncertainties at the federal level with changes in structure, priorities, and funding. The implementation environment for Phase V will be difficult. Regardless of these headwinds, the Company has a well-developed strategy to ensure Phase V success.

1.2.1. Principles Guiding Development of the Plan

PPL Electric Utilities' prior and future success is dependent on multiple core principles of energy efficiency program design, including the following:

- **Focus on Customer Satisfaction** – Ensure the highest levels of customer satisfaction possible for all programs through meaningful program offerings, education, a dedicated community outreach team, and services that empower customers to understand and control their energy usage.
- **Programs Designed for Customers** – All existing Phase IV programs were evaluated for inclusion in Phase V, and this evaluation was supplemented with extensive research on potential new programs. The resulting portfolio maintains cost-effective, popular existing options with enhancements for every sector to meet the challenges of the next five years.
- **A Path for All Customers** – PPL Electric Utilities will continue to partner with CSPs to deliver multiple avenues for participation, including simple online and traditional rebate processing, instant discounts, and a variety of flexible scheduling options for all services, and easy-to-understand resources to guide customers through their journey.
- **Seamless Administration** – PPL Electric Utilities has sophisticated and effective processes and systems, research functions, skilled professionals with extensive experience in designing and implementing energy efficiency programs, and robust relationships with both internal and external stakeholders. This will allow the Company to accurately track and report on data, support CSPs and trade allies, and maintain flexibility to improve the programs over time.
- **CSP Partnerships** –The Company will also utilize only three contracts for program implementation, though CSPs were able to bid on more than one contract. This will create additional opportunities for cross-program functions, such as call centers and customer-facing web tools, as well as a more cohesive customer experience. Performance-based contracts will again be leveraged to lower administrative costs and ensure program success.
- **Overarching Marketing Support** – PPL Electric Utilities will provide oversight of all customer engagement to ensure consistent branding, clear messaging, effective cross-portfolio

promotion, and adherence to the EE&C Plan. This will increase new participation and encourage existing participants to take advantage of other areas of the portfolio.

- **Engaging Stakeholders** – PPL Electric Utilities held several direct meetings with key stakeholders during the development of the EE&C Plan to acquire feedback on stakeholder priorities for evaluation of inclusion in the Plan. The Company will continue to communicate portfolio performance through annual reporting, as well as twice-annual stakeholder meetings. These meetings will provide key information and program updates, allowing for meaningful stakeholder input.

These fundamental program elements are woven into all aspects of the Company’s EE&C Plan and are supported by additional key strategies to ensure success during Phase V, including these:

- **Remove Barriers to Participation** – The Company will create a moderate-income tier within the Residential Energy Efficiency Program to provide higher incentives based on financial need and offer third-party financing through the selected CSPs for both moderate income residential and commercial and industrial (“C&I”) customers.
- **Ensure Program Equity** – Income-eligible customers eligible for the Resource Constrained Energy Efficiency Program will be offered a similar customer journey and measure offerings as in the Residential Energy Efficiency Program, though at no cost. PPL Electric Utilities also plans to require the CSPs and subcontractors delivering both the Residential and Resource Constrained Energy Efficiency Programs to be highly integrated adding to the existing partnerships with the Low-Income Usage Reduction Program (“LIURP”) and other assistance programs.
- **Business Support Services** – The Company will provide early engineering assistance, training and certification incentives, technical feasibility studies, and strategic energy management to engage business customers at critical steps in their project life cycles to ensure energy efficiency integration.
- **New Measure Innovation** – PPL Electric Utilities will work closely with the selected evaluation, measurement, and verification (“EM&V”) CSP, the Statewide Evaluator (“SWE”), and market actors to analyze potential new measures or approaches for inclusion in Phase V via interim measure protocol, custom measure, or pilot, where appropriate.
- **Customer-friendly Demand Response** – The Company has proposed an array of demand response offerings that consider budget limitations and maximize customer benefit while minimizing customer inconvenience.
- **Enhanced Supply Chain Engagement** – Create support structures for manufacturers, distributors, and trade allies to increase the quality of measure installation and increase adoption of energy efficiency practices. This may include new networks offering training, additional incentives for project completion, quality assurance, and control advisement.

1.2.2. Developing the Portfolio

PPL Electric Utilities developed the portfolio as a multiyear, comprehensive, and collaborative undertaking. The Company utilized a data science approach, leveraging vast existing program data elements, to determine preliminary sector budgets. The budgets, cost estimates, and myriad participation data were used to create an initial portfolio model that was compared to the information available within the SWE’s Phase V studies and supporting documentation. Through the RFP process, CSPs were invited to submit program and/or portfolio builds as part of their submissions that outlined how each CSP intended to meet verified gross energy savings and coincident peak demand targets within the available budget for direct program costs, while ensuring total portfolio cost-effectiveness. The CSP submissions were compared to the Company’s baseline portfolio model for alignment, and their portfolio approach was analyzed to ensure it met PPL Electric Utilities’ stated core and new strategies and guiding principles. Other requirements for the CSPs include a customer satisfaction target where at least 85% of customers rate themselves as satisfied or very satisfied and capture at least 15% of the total cumulative savings each program year. All CSP assumptions, estimates, and forecasts were required to have supporting documentation or references to ensure feasibility.

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

Table 3 (Pa PUC Table 1) through Table 6 (Pa PUC Table 4) in this section summarize the estimated savings, budget, and cost-effectiveness for PPL Electric Utilities’ entire portfolio. The tables are numbered sequentially, with the formats matching those provided in the EE&C plan template issued by the Commission on September 8, 2025, at Docket No. M-2025-3052826. Each table caption includes a reference to the corresponding table number provided in the EE&C plan template.

Table 3. Pa PUC Table 1 - Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

| Sector | Total Discounted Lifetime Costs (\$000) ¹ | Total Discounted Lifetime Benefits (\$000) | Total Discounted Net Lifetime Benefits (\$000) ² | Cost-Benefit Ratio (TRC) |
|--|--|--|---|--------------------------|
| Market Rate Residential (exclusive of Low-Income) ³ | \$124,095 | \$156,458 | \$32,364 | 1.26 |
| Residential Low-Income | \$51,075 | \$107,547 | \$56,472 | 2.11 |
| Small Commercial & Industrial | \$431,459 | \$711,778 | \$280,319 | 1.65 |
| Large Commercial & Industrial | \$239,514 | \$441,497 | \$201,983 | 1.84 |
| Total Portfolio⁴ | \$846,143 | \$1,417,280 | \$571,137 | 1.67 |

Note: TRC is the Total Resource Cost test

¹ Discounted common costs are included proportionately to direct costs in the sector totals.

² “Net” refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings.

³ The Phase V Implementation Order disallowed the inclusion of low-income participation in standard, non-low-income-specific residential programs in the calculation of savings towards the low-income carve-out.

⁴ Total values may not equal the sum of all sector values due to rounding.

The PPL Electric Utilities Phase V EE&C Plan follows the Act 129 energy accounting framework, whereby savings targets and reported savings are stated as incremental annual gross savings.

Gross savings are the changes in energy consumption and/or peak demand that result directly from program-related actions taken by participants in an EE&C program, regardless of why they participated. Incremental annual savings are the annualized savings delivered by a measure in the first year. Savings estimates are assumed to be weather-normalized using 15-year weather normals (2006 through 2020), in line with the 2026 Pa TRM.

Although the effective useful life (EUL) of a measure is not factored into savings targets, it is considered in the TRC test; measures with longer EULs have higher lifetime savings and will generate more lifetime TRC benefits.

Table 4 presents a summary of PPL Electric Utilities' Phase V EE&C Plan energy savings in the first year and overall lifetime savings. Energy savings targets and reporting are shown at the meter level, the amount of energy saved at the customer premises, in accordance with the Phase V Final Implementation Order.

Table 4. Pa PUC Table 2 - Summary of Portfolio Energy Savings

| MWh Saved for Consumption Reductions (Meter-Level) | PY18 | | PY19 | | PY20 | | PY21 | | PY22 | | Total | |
|--|------------------------------|------------------|-------------------|------------------|-------------------|------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| | 1st-Year MWh ⁴ | Lifetime MWh | 1st-Year MWh | Lifetime MWh | 1st-Year MWh | Lifetime MWh | 1st-Year MWh | Lifetime MWh | 1st-Year MWh | Lifetime MWh | 1st-Year MWh | Lifetime MWh |
| Baseline¹ | 38,214,368 | | 38,214,368 | | 38,214,368 | | 38,214,368 | | 38,214,368 | | 38,214,368 | |
| Market Rate Residential Sector (<i>exclusive of Low-Income</i>) – Projected Incremental Savings | 41,900 | 305,337 | 41,035 | 307,269 | 39,791 | 302,232 | 24,093 | 252,849 | 23,126 | 242,064 | 169,945 | 1,409,751 |
| Residential Low-Income Sub-Sector – Projected Incremental Savings | 17,738 | 175,456 | 15,875 | 155,293 | 16,125 | 157,077 | 14,532 | 138,640 | 11,353 | 103,932 | 75,623 | 730,399 |
| Small C&I Sector – Projected Incremental Savings | 96,973 | 1,367,425 | 116,828 | 1,669,913 | 112,555 | 1,601,578 | 97,660 | 1,397,551 | 75,341 | 1,076,722 | 499,356 | 7,113,189 |
| Large C&I Sector – Projected Incremental Savings | 50,422 | 748,798 | 65,955 | 978,115 | 74,729 | 1,109,200 | 72,806 | 1,077,724 | 57,223 | 848,203 | 321,135 | 4,762,041 |
| EE&C Plan Total – Projected Incremental Savings | 207,033 | 2,597,016 | 239,692 | 3,110,590 | 243,200 | 3,170,086 | 209,091 | 2,866,765 | 167,043 | 2,270,920 | 1,066,059 | 14,015,378 |
| EE&C Plan Total – Projected Cumulative Savings | 207,033 | 2,597,016 | 446,726 | 5,707,607 | 689,925 | 8,877,693 | 899,016 | 11,744,458 | 1,066,059 | 14,015,378 | 1,066,059 | 14,015,378 |
| EE&C Plan Total – Percentage of Target to be Met² | 25% | | 54% | | 83% | | 109% | | 129% | | 129% | |
| Estimated Phase IV Carryover Savings | | | | | | | | | | | 0 | |
| Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings³ | 207,033 | | 446,726 | | 689,925 | | 899,016 | | 1,066,059 | | 1,066,059 | |
| Cumulative Percent Reduction from Baseline | 1% | | 1% | | 2% | | 2% | | 3% | | 3% | |
| Commission-Identified Goal | | | | | | | | | | | 828,231 | |

¹ As defined in the June 18, 2025, Implementation Order.

² The June 18, 2025, Implementation Order directed that electric distribution companies (EDCs) achieve at least 15% of the target amount in each program year.

³ Total values may not equal the sum of all program year or sector values due to rounding.

Table 5 and Table 6 show portfolio demand savings by year and program type. Table 5 provides planned annual peak demand savings, while Table 6 breaks out winter and summer demand savings. Phase V of Act 129 includes both summer and winter peak demand periods. The summer definition includes an evening period only, while the winter definition includes a morning and evening period. PPL Electric Utilities has elected to update the peak values to align with the Company's specific and identified peak periods. These peak times were obtained from system wide load data from peak summer and winter months. It should be noted that the Company's peak period extends through September in the Summer and from December in the Winter though will follow the months set forth by the Pa PUC:

- **Summer Peak Demand Definition:** non-holiday weekdays June – August, from 4:00 pm to 7:00 pm Eastern Prevailing Time
- **Winter Peak Demand Definition:** non-holiday weekdays, January – February, from 6:00 am to 9:00 am and 6:00 pm to 8:00 pm Eastern Prevailing Time

Annual peak demand savings are the average of summer and winter peak demand savings.

Both coincident demand reductions from energy efficiency programs and demand reductions from demand response programs contribute to peak demand savings, though the accounting for demand reductions from the two program types differs. Energy efficiency programs sum the first-year demand savings from measures within each program year and then sum the incremental savings across the portfolio period. Demand reductions from demand response programs are averaged across the five years of the portfolio. The total portfolio demand reduction is determined by summing the energy efficiency demand savings and the average of the demand response demand savings.

Peak demand targets and reporting are at the system level. The demand savings in Table 5 and Table 6 are scaled up by the PPL Electric Utilities-specific line loss values provided in the 2026 TRM.

Table 5. Pa PUC Table 3 - Summary of Portfolio Demand Savings

| System-Level MW Savings (Average of Summer and Winter) | PY18 | PY19 | PY20 | PY21 | PY22 | Total |
|--|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| | 1st- Year MW | 1st- Year MW | 1st- Year MW | 1st- Year MW | 1st- Year MW | 1st- Year MW |
| Baseline¹ | 6,592 | 6,592 | 6,592 | 6,592 | 6,592 | 6,592 |
| Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Annual Savings | 6.04 | 5.92 | 5.76 | 3.78 | 3.65 | 25.14 |
| Residential Low-Income Sub-Sector – Projected Incremental Annual Savings | 2.51 | 2.28 | 2.31 | 2.12 | 1.74 | 10.95 |
| Small C&I Sector – Projected Incremental Annual Savings | 15.69 | 18.73 | 18.19 | 15.69 | 12.04 | 80.33 |
| Large C&I Sector – Projected Incremental Annual Savings | 8.15 | 10.49 | 12.11 | 11.39 | 9.03 | 51.17 |
| Coincident Demand Reduction from Energy Efficiency Subtotal | 32.38 | 37.41 | 38.37 | 32.97 | 26.47 | 167.60 |
| Residential Load Shifting - Projected MW Savings | 9.00 | 9.00 | 9.00 | 9.00 | 9.00 | 9.00 |
| Small C&I Sector Load Shifting – Projected MW Savings | 0.00 | 4.08 | 6.12 | 0.00 | 0.00 | 2.04 |
| Large C&I Sector Load Shifting – Projected MW Savings | 0.00 | 0.00 | 3.91 | 5.86 | 0.00 | 1.95 |
| Daily Load Shifting Subtotal | 9.00 | 13.08 | 19.02 | 14.86 | 9.00 | 12.99 |
| Cumulative Projected Compliance Savings² | 34.18 | 74.21 | 116.38 | 152.32 | 180.59 | 180.59 |
| Cumulative EE&C Plan Total – Percentage of Target to be Met³ | 23% | 49% | 77% | 101% | 120% | 120% |
| Estimated Phase IV Carryover Savings⁴ | | | | | | 0 |
| Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings⁵ | 34.18 | 74.21 | 116.38 | 152.32 | 180.59 | 180.59 |
| Cumulative Percent Reduction from Baseline | 0.52% | 1.13% | 1.77% | 2.31% | 2.74% | 2.74% |
| Commission-Identified Goals¹ | | | | | | 151.00 |

¹ As defined in the Phase V Implementation Order.

² Cumulative totals reflect one-fifth of the expected MW savings from load shifting programs due to the average performance accounting method. Energy efficiency program savings are additive across program years, while Load Shifting programs average across the Phase.

³ The Phase V Implementation Order directed that EDCs achieve at least 15% of the target amount in each program year.

⁴ 50% of any excess Phase IV demand reduction can be claimed as carryover.

⁵ Total values may not equal the sum of all program year or sector values due to rounding.

Table 6 shows summer (Sum) and winter (Win) MW savings by Plan year.

Table 6. Pa PUC Table 4 - Summary of Seasonal Demand Savings

| Component MW Savings (System-Level) | PY18 | | PY19 | | PY20 | | PY21 | | PY22 | | Total | |
|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------------|---------------|
| | Sum MW | Win MW | Sum MW | Win MW |
| Coincident Reduction from EE - Residential | 9.25 | 7.84 | 8.94 | 7.45 | 8.84 | 7.29 | 6.64 | 5.14 | 6.21 | 4.57 | 39.89 | 32.30 |
| Coincident Reduction from EE - Non-Residential | 30.36 | 17.31 | 36.19 | 22.24 | 38.10 | 22.51 | 32.36 | 21.78 | 24.33 | 17.82 | 161.34 | 101.67 |
| Daily Load Shifting - Residential ¹ | 5.92 | 12.07 | 5.92 | 12.07 | 5.92 | 12.07 | 5.92 | 12.07 | 5.92 | 12.07 | 5.92 | 12.07 |
| Daily Load Shifting - Non-Residential | 0.00 | 0.00 | 4.08 | 4.08 | 10.02 | 10.02 | 5.86 | 5.86 | 0.00 | 0.00 | 3.99 | 3.99 |
| Total² | | | | | | | | | | | 211.14 | 150.03 |
| Phase V Peak Demand Reduction Target | | | | | | | | | | | 151.00 | |
| Percentage of Goal in Season ³ | | | | | | | | | | | 140% | 99% |

¹ Daily load-shifting savings average across the phase, energy efficiency sums across the phase.

² Total values may not equal the sum of all program year or program type values due to rounding.

³ The Phase V Implementation Order directed that EDCs achieve at least 75% of the target amount in each season.

1.4. Summary of Program Implementation Schedule

Table 7 summarizes PPL Electric Utilities' implementation schedule. The Company expects all programs and components to be available to customers at the start of Phase V.

Table 7. PPL Electric Utilities Implementation Schedule

| Program Year (PY) | 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 |

1.5. Strategy to Acquire 15% of Consumption Reduction and Coincident Peak Demand Reduction Target for Each Program Year

PPL Electric Utilities will monitor program and channel performance and, if necessary, adjust marketing and communications, incentive levels, eligibility requirements, sector and program budgets, and/or measure offerings to manage participation as necessary to achieve at least 15% of its portfolio target annually.

1.6. Strategy to Acquire 75% of Peak Demand in Each Season

PPL Electric Utilities has worked closely with the selected CSPs to develop a selection of measures that offer benefits in both seasons, as per the recommendation by the Pa PUC. In addition, our demand response activities will be available across seasons, further supporting the Company's plan to acquire 75% of the proposed peak demand target in each season. The forecasted values across each season can be found in Table 6.

No alternative performance windows for daily load shifting will be recommended by PPL Electric Utilities at the start of Phase V. If the Company determines that a different performance window is required based on performance results, the Company will provide rationale to the SWE, including required documentation, and update evaluation plans, as is necessary.

1.7. Strategy to Manage EE&C Portfolio and Engage Customers and Trade Allies

PPL Electric Utilities will maintain overall general administration, strategic oversight, and overarching marketing of the EE&C portfolio. The Company plans to use CSPs to implement the programs—one CSP with subcontractors will manage the Residential, Resource Constrained, and the Business Energy Efficiency Programs. The CSPs will deliver the programs while also providing program-specific marketing, customer care functions, application and rebate processing, and creation and maintenance of trade ally networks. All customer communications will be consistent across programs and align with the Company's brand and messaging guidelines to ensure a cohesive approach.

In addition to a robust marketing effort, PPL Electric Utilities and its CSPs will work closely with trade allies, community-based organizations, and an array of local, state, and national market actors to create program awareness and continue effective market transformation. The Company may provide incentives to trade allies, distributors, or other market actors to engage the market and ensure program success.

The Company and CSP partnership will be supported by robust internal and independent EM&V to evaluate customer satisfaction and engagement, as well as program effectiveness, which will allow PPL Electric Utilities to modify programs, measures, eligibility, application process and administrative requirements, incentive levels and/or tiers, or other aspects of the programs and/or components to improve program performance and/or customer satisfaction, as needed.

These customer and trade ally engagement strategies may be further bolstered by other offerings, including PPL Electric Utilities' Energy Analyzer, education, training, or any other tools and resources deemed necessary by the Company.

1.8. Data Management, Quality Assurance, and Evaluation Process

1.8.1. Data Management

PPL Electric Utilities' CSPs will provide program implementation data for its central tracking database, which will allow for management of the portfolio and required reporting. If external programs are available during Phase V, the Company will adhere to guidance as per the Pa PUC and comply with agreed-upon data sharing requirements established by the Pa PUC's data sharing working group, provided they meet the Company's data and cybersecurity policies.

1.8.2. Quality Assurance and Quality Control

The Company will design programs and components with quality assurance best practices to prevent issues or errors during implementation. PPL Electric Utilities and its CSPs will employ eligibility screening tools, digital data collection procedures, and leverage CSP field employees to perform virtual, remote (phone), or on-site inspections for a portion of participants to confirm proper measure installation. These activities will allow the Company to maintain data integrity, allow for accurate measurement and verification, and ensure resources are always properly allocated. The Company will ensure that CSPs have applicable training and skills to perform implementation tasks and have a well-defined scope of work and resources required for each activity or project. A detailed description of PPL Electric Utilities' quality assurance and quality control ("QA/QC") protocols and standards is provided in Section 6.

1.8.3. Evaluation Process

The Company's EM&V CSP will develop an evaluation plan, approved by the SWE, which describes the EM&V scope of work, objectives, methods, and activities for evaluating program impacts, processes, cost-effectiveness, and net savings analysis. This evaluation plan may be updated based on program

changes, program metrics, codes or standards updates, and Pa TRM updates or changes to the Evaluation Framework.

PPL Electric Utilities' EM&V CSP will conduct annual evaluations of each program in compliance with all Pa PUC requirements, Pa TRM, and the Evaluation Framework. An impact evaluation will determine verified savings and confirm that all data required for the impact evaluation are available. A separate process evaluation will focus on the qualitative elements of the programs' design and implementation. During the annual evaluation, the EM&V CSP will also determine cost-effectiveness for the programs and portfolio using the TRC test, as well as a net verified savings analysis of each program. The net savings include the effects of free ridership and spillover.

1.9. Cost Recovery Mechanism

Act 129 requires that each EDC establish a reconcilable cost recovery tariff mechanism in accordance with 66 Pa. C.S. § 1307 and to include this mechanism in its EE&C Plan (66 Pa. C.S. § 2806.1(b)(1)(i)(H), (k)(1)). Details on the cost recovery mechanism can be found in Section 7.

2. Energy Efficiency Portfolio and Program Summary Tables and Charts

Table 8 (Pa PUC Table 5), Table 9 (Pa PUC Table 6), and Table 10 (Pa PUC Table 7) provide an overview of the Phase V Plan. The tables are numbered sequentially, with the formats matching those provided in the EE&C plan template issued by the Commission on September 8, 2025, at Docket No. M-2025-3052826. Each table caption includes a reference to the corresponding table number provided in the EE&C plan template. Summaries of portfolio lifetime costs and benefits, and energy and demand savings are provided in Table 3 (Pa PUC Table 1), Table 4 (Pa PUC Table 2), Table 5 (Pa PUC Table 3), and Table 6 (Pa PUC Table 4) within Section 1.3.

Table 8. Pa PUC Table 5 – Summary of Portfolio Costs¹

| Sector | PY18 | | PY19 | | PY20 | | PY21 | | PY22 | | Phase V | |
|---|-----------------|-------------|-----------------|-------------|-----------------|-------------|-----------------|-------------|-----------------|-------------|------------------|-------------|
| | \$000 | % | \$000 | % | \$000 | % | \$000 | % | \$000 | % | \$000 | % |
| Residential Market Rate | \$12,928 | 22% | \$13,290 | 21% | \$13,571 | 21% | \$12,963 | 21% | \$13,215 | 24% | \$65,967 | 21.5% |
| Residential Low-Income | \$10,952 | 18% | \$10,267 | 16% | \$10,235 | 16% | \$9,580 | 15% | \$8,318 | 15% | \$49,352 | 16.0% |
| Small C&I | \$17,718 | 30% | \$20,507 | 32% | \$20,176 | 31% | \$18,092 | 29% | \$14,997 | 27% | \$91,489 | 29.8% |
| Large C&I | \$9,796 | 16% | \$12,028 | 19% | \$13,423 | 20% | \$12,856 | 21% | \$10,495 | 19% | \$58,598 | 19.1% |
| Common Costs | \$8,420 | 14% | \$8,420 | 13% | \$8,420 | 13% | \$8,420 | 14% | \$8,420 | 15% | \$42,100 | 13.7% |
| Total Portfolio Budget² | \$59,547 | 100% | \$64,991 | 100% | \$66,511 | 100% | \$61,975 | 100% | \$54,483 | 100% | \$307,507 | 100% |
| SWE Cost | \$1,000 | | \$1,000 | | \$1,000 | | \$1,000 | | \$1,000 | | \$5,000 | |

¹ Values in this table are nominal.

² Total values may not equal the sum of all program year or sector values due to rounding.

Table 9. Pa PUC Table 6 – Program Summaries

| Sector | Program | Component Name | Program Market | Program Two-Sentence Summary | Program Years Operated | Compliance MWh-year | Lifetime MWh Savings | Compliance MW-year | Percentage of Portfolio Resource Savings (MWh% and MW%) | |
|--|---------------------------------------|------------------------------|---|--|------------------------|---------------------|----------------------|--------------------|---|------------|
| | | | | | | | | | | |
| Market Rate Residential Programs <i>(exclusive of Low-Income)</i> | Residential Energy Efficiency Program | Energy Efficient Homes | Existing and new residential single family and multifamily homes, though available to small and medium-sized businesses if applicable | Offers rebates and instant discounts on a wide range of energy-efficient measures for retrofit and new construction applications, and Home Energy Reports for all residential. | PY18 - PY22 | 139,890 | 1,256,417 | 19.31 | 13% | 11% |
| | | Appliance Recycling | All customers (primarily residential) | Free pick up and recycling of inefficient appliances including refrigerators, freezers, and room air conditioners. Incentive paid for each eligible appliance. | PY18 - PY22 | 24,880 | 107,867 | 4.91 | 2% | 3% |
| | | Student Education | Residential customers: students and teachers | Energy efficiency education targeting primary and secondary grades, including classroom presentations, curriculum, and energy efficiency kits. | PY18 - PY22 | 3,950 | 27,290 | 0.65 | 0% | 0% |
| | | Persistent Peak Demand | Residential single and multifamily | Includes incentivized and non-incentivized demand response channels such as thermostat optimization, managed electric vehicle charging, and battery storage demand response. | PY18-PY22 | 0 | 0 | 9.00 | 0% | 5% |
| | Business Energy Efficiency Program | Small C&I Business Solutions | Residential customers with business end use such as agricultural use/farms | Offers rebates and incentives on energy efficient farm equipment and upgrades to farms on residential accounts. | PY18 - PY22 | 1,224 | 18,177 | 0.27 | 0% | 0% |
| | Totals for Residential Sector | | | | | | 169,945 | 1,409,751 | 34.14 | 16% |

| Sector | Program | Component Name | Program Market | Program Two-Sentence Summary | Program Years Operated | Compliance MWh-year | Lifetime MWh Savings | Compliance MW-year | Percentage of Portfolio Resource Savings (MWh% and MW%) | |
|---------------------------------|--|------------------------------|--|--|------------------------|---------------------|----------------------|--------------------|---|------------|
| | | | | | | | | | | |
| Residential Low-Income Programs | Resource Constrained Program | Energy Efficient Homes | Income-qualified residential customers | Offers a range of free direct install energy efficiency measures, energy assessments, and health and safety measures to customers whose incomes are at or below 150% of federal poverty income guidelines. | PY18 - PY22 | 62,583 | 654,943 | 8.58 | 6% | 5% |
| | | Appliance Recycling | Income-qualified residential customers | Offers free pick up and recycling of inefficient appliances, including refrigerators, freezers, and room air conditioners for income-eligible customers. Incentive paid for each eligible appliance. | PY18-PY22 | 5,410 | 23,069 | 1.12 | 1% | 1% |
| | | Student Education | Income-qualified residential customers | Offers energy efficiency education targeting income-eligible primary and secondary grades, including classroom presentations, curriculum, and energy efficiency kits. | PY18-PY22 | 7,629 | 52,387 | 1.26 | 1% | 1% |
| | Totals for Low-Income Sector | | | | | | 75,623 | 730,399 | 10.95 | 7% |
| Small C&I Programs | Business Energy Efficiency Program | Small C&I Business Solutions | Small C&I | Provides rebates/incentives for a list of qualified energy efficiency and custom measures not included in PPL Electric Utilities' other programs. Includes equipment, process upgrades, engineering support, and other measures. | PY18 - PY22 | 497,390 | 7,105,706 | 82.08 | 47% | 45% |
| | Residential Energy Efficiency Program | Energy Efficient Homes | Small C&I | Offers Energy Analyzer for all small and medium-sized business customers. | PY18 - PY22 | 0 | 0 | 0.00 | 0% | 0% |
| | | Appliance Recycling | Small C&I | Offers free pick up and recycling of inefficient appliances for eligible C&I customers. | PY18-PY22 | 1,582 | 7,099 | 0.29 | 0% | 0% |
| | Resource Constrained Program | Energy Efficient Homes | C&I owners of multifamily buildings with income-eligible tenants | Offers no cost efficiency improvements to multifamily building owners. | PY18 - PY22 | 384 | 384 | 0.00 | 0% | 0% |
| | Totals for Small C&I Sector | | | | | | 499,356 | 7,113,189 | 82.37 | 47% |

| Sector | Program | Component Name | Program Market | Program Two-Sentence Summary | Program Years Operated | Compliance MWh-year | Lifetime MWh Savings | Compliance MW-year | Percentage of Portfolio Resource Savings (MWh% and MW%) | |
|------------------------------------|------------------------------------|------------------------------|----------------|--|------------------------|--|----------------------|--------------------|---|-------------|
| Large C&I Programs | Business Energy Efficiency Program | Large C&I Business Solutions | Large C&I | Provides rebates/incentives for a list of qualified energy efficiency and custom measures not included in PPL Electric Utilities' other programs. Includes equipment, process upgrades, engineering support, and other measures. | PY18 - PY22 | 321,135 | 4,762,041 | 53.12 | 30% | 29% |
| | | | | | | Totals for Large C&I Sector | | | | |
| Totals for Plan¹ | | | | | | 1,066,059 | 14,015,378 | 180.59 | 100% | 100% |

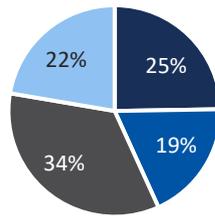
¹ Total values may not equal the sum of all sector or program values due to rounding.

Table 10 shows PPL Electric Utilities' Phase V portfolio budget by sector, as a percentage of the total portfolio budget and as a percentage of PPL Electric Utilities' 2024 revenue and sales.

Table 10. Pa PUC Table 7 - Budget and Parity Analysis Summary

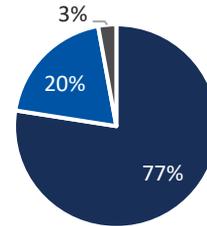
| Customer Sector | Phase V EE&C Budget (inclusive of allocated common cost) | % of Total EDC EE&C Budget | % of EDC Total Annual Revenue ¹ | % of EDC Total MWh Sales ¹ |
|---|--|----------------------------|--|---------------------------------------|
| Residential Sector <i>(exclusive of Low-Income)</i> | \$76,058,365 | 25% | 77% | 39% |
| Residential Low Income Sub-Sector ² | \$56,901,391 | 19% | | |
| Residential Subtotal | \$132,959,756 | 43% | 77% | 39% |
| Small C&I Sector | \$105,934,796 | 34% | 20% | 28% |
| Large C&I Sector | \$68,612,328 | 22% | 3% | 33% |
| Non-Residential Subtotal | \$174,547,124 | 57% | 23% | 61% |
| EDC TOTAL³ | \$307,506,880 | 100% | 100% | 100% |
| EDC TOTAL as Share of Budget Ceiling | 100.0% | | | |

% Budget by Customer Sector



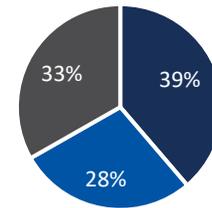
- Residential Sector (exclusive of Low-Income)
- Residential Low Income Sub-Sector
- Small C&I Sector
- Large C&I Sector

% 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

¹ Based on PPL Electric Utilities' 2024 revenue and sales.

² Customers in the Low-Income sector are all customers in the residential customer class. Therefore, the Low-Income sector's figures are included in the Residential part of this table.

³ Total values may not equal the sum of all sector values due to rounding. Budget amounts in this table exclude SWE costs.

3. Program and Component Descriptions

3.1. Process Used for Selection of Programs and Components

PPL Electric Utilities will offer the broadest selection of measures possible for all customer segments through three primary Residential, Business, and Resource Constrained Energy Efficiency Programs. The Residential Energy Efficiency Program will feature incentives that are tiered, based on income, to allow for certain higher incentives for moderate-income customers (151% to 250% of the federal poverty level). This is in addition to fully subsidized measures for customers in the Resource Constrained Energy Efficiency Program (low income: up to 150% of the federal poverty level). The portfolio also provides a new approach to energy efficiency assistance programs that will create a more equitable experience for all customers by allowing income-eligible customers to have access to measures available to standard residential customers, as well as a similar customer journey. This includes a selection of no-cost products through the Company's online marketplace, appliance recycling, student energy efficiency education, and an expanded local contractor network. In addition, the Residential and Resource Constrained Energy Efficiency Programs will be closely coordinated by the selected CSPs to create a portfolio structure that will allow for more efficient and flexible operations and marketing during implementation. The result will be that PPL Electric Utilities' CSPs will reach more customers across all sectors and all income levels, and those customers will have a clearer understanding of energy efficiency offerings, leading to increased participation.

Customers of any sector can take advantage of any eligible measures in the EE&C Plan across programs, with costs to be recovered by the appropriate customer sector. This will allow measures to be applied as needed by the end-use customer, as various residential measures can be useful to business customers and vice versa. This will be an improved and more seamless customer experience. For example, residential customers who own farms can utilize agricultural business measures, and business customers that own multifamily buildings can take advantage of popular residential measures, such as appliance recycling. This approach promotes more comprehensive measure use and provides a more balanced portfolio across customer classes.

PPL Electric Utilities developed separate budgets, targets, and performance objectives for all programs. PPL Electric Utilities will administer, evaluate, and report on program performance at a component level for Residential, Resource Constrained, and Business Energy Efficiency Programs, which will have components separated by customer sector. The remainder of this section provides details on individual programs, program components, and the analysis PPL Electric Utilities conducted to construct its Phase V portfolio.

3.1.1. Portfolio Objectives and Metrics that Define Success

The PPL Electric Utilities Phase V EE&C Plan is designed to meet the requirements set forth by the Public Utility Commission's Phase V Implementation Order. PPL Electric Utilities will monitor progress towards those requirements by tracking and reporting on the implementation data, performing EM&V activities,

and making adjustments as necessary. Table 11 identifies the key portfolio performance indicators PPL Electric Utilities will use to measure success.

Table 11. Key Portfolio Performance Indicators

| Key Indicator | Metrics |
|-----------------------|---|
| Market Response | <ul style="list-style-type: none"> ▪ Participants by customer, trade ally, distributor ▪ Feedback from all market actors ▪ Customer satisfaction based on responses to participant surveys administered as part of EM&V activities |
| Portfolio Performance | <ul style="list-style-type: none"> ▪ kWh/year savings ▪ kW/year savings via measures or demand response |
| Financial Analysis | <ul style="list-style-type: none"> ▪ Expenditures ▪ Acquisition cost (\$/kWh saved)¹ ▪ TRC benefit/cost ratio |

¹ Acquisition cost is the ratio of total EDC expenditures to annual kWh.

3.1.2. Program Design and Construction

PPL Electric Utilities utilized multiple sources of information to develop the programs and program components. This includes Phase IV program evaluations, Pa PUC-provided documentation, including the 2026 Technical Reference Manual Final Order, 2026 Total Resource Cost Test Final Order, and the Market Potential Study. In addition, the Company engaged in extensive external research focused on program design, innovative measures, customer and trade ally perspectives, and territory-specific targeted potential studies. This information was used to determine measure potential within PPL Electric Utilities’ territory, with a focus on comprehensive offerings. Participation was estimated based on internal analysis and costs, within the budget cap. This information was augmented by CSP research and analysis derived through the request for proposal process and resulted in a portfolio design with energy savings and coincident peak demand, with separate demand response, targets by program, set sector budgets, and a wide variety of measures to support the EE&C Plan.

The final portfolio structure and associated measures and activities were evaluated from a technical and economic perspective to meet the Act 129 requirements of income-eligible customer considerations, portfolio-level cost-effectiveness, balanced and equitable offerings for all sectors, and, most importantly, a plan that meets all defined compliance goals for Phase V.

3.1.3. Portfolio Measures

The Company included as many available measures, as per the Pa TRM, as possible, to ensure participation pathways for the maximum number of customers. This includes standard energy efficiency measures, limited combined heat and power (“CHP”), renewables, such as solar photovoltaic (“PV”), and a variety of peak demand load shifting measures. These measures exist within each program,

component, and channel offering. Phase V measures included in PPL Electric Utilities' Phase V Plan can be found in Sections 3.2 through 3.4.

3.1.4. Fuel Switching

PPL Electric Utilities plans to include CHP as the only fuel switching measure in Phase V. The impact of CHP in this Plan is lower than prior phases and is based on Company forecasts and market research for Phase V. CHP is a legacy measure available in prior phases and will benefit select C&I customers, including agricultural customers looking to install CHP digesters to generate electricity and heat. CHP projects must meet program eligibility, including any TRC requirements, to receive incentives.

3.1.5. Non-Act 129 Measure Alignment

The Company plans to offer high-efficiency heat pumps, heat pump water heaters, and other applicable measures that may also be available in other non-Act 129 programs. The Company does not plan to offer additional incentives to encourage customers to switch from fossil fuels to electricity, though customers who install eligible products may apply for incentives. Eligibility requirements for these measures are well defined in the Pa TRM, and we expect external programs to align with these requirements and/or collaborate on ensuring their requirements are not less stringent, which would put participating EDCs at risk of non-compliance. If external programs are available, the Company will work to help customers take advantage of all available incentives, lowering costs for customers and extending the reach of all programs. This coordination is explained throughout various sections of this Plan. If the external implementation vendor provides external incentive levels to the Company, PPL Electric Utilities will track this information accordingly. Details and/or data sharing pathways of some external programs are not yet available at the time of this Plan submission, though the Company is committed to meaningful partnerships that benefit customers. Additional information can be found in Section 4.4.1.

3.1.6. Front-of-the-Meter Measures ("FTM")

As outlined in the Residential Energy Efficiency Pilot section, PPL Electric Utilities will allot up to \$1 million for a conservation voltage reduction pilot. There are no plans to utilize non-Act 129 funding sources for FTM equipment installation. If C&I customers receive benefits based on the circuit, feeder, or other distribution infrastructure utilized, those savings and associated costs will be properly attributed to the correct sector. The pilot will be developed in conjunction with the selected EM&V CSP, with evaluation plans submitted to the Phase V SWE for approval. The goal of the pilot is to create and implement a methodology to reduce energy consumption and peak demand through voltage optimization in front of the meter. The pilot will last up to 24 months. As per the Phase V Implementation Order, savings attributed to the pilot will account for no more than 10% of the total savings of the portfolio. Due to uncertainties around pilot implementation, associated savings were not modeled for this Plan. During and at the conclusion of the pilot(s), the EM&V CSP will include evaluation results as part of the annual reporting process. Further details related to this potential pilot may be found in Section 3, Residential Pilot Programs.

3.1.7. Comprehensive Measure Approach

All programs offered by PPL Electric Utilities are comprehensive in that they provide incentives for most measures found in the Pa TRM, including an array of non-lighting, non-kit options, such as HVAC, solar, water heating, efficient equipment, and appliances. The Company defines comprehensive measures specifically as per the Pa PUC's plan template for residential measures, and the definitions for non-residential comprehensive measures follow a similar methodology. Resource Constrained Energy Efficiency Program customers have access to most measures available to all residential customers, though at no cost, providing this important population with equal access to all measures, including comprehensive measures as defined by the Pa PUC, when income verified. The selected measures may be implemented in all building types, through any existing or new delivery channel, for all sectors for which they are applicable, for both existing and new construction. All programs feature education and technical support, where applicable, designed to encourage customers to implement multiple measures in a holistic manner, to maximize the benefits to their home or business. The Residential Energy Efficiency and Resource Constrained Energy Efficiency Programs will also feature custom measures for the implementation of interim measure protocols and any other existing or new measure that is not found in the Pa TRM, similar to the Business Energy Efficiency Program. This will be supported by marketing and awareness campaigns, online tools, and informational resources that will promote a cost-effective, comprehensive, and satisfying customer energy efficiency journey.

3.1.8. Time of Use

PPL Electric Utilities plans to offer education, communication, and outreach related to available time-of-use ("TOU") programs, if available, to ensure customer awareness and maximum participation. This includes any potential future TOU customer options. The Company's goal is to create a complementary environment for Act 129 offerings and Company TOU rates, though it does not plan to claim savings on TOU at the outset of Phase V. PPL Electric Utilities reserves the right to add TOU participation incentives in Phase V if it will lead to better customer outcomes based on ongoing customer satisfaction and experience measurements.

3.2. Residential Energy Efficiency Program

PPL Electric Utilities' Residential Energy Efficiency Program is an umbrella program with components that will be available for the entirety of Phase V, from 2026 through 2031. The Residential Energy Efficiency Program includes measures for both market-rate (above 250% FPL) and moderate-income customers (151% - 250% FPL) through incentive tiers. The program also includes some measures for multifamily building owners, who are part of the small C&I customer sector. Table 12 shows the percentages of the customer sector budgets represented by the Residential Energy Efficiency Program.

Table 12. Percentages of Customer Sector Budgets Represented by the Residential Energy Efficiency Program

| Customer Sector | Percentage of Sector Budget |
|----------------------|-----------------------------|
| Residential | 99.7% |
| Resource Constrained | 0% |
| Small C&I | 1.9% |
| Large C&I | 0% |

The Residential Energy Efficiency Program has a cost-effective TRC, as shown in Table 56. Table 13 includes the components of the Residential Energy Efficiency Program and summarizes their expected savings by year and as a share of the total program.

Table 13. Residential Energy Efficiency Program Savings by Component and Program Year

| Component | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total Phase V | % of Program |
|----------------------------|-------------------------------|--------|--------|--------|--------|--------|---------------|--------------|
| Energy Efficient Homes | Energy Savings (1st year MWh) | 35,461 | 34,747 | 33,743 | 18,415 | 17,524 | 139,890 | 82% |
| | Summer Demand Reduction (MW) | 4.52 | 4.47 | 4.37 | 2.65 | 2.59 | 18.61 | 57% |
| | Winter Demand Reduction (MW) | 4.29 | 4.17 | 4.04 | 2.27 | 2.13 | 16.90 | 56% |
| | Average Demand Reduction (MW) | 4.41 | 4.32 | 4.21 | 2.46 | 2.36 | 17.75 | 57% |
| Appliance Recycling | Energy Savings (1st year MWh) | 5,664 | 5,355 | 5,353 | 5,045 | 5,044 | 26,462 | 16% |
| | Summer Demand Reduction (MW) | 1.80 | 1.69 | 1.69 | 1.57 | 1.57 | 8.32 | 25% |
| | Winter Demand Reduction (MW) | 0.25 | 0.25 | 0.25 | 0.25 | 0.25 | 1.24 | 4% |
| | Average Demand Reduction (MW) | 1.03 | 0.97 | 0.97 | 0.91 | 0.91 | 4.78 | 15% |
| Student Energy Education | Energy Savings (1st year MWh) | 933 | 933 | 695 | 695 | 695 | 3,950 | 2% |
| | Summer Demand Reduction (MW) | 0.11 | 0.11 | 0.08 | 0.08 | 0.08 | 0.46 | 1% |
| | Winter Demand Reduction (MW) | 0.18 | 0.18 | 0.13 | 0.13 | 0.13 | 0.74 | 2% |
| | Average Demand Reduction (MW) | 0.14 | 0.14 | 0.11 | 0.11 | 0.11 | 0.60 | 2% |
| Persistent Demand Response | Energy Savings (1st year MWh) | - | - | - | - | - | - | 0% |
| | Summer Demand Reduction (MW) | 5.45 | 5.45 | 5.45 | 5.45 | 5.45 | 5.45 | 17% |
| | Winter Demand Reduction (MW) | 11.10 | 11.10 | 11.10 | 11.10 | 11.10 | 11.10 | 37% |

| | | | | | | | | |
|----------------------------------|-------------------------------|---------------|---------------|---------------|---------------|---------------|----------------|-------------|
| | Average Demand Reduction (MW) | 8.27 | 8.27 | 8.27 | 8.27 | 8.27 | 8.27 | 26% |
| Total Program¹ | Energy Savings (1st year MWh) | 42,058 | 41,035 | 39,791 | 24,155 | 23,263 | 170,302 | 100% |
| | Summer Demand Reduction (MW) | 11.88 | 11.71 | 11.58 | 9.75 | 9.69 | 32.83 | 100% |
| | Winter Demand Reduction (MW) | 15.81 | 15.70 | 15.52 | 13.75 | 13.61 | 29.98 | 100% |
| | Average Demand Reduction (MW) | 13.85 | 13.70 | 13.55 | 11.75 | 11.65 | 31.40 | 100% |

¹ Total values may not equal the sum of all program year or component values due to rounding.

Program and Component Operations and Administration

The selected Residential CSP will provide operational management, administrative support, and implementation activities, while PPL Electric Utilities EE&C staff will provide oversight and administration of all programs and components.

Estimated Program Budget

Table 14 shows the estimated budget by year for the Residential Energy Efficient Program, divided by incentive and non-incentive costs.

Table 14. Pa PUC Table 10 – Residential Energy Efficient Program Budget by Year

| Cost Element | | PY18 | PY19 | PY20 | PY21 | PY22 | Phase V Total ¹ |
|---|----------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|----------------------------|
| Total Budget (\$000) | | \$13,221 | \$13,573 | \$13,869 | \$13,303 | \$13,588 | \$67,554 |
| Incentives (\$000)² | Rebates | \$3,860 | \$3,943 | \$4,032 | \$4,146 | \$4,244 | \$20,226 |
| | Upstream/Midstream Buydown | \$404 | \$468 | \$505 | \$521 | \$536 | \$2,434 |
| | Kits | \$516 | \$537 | \$521 | \$541 | \$558 | \$2,673 |
| | Direct Install Materials & Labor | \$931 | \$931 | \$931 | \$931 | \$931 | \$4,655 |
| | Incentive Total | \$5,711 | \$5,879 | \$5,989 | \$6,139 | \$6,268 | \$29,987 |
| Non-Incentives (\$000)³ | Program Design | \$296 | \$302 | \$308 | \$270 | \$274 | \$1,451 |
| | Administrative | \$2,224 | \$2,265 | \$2,306 | \$2,041 | \$2,069 | \$10,905 |
| | EDC Delivery Costs | \$207 | \$210 | \$214 | \$190 | \$192 | \$1,013 |
| | CSP Delivery Fees | \$3,895 | \$4,009 | \$4,127 | \$3,853 | \$3,961 | \$19,846 |
| | Marketing | \$652 | \$665 | \$678 | \$594 | \$603 | \$3,192 |
| | Other ⁴ | \$237 | \$242 | \$246 | \$216 | \$219 | \$1,161 |
| | Non-Incentive Total | \$7,510 | \$7,693 | \$7,880 | \$7,164 | \$7,320 | \$37,567 |
| Percent Incentives | | 43% | 43% | 43% | 46% | 46% | 44% |

¹Total values may not equal the sum of all program year values due to rounding.

²Braided Funding Support Labor costs are not included in this table because they are estimated to be \$0.

³EM&V and AEPS Registration Support Costs are not included in this table because AEPS Registration Support Costs are estimated to be \$0 and EM&V costs are included as portfolio costs.

⁴Indirect CSP Delivery Costs, e.g., fleet vehicles, subscriptions, IT.

Schedule and Milestones for Program and All Components

For all program components, the schedule and milestones include submission of the Company’s EE&C Plan on December 1, 2025, launch of Phase V on June 1, 2026, semi-annual reports submitted annually starting on January 15, 2027, annual reports submitted annually starting on September 30, 2027, and the end of all components at the end of the phase on May 31, 2031.

Program and Component EM&V

All EM&V requirements for all program components will be detailed in PPL Electric Utilities’ Evaluation plan, submitted to the SWE for review. The Company and third-party EM&V CSP will conduct an evaluation on an annual basis for each program and component to verify savings and establish other key performance indicators, such as incentive costs, administrative costs, and participation. The EM&V CSP will follow all applicable methods in the Pa TRM and the Evaluation Framework to calculate energy savings and coincident peak demand reduction. PPL Electric Utilities’ impact and process evaluation activities will vary by year and program component.

Energy Efficient Homes Component

Description

There are four primary delivery channels within the Energy Efficient Homes component. These include the following:

- **New Construction** – This channel provides incentives to either builders or customers for newly constructed single or multifamily homes that exceed existing energy efficiency codes and standards. New for this component is an all-electric tier, which offers increased incentives for all-electric homes. This approach builds on our high-performance pilot in Phase IV.
- **Home Rebates** – Home Rebates channel provides midstream and downstream rebates for efficient HVAC equipment, solar, water heating, appliances, and more. This channel is supported by in-home and remote audits that provide valuable education and recommendations to help customers take advantage of multiple comprehensive rebate opportunities. Comprehensive measures are defined by the Commission in the provided EE&C plan Template Tables Workbook.
- **Instant Discount** – The Instant Discounts channel offers point-of-sale and online marketplace discounts on a variety of energy efficiency products.

Home Energy Reports – Customers will receive email reports, appliance disaggregation, education, and other program recommendations. Paper reports may be used if determined by the Company to be necessary and/or beneficial for the customer. All residential and small- and medium-sized businesses will also be provided with an Energy Analyzer, an online web tool for bill analysis and education. All Home Energy Report offerings will be updated to remove a similar home comparison. This is the result of customer feedback and a goal to make the reports more customer-friendly and educational.

Objective and Target Market

The goal of the Energy Efficient Homes component is to promote the adoption and/or use of efficient buildings, products, and appliances in existing and new residential-use buildings to achieve the gross verified energy and coincident peak demand savings goals shown in Table 13. The Energy Efficient Homes component is designed to target residential homebuilders, all residential sector customers, and commercial and industrial customers that may benefit from residential end-use measures. This component is available to the 1.5 million customers in the PPL Electric Utilities territory who meet eligibility requirements.

Ramp-up and Implementation Strategy

Energy Efficient Homes maintains and enhances existing channels, which will require little ramp-up. Implementation activities continued through the end of Phase IV and will be carried over, supported by marketing and awareness campaigns to create a seamless transition to the new phase. The Energy Efficient Homes component will continue to be delivered by the selected Residential Energy Efficiency Program CSP. The CSP will also operate a customer call center, provide program component marketing and awareness campaigns, process customer incentives, and provide data for the Company's tracking system. PPL Electric Utilities will provide overall strategic direction, administration, and CSP management. The implementation strategy will vary by channel:

- **New Construction** – The CSP will identify, recruit, and educate builders within the EDC territory, provide technical assistance, quality assurance, and control, and issue incentives to builders and homeowners. The CSP will prioritize the creation of all-electric homes with additional incentives for builders.
- **Home Rebates** – The CSP will partner with distributors, trade allies, and manufacturers to promote energy-efficient equipment, products, and services available through the Residential Energy Efficiency Program with both a downstream and midstream approach. The Company will leverage existing partnerships and build new relationships with market actors in PPL Electric Utilities' service territory. PPL Electric Utilities will offer a rebate portal and application process for customers to take advantage of available measure offerings. This channel includes these other features:
 - *PPL Heat Pump Installer Program* – PPL Electric Utilities will offer an enhanced trade ally network component focused on heat pump adoption, proper sizing, and correct installation, as well as promoting other comprehensive program offerings. PPL Electric Utilities may provide basic annual heat pump training, offer training incentives to promote workforce development, and highlight external workforce funding if available. Both customers and contractors who utilize a Heat Pump Installer for their HVAC or water heater project may receive an additional incentive.
 - *Financing Options* – A key hurdle to deeper measure adoption is the initial costs. While energy efficiency incentives can reduce this burden, financing the remaining costs can increase program participation of moderate-income customers. The selected CSP will provide non-utility, third-party financing options for eligible customers.
 - *Moderate Income Tier* – Prior phase participation indicated less participation among moderate-income customers. To support customers who are not eligible for traditional income-eligible programs and may not be able to afford energy efficiency measures, the Company will offer higher incentives on select measures for qualified customers up to 250% of FPL. The Company may change eligibility of this offering, including income eligibility, based on customer need or available funding.
 - *Outreach and Events Team* – The Company will launch a dedicated outreach team to support program CSPs by attending local and community events, such as fairs, conferences,

representative constituent events, business events, and other opportunities to engage with customers directly. The outreach team will support all programs, including Residential Energy Efficiency.

- **Instant Discount** – The CSP will offer customers the opportunity to purchase a variety of eligible efficient products and services through a virtual storefront. In addition, the CSP may offer select point-of-sale rebates on eligible products through point-of-sale retailers.
- **Home Energy Reports** – The CSP will provide custom reports via email on a cadence determined by PPL Electric Utilities to promote energy-efficient behaviors through education, energy usage insights, appliance usage information, and energy cost information. Paper reports may be used if determined by the Company to be necessary and/or beneficial for customers. The reports will also include energy efficiency program recommendations. Customers will also have access to Energy Analyzer, an interactive web tool.

Marketing Strategy

PPL Electric Utilities and current CSPs have deep knowledge of the territory, customer demographics, and industry trends. The marketing strategy will leverage this base and take an adaptive and evolving approach that meets customers' and market actors' needs throughout Phase V. The Company will work with the selected CSP to create a detailed marketing plan that will define the audience, select tactics, employ targeting, and execute campaigns based on industry standards, various research, and historical program data. Successful marketing approaches may include, but will not be limited to, print and email outreach, Company and CSP web assets, social media, regional and national industry partnerships, trade ally, builder, and retailer engagement, point of purchase displays and materials, bill inserts, newsletters, conferences, and events.

- **Underserved Customers** – The Company will offer a variety of new services to ensure underserved customers have an opportunity to participate in the Residential Energy Efficiency Program. This includes a moderate-income tier and financing options, as described above in the Ramp-up and Implementation Strategy section. In addition, a dedicated outreach team will provide a community presence that will create additional program visibility.
- **Multifamily Buildings** – This program component is not contingent on housing type; both homeowners and tenants in all housing types are eligible. Marketing and communication efforts will target the wider population of PPL Electric Utilities' customers, which includes tenants.
- **Coordination** – The Company plans to utilize a single CSP, with qualified subcontractors to administer the portfolio of programs, which reduces barriers to coordination and ensures a high level of visibility across all offerings. This will allow cross-program participation where eligibility allows, as well as a clear understanding of coordination impacts. All programs will be cross-marketed and/or promoted whenever possible to ensure customers take advantage of all options for which they are eligible. For this component, cross-promotion may include recommendations during assessments, dual-purpose email, webinars, in-person events through the community field team, and other similar opportunities to educate customers.

Issues, Risks, and Risk Management

Table 15 shows risks associated with Energy Efficient Homes and how the Company intends to mitigate those risks.

Table 15. Energy Efficient Homes Issues, Risks, and Risk Management Strategies

| Delivery Channels Affected | Issue/Risk | Risk Management Strategies |
|---------------------------------|---|--|
| New Construction, Home Rebates | Component awareness – Market actors and/or customers do not take advantage of the component, impacting savings. | The CSP will use targeted messaging that appeals to the specific needs of customers to encourage participation. The Company will support this through broad awareness campaigns. |
| New Construction, Home Rebates | Equipment/Product Costs – Heat pumps, insulation, and other key measures have higher costs that may be impacted by inflation. | The Company and CSP will focus incentive budgets to reduce incremental costs and educate customers on long-term benefits. In addition, the CSP will provide third-party financing recommendations. |
| Home Rebates | Low participation for moderate-income customers. | The Company and CSP will offer a moderate-income tier with higher incentives on select measures for qualified customers. |
| Home Rebates, Instant Discounts | Income-qualifying moderate-income customers. | The Company will work with the selected CSP to develop an online qualification tool for customers in this category. |
| New Construction, Home Rebates | Potential changes to codes and standards, including changes to ENERGY STAR. | The Company will follow all SWE guidance to ensure appropriate eligibility of products. The Company and CSP will also proactively communicate with customers, where appropriate. |
| Home Energy Reports | Customer experience – Behavioral programs are mature, and the satisfaction and/or effectiveness may wane over time. | The Company and CSP will vary the content and customize reports. In addition, an Energy Analyzer web tool will enhance the experience. The Company will also remove similar home comparisons. |

Energy Efficient Homes: Eligible Measures and Incentives

Table 16 shows PPL Electric Utilities' initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. The cost to the customer for participation varies by measure type. The cost to participating customers is the incremental cost, less the incentive amount.

Incentives were determined based on the service or product incremental cost and the most cost-effective incentive range to ensure customer participation. All incentive levels are designed to comply with the Pa PUC's plan template and Phase V Implementation Order. Not all measures may be available at all times, and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company. In addition, all measures available to customers may be delivered via any available channel to meet the customer's unique needs.

Table 16. Pa PUC TABLE 8 – Residential Energy Efficient Homes Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|---|
| LED Lighting - GSL | Per Bulb | No | No | LED | \$4 | 15 | Up to \$25 |
| Nightlight | Per Product | No | No | LED | \$2 | 8 | Up to \$25 |
| Air Source Heat Pump | Per Product | No | Yes | ENERGY STAR, min. 16 SEER | \$2,903 | 15 | Up to \$2,000 |
| Central Air Conditioner | Per Product | No | Yes | ENERGY STAR, min. 16 SEER | \$2,763 | 15 | Up to \$1,000 |
| Ground Source Heat Pump | Per Project | No | Yes | New system following ENERGY STAR HVAC Quality Installation procedures | \$3,509 | 15 | Up to \$8,000 |
| Packaged Terminal Heat Pump/AC | Per Product | No | Yes | ENERGY STAR or equivalent | \$753 | 15 | Up to \$1,000 |
| Central Air Conditioner, Midstream | Per Product | No | Yes | ENERGY STAR, min. 16 SEER | \$2,763 | 15 | Up to \$1,000 |
| Air Source Heat Pump, Midstream | Per Product | No | Yes | ENERGY STAR, min. 16 SEER | \$5,123 | 15 | Up to \$1,000 |
| Packaged Terminal Heat Pump/AC, Midstream | Per Product | No | Yes | ENERGY STAR or equivalent | \$753 | 15 | Up to \$1,000 |
| Ductless Heat Pump | Per Product | No | Yes | ENERGY STAR | \$538 | 15 | Up to \$1,000 |
| ECM Circulation Fans | Per Product | No | No | Replaces low-efficiency permanent split capacitor fan motor | \$353 | 5 | Up to \$1,000 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|-----------------------------------|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|---|
| GSHP Desuperheaters | Per Product | No | No | Installation on new or existing Ground Source Heat Pump | \$2,260 | 15 | Up to \$1,000 |
| Maintenance - Heat Pump/AC | Per Project | No | No | Professional system tune-up | \$141 | 3 | Up to \$500 |
| Room Air Conditioner | Per Product | No | Yes | ENERGY STAR | \$95 | 9 | Up to \$250 |
| Window Heat Pump | Per Product | No | Yes | Existing electric, non-heat pump heating | \$2,455 | 9 | Up to \$1,000 |
| Duct Sealing & Duct Insulation | Per Project | No | Yes | All accessible duct work sealed throughout the unconditioned and semi-conditioned space in the home. | \$1,684 | 15 | Up to \$6,000 |
| Air Handler Filter Whistles | Per Product | No | No | Applied to central forced-air furnaces, CAC, or heat pump systems | \$5 | 5 | Up to \$25 |
| ENERGY STAR Connected Thermostats | Per Product | No | No | ENERGY STAR | \$168 | 9 | Up to \$250 |
| Furnace Maintenance | Per Product | No | No | Professional system tune-up | \$141 | 3 | Up to \$2,000 |
| ENERGY STAR Bathroom Exhaust Fan | Per Product | No | No | ENERGY STAR | \$312 | 15 | Up to \$100 |
| Heat Pump Water Heater | Per Product | No | Yes | ENERGY STAR | \$920 | 10 | Up to \$1,000 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---------------------------------------|-------------|--------------------|--|---|----------------------------|-----------------------|---|
| Solar Water Heater | Per Product | No | Yes | Existing electric water heater | \$1,111 | 15 | Up to \$1,000 |
| Water Heater Tank Wrap | Per Project | No | No | Installation of R-8 wrap insulation to existing electric water heater with R-24 or less | \$89 | 7 | Up to \$50 |
| Water Heater Temperature Setback | Per Product | No | No | Electric water heater | \$12 | 2 | Up to \$50 |
| Water Heater Pipe Insulation | Per Foot | No | No | ≥ R-3, unconditioned space, electric water heater | \$5 | 11 | Up to \$50 |
| Low-Flow Faucet Aerator | Per Product | No | No | ≤ 1.5 GPM flow rate, homes with electric water heater | \$24 | 10 | Up to \$50 |
| Low-Flow Showerhead | Per Product | No | No | Replaces standard showerhead, homes with electric water heater | \$65 | 10 | Up to \$50 |
| Thermostatic Shower Restriction Valve | Per Product | No | No | Electric water heat | \$42 | 15 | Up to \$50 |
| Drain Water Heat Recovery Unit | Per Product | No | No | Electric water heat | \$735 | 15 | Up to \$4,000 |
| Smart Water Heater Controls | Per Product | No | No | Electric resistance or heat pump storage water heaters | \$156 | 11 | Up to \$1,000 |
| ENERGY STAR Refrigerator | Per Product | No | Yes, if paired with other comprehensive measures | ENERGY STAR | \$395 | 14 | Up to \$1,000 |
| ENERGY STAR Freezers | Per Product | No | Yes, if paired with other | 15% more efficient than federal standard | \$39 | 11 | Up to \$1,000 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|----------------------------|-------------|--------------------|--|---|----------------------------|-----------------------|---|
| | | | comprehensive measures | | | | |
| ENERGY STAR Cooler | Per Product | No | Yes, if paired with other comprehensive measures | 10 - 30% more efficient than minimum federal standard | \$281 | 14 | Up to \$1,000 |
| Induction Cooktop | Per Product | No | No | Replaces electric range/cooktop | \$1,087 | 15 | Up to \$4,000 |
| ENERGY STAR Clothes Washer | Per Product | No | Yes, if paired with other comprehensive measures | ENERGY STAR | \$36 | 14 | Up to \$2,000 |
| ENERGY STAR Clothes Dryer | Per Product | No | Yes, if paired with other comprehensive measures | ENERGY STAR | \$718 | 14 | Up to \$2,000 |
| ENERGY STAR Dishwasher | Per Product | No | Yes, if paired with other comprehensive measures | ENERGY STAR | \$79 | 10 | Up to \$2,000 |
| ENERGY STAR Dehumidifier | Per Product | No | Yes, if paired with other comprehensive measures | ENERGY STAR | \$618 | 12 | Up to \$1,000 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|---|
| ENERGY STAR Ceiling Fan | Per Product | No | No | ENERGY STAR | \$488 | 10 | Up to \$2,000 |
| ENERGY STAR Air Purifier | Per Product | No | No | ENERGY STAR | \$49 | 9 | Up to \$100 |
| Advanced Power Strips | Per Product | No | No | Tier 1 or Tier 2 | \$57 | 5 | Up to \$50 |
| Air Sealing | Per Project | No | Yes | Pre- and post-blower door test. \geq 10% improvement. Primary electric heating or central air conditioning. | \$286 | 15 | Up to \$1,000 |
| Weather Stripping, Caulking and Outlet Gaskets - Direct Install | Per Project | No | No | Exterior doors, exterior windows, unconditioned attic hatches/door, or plumbing/electrical penetrations on exterior walls | \$300 | 15 | Up to \$100 |
| Weather Stripping, Caulking and Outlet Gaskets - Kit Delivery | Per Foot | No | No | Weather stripping for exterior door and exterior windows and outlet gaskets | \$1 | 15 | Up to \$50 |
| Ceiling/Attic Insulation | Per SQ Ft | No | Yes | The existing R-value \leq R-30. Final R-value must be \geq R-49, primary electric heat. Rebate cannot exceed the cost of the measure | \$4 | 15 | Up to \$100 |
| Wall Insulation | Per SQ Ft | No | Yes | R-11 Minimum | \$4 | 15 | Up to \$100 |
| Floor Insulation | Per SQ Ft | No | Yes | R-value of R-30 or higher, except for homes in IECC Climate Zone 4, where R-19 is permissible. | \$3 | 15 | Up to \$100 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-----------------|--------------------|---------------------------|---|----------------------------|-----------------------|---|
| Rim Joist Insulation | Per SQ Ft | No | Yes | Minimum R-10 continuous insulated sheathing on the interior or exterior of the home or R-13 cavity insulation at the interior of the rim joist. | \$4 | 15 | Up to \$100 |
| Basement or Crawl Space Wall Insulation | Per SQ Ft | No | Yes | Climate Zone 4: R-10 or higher continuous insulation or R-13 cavity insulation Climate Zone 5: R-15 of higher continuous insulation or R-19 cavity insulation; or R-13 cavity insulation and R-5 continuous insulation | \$4 | 15 | Up to \$100 |
| ENERGY STAR Windows | Per SQFT | No | Yes | ENERGY STAR | \$52 | 15 | Up to \$500 |
| Whole Home | Per Home | No | Yes | New construction, > 10% UBC | \$6,912 | 15 | Up to \$10,000 |
| ENERGY STAR Manufactured Homes | Per Home | No | Yes | ENERGY STAR | \$1,985 | 15 | Up to \$5,000 |
| Home Energy Reports | Per Participant | No | No | Residential sector with available energy usage and billing data | \$0 | 3 | Not applicable |
| ENERGY STAR Pool Pump | Per Product | No | No | ENERGY STAR | \$404 | 10 | Up to \$1,000 |
| Single Speed Pool Pump Replacement | Per Product | No | No | Replaces single speed pump | \$436 | 3.3 | Up to \$1,000 |
| Residential PV Solar | Per Project | No | Yes, if paired with other | ≤ 50kW AC systems with interconnection agreement | \$2,720 | 15 | Up to \$1,500 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|------------------------|--------------------------------------|----------------------------|-----------------------|---|
| | | | comprehensive measures | | | | |
| ENERGY STAR Pool Pump Pressure Cleaner Booster | Per Product | No | No | ENERGY STAR | \$64 | 10 | Up to \$100 |
| Bonus for participation across multiple measures | Per Project | No | Yes | Eligible product combination | \$0 | 1 | Up to \$1,000 |
| Heat Pump Installer Rebate | Per Product | No | No | Eligible product | \$0 | 1 | Up to \$1,000 |
| In-Home Audit | Per Project | No | No | Home has primary electric heat or AC | \$450 | 1 | Up to \$1,000 |

Deadline for Rebate Applications

All rebate and program applications must be associated with projects, installations, or treatments completed between June 1, 2026, and May 31, 2031. Applications must be submitted within 180 days of installation for all measures except comprehensive measures, as defined by the Commission in the plan template, though it will also include solar installations. The rebate application deadline for these measure categories may be extended up to 365 days due to potential delays from issues like supply chain changes, to allow time for proper documentation, or quality control and assurance activities. PPL Electric Utilities, at its discretion, may allow customers to request project preapproval to lock in the stipulated incentive level and guarantee project funding or approve any rebate application that exceeds application deadlines to ensure customer satisfaction. Final program year rebate applications must be submitted by May 31, 2031.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one full-time employee ("FTE"), plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include 25 FTEs. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 17 shows the participation, energy savings, and coincident peak demand estimates for the Energy Efficient Homes component. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

Table 17. Pa PUC Table 9 – Residential Energy Efficient Homes Estimated Savings and Participation

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-------------------------|-------------------------|--------------------------------------|----------|----------|----------|----------|----------|--------------------|
| LED Lighting - GSL | 2.1.1 | Energy Savings (MWh) | 340.55 | 340.55 | 340.55 | 340.55 | 340.55 | 1,702.76 |
| | | Summer Demand Reduction (MW) | 0.0403 | 0.0403 | 0.0403 | 0.0403 | 0.0403 | 0.2013 |
| | | Winter Demand Reduction (MW) | 0.0403 | 0.0403 | 0.0403 | 0.0403 | 0.0403 | 0.2013 |
| | | Projected Participation ² | 21,390 | 21,390 | 21,390 | 21,390 | 21,390 | 106,950 |
| Nightlight | 2.1.3 | Energy Savings (MWh) | 82.66 | 82.66 | 82.66 | 82.66 | 82.66 | 413.30 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 20,005 | 20,005 | 20,005 | 20,005 | 20,005 | 100,025 |
| Air Source Heat Pump | 2.2.1 | Energy Savings (MWh) | 1,723.01 | 1,723.01 | 1,615.33 | 1,615.33 | 1,618.73 | 8,295.41 |
| | | Summer Demand Reduction (MW) | 0.1153 | 0.1153 | 0.1081 | 0.1081 | 0.1090 | 0.5559 |
| | | Winter Demand Reduction (MW) | 0.0290 | 0.0290 | 0.0272 | 0.0272 | 0.0282 | 0.1404 |
| | | Projected Participation | 800 | 800 | 750 | 750 | 752 | 3,852 |
| Central Air Conditioner | 2.2.1 | Energy Savings (MWh) | 309.34 | 309.34 | 284.92 | 305.27 | 293.06 | 1,501.95 |
| | | Summer Demand Reduction (MW) | 0.1842 | 0.1842 | 0.1697 | 0.1818 | 0.1745 | 0.8943 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 760 | 760 | 700 | 750 | 720 | 3,690 |
| Ground Source Heat Pump | 2.2.1 | Energy Savings (MWh) | 21.50 | 21.50 | 21.50 | 21.50 | 21.50 | 107.50 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0062 | 0.0062 | 0.0062 | 0.0062 | 0.0062 | 0.0310 |
| | | Projected Participation | 8 | 8 | 8 | 8 | 8 | 40 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| Packaged Terminal Heat Pump/AC | 2.2.1 | Energy Savings (MWh) | 0.58 | 0.58 | 0.58 | 0.58 | 0.58 | 2.90 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 |
| | | Projected Participation | 2 | 2 | 2 | 2 | 2 | 10 |
| Central Air Conditioner, Midstream | 2.2.2 | Energy Savings (MWh) | 16.80 | 33.60 | 50.39 | 83.99 | 134.39 | 319.17 |
| | | Summer Demand Reduction (MW) | 0.0091 | 0.0182 | 0.0273 | 0.0454 | 0.0727 | 0.1727 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 50 | 100 | 150 | 250 | 400 | 950 |
| Air Source Heat Pump, Midstream | 2.2.2 | Energy Savings (MWh) | 53.84 | 107.69 | 161.53 | 215.38 | 269.22 | 807.66 |
| | | Summer Demand Reduction (MW) | 0.0036 | 0.0072 | 0.0108 | 0.0144 | 0.0180 | 0.0541 |
| | | Winter Demand Reduction (MW) | 0.0009 | 0.0018 | 0.0027 | 0.0036 | 0.0045 | 0.0136 |
| | | Projected Participation | 25 | 50 | 75 | 100 | 125 | 375 |
| Packaged Terminal Heat Pump/AC, Midstream | 2.2.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.94 | 0.94 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 4 | 4 |
| Ductless Heat Pump | 2.2.3 | Energy Savings (MWh) | 3,477.46 | 3,477.46 | 3,477.46 | 3,477.46 | 3,284.26 | 17,194.09 |
| | | Summer Demand Reduction (MW) | 0.2470 | 0.2470 | 0.2470 | 0.2470 | 0.2333 | 1.2215 |
| | | Winter Demand Reduction (MW) | 0.0620 | 0.0620 | 0.0620 | 0.0620 | 0.0585 | 0.3064 |
| | | Projected Participation | 1,800 | 1,800 | 1,800 | 1,800 | 1,700 | 8,900 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| ECM Circulation Fans | 2.2.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.48 | 0.48 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 3 | 3 |
| GSHP Desuperheaters | 2.2.5 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.52 | 0.52 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Maintenance - Heat Pump/AC | 2.2.6 | Energy Savings (MWh) | 1.29 | 1.29 | 1.29 | 1.29 | 1.29 | 6.43 |
| | | Summer Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0011 |
| | | Winter Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0008 |
| | | Projected Participation | 6 | 6 | 6 | 6 | 6 | 30 |
| Room Air Conditioner | 2.2.7 | Energy Savings (MWh) | 7.99 | 7.99 | 7.99 | 7.99 | 7.99 | 39.96 |
| | | Summer Demand Reduction (MW) | 0.0142 | 0.0142 | 0.0142 | 0.0142 | 0.0142 | 0.0712 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 895 | 895 | 895 | 895 | 895 | 4,475 |
| Window Heat Pump | 2.2.9 | Energy Savings (MWh) | 14.88 | 14.88 | 14.88 | 14.88 | 14.88 | 74.39 |
| | | Summer Demand Reduction (MW) | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0105 |
| | | Winter Demand Reduction (MW) | 0.0941 | 0.0941 | 0.0941 | 0.0941 | 0.0941 | 0.4705 |
| | | Projected Participation | 35 | 35 | 35 | 35 | 35 | 175 |
| Duct Sealing & Duct Insulation | 2.2.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 2.11 | 2.11 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0006 | 0.0006 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-----------------------------------|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| | | Projected Participation | 0 | 0 | 0 | 0 | 3 | 3 |
| Air Handler Filter Whistles | 2.2.11 | Energy Savings (MWh) | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| ENERGY STAR Connected Thermostats | 2.2.12 | Energy Savings (MWh) | 1,298.46 | 1,298.46 | 1,298.46 | 1,298.46 | 1,298.46 | 6,492.28 |
| | | Summer Demand Reduction (MW) | 0.2504 | 0.2504 | 0.2504 | 0.2504 | 0.2504 | 1.2519 |
| | | Winter Demand Reduction (MW) | 0.1612 | 0.1612 | 0.1612 | 0.1612 | 0.1612 | 0.8062 |
| | | Projected Participation | 6,625 | 6,625 | 6,625 | 6,625 | 6,625 | 33,125 |
| Furnace Maintenance | 2.2.13 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Bathroom Exhaust Fan | 2.2.14 | Energy Savings (MWh) | 1.09 | 1.09 | 1.09 | 1.09 | 1.12 | 5.46 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0007 |
| | | Winter Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0008 |
| | | Projected Participation | 15 | 15 | 15 | 15 | 16 | 76 |
| Heat Pump Water Heater | 2.3.1 | Energy Savings (MWh) | 802.62 | 839.64 | 910.72 | 983.28 | 1,054.36 | 4,590.63 |
| | | Summer Demand Reduction (MW) | 0.1046 | 0.1094 | 0.1186 | 0.1281 | 0.1373 | 0.5980 |
| | | Winter Demand Reduction (MW) | 0.1742 | 0.1822 | 0.1977 | 0.2134 | 0.2288 | 0.9963 |
| | | Projected Participation | 542 | 567 | 615 | 664 | 712 | 3,100 |
| | 2.3.2 | Energy Savings (MWh) | 31.44 | 51.09 | 62.89 | 76.64 | 78.61 | 300.67 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Solar Water Heater | | Summer Demand Reduction (MW) | 0.0036 | 0.0059 | 0.0073 | 0.0089 | 0.0091 | 0.0348 |
| | | Winter Demand Reduction (MW) | 0.0061 | 0.0098 | 0.0121 | 0.0148 | 0.0151 | 0.0579 |
| | | Projected Participation | 16 | 26 | 32 | 39 | 40 | 153 |
| Water Heater Tank Wrap | 2.3.3 | Energy Savings (MWh) | 17.47 | 17.47 | 17.47 | 17.47 | 17.47 | 87.33 |
| | | Summer Demand Reduction (MW) | 0.0020 | 0.0020 | 0.0020 | 0.0020 | 0.0020 | 0.0099 |
| | | Winter Demand Reduction (MW) | 0.0033 | 0.0033 | 0.0033 | 0.0033 | 0.0033 | 0.0166 |
| | | Projected Participation | 125 | 125 | 125 | 125 | 125 | 625 |

| | | | | | | | | |
|----------------------------------|-------|------------------------------|----------|----------|----------|----------|----------|------------------|
| Water Heater Temperature Setback | 2.3.4 | Energy Savings (MWh) | 244.05 | 244.05 | 244.05 | 244.05 | 244.05 | 1,220.23 |
| | | Summer Demand Reduction (MW) | 0.0260 | 0.0260 | 0.0260 | 0.0260 | 0.0260 | 0.1299 |
| | | Winter Demand Reduction (MW) | 0.0434 | 0.0434 | 0.0434 | 0.0434 | 0.0434 | 0.2169 |
| | | Projected Participation | 2,225 | 2,225 | 2,225 | 2,225 | 2,225 | 11,125 |
| Water Heater Pipe Insulation | 2.3.5 | Energy Savings (MWh) | 3,259.77 | 3,154.90 | 2,997.59 | 2,735.41 | 2,211.05 | 14,358.71 |
| | | Summer Demand Reduction (MW) | 0.3441 | 0.3330 | 0.3163 | 0.2884 | 0.2327 | 1.5144 |
| | | Winter Demand Reduction (MW) | 0.5670 | 0.5485 | 0.5206 | 0.4742 | 0.3813 | 2.4915 |
| | | Projected Participation | 318,015 | 308,015 | 293,015 | 268,015 | 218,015 | 1,405,075 |
| Low-Flow Faucet Aerator | 2.3.6 | Energy Savings (MWh) | 164.51 | 155.89 | 147.28 | 138.66 | 121.43 | 727.76 |
| | | Summer Demand Reduction (MW) | 0.0742 | 0.0704 | 0.0666 | 0.0628 | 0.0552 | 0.3291 |
| | | Winter Demand Reduction (MW) | 0.2168 | 0.2055 | 0.1943 | 0.1830 | 0.1604 | 0.9600 |
| | | Projected Participation | 12,180 | 11,680 | 11,180 | 10,680 | 9,680 | 55,400 |
| Low-Flow Showerhead | 2.3.7 | Energy Savings (MWh) | 2,230.45 | 2,153.57 | 2,038.25 | 1,846.04 | 1,461.63 | 9,729.93 |
| | | Summer Demand Reduction (MW) | 0.2343 | 0.2262 | 0.2141 | 0.1939 | 0.1536 | 1.0221 |
| | | Winter Demand Reduction (MW) | 0.3946 | 0.3810 | 0.3606 | 0.3267 | 0.2587 | 1.7217 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---------------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Projected Participation | 32,775 | 31,775 | 30,275 | 27,775 | 22,775 | 145,375 |
| Thermostatic Shower Restriction Valve | 2.3.8 | Energy Savings (MWh) | 1.22 | 1.22 | 1.22 | 1.22 | 1.22 | 6.10 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0006 |
| | | Winter Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0010 |
| | | Projected Participation | 15 | 15 | 15 | 15 | 15 | 75 |
| Drain Water Heat Recovery Unit | 2.3.9 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.31 | 0.31 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |

| | | | | | | | | |
|-----------------------------|--------|------------------------------|--------|--------|--------|--------|--------|---------------|
| Smart Water Heater Controls | 2.3.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Refrigerator | 2.4.1 | Energy Savings (MWh) | 102.29 | 102.29 | 102.29 | 102.29 | 102.29 | 511.45 |
| | | Summer Demand Reduction (MW) | 0.0152 | 0.0152 | 0.0152 | 0.0152 | 0.0152 | 0.0758 |
| | | Winter Demand Reduction (MW) | 0.0114 | 0.0114 | 0.0114 | 0.0114 | 0.0114 | 0.0568 |
| | | Projected Participation | 1,900 | 1,900 | 1,900 | 1,900 | 1,900 | 9,500 |
| ENERGY STAR Freezers | 2.4.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 | 0.09 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| | 2.4.5 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| ENERGY STAR Cooler | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Induction Cooktop | 2.4.7 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Clothes Washer | 2.4.8 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.13 | 0.13 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |

| | | | | | | | | |
|---------------------------|--------|------------------------------|--------|--------|----------|----------|----------|-----------------|
| ENERGY STAR Clothes Dryer | 2.4.9 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.79 | 0.79 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 7 | 7 |
| ENERGY STAR Dishwasher | 2.4.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Dehumidifier | 2.4.11 | Energy Savings (MWh) | 658.16 | 899.13 | 1,019.01 | 1,019.01 | 1,019.83 | 4,615.14 |
| | | Summer Demand Reduction (MW) | 0.1348 | 0.1842 | 0.2087 | 0.2087 | 0.2089 | 0.9454 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Projected Participation | 4,425 | 6,050 | 6,850 | 6,850 | 6,852 | 31,027 |
| ENERGY STAR Ceiling Fan | 2.4.13 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.03 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Air Purifier | 2.4.14 | Energy Savings (MWh) | 214.81 | 315.90 | 379.08 | 379.08 | 379.08 | 1,667.97 |
| | | Summer Demand Reduction (MW) | 0.0267 | 0.0392 | 0.0471 | 0.0471 | 0.0471 | 0.2070 |
| | | Winter Demand Reduction (MW) | 0.0343 | 0.0505 | 0.0606 | 0.0606 | 0.0606 | 0.2667 |
| | | Projected Participation | 850 | 1,250 | 1,500 | 1,500 | 1,500 | 6,600 |
| Advanced Power Strips | 2.5.1 | Energy Savings (MWh) | 937.53 | 937.53 | 937.53 | 937.53 | 937.53 | 4,687.65 |
| | | Summer Demand Reduction (MW) | 0.1046 | 0.1046 | 0.1046 | 0.1046 | 0.1046 | 0.5228 |
| | | Winter Demand Reduction (MW) | 0.1438 | 0.1438 | 0.1438 | 0.1438 | 0.1438 | 0.7188 |
| | | Projected Participation | 14,110 | 14,110 | 14,110 | 14,110 | 14,110 | 70,550 |

| | | | | | | | | |
|---|-------|------------------------------|--------|--------|--------|--------|--------|-----------------|
| Air Sealing | 2.6.1 | Energy Savings (MWh) | 226.23 | 226.23 | 226.23 | 226.23 | 226.23 | 1,131.17 |
| | | Summer Demand Reduction (MW) | 0.0038 | 0.0038 | 0.0038 | 0.0038 | 0.0038 | 0.0191 |
| | | Winter Demand Reduction (MW) | 0.0810 | 0.0810 | 0.0810 | 0.0810 | 0.0810 | 0.4052 |
| | | Projected Participation | 149 | 149 | 149 | 149 | 149 | 745 |
| Weather Stripping, Caulking and Outlet Gaskets - Direct Install | 2.6.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| | 2.6.2 | Energy Savings (MWh) | 54.11 | 54.11 | 54.11 | 54.11 | 54.11 | 270.55 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|---------|---------|---------|---------|---------|--------------------|
| Weather Stripping, Caulking and Outlet Gaskets - Kit Delivery | | Summer Demand Reduction (MW) | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0105 |
| | | Winter Demand Reduction (MW) | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0105 |
| | | Projected Participation | 35,100 | 35,100 | 35,100 | 35,100 | 35,101 | 175,501 |
| Ceiling/Attic Insulation | 2.6.3 | Energy Savings (MWh) | 56.17 | 56.17 | 56.17 | 56.17 | 56.17 | 280.83 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 425,000 | 425,000 | 425,000 | 425,000 | 425,000 | 2,125,000 |
| Wall Insulation | 2.6.3 | Energy Savings (MWh) | 20.30 | 20.30 | 20.30 | 20.30 | 20.30 | 101.48 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0376 |
| | | Projected Participation | 34,400 | 34,400 | 34,400 | 34,400 | 34,400 | 172,000 |
| Floor Insulation | 2.6.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Rim Joist Insulation | 2.6.3 | Energy Savings (MWh) | 8.00 | 8.00 | 8.00 | 8.00 | 8.00 | 40.00 |
| | | Summer Demand Reduction (MW) | 0.0004 | 0.0004 | 0.0004 | 0.0004 | 0.0004 | 0.0021 |
| | | Winter Demand Reduction (MW) | 0.0028 | 0.0028 | 0.0028 | 0.0028 | 0.0028 | 0.0141 |
| | | Projected Participation | 10,000 | 10,000 | 10,000 | 10,000 | 10,000 | 50,000 |
| Basement or Crawl Space Wall Insulation | 2.6.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------|-------------------------|------------------------------|-----------|-----------|-----------|----------|----------|--------------------|
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Windows | 2.6.5 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Whole Home | 2.7.1 | Energy Savings (MWh) | 1,997.88 | 2,028.75 | 2,063.81 | 2,098.87 | 2,137.38 | 10,326.68 |
| | | Summer Demand Reduction (MW) | 0.8574 | 0.8643 | 0.8755 | 0.8866 | 0.8990 | 4.3829 |
| | | Winter Demand Reduction (MW) | 0.4604 | 0.4757 | 0.4888 | 0.5018 | 0.5160 | 2.4428 |
| | | Projected Participation | 1,085 | 1,105 | 1,126 | 1,147 | 1,170 | 5,633 |
| ENERGY STAR Manufactured Homes | 2.7.2 | Energy Savings (MWh) | 1.42 | 2.83 | 4.25 | 4.25 | 4.25 | 17.01 |
| | | Summer Demand Reduction (MW) | 0.0004 | 0.0008 | 0.0013 | 0.0013 | 0.0013 | 0.0050 |
| | | Winter Demand Reduction (MW) | 0.0002 | 0.0004 | 0.0006 | 0.0006 | 0.0006 | 0.0026 |
| | | Projected Participation | 1 | 2 | 3 | 3 | 3 | 12 |
| Home Energy Reports | 2.7.3 | Energy Savings (MWh) | 17,082.99 | 16,057.99 | 15,093.99 | 0.00 | 0.00 | 48,234.98 |
| | | Summer Demand Reduction (MW) | 2.1196 | 1.9924 | 1.8729 | 0.0000 | 0.0000 | 5.9850 |
| | | Winter Demand Reduction (MW) | 2.1196 | 1.9924 | 1.8729 | 0.0000 | 0.0000 | 5.9850 |
| | | Projected Participation | 224,031 | 210,590 | 197,954 | 0 | 0 | 632,575 |
| ENERGY STAR Pool Pump | 2.8.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.11 | 0.11 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| | 2.8.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 1.59 | 1.59 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Single Speed Pool Pump Replacement | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0010 | 0.0010 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Residential PV Solar | 2.8.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 13.25 | 13.25 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0045 | 0.0045 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0006 | 0.0006 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Pool Pump Pressure Cleaner Booster | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.06 | 0.06 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Bonus for participation across multiple measures | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 800 | 800 | 800 | 800 | 803 | 4,003 |
| Heat Pump Installer Rebate | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 501 | 600 | 700 | 800 | 1,000 | 3,601 |
| In-Home Audit | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1,250 | 1,250 | 1,250 | 1,250 | 1,250 | 6,250 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---------|-------------------------|--------|------|------|------|------|------|--------------------|
|---------|-------------------------|--------|------|------|------|------|------|--------------------|

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 16.

Appliance Recycling Component

Description

PPL Electric Utilities will continue to offer scheduling, free pick-up, and environmentally responsible recycling of a variety of appliances, including, though not limited to, refrigerators and compact refrigerators, freezers, dehumidifiers, room air conditioners, and other appliances deemed acceptable by the Company. PPL Electric Utilities plans to offer real-time alerts for customers to support the stress-free pickup of their appliances by notifying customers in advance of when program staff arrive to collect their appliances and providing confirmation once it has been collected. The disposal process involves removing hazardous materials, such as chlorinated fluorocarbons, from the refrigerant and foam insulation, preparing refrigerant for reclamation, and recycling other materials, including metal and plastic. PPL Electric Utilities reserves the right to set and/or change the program requirements and eligibility, including minimum and maximum appliance sizes, number of units for pickup, and appliance type and condition. PPL Electric Utilities plans to offer curbside and in-home appliance pickup for one or more units, though it may offer other pickup options at its discretion. The Company plans to offer appliance recycling events to which customers may bring eligible appliances for recycling and receive an incentive.

Objective and Target Market

The goal of the Appliance Recycling component is to promote the environmentally responsible retirement and/or use of efficient appliances in existing residential end-use buildings to achieve high customer satisfaction and the gross verified energy and coincident peak demand savings goals shown in Table 13. Through the component, the Company intends to promote other PPL Electric Utilities energy efficiency offerings, enhance relationships with retailers selling new appliances, and prevent the resale of units on the secondary market. The Appliance Recycling component is designed to target all residential sector customers and C&I customers that may benefit from residential end-use appliance recycling measures. This component is available to the 1.5 million customers in the PPL Electric Utilities territory who meet eligibility requirements.

Ramp-up and Implementation Strategy

Appliance Recycling is an active and popular offering, which requires little ramp-up. Implementation activities continued through the end of Phase IV, and activities will be carried over with marketing and awareness to support a successful transition to Phase V. The Appliance Recycling component will continue to be delivered by the selected Residential Energy Efficiency Program CSP. The CSP will provide a call center for appointment scheduling and customer support, provide program component marketing and awareness campaigns, process customer incentives,

and provide data for the Company's tracking system. PPL Electric Utilities will provide overall strategic direction, administration, and CSP management, while the EM&V CSP will provide evaluation services.

Marketing Strategy

PPL Electric Utilities and current CSPs have deep knowledge of the territory, customer demographics, and industry trends. The marketing strategy will leverage this base and take an adaptive and evolving approach that meets customers' and market actors' needs throughout Phase V. The Company will work with the CSP to create a detailed marketing plan that will define the audience, select tactics, employ targeting, and execute campaigns based on industry standards, various research, and historical program data. Successful marketing approaches may include, but will not be limited to, print and email outreach, Company and CSP web assets, social media, outreach to multifamily building owners and operators, community events, retailer outreach and training, outreach to new refrigerator rebate participants, bill inserts, and/or newsletters.

- **Underserved Customers** – The Company will offer appliance recycling to income-eligible customers through the Resource Constrained Energy Efficiency Program.
- **Multifamily** – In addition, the Company will focus on multifamily opportunities to ensure maximum benefits are provided to tenants, both income-eligible and standard residential customers.
- **Coordination** – The Company plans to utilize a single CSP, with qualified subcontractors to administer the portfolio of programs, which reduces barriers to coordination and ensures a high level of visibility across all offerings. This will allow cross-program participation where eligibility allows, as well as a clear understanding of coordination impacts. All programs will be cross-marketed and/or promoted whenever possible to ensure customers take advantage of all options for which they are eligible. For this component, cross-promotion may include dual-purpose bill inserts or email campaigns, as well as customer leave-behinds during appliance pickups.

Issues, Risks, and Risk Management

Table 18 shows risks associated with Appliance Recycling and how the Company intends to mitigate those risks.

Table 18. Appliance Recycling Issues, Risks, and Risk Management Strategies

| Component(s) Affected | Issue/Risk | Risk Management Strategies |
|-----------------------|---|---|
| Appliance Recycling | Customer awareness of offering. | The Company will work with the selected CSP to create an effective marketing strategy that includes community events, bill inserts, social media, and other channels. |
| Appliance Recycling | Diminished returns due to newer appliances in use in the territory. | The Company will work with the selected CSP to highlight the importance of recycling older units, including secondary appliances, through all available communication channels. |

Appliance Recycling Eligible Measures and Incentives

Table 19 shows PPL Electric Utilities’ initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. There is no expected cost for customer participation. Incentives were determined based on the most cost-effective incentive range to ensure customer participation. All incentive levels are designed to comply with the Pa PUC’s plan template and Implementation Order. Measures not available in the TRM will be considered custom measures with an incentive range up to \$200 per unit. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company. In addition, all measures available to customers may be delivered via any available channel to meet the customer’s unique needs.

Table 19. Pa PUC TABLE 8 – Residential Appliance Recycling Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---------------------|-------------|--------------------|-----------------------|-------------------------------------|----------------------------|-----------------------|---|
| Recycling - Room AC | Per Product | No | No | Working unit, no direct replacement | \$15 | 3 | Up to \$100 |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|---|
| Recycling - Refrigerator/Freezer | Per Product | No | No | Working unit, 10-30 cubic ft | \$35 | 5 | Up to \$200 |
| Recycling - Low-Capacity Refrigerator/Freezer | Per Product | No | No | Working unit, ≤ 10 cubic ft | \$15 | 5 | Up to \$100 |
| Recycling - Cooler | Per Product | No | No | Working unit | \$15 | 5 | Up to \$100 |
| Recycling - Dehumidifier | Per Product | No | No | Working room dehumidifier unit, no direct replacement | \$15 | 4 | Up to \$100 |

Deadline for Rebate Applications

There is no rebate application for this component.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one FTE, plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include 11 FTEs. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 20 shows the participation, energy savings, and coincident peak demand estimates for the Appliance Recycling component. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

Table 20. Pa PUC Table 9 – Residential Appliance Recycling Estimated Savings and Participation

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|--------------------------------------|----------|----------|----------|----------|----------|--------------------|
| Recycling - Room AC | 2.2.8 | Energy Savings (MWh) | 618.88 | 574.68 | 574.68 | 530.47 | 530.53 | 2,829.24 |
| | | Summer Demand Reduction (MW) | 1.1513 | 1.0690 | 1.0690 | 0.9868 | 0.9869 | 5.2631 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation ² | 3,500 | 3,250 | 3,250 | 3,000 | 3,001 | 16,001 |
| Recycling - Refrigerator/Freezer | 2.4.3 | Energy Savings (MWh) | 2,334.21 | 2,334.21 | 2,334.21 | 2,334.93 | 2,333.32 | 11,670.88 |
| | | Summer Demand Reduction (MW) | 0.3449 | 0.3449 | 0.3449 | 0.3450 | 0.3448 | 1.7244 |
| | | Winter Demand Reduction (MW) | 0.2640 | 0.2640 | 0.2640 | 0.2641 | 0.2638 | 1.3199 |
| | | Projected Participation | 3,230 | 3,230 | 3,230 | 3,231 | 3,229 | 16,150 |
| Recycling - Low-Capacity Refrigerator/Freezer | 2.4.4 | Energy Savings (MWh) | 55.44 | 55.44 | 55.44 | 55.44 | 55.44 | 277.22 |
| | | Summer Demand Reduction (MW) | 0.0082 | 0.0082 | 0.0082 | 0.0082 | 0.0082 | 0.0410 |
| | | Winter Demand Reduction (MW) | 0.0061 | 0.0061 | 0.0061 | 0.0061 | 0.0061 | 0.0305 |
| | | Projected Participation | 213 | 213 | 213 | 213 | 213 | 1,067 |
| Recycling - Cooler | 2.4.6 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.37 | 0.37 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Recycling - Dehumidifier | 2.4.12 | Energy Savings (MWh) | 2,655.42 | 2,390.94 | 2,388.82 | 2,124.34 | 2,124.34 | 11,683.87 |
| | | Summer Demand Reduction (MW) | 0.4584 | 0.4128 | 0.4124 | 0.3667 | 0.3667 | 2.0170 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 2,500 | 2,251 | 2,249 | 2,000 | 2,000 | 11,000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---------|-------------------------|--------|------|------|------|------|------|--------------------|
|---------|-------------------------|--------|------|------|------|------|------|--------------------|

¹ Total values may not equal the sum of all program year values due to rounding.

² Projected participation is based on the unit value for the corresponding measure in Table 19.

Student Energy Efficiency Education Component

Description

PPL Electric Utilities will continue to provide in-class presentations and/or school-based events to educate students and their families about energy safety, use, management, and conservation through hands-on activities, discussions, multimedia, and other materials deemed appropriate by the Company. Where possible, PPL Electric Utilities will align grade-level content with the Pennsylvania State Academic Standards. Students who participate in the presentations or events will receive a package of energy efficiency products to take home and install with the help of a trusted adult. In addition, the Company, with the support of the CSP, may also offer contests and challenges which provide the students and educators with additional opportunities to engage with the material and demonstrate energy efficiency learnings. Participating educators will receive lesson plans, training information, materials, and/or energy efficiency products to help reinforce energy efficiency education before and after the presentations. There are four planned Student Energy Efficiency Education channels, though the Company may choose to expand or contract these channels based on participation:

- **Primary Grade** – Presentations for Students and Educators in grades 2 – 3.
- **Intermediate Grade** – Presentations for Students and Educators in grades 5 – 7.
- **Secondary Grade** – Presentations for Students and Educators in grades 9 – 12.
- **Student Energy Efficiency Events** – This may include participation in school assemblies, Parent Teacher Organization events, Parent Nights, and/or back-to-school events, and local club or sporting events.

Objective and Target Market

The goal of the Student Energy Efficiency Education component is to promote energy efficiency in educational settings to inform students about energy efficiency behaviors and activities through enjoyable and interactive presentations utilizing high-quality curricula. This education is designed to be a first step in a longer energy efficiency journey, empowering participants, now and in the future. The informational aspect is supported through energy efficiency measures made available to students and educators that can be used in classrooms and installed at home. All materials, information, and products are designed to achieve high student and educator satisfaction. The Student Energy Efficiency Education component is designed to target residential sector customers and educators at schools serving the students and their families.

Ramp-up and Implementation Strategy

The Student Energy Efficiency Education component is a continuation from Phase IV, and PPL Electric Utilities has existing relationships with school districts across the territory. The component is highly popular with both students and educators. The selected Residential Energy Efficiency Program CSP will implement the component and provide marketing in conjunction with the Company, provide school recruitment, curriculum development, on-site presentations, and event management, while also

providing any take-home materials and energy efficiency products. The CSP will also provide a call center and support services for educators and administrators and provide data for the Company’s tracking system. PPL Electric Utilities will provide overall strategic direction, administration, and CSP management, while the EM&V CSP will provide evaluation services.

Marketing Strategy

The Company and CSP will create a marketing strategy for potential schools and districts designed to promote the empowerment of students as energy leaders at school and at home. The selected Residential Energy Efficiency Program CSP will promote the program to a list of qualified PPL Electric Utilities’ territory schools through awareness materials and marketing efforts to participants primarily through email and direct mail. The messaging will emphasize interactive learning, community impact, and engaging classroom activities. Whenever possible, at-risk and disadvantaged communities will be prioritized and served through the Resource Constrained Energy Efficiency Program. Other outreach strategies include:

- **Underserved Customers** – The Company will offer Student Energy Efficiency Education to income-eligible households through the Resource Constrained Energy Efficiency Program as noted above.
- **Multifamily Buildings** – This program component is not contingent on housing type; students of both homeowners and tenants in all housing types are eligible. Communication and marketing are school-focused, not customer-dependent.
- **Coordination** – The Company plans to utilize a single CSP, with qualified subcontractors to administer the portfolio of programs, which reduces barriers to coordination and ensures a high level of visibility across all offerings. This will allow cross-program participation where eligibility allows, as well as a clear understanding of coordination impacts. All programs will be cross-marketed and/or promoted whenever possible to ensure customers take advantage of all options for which they are eligible. For this component, cross-promotion may include energy kit inserts describing other program offerings.

Issues, Risks, and Risk Management

Table 21 shows risks associated with Student Energy Efficiency Education and how the Company intends to mitigate those risks.

Table 21. Student Energy Efficiency Issues, Risks, and Risk Management Strategies

| Component(s) Affected | Issue/Risk | Risk Management Strategies |
|---------------------------|---|--|
| Student Energy Efficiency | Lack of interest or engagement from secondary-level students. This may lead to low satisfaction scores. | The Company will work with the selected CSP to ensure content is up to date, engaging, and age-appropriate for all participants. |

Student Energy Efficiency Education Eligible Measures and Incentives

Table 22 shows PPL Electric Utilities' initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. There is no expected cost for customers to participate. All incentive levels are designed to comply with the Pa PUC's plan template and Implementation Order. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company. There is no cost for students or educators to participate in this program component. In addition, all measures available to customers may be delivered via any available channel to meet the customer's unique needs.

Table 22. Pa PUC TABLE 8 – Residential Student Energy Efficiency Education Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---------------------------------------|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|---|
| LED Lighting - GSL | Per Bulb | No | No | LED | \$4 | 15 | 100% of measure cost |
| Linear LED fixture | Per Product | No | No | LED | \$6 | 15 | 100% of measure cost |
| Lighting Occupancy Sensor | Per Product | No | No | Occupancy sensors and/or connected (“smart”) lighting installed inside a residential unit | \$17 | 8 | 100% of measure cost |
| Nightlight | Per Product | No | No | LED | \$2 | 8 | 100% of measure cost |
| Holiday Lights | Per Product | No | No | LED | \$17 | 10 | 100% of measure cost |
| Air Handler Filter Whistles | Per Product | No | No | Applied to central forced-air furnaces, CAC, or heat pump systems | \$2 | 5 | 100% of measure cost |
| Water Heater Temperature Setback | Per Product | No | No | Electric water heater where applicable | \$12 | 2 | 100% of measure cost |
| Low-Flow Faucet Aerator | Per Product | No | No | ≤ 1.5 GPM flow rate, homes with electric water heater | \$2 | 10 | 100% of measure cost |
| Low-Flow Showerhead | Per Product | No | No | Replaces standard showerhead, homes with electric water heater where applicable | \$5 | 10 | 100% of measure cost |
| Thermostatic Shower Restriction Valve | Per Product | No | No | Electric water heat where applicable | \$17 | 15 | 100% of measure cost |
| Advanced Power Strips | Per Product | No | No | Tier 1 or Tier 2 | \$19 | 5 | 100% of measure cost |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|----------|--------------------|-----------------------|--|----------------------------|-----------------------|---|
| Weather Stripping, Caulking and Outlet Gaskets - Kit Delivery | Per Foot | No | No | Weather stripping for exterior doors and exterior windows and outlet gaskets | \$1 | 15 | 100% of measure cost |

Deadline for Rebate Applications

There is no rebate application for this component.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one FTE, plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include two FTEs. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 23 shows the participation, energy savings, and coincident peak demand estimates for the Student Energy Efficiency program component. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

**Table 23. Pa PUC Table 9 – Residential Student Energy Efficiency Education
Estimated Savings and Participation**

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---------------------------|-------------------------|--------------------------------------|--------|--------|--------|--------|--------|--------------------|
| LED Lighting - GSL | 2.1.1 | Energy Savings (MWh) | 195.97 | 195.97 | 142.06 | 142.06 | 142.23 | 818.28 |
| | | Summer Demand Reduction (MW) | 0.0232 | 0.0232 | 0.0168 | 0.0168 | 0.0168 | 0.0967 |
| | | Winter Demand Reduction (MW) | 0.0232 | 0.0232 | 0.0168 | 0.0168 | 0.0168 | 0.0967 |
| | | Projected Participation ² | 11,400 | 11,400 | 8,550 | 8,550 | 8,554 | 48,454 |
| Linear LED fixture | 2.1.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.02 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Lighting Occupancy Sensor | 2.1.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.04 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Nightlight | 2.1.3 | Energy Savings (MWh) | 12.40 | 12.40 | 9.30 | 9.30 | 9.30 | 52.68 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 3,000 | 3,000 | 2,250 | 2,250 | 2,250 | 12,750 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Holiday Lights | 2.1.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.03 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Air Handler Filter Whistles | 2.2.11 | Energy Savings (MWh) | 18.70 | 18.70 | 14.02 | 14.02 | 14.02 | 79.46 |
| | | Summer Demand Reduction (MW) | 0.0045 | 0.0045 | 0.0034 | 0.0034 | 0.0034 | 0.0190 |
| | | Winter Demand Reduction (MW) | 0.0048 | 0.0048 | 0.0036 | 0.0036 | 0.0036 | 0.0204 |
| | | Projected Participation | 2,800 | 2,800 | 2,100 | 2,100 | 2,100 | 11,900 |
| Water Heater Temperature Setback | 2.3.4 | Energy Savings (MWh) | 307.11 | 307.11 | 230.34 | 230.34 | 230.34 | 1,305.24 |
| | | Summer Demand Reduction (MW) | 0.0327 | 0.0327 | 0.0245 | 0.0245 | 0.0245 | 0.1390 |
| | | Winter Demand Reduction (MW) | 0.0546 | 0.0546 | 0.0409 | 0.0409 | 0.0409 | 0.2320 |
| | | Projected Participation | 2,800 | 2,800 | 2,100 | 2,100 | 2,100 | 11,900 |
| Low-Flow Faucet Aerator | 2.3.6 | Energy Savings (MWh) | 37.39 | 37.39 | 28.05 | 28.05 | 28.05 | 158.93 |
| | | Summer Demand Reduction (MW) | 0.0174 | 0.0174 | 0.0130 | 0.0130 | 0.0130 | 0.0739 |
| | | Winter Demand Reduction (MW) | 0.0498 | 0.0498 | 0.0373 | 0.0373 | 0.0373 | 0.2115 |
| | | Projected Participation | 3,600 | 3,600 | 2,700 | 2,700 | 2,700 | 15,300 |
| Low-Flow Showerhead | 2.3.7 | Energy Savings (MWh) | 109.01 | 109.01 | 81.76 | 81.76 | 81.76 | 463.30 |
| | | Summer Demand Reduction (MW) | 0.0115 | 0.0115 | 0.0086 | 0.0086 | 0.0086 | 0.0490 |
| | | Winter Demand Reduction (MW) | 0.0193 | 0.0193 | 0.0145 | 0.0145 | 0.0145 | 0.0822 |
| | | Projected Participation | 2,800 | 2,800 | 2,100 | 2,100 | 2,100 | 11,900 |
| | 2.3.8 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 | 0.08 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Thermostatic Shower Restriction Valve | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Advanced Power Strips | 2.5.1 | Energy Savings (MWh) | 252.34 | 252.34 | 189.25 | 189.25 | 189.25 | 1,072.43 |
| | | Summer Demand Reduction (MW) | 0.0281 | 0.0281 | 0.0211 | 0.0211 | 0.0211 | 0.1196 |
| | | Winter Demand Reduction (MW) | 0.0387 | 0.0387 | 0.0290 | 0.0290 | 0.0290 | 0.1644 |
| | | Projected Participation | 3,800 | 3,800 | 2,850 | 2,850 | 2,850 | 16,150 |
| Weather Stripping, Caulking and Outlet Gaskets - Kit Delivery | 2.6.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 22.

Persistent Peak Demand Component

Description

The Persistent Peak Demand Reduction component is designed to reduce electric system demand during the defined peak periods through the coordinated deployment of thermostat optimization, managed electric vehicle (“EV”) charging, and battery storage. This offering supports grid reliability, defers capacity investments, and enhances the integration of variable renewable energy resources. The component features three channels:

- **Thermostat Optimization** – This channel will leverage smart thermostats by enabling pre-conditioning and dynamic temperature adjustments during defined critical peak hours for existing customer-owned thermostats. Participating thermostats will receive signals to reduce HVAC operation while maintaining occupant comfort, based on predictive algorithms and real-time system conditions.
- **EV Managed Charging** – In parallel, the managed EV charging channel will utilize either utility or CSP control or customer-enrolled scheduling to shift EV charging away from peak hours, reducing aggregate residential demand during the defined peak periods for existing customer-owned vehicles and eligible chargers. The Company may align managed charging with time-of-use EV rates, if they exist, within Phase V to ensure a seamless customer experience.
- **Battery Storage** – This channel will enroll existing residential battery systems to participate in demand management through the CSP Distributed Energy Resource Management Systems (“DERMS”) platforms with existing battery partner integrations for customer-owned battery storage systems.

Objective and Target Market

The objective of the Persistent Peak Demand Reduction component is to establish a scalable, cost-effective residential demand response program using behavioral, smart thermostat optimization, and managed EV charging to reduce peak electric demand and support grid reliability for customers. The target market for the thermostat optimization channel is residential customers with eligible central HVAC systems and compatible, existing, or newly purchased smart thermostats. While customers may purchase a Company-incentivized thermostat, the target demographic is customers who have already opted into utility demand response programs through an existing thermostat original equipment manufacturer. For the EV managed charging channel, the target is residential customers with EVs and existing or newly purchased at-home charging equipment that can be effectively networked into the component. For battery storage, the target demographic is customers with an existing battery storage system. Approximately 1.2 million residential customers will be eligible for demand response incentives.

Ramp-up and Implementation Strategy

The program will launch with a ramp-up phase targeting a limited number of residential customers in the beginning of program year 18 to validate load reduction potential and customer experience across

all channels. This includes launching marketing in high-propensity zones within the PPL Electric Utilities’ territory, testing operational cycles, and assessing customer experience, comfort feedback, and technology performance. During the remainder of the first year, the component will incrementally expand to reach the full expected participation levels, contingent on performance metrics, cost-effectiveness, and grid needs and seek to maintain those levels throughout the phase. Integration with existing smart thermostat rebate incentives and utility EV outreach will support enrollment scalability.

Marketing Strategy

The marketing objective is to drive enrollment and sustained engagement, which is critical to the adopted framework, which averages savings across program years. The component will be marketed through digital outreach, utility bill inserts, community partnerships, and trade ally networks. Messaging will focus on customer incentives, bill savings, comfort retention, and environmental impact. A customer portal will provide access to participation status, energy reports, and scheduling preferences for EV charging. Behavioral engagement strategies, such as usage feedback and comparative analytics, will support continual retention and satisfaction. Ongoing measurement and verification will track peak demand reduction, participation levels, and customer satisfaction, with the Company leveraging annual reporting to assess progress and inform refinements to messaging and program implementation. The marketing strategy will also rely on key market actor partnerships, including original equipment manufacturers and retailers that are essential for co-marketing, as well as EV dealerships and charging equipment installers. The Company and CSP will also work with charger network operators, EV installers, and local housing programs to identify and recruit eligible multifamily properties, supported by resident engagement and education to encourage program support. The CSP will provide a single landing page with eligibility information and incentive details, as well as integration with original equipment manufacturer platforms for direct opt-in. The CSP may also leverage annual participation recognition and a tiered incentive structure featuring upfront opt-in incentives with an ongoing seasonal or annual incentive. Income-eligible customers will not be targeted with persistent demand reduction offerings at the outset of the phase due to the unproven customer experience with a daily load shifting approach. The Company may choose to include these populations in the future.

Issues, Risks, and Risk Management

Table 24 shows risks associated with Persistent Peak Demand and planned mitigation strategies.

Table 24. Persistent Peak Demand Issues, Risks, and Risk Management Strategies

| Component(s) Affected | Issue/Risk | Risk Management Strategies |
|------------------------|---|--|
| Persistent Peak Demand | Low customer participation in EV managed charging – enrolling and retaining adequate customers to meet goals. | The Company will offer compelling incentives and partner with trusted brands. The enrollment process will be simplified with an easy opt-out option. |

| | | |
|------------------------|---|---|
| Persistent Peak Demand | Customer comfort concerns for thermostat optimization, leading to high levels of opt-out. | The CSP will ensure override options and clear communication about expected impacts. The CSP will gather feedback to continually optimize the offering. |
| Persistent Peak Demand | Technology integration challenges. | The Company and CSP will pre-qualify technology partners through an organized integration process and use open standards if possible. |

Persistent Peak Demand Eligible Measures and Incentives

Table 25 shows PPL Electric Utilities’ initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. There is no expected cost for customers to participate. All incentive levels are designed to comply with the Pa PUC’s plan template and Implementation Order. Measures within this component may not have a direct customer incentive due to the nature of daily load shift programs. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company.

Table 25. Pa PUC TABLE 8 – Persistent Peak Demand Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|-------------------------------|-----------------|---------------------------|------------------------------|--|-----------------------------------|------------------------------|--|
| EV Managed Charging | Per Device | No | No | Eligible charging equipment or vehicle | \$90 | 1 | Up to \$750 |
| Thermostat Optimization | Per Device | No | No | Opted-in, eligible thermostat | \$0 | 1 | Up to \$300 |
| Residential BESS ¹ | Per Participant | No | No | Opted-in, eligible product | \$456 | 1 | Up to \$1,500 |

¹ BESS is Battery Energy Storage System

Deadline for Rebate Applications

There is no rebate application for this component, though the Company may choose to provide this option at its discretion. For particular channels, once customers opt in or sign up, participation will be measured per season through the selected evaluation methodology (i.e., usage analysis). If customers participate at the required and agreed-upon level, rebates will be sent to customers directly without additional required action. Customers must be actively enrolled for the entire season in order to qualify for that season's incentive.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one and a half FTEs, plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include five FTEs. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 26 shows the participation and peak demand reduction estimates for the Persistent Peak Demand component. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

Table 26. Pa PUC Table 9 – Persistent Peak Demand Estimated Savings and Participation

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-------------------------|-------------------------|--------------------------------------|--------|--------|--------|--------|--------|--------------------|
| EV Managed Charging | 2.9.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.12 | 0.12 | 0.12 | 0.12 | 0.12 | 0.1223 |
| | | Winter Demand Reduction (MW) | 0.12 | 0.12 | 0.12 | 0.12 | 0.12 | 0.1223 |
| | | Projected Participation ² | 750 | 750 | 750 | 750 | 750 | 750 |
| Thermostat Optimization | 2.9.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 3.16 | 3.16 | 3.16 | 3.16 | 3.16 | 3.1565 |
| | | Winter Demand Reduction (MW) | 6.66 | 6.66 | 6.66 | 6.66 | 6.66 | 6.6647 |
| | | Projected Participation | 25,800 | 25,800 | 25,800 | 25,800 | 25,800 | 25,800 |
| Residential BESS | 2.9.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 2.64 | 2.64 | 2.64 | 2.64 | 2.64 | 2.6426 |
| | | Winter Demand Reduction (MW) | 5.29 | 5.29 | 5.29 | 5.29 | 5.29 | 5.2853 |
| | | Projected Participation | 1,200 | 1,200 | 1,200 | 1,200 | 1,200 | 1,200 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 25.

Residential Pilot Programs

Description

Conservation Voltage Reduction (“CVR”) Pilot – Due to quickly evolving technology, methods, and policies related to energy efficiency, PPL Electric Utilities may allot up to \$1 million for the CVR pilot. If C&I customers receive benefits based on the circuit, feeder, etc., utilized, those savings and associated costs will be properly attributed to the correct sector. The pilot will be developed in conjunction with the selected EM&V CSP, with evaluation plans submitted to the Phase V SWE for approval. The objective of the pilot is to create and implement a methodology to reduce energy consumption and peak demand through voltage optimization in front of the meter. The Company will evaluate a potential CVR pilot through research to establish weather-normalized feeder performance baseline parameters that may inform potential CVR savings estimates and support planning and evaluation of any CVR deployment. A key research question is whether the Company has the existing technology, including substation line tap changers and voltage regulators, to implement a CVR program that is in line with Act 129, as well as evaluate any costs of such equipment. If viable, the Company will establish parameters to safely and effectively reduce voltage in front of customer meters to reduce energy consumption. Metrics to be tracked include baseline voltage, voltage adjustments, time on versus off, and overall energy impacts. The potential savings related to this pilot have not been included in the Plan’s forecasted savings due to uncertainty around pilot design and implementation. The pilot may last up to 24 months from the start. Energy and peak demand savings attributed to the pilot will account for no more than 10% of the total savings of the total portfolio savings. At the conclusion of the pilot(s), the EM&V CSP will include evaluation results as part of the annual reporting process.

Peak Time Rebates (Behavioral Demand Response) Pilot – PPL Electric Utilities may allot up to \$1 million for a Peak Time Rebate (“PTR”) demand response pilot for residential customers. The objective of the pilot is to test the effectiveness of a static, seasonal rebate with a performance bonus. A key research question is to understand if a PTR can encourage residential customers to shift energy usage away from peak periods during both summer and winter seasons. Metrics to be tracked include customer enrollment by season, customer performance by appliance or equipment, attrition rates, and overall peak demand impacts. The pilot may last up to 24 months, though the start date may occur after the start of Phase V. Peak demand reductions from the pilot are forecasted to be approximately 800 kW, though this may change based on the final pilot design. The potential savings related to this pilot have not been included in the Plan’s forecasted savings due to uncertainty around pilot design and implementation. If C&I customers receive any pilot benefits, those savings and associated costs will be properly attributed to the correct sector. This pilot may feature peak-time rebates to encourage behavior change, as well as incentives for customers to move to future TOU rates, if available. At the conclusion of the pilot(s), the EM&V CSP will include evaluation results as part of the annual reporting process. At the conclusion of the pilot(s), the EM&V CSP will include evaluation results as part of the annual reporting process.

PPL Electric Utilities reserves the right to propose additional pilots as deemed necessary by the Company to demonstrate new technology, methods, program design, or for any other reason, utilizing allocated contingency funding and in alignment with the funding limitations in Section 9.1.4. All proposed pilots will be filed with the Commission for review, as is outlined in the Final Implementation Order.

3.3. Resource Constrained Energy Efficiency Program

The Pa PUC Plan V Template includes the Low-Income Programs as section 3.2.1. PPL Electric Utilities has included it as a separate section rather than a subsection of the Residential Sector Program to align with its portfolio organization.

PPL Electric Utilities’ Resource Constrained Energy Efficiency Program, previously known as the Low-Income Program, is a customer assistance program with three primary components that will be available for the entirety of Phase V, from 2026 through 2031. The program takes a new approach to energy assistance programs by aligning measure and channel delivery with the Residential Energy Efficiency Program, keeping the existing participation pathways while expanding options for income-eligible customers. The Resource Constrained Energy Efficiency Program includes measures for customers at or below 150% of the federal poverty level; only measures outlined within this program will be attributed to the low-income carveout. The program includes several measures targeted toward owners of multifamily buildings, who fall within the Small C&I customer sector.

Table 27 shows the percentages of the customer sector budgets represented by the Resource Constrained Energy Efficiency Program.

Table 27. Percentages of Customer Sector Budgets Represented by the Resource Constrained Energy Efficiency Program

| Customer Sector | Percentage of Sector Budget |
|----------------------|-----------------------------|
| Residential | 0% |
| Resource Constrained | 100% |
| Small C&I | 0.6% |
| Large C&I | 0% |

The Resource Constrained Energy Efficiency Program includes the majority of residential measures available in the Pa TRM, ensuring the Company meets the minimum number of measures required for income-eligible customers. The Resource Constrained Energy Efficiency Program budget is 19% of the total portfolio budget, and the program’s TRC can be found in Table 56 in Section 8. PPL Electric Utilities does not anticipate carryover savings from Phase IV to meet the Phase V low-income carveout.

Table 28 includes the components of the Resource Constrained Energy Efficiency Program and summarizes their expected costs and savings by year and as a share of the total program.

Table 28. Resource Constrained Energy Efficiency Program Savings by Program Year

| Component | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total Phase V | % of Program |
|----------------------------------|-------------------------------|--------|--------|--------|--------|--------|---------------|--------------|
| Energy Efficient Homes | Energy Savings (MWh) | 15,374 | 13,495 | 13,508 | 11,900 | 8,690 | 62,967 | 83% |
| | Summer Demand Reduction (MW) | 1.56 | 1.38 | 1.38 | 1.23 | 0.93 | 6.48 | 70% |
| | Winter Demand Reduction (MW) | 2.22 | 1.98 | 1.96 | 1.76 | 1.38 | 9.29 | 85% |
| | Average Demand Reduction (MW) | 1.89 | 1.68 | 1.67 | 1.50 | 1.15 | 7.89 | 78% |
| Appliance Recycling | Energy Savings (MWh) | 1,082 | 1,082 | 1,082 | 1,082 | 1,082 | 5,410 | 7% |
| | Summer Demand Reduction (MW) | 0.37 | 0.37 | 0.37 | 0.37 | 0.37 | 1.84 | 20% |
| | Winter Demand Reduction (MW) | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.21 | 2% |
| | Average Demand Reduction (MW) | 0.21 | 0.21 | 0.21 | 0.21 | 0.21 | 1.03 | 10% |
| Student Energy Education | Energy Savings (MWh) | 1,383 | 1,383 | 1,621 | 1,621 | 1,621 | 7,629 | 10% |
| | Summer Demand Reduction (MW) | 0.16 | 0.16 | 0.19 | 0.19 | 0.19 | 0.88 | 10% |
| | Winter Demand Reduction (MW) | 0.26 | 0.26 | 0.31 | 0.31 | 0.31 | 1.44 | 13% |
| | Average Demand Reduction (MW) | 0.21 | 0.21 | 0.25 | 0.25 | 0.25 | 1.16 | 12% |
| Total Program¹ | Energy Savings (MWh) | 17,839 | 15,960 | 16,211 | 14,603 | 11,393 | 76,007 | 100% |
| | Summer Demand Reduction (MW) | 2.09 | 1.91 | 1.94 | 1.79 | 1.48 | 9.20 | 100% |
| | Winter Demand Reduction (MW) | 2.52 | 2.28 | 2.31 | 2.11 | 1.73 | 10.94 | 100% |
| | Average Demand Reduction (MW) | 2.31 | 2.09 | 2.12 | 1.95 | 1.60 | 10.07 | 100% |

¹ Total values may not equal the sum of all program year or component values due to rounding.

Program and Component Operations and Administration

The selected Resource Constrained Energy Efficiency CSP will provide operational management while closely coordinating with the Residential Energy Efficiency CSP, administrative support, and implementation activities. PPL Electric Utilities EE&C staff will provide oversight and administration of all programs and components.

Schedule and Milestones for Program and All Components

For all program components, the schedule and milestones include submission of the Company’s EE&C Plan on December 1, 2025, launch of Phase V on June 1, 2026, semi-annual reports submitted annually starting on January 15, 2027, annual reports submitted annually starting on September 30, 2027, and the end of all components at the end of the phase on May 31, 2031.

Estimated Program Budget

Table 29 shows the estimated budget by year for the Resource Constrained Energy Efficient Program, divided by incentive and non-incentive costs.

Table 29. Pa PUC Table 10 – Resource Constrained Energy Efficient Program Budget by Year

| Cost Element | | PY18 | PY19 | PY20 | PY21 | PY22 | Phase V Total ¹ |
|---|----------------------------------|-----------------|-----------------|-----------------|----------------|----------------|----------------------------|
| Total Budget (\$000) | | \$11,100 | \$10,395 | \$10,366 | \$9,690 | \$8,384 | \$49,934 |
| Incentives (\$000)² | Rebates | \$39 | \$39 | \$39 | \$39 | \$39 | \$196 |
| | Upstream/Midstream Buydown | \$79 | \$79 | \$79 | \$79 | \$79 | \$395 |
| | Kits | \$739 | \$763 | \$821 | \$847 | \$867 | \$4,037 |
| | Direct Install Materials & Labor | \$5,705 | \$5,153 | \$5,238 | \$4,770 | \$3,674 | \$24,539 |
| | Incentive Total | \$6,562 | \$6,035 | \$6,177 | \$5,736 | \$4,659 | \$29,168 |
| Non-Incentives (\$000)³ | Program Design | \$175 | \$165 | \$156 | \$144 | \$131 | \$770 |
| | Administrative | \$1,255 | \$1,190 | \$1,127 | \$1,042 | \$958 | \$5,572 |
| | EDC Delivery Costs | \$135 | \$128 | \$121 | \$112 | \$103 | \$600 |
| | CSP Delivery Fees | \$2,457 | \$2,389 | \$2,324 | \$2,232 | \$2,143 | \$11,545 |
| | Marketing | \$379 | \$358 | \$338 | \$312 | \$285 | \$1,672 |
| | Other ⁴ | \$137 | \$130 | \$123 | \$113 | \$104 | \$607 |
| | Non-Incentive Total | \$4,538 | \$4,360 | \$4,189 | \$3,954 | \$3,725 | \$20,766 |
| Percent Incentives | | 59% | 58% | 60% | 59% | 56% | 58% |

¹ Total values may not equal the sum of all program year values due to rounding.

² Braided Funding Support Labor costs are not included in this table because they are estimated to be \$0.

³ EM&V and AEPS Registration Support Costs are not included in this table because AEPS Registration Support Costs are estimated to be \$0 and EM&V costs are included as portfolio costs.

⁴ Indirect CSP Delivery Costs, e.g., fleet vehicles, subscriptions, IT.

Program and Component EM&V

All EM&V requirements for all program components will be detailed in PPL Electric Utilities' Evaluation plan, submitted to the SWE for review. The Company and third-party EM&V CSP will conduct an evaluation on an annual basis for each program and component to verify savings and establish other key performance indicators, such as program direct costs, administrative costs, and participation. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and coincident peak demand reduction. PPL Electric Utilities' impact and process evaluation activities will vary by year and program component.

Energy Efficient Homes Component

Description

The Energy Efficient Homes component is the primary program component and features four delivery channels for the Resource Constrained Energy Efficiency Program. These include the following:

- **Single Family Energy Assessment** – This channel provides customers with energy education and a broad array of available measures, similar to the Residential Energy Efficiency Program, though at no cost to qualifying customers. The goal of the channel is to maximize comprehensive offerings while meeting Pa PUC mandates, even when customers do not have electric heat. Customers may receive an in-person or virtual assessment, with a focus on home performance analysis that may lead to comprehensive measures, defined in the Commission’s plan template tables, for all eligible customers. Measures may include refrigerator, freezer, dehumidifier, and other appliance replacement; room-specific HVAC replacement, such as room air conditioners; heat pump water heater installation for customers with electric water heating; and a wide variety of other direct install measures, such as water reduction, water pipe insulation, and advanced smart strips. Qualified technicians will determine the appropriate measures based on assessment findings.
- **Electric Heat Customers** – Customers who have existing electric heating systems may also be eligible for HVAC system maintenance, HVAC replacement, solar, building shell measures, and controls, such as smart thermostats. This is in addition to measures available to all eligible program participants.
- **Health and Safety** – PPL Electric Utilities will continue to install no-cost smoke and carbon monoxide detectors as needed in customer homes. In addition, the Company will allocate up to \$1.5 million for health and safety repairs and/or upgrades needed to install comprehensive measures. This builds on the successful Phase IV Health and Safety Pilot. Measures may include, but are not limited to, electrical, plumbing, carpentry, moisture remediation, indoor air quality issues, or any other barrier determined by the Company to be preventing comprehensive measures.
- **Expanded Trade Ally Network** – PPL Electric Utilities will work with the selected CSP to expand the available direct discount trade allies available to participants, with a focus on local, trusted community businesses. The CSP will reduce barriers to contractor participation and provide meaningful technical assistance and training. This will support the community workforce and economic development.
- **Comprehensive Funding** – There is no budget cap on comprehensive measures, though the Company reserves the right to reduce or eliminate specific measures based on available funding.
- **Multifamily Energy Assessment** – Individually and master-metered customers and/or tenants are eligible for participation with landlord, owner, or building operator approval. All occupants of multifamily buildings will have access to the same measures as Single-Family Energy Assessment customers, including comprehensive measures when applicable, though measure

selection and application will be determined by a qualified multifamily technician to ensure applicability. Income eligibility for master-metered buildings will be based on attestation from the building owner, landlord, or operator, and subject to approval by the Company and program CSP.

- **Landlord Incentives** – Landlords providing consent for multifamily projects may be provided a direct incentive per building site. This approach will encourage higher levels of consent and engagement and increase participation.
- **Common Spaces** – Qualifying common space opportunities will be coordinated directly with the Business Energy Efficiency Program to take advantage of rebates for which these projects are eligible. Where possible, landlords will be directed to and/or coordinated with state-funded programs to take advantage of additional incentives to make these projects more feasible.
- **Program Coordination** – The chosen CSP will have a dedicated multifamily outreach coordinator and installation team to ensure multifamily knowledge and best practices are utilized. In the event that outside funding is available, such as Inflation Reduction Act programs, the outreach coordinator will act as the primary point of contact to ensure appropriate program and funding braiding, to maximize customer benefits.
- **Multifamily Funding** – There is no budget cap on multifamily participation, though the Company reserves the right to reduce or eliminate any offering based on available funding and/or to ensure compliance targets are met. All costs for master-metered multifamily will be appropriately recovered by the proper customer sector.
- **Instant Discount** – The Instant Discount channel offers select online marketplace products with associated savings for income-verified customers at no cost. Customers will be able to select products via the online marketplace at no cost, though subject to eligibility, such as a maximum number of products per account, as determined by the Company. The Company will also offer select instant discount measures at no cost through retail partners such as Habitat ReStore and Salvation Army, which cater to income-eligible customers. Instant Discount is a new offering for this segment in Phase V.
- **Home Energy Reports** – Select customers will receive email reports specifically tailored to income-eligible customers with the purpose of driving customers to primary programs, and these reports will not contain any similar home comparisons. Paper reports may be used if determined by the Company to be necessary and/or beneficial for the customer. The Company does not plan to claim savings for income-eligible home energy reports at the beginning of Phase V, though it reserves the right to do so later in the phase, if deemed appropriate. All customers at or below 150% of the federal poverty guidelines will also be provided an Energy Analyzer, an online web tool for bill analysis and education.

Objective and Target Market

The goal of the Energy Efficient Homes component in the Resource Constrained Energy Efficiency Program is to promote the adoption and/or use of no-cost efficient products and appliances in existing

qualified residential single and multifamily buildings to achieve the gross verified energy and coincident peak demand savings goals shown in Table 28. The Company also intends to continue to educate and empower disadvantaged households and communities through effective energy education and advisement. The Energy Efficient Homes component is designed to target residential sector customers at or below 150% of the federal poverty level, estimated at 325,000, and commercial and industrial multifamily customers serving income-eligible tenants that may benefit from program measures. Customers above 150% of the federal poverty level will have the opportunity to participate in the Residential Energy Efficiency Program and receive increased incentives through the moderate-income tier if eligible.

Ramp-up and Implementation Strategy

Energy Efficient Homes leverages the Phase IV Low-Income Program's existing framework, though the new channels available to income-eligible customers will require coordination and integration across CSPs. The Energy Efficient Homes component will be delivered by a selected Resource Constrained Program Energy Efficiency Program CSP. Certain elements of the program may be administered by the Residential Energy Efficiency Program CSP, such as online marketplace access and home energy reports. These requirements were noted in both the program request for proposals, and PPL Electric Utilities will manage the coordination between CSPs. Implementation activities for primary program functions continued through the end of Phase IV and will be carried over, supported by targeted marketing and awareness campaigns for potentially eligible customers, especially around new offerings, to create a seamless transition to Phase V. The CSP(s) will also operate customer call centers, provide program component marketing and awareness campaigns, process customer intake, perform assessments, work with a closed network of trade allies for direct installation of measures, and provide data for the Company's tracking system. PPL Electric Utilities will provide overall strategic direction, administration, and CSP management.

Marketing Strategy

PPL Electric Utilities and the Phase IV CSP have deep knowledge of disadvantaged communities within the PPL Electric Utilities service territory, customer demographics, and specific issues facing this critical segment of the residential customer base. The marketing strategy will leverage historical trends, emerging research on income-eligible communities, lessons learned from the prior phases, and take a flexible and adjustable approach that meets customer needs throughout Phase V. This includes a close partnership with LIURP, as well as cross-promotion through other assistance programs, such as OnTrack. The Company will work with the selected CSP to develop a detailed marketing plan that will create strategies to engage difficult-to-reach populations, provide messaging that is understandable and effective, incorporate effective tactics with integrated, interactive bilingual materials and web assets, employ targeting, and execute campaigns based on customer preferences, leveraging income-eligible specific research and historical program data. Successful marketing approaches may include, but will not be limited to, print and email outreach, Company and CSP web assets, social media, community and town halls, fairs and local events, homeowner association and landlord engagement, displays and local

advertising, bill inserts, newsletters, and direct customer outreach. In addition, the Company may utilize welcome kits featuring Pa TRM eligible measures, not as a primary savings driver, but as an introduction to a deeper customer journey towards more comprehensive measures. Company research indicates that kit recipients are more aware of all assistance programs than customers who did not receive a kit, likely due to cross-promotion.

LIURP Program Coordination

PPL Electric Utilities will build on the existing and successful collaboration with LIURP to ensure customers receive the maximum available benefits between both programs and to reduce customer acquisition costs. This includes the customer's program assignment that is invisible to the customer, though it is based on the best possible customer outcome. Projects and/or measures may be jointly funded by the Resource Constrained Energy Efficiency Program and LIURP, reducing contractor visits to customer homes and extending the available funding of both programs. The Company may split measure costs between the programs as is necessary. Other program coordination activities will include joint marketing, integrated customer intake, administrative collaboration and management alignment, and consistent quality assurance and control approaches.

External Program Coordination

PPL Electric Utilities, as well as other Pennsylvania EDCs, have successful programs that align with community benefits goals of proposed Inflation Reduction Act ("IRA") programs, the Weatherization Assistance Program, and other energy assistance programs. In addition, the Company and CSPs maintain relationships with a network of qualified trade allies critical to the success of all programs. PPL Electric Utilities will offer measures common to all programs in the Resource Constrained Energy Efficiency Program, including heat pumps and heat pump water heaters, which will ensure possible coordination if IRA funding is available in Phase V, as expected. The Company and selected CSP will work with external program implementation vendor(s) to ensure minimal impact to customers and appropriate incentive stacking. The Company, as per Pa PUC Commission guidance, will claim full savings for any measure for which Act 129 funding is applied. The Company also reserves the right to cease coordination of programs based on poor customer experience, risk to its compliance goals, or for any other reason deemed necessary by the Company. Further details related to external program coordination can be found in Section 4.4.

Issues, Risks, and Risk Management

Table 30 shows risks associated with Energy Efficient Homes and how the Company intends to mitigate those risks.

Table 30. Energy Efficient Homes Issues, Risks, and Risk Management Strategies

| Delivery Channels Affected | Issue/Risk | Risk Management Strategies |
|--|--|---|
| Single and Multifamily Energy Assessment | There is a lack of program knowledge and low prioritization compared to other basic needs. | Customer and external stakeholder survey results indicate that respondents are motivated by learning how to reduce costs and increase home comfort – the CSP will focus messaging on these areas. In addition, the Company has created a Low-Income Needs Assessment dashboard tool to help the CSP target underserved communities and those with the highest opportunity for program services. |
| Single Family Energy Assessment | Company research indicates that poor building conditions may prevent comprehensive measure installation. | The Company will increase available health and safety funding to \$1.5 million to resolve potential issues. |
| Multifamily Energy Assessment | Difficulty securing landlord approval for participation by tenants. | The Company will offer a landlord incentive and a dedicated multifamily outreach coordinator to coordinate multiple project sites. |
| Multifamily Energy Assessment | Issues with program coordination with potential state programs. | The Company and CSP will have measures also available in a variety of external programs for potential cost sharing, and a flexible framework that encourages coordination. The CSP will also have a dedicated coordinator to ensure a seamless customer experience and maximum benefits. |
| Instant Discounts | Identifying income-eligible customers. | The Company will work with the selected CSP to develop an online qualification tool for customers in this category. |
| Single and Multifamily Energy Assessment | Potential changes to codes and standards, including changes to ENERGY STAR | The Company will follow all SWE guidance to ensure appropriate eligibility of products. |

Energy Efficient Homes: Eligible Measures and Incentives

Table 31 shows PPL Electric Utilities’ initial measures, eligibility qualifications, incentive ranges, incremental costs, and estimated useful life. PPL Electric Utilities expects all measures provided to income-eligible customers will be subsidized at 100% of the full measure cost, requiring no customer contribution or sharing of incremental costs between participants and the Company. Measures not available in the TRM will be considered custom measures. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company. There is no cap on comprehensive

measure offerings, though the availability of comprehensive measures is based on available funding and compliance target requirements.

Table 31. Pa PUC TABLE 8 – Resource Constrained Energy Efficient Homes Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|-----------------------------------|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|---|
| LED Lighting - GSL | Per Bulb | Yes | No | LED | \$11 | 15 | 100% of measure cost |
| Linear LED fixture | Per Product | Yes | No | LED | \$21 | 15 | 100% of measure cost |
| Lighting Occupancy Sensor | Per Product | Yes | No | Occupancy sensors and/or connected (“smart”) lighting installed inside a residential unit | \$96 | 8 | 100% of measure cost |
| Nightlight | Per Product | Yes | No | LED | \$5 | 8 | 100% of measure cost |
| Holiday Lights | Per Product | Yes | No | LED | \$17 | 10 | 100% of measure cost |
| Ductless Heat Pump | Per Product | Yes | Yes | ENERGY STAR | \$17,333 | 15 | 100% of measure cost |
| ECM Circulation Fans | Per Product | Yes | No | Replaces low-efficiency permanent split capacitor fan motor | \$100 | 5 | 100% of measure cost |
| Maintenance - Heat Pump/AC | Per Project | Yes | No | Professional system tune up | \$619 | 3 | 100% of measure cost |
| Room Air Conditioner | Per Product | Yes | Yes | ENERGY STAR | \$95 | 9 | 100% of measure cost |
| Room AC Replacement | Per Product | Yes | No | Replaces working unit | \$591 | 3 | 100% of measure cost |
| Window Heat Pump | Per Product | Yes | Yes | Existing electric, non-heat pump heating | \$3,500 | 9 | 100% of measure cost |
| Duct Sealing & Duct Insulation | Per Project | Yes | Yes | All accessible duct work sealed throughout the unconditioned and semi-conditioned space in the home. | \$4,221 | 15 | 100% of measure cost |
| Air Handler Filter Whistles | Per Product | Yes | No | Applied to central forced-air furnaces, CAC, or heat pump systems | \$4 | 5 | 100% of measure cost |
| ENERGY STAR Connected Thermostats | Per Product | Yes | No | ENERGY STAR | \$428 | 9 | 100% of measure cost |
| ENERGY STAR Bathroom Exhaust Fan | Per Product | Yes | No | ENERGY STAR | \$352 | 15 | 100% of measure cost |
| Heat Pump Water Heater | Per Product | Yes | Yes | ENERGY STAR | \$4,502 | 10 | 100% of measure cost |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---------------------------------------|-------------|--------------------|--|---|----------------------------|-----------------------|---|
| Solar Water Heater | Per Product | Yes | Yes | Existing electric water heater | \$9,567 | 15 | 100% of measure cost |
| Water Heater Tank Wrap | Per Project | Yes | No | Installation of R-8 wrap insulation to existing electric water heater with R-24 or less | \$39 | 7 | 100% of measure cost |
| Water Heater Temperature Setback | Per Product | Yes | No | Electric water heater | \$13 | 2 | 100% of measure cost |
| Water Heater Pipe Insulation | Per Foot | Yes | No | ≥ R-3, unconditioned space, electric water heater | \$2 | 11 | 100% of measure cost |
| Low-Flow Faucet Aerator | Per Product | Yes | No | ≤ 1.5 GPM flow rate, homes with electric water heater | \$4 | 10 | 100% of measure cost |
| Low-Flow Showerhead | Per Product | Yes | No | Replaces standard showerhead, homes with electric water heater | \$21 | 10 | 100% of measure cost |
| Thermostatic Shower Restriction Valve | Per Product | Yes | No | Electric water heat | \$39 | 15 | 100% of measure cost |
| Smart Water Heater Controls | Per Product | Yes | No | Electric resistance or heat pump storage water heaters | \$668 | 11 | 100% of measure cost |
| Refrigerator Replacement | Per Product | Yes | No | Replaces working unit, 10-30 cubic ft | \$1,300 | 6 | 100% of measure cost |
| Freezer Replacement | Per Product | Yes | No | Replaces working unit, 10-30 cubic ft | \$820 | 5 | 100% of measure cost |
| Cooler Replacement | Per Project | Yes | No | Replaces working unit | \$700 | 9 | 100% of measure cost |
| ENERGY STAR Clothes Washer | Per Product | Yes | Yes, if paired with other comprehensive measures | ENERGY STAR | \$36 | 14 | 100% of measure cost |
| ENERGY STAR Clothes Dryer | Per Product | Yes | Yes, if paired with other comprehensive measures | ENERGY STAR | \$718 | 14 | 100% of measure cost |
| ENERGY STAR Dishwasher | Per Product | Yes | Yes, if paired with other | ENERGY STAR | \$450 | 10 | 100% of measure cost |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|--|---|----------------------------|-----------------------|---|
| | | | comprehensive measures | | | | |
| ENERGY STAR Dehumidifier | Per Product | Yes | Yes, if paired with other comprehensive measures | ENERGY STAR | \$2,026 | 12 | 100% of measure cost |
| ENERGY STAR Ceiling Fan | Per Product | Yes | No | ENERGY STAR | \$422 | 10 | 100% of measure cost |
| ENERGY STAR Air Purifier | Per Product | Yes | No | ENERGY STAR | \$394 | 9 | 100% of measure cost |
| Advanced Power Strips | Per Product | Yes | No | Tier 1 or Tier 2 | \$56 | 5 | 100% of measure cost |
| Air Sealing | Per CFM | Yes | Yes | Pre- and post-blower door test. $\geq 10\%$ improvement. Primary electric heating or central air conditioning. | \$1 | 15 | 100% of measure cost |
| Weather Stripping, Caulking and Outlet Gaskets - Direct Install | Per Project | Yes | No | Exterior doors, exterior windows, unconditioned attic hatches/door, or plumbing/electrical penetrations on exterior walls | \$35 | 15 | 100% of measure cost |
| Weather Stripping, Caulking and Outlet Gaskets - Kit Delivery | Per Project | Yes | No | Weather stripping for exterior doors and exterior windows and outlet gaskets | \$30 | 15 | 100% of measure cost |
| Ceiling/Attic Insulation | Per SQ Ft | Yes | Yes | The existing R-value \leq R-30. Final R-value must be \geq R-49, primary electric heat. Rebate cannot exceed the cost of the measure | \$4 | 15 | 100% of measure cost |
| Wall Insulation | Per SQ Ft | Yes | Yes | R-11 Minimum | \$3 | 15 | 100% of measure cost |
| Floor Insulation | Per SQ Ft | Yes | Yes | R-value of R-30 or higher, except for homes in IECC Climate Zone 4, where R-19 is permissible. | \$3 | 15 | 100% of measure cost |
| Rim Joist Insulation | Per SQ Ft | Yes | Yes | Minimum R-10 continuous insulated sheathing on the interior or exterior of the home or R-13 cavity insulation at the interior of the rim joist. | \$3 | 15 | 100% of measure cost |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-----------------|--------------------|-----------------------|---|----------------------------|-----------------------|---|
| Basement or Crawl Space Wall Insulation | Per SQ Ft | Yes | Yes | Climate Zone 4: R-10 or higher continuous insulation or R-13 cavity insulation Climate Zone 5: R-15 of higher continuous insulation or R-19 cavity insulation; or R-13 cavity insulation and R-5 continuous insulation | \$4 | 15 | 100% of measure cost |
| ENERGY STAR Windows | Per SQ Ft | Yes | Yes | ENERGY STAR | \$23 | 15 | 100% of measure cost |
| Home Energy Reports | Per Participant | Yes | No | Residential sector with available energy usage and billing data | \$0 | 3 | 100% of measure cost |
| Energy Saving Education | Per Project | Yes | No | Eligible assessment participant | \$158 | 1 | 100% of measure cost |
| Health & Safety | Per Project | Yes | No | Improvement required for safe installation of energy efficiency measure | \$3,000 | 1 | 100% of measure cost |

Deadline for Rebate Applications

There is no cost to eligible customers and no required rebate application.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one FTE, plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include 30 FTEs. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 32 shows the participation, energy savings, and coincident peak demand reduction estimates for the Energy Efficient Homes component. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

**Table 32. Pa PUC Table 9 – Resourced Constrained Energy Efficient Homes
Estimated Savings and Participation**

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---------------------------|-------------------------|--------------------------------------|----------|----------|----------|----------|----------|--------------------|
| LED Lighting - GSL | 2.1.1 | Energy Savings (MWh) | 6,334.13 | 5,410.68 | 5,410.68 | 4,394.48 | 2,574.45 | 24,124.41 |
| | | Summer Demand Reduction (MW) | 0.7264 | 0.6206 | 0.6206 | 0.5041 | 0.2955 | 2.7671 |
| | | Winter Demand Reduction (MW) | 0.7458 | 0.6371 | 0.6371 | 0.5175 | 0.3033 | 2.8410 |
| | | Projected Participation ² | 133,100 | 114,600 | 114,600 | 94,560 | 58,074 | 514,934 |
| Linear LED fixture | 2.1.1 | Energy Savings (MWh) | 9.02 | 7.52 | 7.52 | 6.02 | 3.01 | 33.09 |
| | | Summer Demand Reduction (MW) | 0.0011 | 0.0009 | 0.0009 | 0.0008 | 0.0004 | 0.0042 |
| | | Winter Demand Reduction (MW) | 0.0011 | 0.0009 | 0.0009 | 0.0007 | 0.0004 | 0.0039 |
| | | Projected Participation | 420 | 350 | 350 | 280 | 140 | 1,540 |
| Lighting Occupancy Sensor | 2.1.2 | Energy Savings (MWh) | 0.93 | 0.89 | 0.89 | 0.85 | 0.76 | 4.33 |
| | | Summer Demand Reduction (MW) | 0.0003 | 0.0003 | 0.0003 | 0.0003 | 0.0002 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0003 | 0.0003 | 0.0003 | 0.0002 | 0.0002 | 0.0012 |
| | | Projected Participation | 110 | 95 | 95 | 80 | 50 | 430 |
| Nightlight | 2.1.3 | Energy Savings (MWh) | 64.40 | 57.11 | 57.11 | 49.82 | 35.24 | 263.69 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 15,500 | 13,750 | 13,750 | 12,000 | 8,500 | 63,500 |
| Holiday Lights | 2.1.4 | Energy Savings (MWh) | 0.44 | 0.33 | 0.33 | 0.33 | 0.33 | 1.77 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 81 | 56 | 56 | 56 | 56 | 305 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Ductless Heat Pump | 2.2.3 | Energy Savings (MWh) | 105.45 | 105.45 | 105.45 | 105.45 | 105.45 | 527.24 |
| | | Summer Demand Reduction (MW) | 0.0189 | 0.0189 | 0.0189 | 0.0189 | 0.0189 | 0.0944 |
| | | Winter Demand Reduction (MW) | 0.0168 | 0.0168 | 0.0168 | 0.0168 | 0.0168 | 0.0839 |
| | | Projected Participation | 50 | 50 | 50 | 50 | 50 | 250 |
| ECM Circulation Fans | 2.2.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.48 | 0.48 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 3 | 3 |
| Maintenance - Heat Pump/AC | 2.2.6 | Energy Savings (MWh) | 15.26 | 11.12 | 14.13 | 14.13 | 13.68 | 68.32 |
| | | Summer Demand Reduction (MW) | 0.0023 | 0.0019 | 0.0022 | 0.0022 | 0.0022 | 0.0108 |
| | | Winter Demand Reduction (MW) | 0.0018 | 0.0012 | 0.0016 | 0.0016 | 0.0016 | 0.0078 |
| | | Projected Participation | 55 | 44 | 52 | 52 | 52 | 255 |
| Room Air Conditioner | 2.2.7 | Energy Savings (MWh) | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.04 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1 | 1 | 1 | 1 | 1 | 5 |
| Room AC Replacement | 2.2.8 | Energy Savings (MWh) | 7.71 | 6.82 | 6.82 | 6.82 | 6.82 | 34.99 |
| | | Summer Demand Reduction (MW) | 0.0143 | 0.0127 | 0.0127 | 0.0127 | 0.0127 | 0.0651 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 130 | 115 | 115 | 115 | 115 | 590 |
| Window Heat Pump | 2.2.9 | Energy Savings (MWh) | 19.83 | 16.47 | 13.42 | 9.76 | 6.10 | 65.59 |
| | | Summer Demand Reduction (MW) | 0.0028 | 0.0023 | 0.0019 | 0.0014 | 0.0009 | 0.0092 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-----------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.1246 | 0.1035 | 0.0843 | 0.0613 | 0.0383 | 0.4121 |
| | | Projected Participation | 65 | 54 | 44 | 32 | 20 | 215 |
| Duct Sealing & Duct Insulation | 2.2.10 | Energy Savings (MWh) | 15.76 | 12.37 | 12.37 | 12.37 | 12.37 | 65.22 |
| | | Summer Demand Reduction (MW) | 0.0018 | 0.0014 | 0.0014 | 0.0014 | 0.0014 | 0.0076 |
| | | Winter Demand Reduction (MW) | 0.0042 | 0.0033 | 0.0033 | 0.0033 | 0.0033 | 0.0174 |
| | | Projected Participation | 24 | 19 | 19 | 19 | 19 | 101 |
| Air Handler Filter Whistles | 2.2.11 | Energy Savings (MWh) | 54.43 | 54.26 | 54.26 | 54.26 | 54.26 | 271.46 |
| | | Summer Demand Reduction (MW) | 0.0130 | 0.0130 | 0.0130 | 0.0130 | 0.0130 | 0.0650 |
| | | Winter Demand Reduction (MW) | 0.0139 | 0.0139 | 0.0139 | 0.0139 | 0.0139 | 0.0694 |
| | | Projected Participation | 8,123 | 8,102 | 8,102 | 8,102 | 8,102 | 40,531 |
| ENERGY STAR Connected Thermostats | 2.2.12 | Energy Savings (MWh) | 100.98 | 110.15 | 123.90 | 137.66 | 161.43 | 634.12 |
| | | Summer Demand Reduction (MW) | 0.0113 | 0.0125 | 0.0143 | 0.0160 | 0.0187 | 0.0728 |
| | | Winter Demand Reduction (MW) | 0.0157 | 0.0169 | 0.0188 | 0.0206 | 0.0243 | 0.0962 |
| | | Projected Participation | 240 | 256 | 280 | 304 | 340 | 1,420 |
| ENERGY STAR Bathroom Exhaust Fan | 2.2.14 | Energy Savings (MWh) | 0.07 | 0.07 | 0.07 | 0.07 | 0.14 | 0.43 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 1 | 1 | 1 | 1 | 3 | 7 |
| Heat Pump Water Heater | 2.3.1 | Energy Savings (MWh) | 41.46 | 35.54 | 34.06 | 34.06 | 25.17 | 170.30 |
| | | Summer Demand Reduction (MW) | 0.0054 | 0.0046 | 0.0044 | 0.0044 | 0.0033 | 0.0222 |
| | | Winter Demand Reduction (MW) | 0.0090 | 0.0077 | 0.0074 | 0.0074 | 0.0055 | 0.0370 |
| | | Projected Participation | 28 | 24 | 23 | 23 | 17 | 115 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------------|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| Solar Water Heater | 2.3.2 | Energy Savings (MWh) | 1.97 | 0.00 | 0.00 | 0.00 | 0.00 | 1.97 |
| | | Summer Demand Reduction (MW) | 0.0002 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0004 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| Water Heater Tank Wrap | 2.3.3 | Energy Savings (MWh) | 40.80 | 34.93 | 34.93 | 29.06 | 17.33 | 157.06 |
| | | Summer Demand Reduction (MW) | 0.0046 | 0.0040 | 0.0040 | 0.0033 | 0.0020 | 0.0178 |
| | | Winter Demand Reduction (MW) | 0.0077 | 0.0066 | 0.0066 | 0.0055 | 0.0033 | 0.0298 |
| | | Projected Participation | 292 | 250 | 250 | 208 | 124 | 1,124 |
| Water Heater Temperature Setback | 2.3.4 | Energy Savings (MWh) | 521.00 | 438.74 | 438.74 | 356.47 | 164.53 | 1,919.47 |
| | | Summer Demand Reduction (MW) | 0.0555 | 0.0467 | 0.0467 | 0.0380 | 0.0175 | 0.2044 |
| | | Winter Demand Reduction (MW) | 0.0926 | 0.0780 | 0.0780 | 0.0634 | 0.0292 | 0.3412 |
| | | Projected Participation | 4,750 | 4,000 | 4,000 | 3,250 | 1,500 | 17,500 |
| Water Heater Pipe Insulation | 2.3.5 | Energy Savings (MWh) | 1,014.20 | 927.87 | 927.87 | 863.12 | 733.62 | 4,466.68 |
| | | Summer Demand Reduction (MW) | 0.1085 | 0.0992 | 0.0992 | 0.0923 | 0.0783 | 0.4776 |
| | | Winter Demand Reduction (MW) | 0.1817 | 0.1661 | 0.1661 | 0.1544 | 0.1310 | 0.7991 |
| | | Projected Participation | 69,200 | 65,200 | 65,200 | 62,200 | 56,200 | 318,000 |
| Low-Flow Faucet Aerator | 2.3.6 | Energy Savings (MWh) | 910.86 | 822.10 | 822.10 | 786.44 | 719.68 | 4,061.18 |
| | | Summer Demand Reduction (MW) | 0.1540 | 0.1439 | 0.1439 | 0.1399 | 0.1324 | 0.7142 |
| | | Winter Demand Reduction (MW) | 0.3472 | 0.3303 | 0.3303 | 0.3235 | 0.3108 | 1.6420 |
| | | Projected Participation | 17,510 | 16,510 | 16,510 | 16,110 | 15,360 | 82,000 |
| Low-Flow Showerhead | 2.3.7 | Energy Savings (MWh) | 2,567.62 | 2,300.70 | 2,300.70 | 2,193.47 | 1,965.31 | 11,327.81 |
| | | Summer Demand Reduction (MW) | 0.2872 | 0.2569 | 0.2569 | 0.2448 | 0.2191 | 1.2650 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---------------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.4835 | 0.4326 | 0.4326 | 0.4122 | 0.3688 | 2.1296 |
| | | Projected Participation | 16,030 | 15,030 | 15,030 | 14,630 | 13,780 | 74,500 |
| Thermostatic Shower Restriction Valve | 2.3.8 | Energy Savings (MWh) | 21.47 | 18.44 | 18.44 | 15.41 | 9.40 | 83.16 |
| | | Summer Demand Reduction (MW) | 0.0022 | 0.0019 | 0.0019 | 0.0016 | 0.0010 | 0.0085 |
| | | Winter Demand Reduction (MW) | 0.0037 | 0.0032 | 0.0032 | 0.0027 | 0.0016 | 0.0143 |
| | | Projected Participation | 353 | 303 | 303 | 253 | 154 | 1,366 |
| Smart Water Heater Controls | 2.3.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 | 0.09 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Refrigerator Replacement | 2.4.3 | Energy Savings (MWh) | 20.13 | 16.10 | 16.10 | 16.10 | 16.10 | 84.54 |
| | | Summer Demand Reduction (MW) | 0.0030 | 0.0024 | 0.0024 | 0.0024 | 0.0024 | 0.0125 |
| | | Winter Demand Reduction (MW) | 0.0030 | 0.0024 | 0.0024 | 0.0024 | 0.0024 | 0.0128 |
| | | Projected Participation | 25 | 20 | 20 | 20 | 20 | 105 |
| Freezer Replacement | 2.4.3 | Energy Savings (MWh) | 1.04 | 1.04 | 1.04 | 1.04 | 1.04 | 5.20 |
| | | Summer Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0008 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0006 |
| | | Projected Participation | 4 | 4 | 4 | 4 | 4 | 20 |
| Recycling - Cooler | 2.4.6 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.37 | 0.37 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| ENERGY STAR Clothes Washer | 2.4.8 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.13 | 0.13 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| ENERGY STAR Clothes Dryer | 2.4.9 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.79 | 0.79 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 7 | 7 |
| ENERGY STAR Dishwasher | 2.4.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Dehumidifier | 2.4.11 | Energy Savings (MWh) | 10.49 | 8.99 | 9.17 | 9.17 | 9.63 | 47.45 |
| | | Summer Demand Reduction (MW) | 0.0021 | 0.0018 | 0.0019 | 0.0019 | 0.0020 | 0.0097 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 50 | 44 | 44 | 44 | 46 | 227 |
| ENERGY STAR Ceiling Fan | 2.4.13 | Energy Savings (MWh) | 1.73 | 1.06 | 1.06 | 1.06 | 1.06 | 5.98 |
| | | Summer Demand Reduction (MW) | 0.0002 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0007 |
| | | Winter Demand Reduction (MW) | 0.0003 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0012 |
| | | Projected Participation | 65 | 40 | 40 | 40 | 40 | 225 |
| ENERGY STAR Air Purifier | 2.4.14 | Energy Savings (MWh) | 13.90 | 13.90 | 13.90 | 13.90 | 13.90 | 69.50 |
| | | Summer Demand Reduction (MW) | 0.0017 | 0.0017 | 0.0017 | 0.0017 | 0.0017 | 0.0086 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0022 | 0.0022 | 0.0022 | 0.0022 | 0.0022 | 0.0111 |
| | | Projected Participation | 55 | 55 | 55 | 55 | 55 | 275 |
| Advanced Power Strips | 2.5.1 | Energy Savings (MWh) | 2,248.59 | 2,013.89 | 2,013.89 | 1,880.91 | 1,453.18 | 9,610.47 |
| | | Summer Demand Reduction (MW) | 0.2718 | 0.2431 | 0.2431 | 0.2267 | 0.1743 | 1.1590 |
| | | Winter Demand Reduction (MW) | 0.3357 | 0.3007 | 0.3007 | 0.2811 | 0.2175 | 1.4357 |
| | | Projected Participation | 28,172 | 25,522 | 25,522 | 23,702 | 18,742 | 121,660 |
| Air Sealing | 2.6.1 | Energy Savings (MWh) | 7.78 | 7.78 | 7.78 | 7.78 | 7.78 | 38.91 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0005 |
| | | Winter Demand Reduction (MW) | 0.0025 | 0.0025 | 0.0025 | 0.0025 | 0.0025 | 0.0126 |
| | | Projected Participation | 10,300 | 10,300 | 10,300 | 10,300 | 10,300 | 51,500 |
| Weather Stripping, Caulking and Outlet Gaskets - Direct Install | 2.6.2 | Energy Savings (MWh) | 11.73 | 11.45 | 11.45 | 11.45 | 11.45 | 57.54 |
| | | Summer Demand Reduction (MW) | 0.0012 | 0.0012 | 0.0012 | 0.0012 | 0.0012 | 0.0060 |
| | | Winter Demand Reduction (MW) | 0.0020 | 0.0019 | 0.0019 | 0.0019 | 0.0019 | 0.0097 |
| | | Projected Participation | 42 | 41 | 41 | 41 | 41 | 206 |
| Weather Stripping, Caulking and Outlet Gaskets - Kit Delivery | 2.6.2 | Energy Savings (MWh) | 57.74 | 57.74 | 57.74 | 57.74 | 57.74 | 288.68 |
| | | Summer Demand Reduction (MW) | 0.0056 | 0.0056 | 0.0056 | 0.0056 | 0.0056 | 0.0278 |
| | | Winter Demand Reduction (MW) | 0.0060 | 0.0060 | 0.0060 | 0.0060 | 0.0060 | 0.0299 |
| | | Projected Participation | 33,000 | 33,000 | 33,000 | 33,000 | 33,000 | 165,000 |
| Ceiling/Attic Insulation | 2.6.3 | Energy Savings (MWh) | 10.91 | 10.91 | 10.91 | 10.91 | 10.91 | 54.56 |
| | | Summer Demand Reduction (MW) | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0023 |
| | | Winter Demand Reduction (MW) | 0.0037 | 0.0037 | 0.0037 | 0.0037 | 0.0037 | 0.0187 |
| | | Projected Participation | 14,800 | 14,800 | 14,800 | 14,800 | 14,800 | 74,000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Wall Insulation | 2.6.3 | Energy Savings (MWh) | 11.64 | 11.64 | 11.64 | 11.64 | 11.64 | 58.21 |
| | | Summer Demand Reduction (MW) | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0024 |
| | | Winter Demand Reduction (MW) | 0.0040 | 0.0040 | 0.0040 | 0.0040 | 0.0040 | 0.0199 |
| | | Projected Participation | 7,200 | 7,200 | 7,200 | 7,200 | 7,200 | 36,000 |
| Floor Insulation | 2.6.3 | Energy Savings (MWh) | 11.32 | 11.32 | 11.32 | 11.32 | 11.32 | 56.60 |
| | | Summer Demand Reduction (MW) | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0024 |
| | | Winter Demand Reduction (MW) | 0.0039 | 0.0039 | 0.0039 | 0.0039 | 0.0039 | 0.0194 |
| | | Projected Participation | 4,700 | 4,700 | 4,700 | 4,700 | 4,700 | 23,500 |
| Rim Joist Insulation | 2.6.3 | Energy Savings (MWh) | 4.80 | 4.80 | 4.80 | 4.80 | 4.80 | 24.02 |
| | | Summer Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0010 |
| | | Winter Demand Reduction (MW) | 0.0016 | 0.0016 | 0.0016 | 0.0016 | 0.0016 | 0.0082 |
| | | Projected Participation | 1,215 | 1,215 | 1,215 | 1,215 | 1,215 | 6,075 |
| Basement or Crawl Space Wall Insulation | 2.6.4 | Energy Savings (MWh) | 3.06 | 3.06 | 3.06 | 3.06 | 3.06 | 15.28 |
| | | Summer Demand Reduction (MW) | 0.0011 | 0.0011 | 0.0011 | 0.0011 | 0.0011 | 0.0056 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 3,110 | 3,110 | 3,110 | 3,110 | 3,110 | 15,550 |
| ENERGY STAR Windows | 2.6.5 | Energy Savings (MWh) | 0.78 | 0.78 | 0.78 | 0.78 | 0.78 | 3.92 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0012 |
| | | Projected Participation | 300 | 300 | 300 | 300 | 300 | 1,500 |
| Home Energy Reports | 2.7.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-------------------------|-------------------------|------------------------------|----------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 100 | 100 | 100 | 100 | 100 | 500 |
| Energy Saving Education | Custom | Energy Savings (MWh) | 1,010.00 | 863.55 | 863.55 | 717.10 | 424.20 | 3,878.40 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 10,000 | 8,550 | 8,550 | 7,100 | 4,200 | 38,400 |
| Health & Safety | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 47 | 47 | 47 | 47 | 47 | 235 |
| Energy Education | Custom | Energy Savings (MWh) | 101.00 | 85.85 | 85.85 | 70.70 | 40.40 | 383.80 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1,000 | 850 | 850 | 700 | 400 | 3,800 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 31.

Appliance Recycling Component

Description

PPL Electric Utilities will include appliance recycling in the Resource Constrained Energy Efficiency Program, a new offering for income-eligible customers, which is tailored for this customer subset's needs. This component mirrors the Residential Energy Efficiency Program and includes the scheduling, free pick-up, and environmentally responsible recycling of a variety of appliances, including, though not limited to, refrigerators and compact refrigerators, freezers, dehumidifiers, room air conditioners, and other appliances deemed acceptable by the Company. PPL Electric Utilities plans to utilize the same subcontractor or vendor for this component, allowing Resource Constrained Energy Efficiency Program participants to also receive real-time alerts to support the stress-free pickup of their appliances. The disposal process involves removing hazardous materials, such as chlorinated fluorocarbons, from the refrigerant and foam insulation, preparing refrigerant for reclamation, and recycling other materials, including metal and plastic. PPL Electric Utilities reserves the right to set and/or change the program requirements and eligibility, including minimum and maximum appliance sizes, number of units for pickup, and appliance type and condition. PPL Electric Utilities plans to offer curbside and in-home appliance pickup for one or more units, though it may offer other pickup options at its discretion. The Company plans to offer appliance recycling events to which customers may bring eligible appliances for recycling and receive an incentive. Income-eligible customers participating in these events may self-identify as eligible for later verification and contribute to program savings attribution.

Objective and Target Market

The goal of the Appliance Recycling component is to promote the environmentally responsible retirement and/or use of efficient appliances in existing residential end-use buildings with income-eligible customers and/or occupants and to achieve high customer satisfaction and the gross verified energy and coincident peak demand savings goals shown in Table 28. Through the component, the Company intends to promote other PPL Electric Utilities energy efficiency offerings for income-eligible customers, including the appropriate energy assessment offering, encourage participation in other assistance programs such as OnTrack, enhance relationships with retailers selling new appliances in resource-constrained communities, and prevent the resale of units on the secondary market. The Appliance Recycling component of the Resource Constrained Energy Efficiency Program is designed for residential sector customers at or below 150% of the federal poverty level, estimated at 325,000, and commercial and industrial customers that own multifamily buildings that serve income-eligible tenants who may benefit from residential end-use appliance recycling measures.

Ramp-up and Implementation Strategy

Appliance Recycling is an offering with high participation and customer satisfaction, though coordination between CSPs and/or subcontractors and vendors may be necessary to adequately serve income-eligible customers. Implementation activities continued through the end of Phase IV for all residential

customers, and activities will be carried over with new marketing and awareness specific to Resource Constrained Energy Efficiency Program eligible participants to support a successful launch in Phase V. This includes training for technicians performing assessments to recognize recycling opportunities. The Appliance Recycling component will continue to be delivered by the selected Residential Energy Efficiency Program CSP, in coordination with the Resource Constrained Energy Efficiency Program CSP. The CSP(s) will provide a central call center for appointment scheduling and customer support, provide program component marketing and awareness campaigns, process customer incentives, and provide data for the Company's tracking system. The CSP(s) will also coordinate with LIURP to ensure full access to the income-eligible community. PPL Electric Utilities will provide overall strategic direction, administration, and CSP management, while the EM&V CSP will provide evaluation services.

Marketing Strategy

PPL Electric Utilities and current CSPs have deep knowledge of the territory, customer demographics, and potential barriers of the income-eligible segment. The Company will work with the CSP to create a comprehensive, integrated marketing plan that will define the audience, select tactics, employ targeting, and execute campaigns based on industry standards, various research, and historical program data. Successful marketing approaches may include, but will not be limited to, print and email outreach, Company and CSP web assets, social media, outreach to multifamily building owners and operators, community events, retailer outreach and training, outreach to free refrigerator, freezer, or other appliance replacement participants, bill inserts, and/or newsletters. The Company will employ marketing strategies tailored to effectively reach and engage underserved customers and customers of different housing types and, when applicable, encourage cross-program participation.

- **Underserved Customers** – While income-eligible customers could participate in appliance recycling in prior phases, it was not part of the Phase IV Low-Income Program. The marketing strategy will leverage all available information to ensure income-eligible customers' needs are met throughout Phase V and that the component also experiences high participation in income-eligible communities. This includes leveraging Company and CSP segmentation data, publicly available information, and other similar resources.
- **Coordination** – The Company plans to utilize a single CSP, with qualified subcontractors to administer the portfolio of programs, which reduces barriers to coordination and ensures a high level of visibility across all offerings. This will allow cross-program participation where eligibility allows, as well as a clear understanding of coordination impacts. In addition, technicians performing in-home or remote assessments will be trained to identify recycling opportunities while in customer homes, especially those that can be combined with appliance replacement opportunities.
- **Multifamily Buildings** – Multifamily building owners will receive direct outreach and marketing. Coordinated income-eligible multifamily assessment sites will include appliance recycling as an additional opportunity for building owners and operators. These efforts will be coordinated by the CSP's multifamily outreach coordinator.

Issues, Risks, and Risk Management

Table 33 shows risks associated with Appliance Recycling and how the Company intends to mitigate those risks.

Table 33. Appliance Recycling Issues, Risks, and Risk Management Strategies

| Component(s) Affected | Issue/Risk | Risk Management Strategies |
|-----------------------|---|---|
| Appliance Recycling | Customer awareness of an offering in disadvantaged communities. | The Company will work with the selected CSP to create an income-eligible specific marketing plan with messaging appropriate for the community, including bilingual options. |

Appliance Recycling Eligible Measures and Incentives

Table 34 shows PPL Electric Utilities' initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. There is no expected cost for customers to participate. All incentive levels are designed to comply with the Pa PUC's plan template and Implementation Order. Measures not available in the TRM will be considered custom measures with an incentive range up to \$200 per unit. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company.

Table 34. Pa PUC TABLE 8 – Resource Constrained Appliance Recycling Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|---|
| Recycling - Room AC | Per Product | Yes | No | Working unit, no direct replacement | \$15 | 3 | Up to \$100 |
| Recycling - Refrigerator/Freezer | Per Product | Yes | No | Working unit, 10-30 cubic ft | \$35 | 5 | Up to \$200 |
| Recycling - Low-Capacity Refrigerator/Freezer | Per Product | Yes | No | Working unit, ≤ 10 cubic ft | \$15 | 5 | Up to \$100 |
| Recycling - Dehumidifier | Per Product | Yes | No | Working room dehumidifier unit, no direct replacement | \$15 | 4 | Up to \$100 |

Deadline for Rebate Applications

There is no rebate application for this component.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one FTE, plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include two FTEs. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 35 shows the participation, energy savings, and coincident peak demand reduction estimates for the Appliance Recycling component of the Resource Constrained Energy Efficiency Program. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

**Table 35. Pa PUC Table 9 – Resource Constrained Appliance Recycling
Estimated Savings and Participation**

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|--------------------------------------|--------|--------|--------|--------|--------|--------------------|
| Recycling - Room AC | 2.2.8 | Energy Savings (MWh) | 132.62 | 132.62 | 132.62 | 132.62 | 132.62 | 663.09 |
| | | Summer Demand Reduction (MW) | 0.2467 | 0.2467 | 0.2467 | 0.2467 | 0.2467 | 1.2335 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation ² | 750 | 750 | 750 | 750 | 750 | 3,750 |
| Recycling – Refrigerator/ Freezer | 2.4.3 | Energy Savings (MWh) | 408.53 | 408.53 | 408.53 | 408.53 | 408.53 | 2,042.64 |
| | | Summer Demand Reduction (MW) | 0.0604 | 0.0604 | 0.0604 | 0.0604 | 0.0604 | 0.3019 |
| | | Winter Demand Reduction (MW) | 0.0450 | 0.0450 | 0.0450 | 0.0450 | 0.0450 | 0.2248 |
| | | Projected Participation | 570 | 570 | 570 | 570 | 570 | 2,850 |
| Recycling - Low-Capacity Refrigerator/ Freezer | 2.4.4 | Energy Savings (MWh) | 9.78 | 9.78 | 9.78 | 9.78 | 9.78 | 48.92 |
| | | Summer Demand Reduction (MW) | 0.0014 | 0.0014 | 0.0014 | 0.0014 | 0.0014 | 0.0072 |
| | | Winter Demand Reduction (MW) | 0.0011 | 0.0011 | 0.0011 | 0.0011 | 0.0011 | 0.0054 |
| | | Projected Participation | 38 | 38 | 38 | 38 | 38 | 188 |
| Recycling - Dehumidifier | 2.4.12 | Energy Savings (MWh) | 531.08 | 531.08 | 531.08 | 531.08 | 531.08 | 2,655.42 |
| | | Summer Demand Reduction (MW) | 0.0917 | 0.0917 | 0.0917 | 0.0917 | 0.0917 | 0.4584 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 500 | 500 | 500 | 500 | 500 | 2,500 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 34.

Student Energy Efficiency Education Component

Description

PPL Electric Utilities will include the Student Energy Efficiency Education component for income-eligible customers in Phase V and provide in-class presentations and/or school-based events to educate students and their families about energy safety, use, management, and conservation through hands-on activities, discussions, multimedia, and other materials deemed appropriate by the Company. Where possible, PPL Electric Utilities will align grade-level content with the Pennsylvania State Academic Standards. Students who participate in the presentations or events will receive a package of energy efficiency products to take home and install with the help of a trusted adult. In addition, the Company, with the support of the CSP, may also offer contests and challenges which provide the students and educators with additional opportunities to engage with the material and demonstrate energy efficiency learnings. Participating educators will receive lesson plans, training information, materials, and/or energy efficiency products to help reinforce energy efficiency education before and after the presentations. There are four planned Student Energy Efficiency Education channels, though the Company may choose to expand or contract these channels based on participation:

- **Primary Grade** – Presentations for Students and Educators in grades 2 – 3.
- **Intermediate Grade** – Presentations for Students and Educators in grades 5 – 7.
- **Secondary Grade** – Presentations for Students and Educators in grades 9 – 12.
- **Student Energy Efficiency Events** – This may include participation in school assemblies, Parent Teacher Organization events, Parent Nights, and/or back-to-school events, and local club or sporting events.

Objective and Target Market

The goal of the Student Energy Efficiency Education component is to promote energy efficiency in education settings in disadvantaged communities to inform students about energy efficiency behaviors and activities through enjoyable and interactive presentations utilizing high-quality curricula. This education is designed to be a first step in a longer energy efficiency journey, empowering participants, now and in the future. The informational aspect is supported through energy efficiency measures made available to students and educators that can be used in classrooms and installed at home. All materials, information, and products are designed to achieve high student and educator satisfaction. The Student Energy Efficiency Education component is designed to target residential sector customers at or below 150% of federal poverty, estimated at 325,000, and educators at schools serving the students and families. Since not all schools have 100% income-eligible students, the Company will direct the EM&V CSP to update savings attribution through the estimated percentage of eligible students based on publicly available data.

Ramp-up and Implementation Strategy

The Student Energy Efficiency Education component is a continuation from Phase IV, though is being expanded to income-eligible customers in Phase V. The selected CSP will work closely with the Residential Energy Efficiency Program CSP to implement the component and provide marketing in conjunction with the Company, provide school recruitment, curriculum development, on-site presentations and event management, while also providing any take-home materials and energy efficiency products. The Residential Energy Efficiency CSP will provide a call center and support services for educators and administrators on behalf of the Resource Constrained Energy Efficiency Program and provide data for the Company's tracking system. PPL Electric Utilities will provide overall strategic direction, administration, and CSP management, while the EM&V CSP will provide evaluation services.

Marketing Strategy

The Company and CSP will create a marketing strategy for potential schools and districts designed to promote the empowerment of students as energy leaders at school and at home. The selected Residential Energy Efficiency Program CSP will promote the program to a list of qualified PPL Electric Utilities' territory schools through awareness materials and marketing efforts to participants primarily through email and direct mail. The messaging will emphasize interactive learning, community impact, and engaging classroom activities. Whenever possible, the most at-risk and disadvantaged communities will be prioritized. The Company will employ marketing strategies tailored to effectively reach and engage underserved customers and customers of different housing types and, when applicable, encourage cross-program participation.

- **Underserved Customers** – While the residential version of the component included income-eligible communities in prior phases, this offering will be more targeted and focused on this customer subset's specific needs. Schools will be identified using publicly available data, providing insight into districts that have a majority of households at or below 150% of the federal poverty level. Opportunities for further participation in other Resource Constrained offerings, particularly the Single Family and Multifamily Assessment channels, will be featured in student printed materials.
- **Multifamily Buildings** – This program component is not contingent on housing type; students of both homeowners and tenants in all housing types are eligible. Communication and marketing are school-focused, not customer-dependent.
- **Coordination** – The Company plans to utilize a single CSP, with qualified subcontractors to administer the portfolio of programs, which reduces barriers to coordination and ensures a high level of visibility across all offerings. This will allow cross-program participation where eligibility allows, as well as a clear understanding of coordination impacts.

Issues, Risks, and Risk Management

Table 36 shows risks associated with Student Energy Efficiency Education and how the Company intends to mitigate those risks.

Table 36. Student Energy Efficiency Issues, Risks, and Risk Management Strategies

| Component(s) Affected | Issue/Risk | Risk Management Strategies |
|---------------------------|--|--|
| Student Energy Efficiency | Identification of and engagement with disadvantaged communities. | The Company has developed a comprehensive Income-Eligible Needs Assessment Dashboard that allows for meter-level identification of likely eligible homes, communities, and neighborhoods. This tool will be shared with the selected CSP for proper targeting of eligible schools. |

Student Energy Efficiency Education Eligible Measures and Incentives

Table 37 shows PPL Electric Utilities’ initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. There is no expected cost for customers to participate. All incentive levels are designed to comply with the Pa PUC’s plan template and Implementation Order. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company. There is no cost for students or educators to participate in this program component. In addition, all measures available to customers may be delivered via any available channel to meet the customer’s unique needs.

**Table 37. Pa PUC TABLE 8 – Resource Constrained Student Energy Efficiency Education
Eligible Measures**

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|----------------------------------|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|---|
| LED Lighting - GSL | Per Bulb | Yes | No | LED | \$4 | 15 | 100% of Measure Cost |
| Nightlight | Per Product | Yes | No | LED | \$2 | 8 | 100% of Measure Cost |
| Air Handler Filter Whistles | Per Product | Yes | No | Applied to central forced-air furnaces, CAC, or heat pump systems | \$2 | 5 | 100% of Measure Cost |
| Water Heater Temperature Setback | Per Product | Yes | No | Electric water heater where applicable | \$1 | 2 | 100% of Measure Cost |
| Low-Flow Faucet Aerator | Per Product | Yes | No | ≤ 1.5 GPM flow rate, homes with electric water heater where applicable | \$2 | 10 | 100% of Measure Cost |
| Low-Flow Showerhead | Per Product | Yes | No | Replaces standard showerhead, homes with electric water heater where applicable | \$5 | 10 | 100% of Measure Cost |
| Advanced Power Strips | Per Product | Yes | No | Tier 1 or Tier 2 | \$19 | 5 | 100% of Measure Cost |

Deadline for Rebate Applications

There is no rebate application for this component.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include one FTE plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include one FTE. As a component of a larger program, FTEs may be fractional depending on the delegation of responsibilities.

Estimated Savings and Participation

Table 38 shows the participation, energy savings, and coincident peak demand estimates for the Student Energy Efficiency program component. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the component to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

**Table 38. Pa PUC Table 9 – Resource Constrained Student Energy Efficiency Education
Estimated Savings and Participation**

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------------|-------------------------|--------------------------------------|--------|--------|--------|--------|--------|--------------------|
| LED Lighting - GSL | 2.1.1 | Energy Savings (MWh) | 277.57 | 277.57 | 331.47 | 331.47 | 331.47 | 1,549.55 |
| | | Summer Demand Reduction (MW) | 0.0328 | 0.0328 | 0.0392 | 0.0392 | 0.0392 | 0.1832 |
| | | Winter Demand Reduction (MW) | 0.0328 | 0.0328 | 0.0392 | 0.0392 | 0.0392 | 0.1832 |
| | | Projected Participation ² | 17,100 | 17,100 | 19,950 | 19,950 | 19,950 | 94,050 |
| Nightlight | 2.1.3 | Energy Savings (MWh) | 18.59 | 18.59 | 21.69 | 21.69 | 21.69 | 102.27 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 4,500 | 4,500 | 5,250 | 5,250 | 5,250 | 24,750 |
| Air Handler Filter Whistles | 2.2.11 | Energy Savings (MWh) | 28.05 | 28.05 | 32.72 | 32.72 | 32.72 | 154.25 |
| | | Summer Demand Reduction (MW) | 0.0067 | 0.0067 | 0.0078 | 0.0078 | 0.0078 | 0.0370 |
| | | Winter Demand Reduction (MW) | 0.0072 | 0.0072 | 0.0084 | 0.0084 | 0.0084 | 0.0396 |
| | | Projected Participation | 4,200 | 4,200 | 4,900 | 4,900 | 4,900 | 23,100 |
| Water Heater Temperature Setback | 2.3.4 | Energy Savings (MWh) | 460.67 | 460.67 | 537.45 | 537.45 | 537.45 | 2,533.70 |
| | | Summer Demand Reduction (MW) | 0.0491 | 0.0491 | 0.0572 | 0.0572 | 0.0572 | 0.2698 |
| | | Winter Demand Reduction (MW) | 0.0819 | 0.0819 | 0.0955 | 0.0955 | 0.0955 | 0.4504 |
| | | Projected Participation | 4,200 | 4,200 | 4,900 | 4,900 | 4,900 | 23,100 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Low-Flow Faucet Aerator | 2.3.6 | Energy Savings (MWh) | 56.09 | 56.09 | 65.44 | 65.44 | 65.44 | 308.51 |
| | | Summer Demand Reduction (MW) | 0.0261 | 0.0261 | 0.0304 | 0.0304 | 0.0304 | 0.1435 |
| | | Winter Demand Reduction (MW) | 0.0747 | 0.0747 | 0.0871 | 0.0871 | 0.0871 | 0.4106 |
| | | Projected Participation | 5,400 | 5,400 | 6,300 | 6,300 | 6,300 | 29,700 |
| Low-Flow Showerhead | 2.3.7 | Energy Savings (MWh) | 163.52 | 163.52 | 190.77 | 190.77 | 190.77 | 899.34 |
| | | Summer Demand Reduction (MW) | 0.0173 | 0.0173 | 0.0202 | 0.0202 | 0.0202 | 0.0951 |
| | | Winter Demand Reduction (MW) | 0.0290 | 0.0290 | 0.0339 | 0.0339 | 0.0339 | 0.1596 |
| | | Projected Participation | 4,200 | 4,200 | 4,900 | 4,900 | 4,900 | 23,100 |
| Advanced Power Strips | 2.5.1 | Energy Savings (MWh) | 378.51 | 378.51 | 441.59 | 441.59 | 441.59 | 2,081.78 |
| | | Summer Demand Reduction (MW) | 0.0422 | 0.0422 | 0.0492 | 0.0492 | 0.0492 | 0.2321 |
| | | Winter Demand Reduction (MW) | 0.0580 | 0.0580 | 0.0677 | 0.0677 | 0.0677 | 0.3192 |
| | | Projected Participation | 5,700 | 5,700 | 6,650 | 6,650 | 6,650 | 31,350 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 37.

Resource Constrained Pilot Programs

Description

PPL Electric Utilities may work with the selected EM&V CSP to develop a Window Saddle Heat Pump Pilot program for multifamily tenants to examine the savings potential and benefit to customers in Act 129 energy efficiency programs. This pilot will not require further future approval by SWE or Commission staff, though stakeholder notification will be provided via a PPL Electric Utilities biannual stakeholder meeting prior to launch. If C&I customers receive benefits based on the building type and meter configuration, those savings and associated costs will be properly attributed to the correct sector. A key research question is whether this nascent technology can effectively replace baseboard resistance heat in multifamily applications. Metrics to be tracked include product performance, customer response, and avoided electric demand and energy savings impacts. If launched, the EM&V CSP will submit an evaluation plan to the Phase V SWE for approval. The initial pilot may span 24 months and have a budget of up to \$1 million. The Company will issue a final report at the conclusion of the potential pilot, and the EM&V CSP will provide evaluation results as part of the annual reporting process. PPL Electric Utilities may choose to continue the program without the submission of an EE&C plan change with contingency funding if it is determined that the program provides a benefit to customers and/or helps the Company meet compliance targets.

PPL Electric Utilities reserves the right to propose additional pilots as deemed necessary by the Company to demonstrate new technology, methods, program design, or for any other reason, utilizing allocated contingency funding. All proposed pilots will be filed with the Commission for review, as is outlined in the Final Implementation Order.

3.4. Small and Large Commercial and Industrial (Business Energy Efficiency Program)

While the Pa PUC separated the C&I sector into small (Pa PUC Plan V Template Section 3.3) and large (Pa PUC Plan V Template Section 3.4) in the plan template, PPL Electric Utilities' Plan has only the Business Energy Efficiency Program, which is eligible to both small and large industrial customers. Section 3.4 in this report contains all information for both applicable sectors.

PPL Electric Utilities' Business Energy Efficiency Program is an umbrella program with components that will be available for the entirety of Phase V, from 2026 through 2031. The Business Energy Efficiency Program includes measures and services for all large and small C&I customers. The small C&I component of the program includes agricultural measures for small farms, which may fall into the residential customer sector. Table 39 and Table 40 show the percentages of the customer sector budgets represented by the small and large C&I components of the Business Energy Efficiency Program.

Table 39. Percentages of Customer Sector Budgets Represented by the Small C&I Component of the Business Energy Efficiency Program

| Customer Sector | Percentage of Sector Budget |
|----------------------|-----------------------------|
| Residential | 0.3% |
| Resource Constrained | 0% |
| Small C&I | 97.4% |
| Large C&I | 0% |

Table 40. Percentages of Customer Sector Budgets Represented by the Large C&I Component of the Business Energy Efficiency Program

| Customer Sector | Percentage of Sector Budget |
|----------------------|-----------------------------|
| Residential | 0% |
| Resource Constrained | 0% |
| Small C&I | 0% |
| Large C&I | 100% |

The Business Energy Efficiency Program has a cost-effective TRC, as found in Table 56 in Section 8. The Business Energy Efficiency Program includes the following components:

- Small C&I Business Solutions (Table 41)
- Large C&I Business Solutions (Table 42)

Table 41. Small C&I Business Solutions Component Savings by Program Year

| Component | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total Phase V ¹ | % of Program |
|-----------|-------------------------------|--------|---------|---------|--------|--------|----------------------------|--------------|
| Small C&I | Energy Savings (MWh) | 96,714 | 116,741 | 112,469 | 97,527 | 75,163 | 498,615 | 100% |
| | Summer Demand Reduction (MW) | 18.65 | 25.38 | 26.61 | 17.58 | 12.83 | 93.56 | 100% |
| | Winter Demand Reduction (MW) | 10.16 | 16.58 | 18.13 | 11.26 | 9.27 | 57.90 | 100% |
| | Average Demand Reduction (MW) | 14.40 | 20.98 | 22.37 | 14.42 | 11.05 | 75.73 | 100% |

¹ Total values may not equal the sum of all program year or component values due to rounding.

Table 42. Large C&I Business Solutions Component Savings by Program Year

| Component | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total Phase V ¹ | % of Program |
|-----------|----------------------|--------|--------|--------|--------|--------|----------------------------|--------------|
| Large C&I | Energy Savings (MWh) | 50,422 | 65,955 | 74,729 | 72,806 | 57,223 | 321,135 | 100% |

| Component | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total Phase V ¹ | % of Program |
|-----------|-------------------------------|------|-------|-------|-------|------|----------------------------|--------------|
| | Summer Demand Reduction (MW) | 9.65 | 12.21 | 18.47 | 18.35 | 9.94 | 61.12 | 100% |
| | Winter Demand Reduction (MW) | 5.98 | 7.93 | 12.28 | 14.75 | 7.40 | 40.84 | 100% |
| | Average Demand Reduction (MW) | 7.82 | 10.07 | 15.37 | 16.55 | 8.67 | 50.98 | 100% |

¹ Total values may not equal the sum of all program year or component values due to rounding.

Program and Component Operations and Administration

The selected Business Energy Efficiency Program CSP will provide operational management, administrative support, and implementation activities, while PPL Electric Utilities EE&C staff will provide oversight and administration of all programs and components.

Estimated Program Budgets

Table 37 and Table 44 show the estimated budget by year for the Small and Large C&I Business Solutions components of the business Energy Efficiency Program, divided by incentive and non-incentive costs.

Table 43. Pa PUC Table 10 – Small C&I Business Solutions Component Budget by Year

| Cost Element | | PY18 | PY19 | PY20 | PY21 | PY22 | Phase V Total |
|---|----------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| Total Budget (\$000) | | \$17,270 | \$20,089 | \$19,740 | \$17,649 | \$14,571 | \$89,320 |
| Incentives (\$000)² | Rebates | \$8,298 | \$9,784 | \$9,449 | \$8,055 | \$6,300 | \$41,886 |
| | Upstream/ Midstream Buydown | \$1,652 | \$1,717 | \$1,683 | \$1,588 | \$1,414 | \$8,053 |
| | Kits | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| | Direct Install Materials & Labor | \$304 | \$861 | \$959 | \$980 | \$772 | \$3,876 |
| | Incentive Total | \$10,254 | \$12,362 | \$12,091 | \$10,622 | \$8,486 | \$53,815 |
| Non-Incentives (\$000)³ | Program Design | \$323 | \$362 | \$359 | \$331 | \$286 | \$1,661 |
| | Administrative | \$2,282 | \$2,451 | \$2,428 | \$2,259 | \$2,000 | \$11,421 |
| | EDC Delivery Costs | \$261 | \$280 | \$277 | \$258 | \$228 | \$1,304 |
| | CSP Delivery Fees | \$2,800 | \$3,081 | \$3,051 | \$2,803 | \$2,426 | \$14,160 |
| | Marketing | \$915 | \$1,045 | \$1,029 | \$922 | \$766 | \$4,677 |
| | Other ⁴ | \$435 | \$509 | \$504 | \$455 | \$379 | \$2,283 |
| | Non-Incentive Total | \$7,016 | \$7,728 | \$7,649 | \$7,027 | \$6,085 | \$35,505 |
| Percent Incentives | | 59% | 62% | 61% | 60% | 58% | 60% |

| Cost Element | PY18 | PY19 | PY20 | PY21 | PY22 | Phase V Total |
|--------------|------|------|------|------|------|---------------|
|--------------|------|------|------|------|------|---------------|

¹Total values may not equal the sum of all program year values due to rounding.

²Braided Funding Support Labor costs are not included in this table because they are estimated to be \$0.

³EM&V and AEPS Registration Support Costs are not included in this table because AEPS Registration Support Costs are estimated to be \$0 and EM&V costs are included as portfolio costs.

⁴Indirect CSP Delivery Costs, e.g., fleet vehicles, subscriptions, IT.

Table 44. Pa PUC Table 10 – Large C&I Business Solutions Component Budget by Year

| Cost Element | | PY18 | PY19 | PY20 | PY21 | PY22 | Phase V Total ¹ |
|---|----------------------------------|----------------|-----------------|-----------------|-----------------|-----------------|----------------------------|
| Total Budget (\$000) | | \$9,800 | \$12,027 | \$13,420 | \$12,855 | \$10,497 | \$58,598 |
| Incentives (\$000)² | Rebates | \$4,029 | \$5,321 | \$6,053 | \$6,004 | \$4,443 | \$25,850 |
| | Upstream/Midstream Buydown | \$1,071 | \$1,061 | \$1,043 | \$994 | \$921 | \$5,090 |
| | Kits | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| | Direct Install Materials & Labor | \$254 | \$393 | \$527 | \$441 | \$345 | \$1,960 |
| | Incentive Total | \$5,354 | \$6,775 | \$7,623 | \$7,439 | \$5,710 | \$32,901 |
| Non-Incentives (\$000)³ | Program Design | \$221 | \$271 | \$300 | \$271 | \$241 | \$1,305 |
| | Administrative | \$1,372 | \$1,586 | \$1,723 | \$1,607 | \$1,452 | \$7,740 |
| | EDC Delivery Costs | \$189 | \$218 | \$237 | \$221 | \$200 | \$1,064 |
| | CSP Delivery Fees | \$1,662 | \$1,965 | \$2,181 | \$2,052 | \$1,814 | \$9,675 |
| | Marketing | \$650 | \$792 | \$887 | \$820 | \$696 | \$3,844 |
| | Other ⁴ | \$351 | \$419 | \$469 | \$445 | \$385 | \$2,069 |
| Non-Incentive Total | \$4,446 | \$5,252 | \$5,797 | \$5,416 | \$4,787 | \$25,698 | |
| Percent Incentives | | 55% | 56% | 57% | 58% | 54% | 56% |

¹Total values may not equal the sum of all program year values due to rounding.

²Braided Funding Support Labor costs are not included in this table because they are estimated to be \$0.

³EM&V and AEPS Registration Support Costs are not included in this table because AEPS Registration Support Costs are estimated to be \$0 and EM&V costs are included as portfolio costs.

⁴Indirect CSP Delivery Costs, e.g., fleet vehicles, subscriptions, IT.

Schedule and Milestones for Program and All Components

For all program components, the schedule and milestones include submission of the Company's EE&C Plan on December 1, 2025, launch of Phase V on June 1, 2026, semi-annual reports submitted annually starting on January 15, 2027, annual reports submitted annually starting on September 30, 2027, and the end of all components at the end of the phase on May 31, 2031.

Program and Component EM&V

All EM&V requirements for all program components will be detailed in PPL Electric Utilities' evaluation plan, submitted to SWE for review. The Company and third-party EM&V CSP will conduct an evaluation on an annual basis for each program and component to verify savings and establish other key performance indicators, such as incentive costs, administrative costs, and participation. The EM&V CSP will follow all applicable methods in the TRM and the Evaluation Framework to calculate energy savings and coincident peak demand reduction. PPL Electric Utilities' impact and process evaluation activities will vary by year and program component and/or channel.

Small and Large C&I Business Solutions Components

Description

PPL Electric Utilities' Small and Large C&I Business Solutions components provide education and technical assistance for all business types in our service territory, financial incentives to drive energy efficiency market transformation and offset project costs, while providing verified savings for a wide variety of measures in new and existing facilities. Available measures may include, but are not limited to, HVAC, refrigeration, solar, controls, lighting, appliances, motors and drives, CHP, compressed air, and more. Comprehensive measures are defined by the Pa PUC's plan template for residential measures and the Company has followed a similar methodology in determining comprehensiveness for C&I; both components include a variety of comprehensive measures across available channels. There are four primary delivery channels within both the Small and Large C&I Business Solutions components. Except where otherwise noted, the offerings and participation channels are the same for both components. These include the following:

- **Downstream** – PPL Electric Utilities will provide end-use level, or downstream, incentives for business customers. This includes prescriptive measures as found in the Pa TRM. The CSP will review, process, and validate all submitted applications, follow up as necessary, and distribute incentives upon project completion and final savings calculations.
- **Custom Measures** – PPL Electric Utilities will continue to offer incentives to customers and trade allies for complex and comprehensive projects generally not found in the Pa TRM. This pathway encourages customers to utilize advanced, innovative, and impactful measures, processes, and optimizations. Available measures may include, but are not limited to, CHP, advanced controls, compressed air, and other projects deemed necessary by the Company.
- **Direct Discount** – The Direct Discount channel, available exclusively to small commercial and industrial customers, allows qualified trade allies to provide lower project costs for customers through an incentive paid directly to the trade ally. Trade allies will identify opportunities, provide project management, and apply for available incentives on the customer's behalf to offset upfront project costs. Customers who utilize PPL Electric Utilities' closed network of Direct Discount trade allies, created and maintained by the selected CSP, may be eligible for higher incentives, while trade allies may receive additional technical support and training.

- **Midstream** – PPL Electric Utilities will offer a comprehensive midstream channel with a variety of available products, providing incentives to distributors rather than customers, to reduce program participation barriers through quick access to efficient products. Midstream offerings drive market transformation by aligning the incentive with the supply chain. Midstream rebates also simplify the process for customers and trade allies by embedding the rebate at the point of sale. The Company and selected CSP will engage and qualify distributors for participation and ensure they stock, promote, and provide high-efficiency technology options to participating contractors with an immediate rebate. The midstream offering increases trade ally participation and customer satisfaction, while reducing administrative costs and participant confusion.
- **Business Support Services** – Business Support Services is a new offering in Phase V dedicated to supporting the business community and ensuring high participation for as many industries and sectors as possible. This is accomplished through a strong focus on relationship building and providing customers with energy consumption and strategic insights by industry experts. Business Support Services are structured in tiers according to customer need:
 - *Basic Engineering Support*– Customers can access direct application support to reduce administrative burden, receive site visits to help determine measure and rebate opportunities, and ongoing technical support for customers and trade allies.
 - *Deep Engineering Support*
 - *Feasibility Studies* – The selected CSP will provide enhanced engineering support in the early development stages of a project; this may include feasibility studies for businesses that cannot undertake this effort without support.
 - *Virtual Commissioning* – The Company may leverage virtual commissioning via remote diagnostics and advanced analytics to optimize building systems without always requiring onsite visits. This provides a cost-effective option for business customers to identify and implement operational improvements to extend equipment life and realize energy savings with minimal disruption to daily activities.
- **Customer Training and Certifications** – PPL Electric Utilities will provide meaningful education and training for trade allies and customers, such as the Building Operator Certification offered in partnership with Penn College in Phase IV. This certification will build in-house expertise so customers can identify and implement energy-saving measures, taking advantage of all available rebates. Trained staff can also optimize equipment to balance long-term savings and performance. The Company is dedicated to helping businesses stay competitive in a rapidly evolving energy landscape.
- **Strategic Energy Management (“SEM”)** – Customers with complex energy usage, such as hospitals, data centers, and manufacturing plants and that have interest in long-term energy solutions can take advantage of SEM support that braids all areas of Business Support Services and available rebates into an integrated behavioral, operational, and overarching energy management strategy that may include all elements within the Business Support Services

channel. PPL Electric Utilities' SEM channel will be tailored to each customer's needs, though it may be delivered over 12 to 24 months and include site assessment, technical support, employee engagement and training, goal setting and tracking, and project planning.

Objective and Target Market

The goal of the Small and Large C&I Business Solutions components is to promote qualifying high-efficiency equipment and technology installations, equipment repair, systems optimization, and operational or process changes that reduce both energy consumption and coincident peak demand across a variety of commercial and industrial end uses, facility types, and building designs. The target market is approximately 300,000 business customers, regardless of industry and sector, as well as residential customers (e.g., those who own farms), and may benefit from business energy efficiency rebates. Through cross-promotion, education, and technical assistance, PPL Electric Utilities will increase awareness of the benefits of energy efficiency for all business customers. In addition, through the custom pathway in the Downstream channel, the Company will also support emerging technology and create program flexibility throughout Phase V. These activities are designed to achieve the gross verified energy and coincident peak demand savings forecasts shown in Table 41 and Table 42.

Ramp-up and Implementation Strategy

Most component channels existed in Phase IV and will be carried over to Phase V, though a robust transitional strategy for managing differences in eligibility, incentive levels, and overall awareness is planned. The Company does not expect to carry a waitlist from Phase IV, though there are projects that have received approval in Phase IV that will not be completed by the end of the phase. PPL Electric Utilities will allow projects started in the prior phase to receive either the Phase IV or Phase V incentive level, whichever is higher. The implementation strategy for the components is dependent on the channel, though it relies on a robust network of trusted trade allies, distributor partners, and other market actors to act as program ambassadors and drive high customer uptake. The selected CSP will provide enhanced customer support through digital tools, such as a web portal for application submission, energy savings calculators, and other online resources:

- **Downstream** – PPL Electric Utilities will coordinate marketing activities with the selected CSP to build awareness and drive customers and trade allies to complete applications or provide direct application support for eligible measures. This includes ensuring the required documentation and data, if necessary, are provided, per the approved EM&V framework. Rebates, in the form of a check or other approved method, will be provided to customers once requirements for each particular measure or project are met.
- **Direct Discount** – The selected CSP will recruit, develop, train, and manage the closed network of trade allies in key technology areas for this channel. The trade allies will be responsible for co-marketing the program and providing overall project management for each customer. All available incentives provided by the Company will be communicated to the customer at the invoice level, with customers covering the remainder of the costs. Trade allies will be educated on how incentives can help improve their close rates and differentiate them from competitors.

Trade allies will be provided active sales and ready-to-use marketing support, as well as public recognition opportunities and potential incentives for performance.

- **Midstream** – The Company and selected CSP will leverage the existing distributor network, expanding it through market research to identify key product categories, sales volume, and those with regional market influence. Distributors will provide point-of-purchase instant discounts while submitting for reimbursement directly with the CSP. Participating distributors will be educated on how the program may boost sales and customer satisfaction. They may be provided with incentives to align with the program’s distributor model, and will be provided with a quick, easy-to-understand enrollment process.
- **Business Support Services** – PPL Electric Utilities will take a phased, customer-centric approach focused on value delivery and strategic partnerships. The Company has identified high-potential business sectors and their common technical and operational barriers to energy efficiency. Support services will be packaged according to customer needs in tiers—basic support, deep technical support, and strategic energy management, with a single point of entry. This will align the offerings with customer size, level of sophistication, and organizational goals. The selected CSP will provide specialized expertise at scale and promote how the service can reduce project risk and position customers for a variety of incentives.

Marketing Strategy

PPL Electric Utilities and current CSPs have successfully reached business customers across multiple phases of Act 129 and have undertaken significant research efforts to prepare for Phase V. This includes direct customer and trade ally input and preferences, barriers to participation, and effective marketing approaches. The Company will collaborate with the selected CSP to create a sector and industry-specific marketing plan that will define the audience, select tactics, employ targeting, and execute campaigns based on industry standards, key internal and external research, and historical program data. There will be a continual focus on sectors with high unrealized energy savings potential as well as underserved customer segments. The marketing strategy will also feature these additional areas of focus:

- **Channels and Tactics** – PPL Electric Utilities' overall marketing approach will promote the program through a variety of mass media channels, which may include but are not limited to newspapers, radio, direct mail, bill inserts, and digital advertising. The Company will also communicate program information via the Company’s EE&C website, CSP website(s), newsletters, case studies, and co-branded marketing materials. This effort will be supported by hosting webinars and participating in trade shows, industry conferences, and other outreach events to increase visibility and awareness. The CSP will utilize marketing campaigns targeted at specific customer segments and industry, personalized to the business and industry whenever possible.
- **Market Actor and Partner Engagement** – The Company and selected CSP will leverage relationships with trade allies, manufacturers, distributors, and key market partners (e.g., trade associations, agencies) to co-market energy-efficient products and services. This includes

coordinating advertising opportunities and program messaging with trade allies and distributors. The Company will publish and distribute brochures, technical guides, and case studies to support customer decision-making. As noted elsewhere, trade allies and distributors may be eligible for rewards, incentives, and recognition programs to enhance participation and performance.

- **Targeted Marketing** – The selected CSP will develop targeted campaigns for facility managers, engineers, contractors, building owners, property managers, and tenant decision-makers. They may also conduct one-on-one marketing and consulting with small and mid-sized commercial customers through CSP outreach and trade allies. PPL Electric Utilities’ key account managers will continue to play an important role in supporting energy efficiency messaging for large C&I customers, while the Business Account Services team will support messaging to small C&I customers. Finally, limited-time offers, special promotions, and leveraging our Business Support Services will ensure customer awareness and additional program uptake.
- **Underserved Customers** – The Company will offer a variety of business support services, including financing, that will support business customers, particularly small business customers, with administrative burdens to participation, technical resources, and access to financial resources that will allow access to incentives and rebates in a way not previously possible.
- **Coordination** – The Company plans to utilize a single CSP, with qualified subcontractors to administer the portfolio of programs, which reduces barriers to coordination and ensures a high level of visibility across all offerings. This will allow cross-program participation where eligibility allows, as well as a clear understanding of coordination impacts.
- **Multifamily Buildings** – As an area of focus, the Company will coordinate with other portfolio components that treat in-unit multifamily customers, sharing leads and developing total building site strategies that allow multifamily building owners to take advantage of Business Energy Efficiency Program incentives for common spaces.

Issues, Risks, and Risk Management

Table 45 shows risks associated with the Small and Large Commercial Business Solutions components and how the Company intends to mitigate those risks.

Table 45. Small and Large C&I Business Solutions Issues, Risks, and Risk Management Strategies

| Delivery Channels Affected | Issue/Risk | Risk Management Strategies |
|--|---|---|
| Downstream, Midstream, Direct Discount | Internal research indicates that budget constraints are the top barrier among both participants and non-participants. | The Company and CSP may tailor incentives by measure and sector, with a plan to keep levels consistent to ensure steady customer participation. |
| Downstream, Midstream, Direct Discount | PPL Electric Utilities’ research indicates that over half of non- | In non-participant outreach, the CSP will use a variety of channels to share participant success stories that address non-participant barriers like |

| Delivery Channels Affected | Issue/Risk | Risk Management Strategies |
|---|--|--|
| | participants (54%) haven't made EE improvements, often due to a lack of awareness | lack of time and resources, while emphasizing energy savings and ease of participation. The Company will also use an online interest form that allows businesses to request contact, allowing proactive follow-up from appropriate personnel. |
| Downstream, Midstream, Direct Discount, Business Support Services | Market actors indicated confusion around product codes, eligible equipment, program updates, and other important application issues. | The Company and CSP will make program newsletters more visible and easier to find for those not subscribed. The submission portal will be reviewed for updates. The CSP will hold additional live webinars focused on program changes and best practices with a Q&A section. |

Small and Large C&I Business Solutions Eligible Measures and Incentives

Table 46 and Table 47 show PPL Electric Utilities' initial measures, eligibility qualifications, incentive level ranges, incremental costs, and estimated useful life. The cost to participating customers is the incremental cost minus the incentive amount. Incentives were determined based on the service or product incremental cost and the most cost-effective incentive range to ensure customer participation. Not all measures may be available at all times and the Company may remove measures, change eligibility, application process and administrative requirements, adjust incentive levels and/or tiers, or other aspects of the program and/or component due to savings achieved, costs, evaluation requirements and/or issues, customer feedback, Company priorities, or for any other reason, as determined by the Company. In addition, all measures available to customers may be delivered via any available channel to meet the customer's unique needs. Customers will have the option to assign rebate payments to a third party. All incentive levels are designed to comply with the Pa PUC's Implementation Order. The Company may cap incentives on a per-project basis as a percentage of total project costs, excluding internal labor, or based on an annual cap by project or participating customer. This may include a parent company cap for organizations with a campus setting or a common owner with multiple buildings. PPL Electric Utilities may also implement a minimum TRC requirement for qualifying measures if it is determined to be necessary for program and/or portfolio success. For any proposed changes to the program, component, or measures as noted above, the Company will strive to provide 30-day notification, though it reserves the right to make immediate changes based on the Company's discretion.

Table 46. Pa PUC TABLE 8 – Small C&I Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| Lighting Retrofits | Per Product | No | No | LED fixtures and lamps replacing less efficient lighting in existing commercial or industrial facilities. Screw-based integrated LED lamps are not eligible | \$2,693 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| New Construction Lighting | Per Project | No | No | New construction, ≥ 45 lumens/watt | \$532,614 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Lighting Controls | Per Product | No | No | Automatically adjusts lighting levels based on schedule or sensor | \$775 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| LED Exit Signs | Per Product | No | No | Early replacement from incandescent or fluorescent to LED | \$69 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| LED Refrigeration Display Case Lighting | Per Door | No | No | Retrofit on existing refrigerator, freezer, or cooler | \$11 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Midstream Lighting | Per Product | No | No | LED fixtures and lamps replacing less efficient lighting in existing commercial or industrial facilities. Screw-based integrated LED lamps are not eligible | \$713 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Indoor Horticultural Lighting | Per Project | No | No | Design Lights Consortium (DLC) Horticultural Technical Requirements V3.0 or later | \$169,458 | 7 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| ASHP and Air Source AC | Per Product | No | Yes | Comfort heating and/or cooling end use | \$18,658 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ASHP and Air Source AC - Midstream | Per Product | No | Yes | Comfort heating and/or cooling end use | \$18,658 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Electric Chiller | Per Product | No | Yes | Standard comfort cooling applications, defined as unitary electric chillers serving a single load at the system or sub-system level | \$76,816 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ground or Groundwater Source Heat Pump | Per Product | No | Yes | Exceeds energy efficiency requirements of the International Energy Conservation Code (IECC) 2021 | \$10,985 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ductless Mini-Split Heat Pump | Per Product | No | Yes | Cold Climate, ENERGY STAR Version 6.1 | \$1,516 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Midstream Mini-Split Heat Pump | Per Product | No | Yes | Cold Climate, ENERGY STAR Version 6.1 | \$1,516 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Small C&I HVAC Refrigerant Charge Correction | Per Product | No | Yes | Documented tune-ups for package or split systems up to 20 tons, small C&I customers | \$33 | 3 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| HVAC Tune Up | Per Project | No | No | Documented tune-ups for air conditioners and heat pumps operating in commercial applications up to 20 tons | \$7,538 | 3 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Room Air Conditioner | Per Product | No | No | Efficiency exceeds the minimum level as required by the federal standards effective May 26, 2026 | \$124 | 9 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| HVAC Controls: Guest Room Occupancy Sensor | Per Product | No | No | Automatically adjusts the temperature setback in hotel guest rooms during unoccupied periods | \$208 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| HVAC Controls: Economizer | Per SQFT | No | Yes | Dual enthalpy economizers on HVAC equipment in commercial applications | \$0.05 | 3 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Computer Room Air Conditioner | Per Product | No | Yes | Exceed TRM baseline efficiencies | \$904 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Electronically Commutated Plug Fans on Computer Room Air Conditioner/Handler | Per HP | No | No | Electronically Commutated Plug Fan | \$277 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| VSD on Computer Room Air Conditioner or Handler Fan Motor | Per HP | No | Yes | New construction or retrofit | \$340 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| Circulation Fan: High-Volume Low-Speed | Per Product | No | Yes | 8 to 24 ft diameter, commercial and industrial applications | \$4,074 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Demand Controlled Ventilation | Per SQFT | No | Yes | Commercial and institutional applications, retrofit on HVAC systems without economizers installed | \$2 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Advanced Rooftop Controls | Per Product | No | Yes | Commercial and institutional applications in buildings served by single-zone packaged HVAC units that include functional integrated economizers | \$3,146 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Connected Thermostat | Per Product | No | No | ENERGY STAR | \$76 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Adjustment to Programmable Thermostats | Per Product | No | No | Adjustment align HVAC operation with building occupancy | \$0 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Duct Sealing And Insulation | Per Product | No | Yes | Retrofit only, HVAC supply ducts passing through an unconditioned space | \$10,860 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Chilled Water Pipe Insulation | Per Foot | No | No | Electric chiller, retrofit, ≥ 1 inch of insulation | \$10 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Premium Efficiency Motors | Per HP | No | Yes | Replacement of old motors with new energy efficient motors of the same rated HP | \$197 | 15 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---------------------------------|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| VFD Improvements | Per Product | No | Yes | A motor with a VFD control replacing a motor without a VFD control | \$2,067 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ECM Circulating Fan | Per Product | No | Yes | Circulating fan motors of 1 HP or less, retrofit for air handling equipment with an SP or PSC fan motor | \$319 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| VSD on Kitchen Exhaust Fan | Per HP | No | No | Kitchen ventilation system with VSD and demand ventilation controls and sensors | \$1,069 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ECM Circulator Pump | Per Product | No | Yes | An ECM or BPM circulator pump replacing single-speed induction motor circulator pumps in space heating and hot water applications. | \$66 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Efficiency Pumps | Per Product | No | Yes | Compliant pumps will achieve a PEI of 1.0 or less. All pumps manufactured after January 27, 2020 must comply with the DOE's energy conservation standard as described in 10 CFR 431 Subpart Y | \$142 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Heat Pump Water Heaters | Per Product | No | Yes | ENERGY STAR | \$1,204 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Low Flow Pre-Rinse Spray Valves | Per Product | No | No | Electric water heater, maximum GPM varies by product class | \$662 | 8 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| Domestic Hot Water Pipe Insulation | Per Project | No | No | Uninsulated electric DHW piping in non-residential facility with looped system and operational circulation pump, ≥ 1 inch of insulation that complies with the IECC specifications | \$4 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Freezer Case | Per Product | No | No | ENERGY STAR | \$750 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Efficiency Evaporator Fan Motors for Walk-in or Reach-in Cases | Per Product | No | Yes | Replacement of existing SP evaporator fan motors or PSC motors in walk-in or reach-in refrigerated display cases with an ECM or a PMS motor | \$429 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Evaporator Fan Controllers | Per Product | No | Yes | Installed in medium-temperature walk-in or reach-in coolers or low temperature walk-in or reach-in freezers | \$162 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Floating Head Pressure Control | Per HP | No | Yes | Applied to a single-compressor refrigeration system with FHPC in commercial applications. FHPCs must have a minimum Saturated Condensing Temperature programmed for the floating head pressure control of ≤70 °F. Compressor must be 1 HP or larger. | \$431 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Anti-Sweat Heater Control | Per Product | No | Yes | Added to glass door cooler or refrigerator with uncontrolled heaters utilizing either ON/OFF or micro pulse controls | \$831 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| Evaporator Coil Defrost Control | Per Product | No | Yes | Added to existing walk-in coolers or freezers without defrost controls | \$987 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Variable Speed Refrigeration Compressor | Per HP | No | Yes | Replaces a slide valve control system in an existing commercial refrigeration system | \$1,951 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Strip Curtains for Walk-in Cooler or Freezer | Per Product | No | No | Install or retrofit strip curtains in commercial walk-in cooler and freezer doors. Strip curtains must be at least 0.06 inches thick | \$5,193 | 4 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Night Covers for Display Cases | Per Product | No | No | Installed on existing open-type refrigerated display cases, where covers are deployed during the facility's unoccupied hours | \$72 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Auto Closer for Cooler or Freezer | Per Product | No | No | Installed for walk-in freezer or cooler, door perimeter \geq 16 feet | \$573 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Door with Low or No Anti-Sweat Heat for Reach-In Cooler or Freezer | Per Product | No | No | Upright display case door \geq 57 inches tall, no-heat/low-heat clear glass door with heat reflective treated glass, be gas filled, or both | \$697 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Suction Pipe Insulation for Walk-In Cooler or Freezer | Per Foot | No | No | Must insulate bare refrigeration suction lines \leq 1-5/8 inches in diameter on existing equipment; Medium temperature lines require 3/4 inch flexible, closed-cell, nitrite rubber or equivalent insulation; Low temperature lines require 1-inch flexible, closed-cell, nitrite rubber or equivalent | \$6 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | insulation; Insulation exposed to the outdoors must be protected from the weather | | | |
| Refrigerated Display Case with Doors Replacing Open Case | Per Foot | No | No | A new, vertical case with no sweat doors that meets federal standard requirements, replaces open display case | \$390 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Adding Doors to Existing Refrigerated Display Case | Per Foot | No | No | Retrofit existing vertical open display cases with zero heat doors | \$419 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Refrigerated Case Light Occupancy Sensors | Per Product | No | No | Motion-based lighting controls that allow LED case lighting to be dimmed or turned off | \$55 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Novelty Cooler Shutoff Timer | Per Product | No | No | Adds a control system feature to automatically shut off novelty coolers based on pre-set store operating hours | \$303 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Clothes Washer | Per Product | No | No | ENERGY STAR commercial clothes washer in commercial laundromat or multifamily laundry room | \$677 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Bathroom Ventilation Fan in Commercial Application | Per Product | No | No | ENERGY STAR | \$49 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Ice Machines | Per Product | No | No | ENERGY STAR air-cooled batch-type or continuous ice machine | \$414 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| Beverage and Snack Machine Controls | Per Product | No | No | Added to non-ENERGY STAR, non-refrigerated machines | \$245 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Electric Steam Cooker | Per Product | No | No | ENERGY STAR | \$1,706 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Combination Oven | Per Product | No | No | 5-40 pan capacity, meets ENERGY STAR idle rate and cooking efficiency requirements | \$1,899 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Convection Oven | Per Product | No | No | Installation of an electric convection oven that meets ENERGY STAR specifications. | \$1,118 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Fryer | Per Product | No | No | ENERGY STAR | \$1,903 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Hot Food Holding Cabinet | Per Product | No | No | ENERGY STAR | \$2,479 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Dishwasher | Per Product | No | No | ENERGY STAR version 3.0 | \$5,576 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Griddle | Per Product | No | No | ENERGY STAR | \$1,289 | 12 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| Commercial Induction Cooktops | Per Product | No | No | Each cooking unit/zone within the induction cooktop must meet a minimum 80% cooking (boil) energy efficiency percentage as determined by the ASTM F1521-22 test method | \$574 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ceiling & Wall Insulation | Per SQFT | No | Yes | Installation of insulation in conditioned, non-residential buildings or in common areas of multifamily complexes that are electrically heated and/or cooled | \$1 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Advanced Power Strips | Per Product | No | No | Tier 1 or Tier 2 | \$24 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Server | Per Product | No | No | ENERGY STAR, replacement of an existing server in a data center or closet | \$2,204 | 4 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Server Virtualization | Per Product | No | No | Consolidation of virtualized servers that are either removed or physically disconnected from power | \$1,089 | 4 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Cycling Refrigerated Thermal Mass Dryer | Per HP | No | Yes | ≤ 600 CFM capacity | \$5 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Air-Entraining Air Nozzle | Per Product | No | No | Replacement of a non-air entraining air nozzle, uses <15 CFM at 100 psig, industrial applications | \$495 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| No-Loss Condensate Drain | Per Product | No | No | Retrofit existing timed drained system with new no-loss condensate drain properly sized for the compressed air system | \$256 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Air Tanks for Load/No Load Compressors | Per HP | No | No | Installation of new air receivers with pressure/flow controls to load/no load compressors with storage ratio of ≥ 4 gallons of storage per CFM. | \$7,000 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Variable-Speed Drive Air Compressor | Per HP | No | Yes | Installation or retrofit a ≤ 40 HP compressor with variable speed control | \$7,000 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Compressed Air Controller | Per HP | No | Yes | Installation of a compressed air pressure or flow controller for compressed air systems, minimum storage of 3gal/ CFM, compressed air systems total motor nameplate capacity ≥ 40 hp | \$36 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Compressed Air Low Pressure Drop Filters | Per HP | No | No | Pressure drop ≤ 1 psi when new and 3 psi at element change | \$12 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Compressed Air Mist Eliminations | Per HP | No | No | Installation of mist eliminator air filters for compressed air system with < 1 psi pressure drop and > 50 HP | \$20 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Efficiency Transformer | Per Product | No | Yes | More efficient than the federal standard | \$3,117 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Engine Block Heater Timer | Per Product | No | Yes | Commercial, industrial, and agricultural applications | \$17 | 15 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|--|--|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| High Frequency Battery Chargers | Per Product | No | Yes | Minimum power conversion efficiency of 90% and 8-hour shift operation five days per week | \$402 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Uninterruptible Power Supply (UPS) | Per Product | No | Yes | ENERGY STAR version 2.0 UPS alternating current output system < 2 kW that connects to a 15A single phase 120V outlet (NEMA 5-15A) | \$47 | 7 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Building Operator Certification Training | Per Project | No | No | Training by an institution that is accredited by the National BOC Advisory Commission, with certificate of completion. Applicable to buildings that exceed 20,000 sq ft | \$4,299 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Photovoltaic (PV) Solar Generation | Per Project | No | Yes, when combined with other measures | Installation of a photovoltaic solar system that uses generated power to offset concurrent building loads and feeds onto the local power grid through net metering. All projects must receive an interconnection agreement and comply with all EDC requirements. | \$162,703 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Automatic Milker Takeoffs | Per Product | No | No | Installation of automatic milker take-offs that determine milking end time, with a vacuum pump system serving the impacted milking units that is equipped with a variable speed drive | \$3,004 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Dairy Scroll Compressors | Per Product | No | Yes | Replaces an existing reciprocating compressor or installed in a new construction application | \$557 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ag High-Efficiency Ventilation Fans With | Per Product | No | Yes | Installation of high-efficiency ventilation fans to replace standard efficiency ventilation fans or | \$281 | 13 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| and Without Thermostats | | | | the installation of a thermostat controlling either new efficient fans or existing fans. Equipment must be purchased through a commercial channel for installation at a farm. | | | \$2500/kW first year savings |
| Ag Heat Reclaimers | Per Product | No | Yes | Installation of heat recovery equipment on dairy parlor milk refrigeration systems to pre-heat hot water. Must have electric water heating equipment | \$5,840 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ag High Volume Low Speed Fans | Per Product | No | No | Replaces conventional circulating fans, meets federal baseline standards with a ceiling fan energy index that ≥ 1.31 at 40% rated RPM and has a CEI ≥ 1.00 at 100% rated RPM | \$7,010 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Livestock Waterer | Per Product | No | No | Thermostatically controlled with 2-inches or more of factory-installed insulation. | \$553 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps | Per Product | No | Yes | Installation of a VSD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability | \$5,052 | 14 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Low Pressure Irrigation System | Per Product | No | Yes | $\geq 50\%$ reduction in irrigation pumping pressure, pre- and post-retrofit pump pressure measurements are required | \$1,138 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM HVAC | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$317,277 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--------------------------------|-----------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| CUSTOM AGRICULTURE | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$455,253 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM MOTORS / COMPRESSED AIR | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$151,016 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM REFRIGERATION | Per Project | No | No | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$256,736 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Custom CHP | Per Project | No | Yes | Projects may be required to meet minimum TRC | \$5,710,026 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Custom Other | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site. | \$513,825 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Virtual RCx | Per Participant | No | No | SCI customer sector and available usage data | \$83,237 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Benchmarking | Per Benchmark | No | No | SCI customer sector and available usage data | \$0 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Financing Buy Down | Per Loan | No | No | Meets third-party eligibility | \$7,849 | 5 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--------------------------------------|--------------------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| Facility Assessments | Per Participant | No | No | None, by customer request | \$1,000 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Technical Audits/Feasibility Studies | Per Audit | No | No | None, by customer request | \$7,000 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| C&I Load Shift | Per Participant & Per kW | No | No | SCI customer sector and available usage and billing data | \$37,500 | 1 | Up to \$100/kW, up to \$100,000 per participant |

Table 47. Pa PUC TABLE 8 – Large C&I Eligible Measures

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---------------------------|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| Lighting Retrofits | Per Product | No | No | LED fixtures and lamps replacing less efficient lighting in existing commercial or industrial facilities. Screw-based integrated LED lamps are not eligible | \$319 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| New Construction Lighting | Per Project | No | No | New construction, ≥ 45 lumens/watt | \$532,614 | 15 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| Lighting Controls | Per Product | No | No | Automatically adjusts lighting levels based on schedule or sensor | \$564 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| LED Exit Signs | Per Product | No | No | Early replacement from incandescent or fluorescent to LED | \$33 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| LED Refrigeration Display Case Lighting | Per Door | No | No | Retrofit on existing refrigerator, freezer, or cooler | \$11 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Midstream Lighting | Per Product | No | No | LED fixtures and lamps replacing less efficient lighting in existing commercial or industrial facilities. Screw-based integrated LED lamps are not eligible | \$713 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Indoor Horticultural Lighting | Per Project | No | No | Design Lights Consortium (DLC) Horticultural Technical Requirements V3.0 or later | \$254,188 | 7 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ASHP and Air Source AC | Per Product | No | Yes | Comfort heating and/or cooling end use | \$18,658 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| ASHP and Air Source AC - Midstream | Per Product | No | Yes | Comfort heating and/or cooling end use | \$18,658 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Electric Chiller | Per Product | No | Yes | Standard comfort cooling applications, defined as unitary electric chillers serving a single load at the system or sub-system level | \$76,816 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ground or Groundwater Source Heat Pump | Per Product | No | Yes | Exceeds energy efficiency requirements of the International Energy Conservation Code (IECC) 2021 | \$10,985 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ductless Mini-Split Heat Pump | Per Product | No | Yes | Cold Climate, ENERGY STAR Version 6.1 | \$1,516 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Midstream Mini-Split Heat Pump | Per Product | No | Yes | Cold Climate, ENERGY STAR Version 6.1 | \$1,516 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| HVAC Tune Up | Per Project | No | No | Documented tune-ups for air conditioners and heat pumps operating in commercial applications up to 20 tons | \$7,538 | 3 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Room Air Conditioner | Per Product | No | No | Efficiency exceeds the minimum level as required by the federal standards effective May 26, 2026 | \$124 | 9 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| HVAC Controls: Guest Room Occupancy Sensor | Per Product | No | No | Automatically adjusts the temperature setback in hotel guest rooms during unoccupied periods | \$208 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| HVAC Controls: Economizer | Per SQFT | No | Yes | Dual enthalpy economizers on HVAC equipment in commercial applications | \$0.05 | 3 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Computer Room Air Conditioner | Per Product | No | Yes | Exceed TRM baseline efficiencies | \$904 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Electronically Commutated Plug Fans on Computer Room Air Conditioner/Handler | Per HP | No | No | Electronically Commutated Plug Fan | \$277 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| VSD on Computer Room Air Conditioner or Handler Fan Motor | Per HP | No | Yes | New construction or retrofit | \$340 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Circulation Fan: High-Volume Low-Speed | Per Product | No | Yes | 8 to 24 ft diameter, commercial and industrial applications | \$4,074 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Demand Controlled Ventilation | Per SQFT | No | Yes | Commercial and institutional applications, retrofit on HVAC systems without economizers installed | \$2 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|----------------------------------|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| Advanced Rooftop Controls | Per Product | No | Yes | Commercial and institutional applications in buildings served by single-zone packaged HVAC units that include functional integrated economizers | \$3,146 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Connected Thermostat | Per Product | No | No | ENERGY STAR | \$76 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Duct Sealing And Insulation | Per Product | No | Yes | Retrofit only, HVAC supply ducts passing through an unconditioned space | \$10,860 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Chilled Water Pipe Insulation | Per Foot | No | No | Electric chiller, retrofit, ≥ 1 inch of insulation | \$10 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Premium Efficiency Motors | Per HP | No | Yes | Replacement of old motors with new energy efficient motors of the same rated HP | \$197 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| VFD Improvements | Per Product | No | Yes | A motor with a VFD control replacing a motor without a VFD control | \$2,067 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ECM Circulating Fan | Per Product | No | Yes | Circulating fan motors of 1 HP or less, retrofit for air handling equipment with an SP or PSC fan motor | \$319 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| VSD on Kitchen Exhaust Fan | Per HP | No | No | Kitchen ventilation system with VSD and demand ventilation controls and sensors | \$1,069 | 15 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|------------------------------------|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| ECM Circulator Pump | Per Product | No | Yes | An ECM or BPM circulator pump replacing single-speed induction motor circulator pumps in space heating and hot water applications. | \$66 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Efficiency Pumps | Per Product | No | Yes | Compliant pumps will achieve a PEI of 1.0 or less. All pumps manufactured after January 27, 2020 must comply with the DOE's energy conservation standard as described in 10 CFR 431 Subpart Y. | \$142 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Heat Pump Water Heaters | Per Product | No | Yes | ENERGY STAR | \$1,204 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Low Flow Pre-Rinse Spray Valves | Per Product | No | No | Electric water heater, maximum GPM varies by product class | \$662 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Domestic Hot Water Pipe Insulation | Per Project | No | No | Uninsulated electric DHW piping in non-residential facility with looped system and operational circulation pump, ≥ 1 inch of insulation that complies with the IECC specifications | \$4 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Freezer Case | Per Product | No | No | ENERGY STAR | \$750 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Efficiency Evaporator Fan | Per Product | No | Yes | Replacement of existing SP evaporator fan motors or PSC motors in walk-in or reach-in | \$312 | 15 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| Motors for Walk-in or Reach-in Cases | | | | refrigerated display cases with an ECM or a PMS motor | | | \$2500/kW first year savings |
| Evaporator Fan Controllers | Per Product | No | Yes | Installed in medium-temperature walk-in or reach-in coolers or low temperature walk-in or reach-in freezers | \$162 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Floating Head Pressure Control | Per HP | No | Yes | Applied to a single-compressor refrigeration system with FHPC in commercial applications. FHPCs must have a minimum Saturated Condensing Temperature programmed for the floating head pressure control of ≤ 70 °F. Compressor must be 1 HP or larger. | \$431 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Anti-Sweat Heater Control | Per Product | No | Yes | Added to glass door cooler or refrigerator with uncontrolled heaters utilizing either ON/OFF or micro pulse controls | \$831 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Evaporator Coil Defrost Control | Per Product | No | Yes | Added to existing walk-in coolers or freezers without defrost controls | \$987 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Variable Speed Refrigeration Compressor | Per HP | No | Yes | Replaces a slide valve control system in an existing commercial refrigeration system | \$1,951 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Strip Curtains for Walk-in Cooler or Freezer | Per Product | No | No | Installed or retrofit strip curtains in commercial walk-in cooler and freezer doors. Strip curtains must be at least 0.06 inches thick | \$3,776 | 4 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| Night Covers for Display Cases | Per Product | No | No | Installed on existing open-type refrigerated display cases, where covers are deployed during the facility's unoccupied hours | \$72 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Auto Closer for Cooler or Freezer | Per Product | No | No | Installed for walk-in freezer or cooler, door perimeter \geq 16 feet | \$494 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Door with Low or No Anti-Sweat Heat for Reach-In Cooler or Freezer | Per Product | No | No | Upright display case door \geq 57 inches tall, no-heat/low-heat clear glass door with heat reflective treated glass, be gas filled, or both | \$697 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Suction Pipe Insulation for Walk-In Cooler or Freezer | Per Foot | No | No | Must insulate bare refrigeration suction lines \leq 1-5/8 inches in diameter on existing equipment ; Medium temperature lines require 3/4 inch flexible, closed-cell, nitrile rubber or equivalent insulation; Low temperature lines require 1-inch flexible, closed-cell, nitrile rubber or equivalent insulation; Insulation exposed to the outdoors must be protected from the weather | \$6 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Refrigerated Display Case with Doors Replacing Open Case | Per Foot | No | No | A new, vertical case with no sweat doors that meets federal standard requirements, replaces open display case | \$390 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Adding Doors to Existing Refrigerated Display Case | Per Foot | No | No | Retrofit existing vertical open display cases with zero heat doors | \$419 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| Refrigerated Case Light Occupancy Sensors | Per Product | No | No | Motion-based lighting controls that allow LED case lighting to be dimmed or turned off | \$55 | 8 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Novelty Cooler Shutoff Timer | Per Product | No | No | Adds a control system feature to automatically shut off novelty coolers based on pre-set store operating hours | \$303 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Clothes Washer | Per Product | No | No | ENERGY STAR commercial clothes washer in commercial laundromat or multifamily laundry room | \$677 | 11 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Bathroom Ventilation Fan in Commercial Application | Per Product | No | No | ENERGY STAR | \$49 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Ice Machines | Per Product | No | No | ENERGY STAR air-cooled batch-type or continuous ice machine | \$414 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Beverage and Snack Machine Controls | Per Product | No | No | Added to non-ENERGY STAR, non-refrigerated machines | \$245 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Electric Steam Cooker | Per Product | No | No | ENERGY STAR | \$1,706 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Combination Oven | Per Product | No | No | 5-40 pan capacity, meets ENERGY STAR idle rate and cooking efficiency requirements | \$1,899 | 12 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| ENERGY STAR Commercial Convection Oven | Per Product | No | No | Installation of an electric convection oven that meets ENERGY STAR specifications. | \$1,118 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Fryer | Per Product | No | No | ENERGY STAR | \$1,903 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Hot Food Holding Cabinet | Per Product | No | No | ENERGY STAR | \$2,479 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Dishwasher | Per Product | No | No | ENERGY STAR version 3.0 | \$2,472 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Commercial Griddle | Per Product | No | No | ENERGY STAR | \$1,289 | 12 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Commercial Induction Cooktops | Per Product | No | No | Each cooking unit/zone within the induction cooktop must meet a minimum 80% cooking (boil) energy efficiency percentage as determined by the ASTM F1521-22 test method | \$574 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ceiling & Wall Insulation | Per SQFT | No | Yes | Installation of insulation in conditioned, non-residential buildings or in common areas of multifamily complexes that are electrically heated and/or cooled | \$1 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| Advanced Power Strips | Per Product | No | No | Tier 1 or Tier 2 | \$24 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| ENERGY STAR Server | Per Product | No | No | ENERGY STAR, replacement of an existing server in a data center or closet | \$2,204 | 4 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Server Virtualization | Per Product | No | No | Consolidation of virtualized servers that are either removed or physically disconnected from power | \$1,089 | 4 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Cycling Refrigerated Thermal Mass Dryer | Per HP | No | Yes | ≤ 600 CFM capacity | \$5 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Air-Entraining Air Nozzle | Per Product | No | No | Replacement of a non-air entraining air nozzle, uses <15 CFM at 100 psig, industrial applications | \$146 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| No-Loss Condensate Drain | Per Product | No | No | Retrofit existing timed drained system with new no-loss condensate drain properly sized for the compressed air system | \$256 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Air Tanks for Load/No Load Compressors | Per HP | No | No | Installation of new air receivers with pressure/flow controls to load/no load compressors with storage ratio of ≥ 4 gallons of storage per CFM | \$7,000 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Variable-Speed Drive Air Compressor | Per HP | No | Yes | Installation or retrofit a ≤40 HP compressor with variable speed control | \$7,000 | 13 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| | | | | | | | \$2500/kW first year savings |
| Compressed Air Controller | Per HP | No | Yes | Installation of a compressed air pressure or flow controller for compressed air systems, minimum storage of 3gal/ CFM, compressed air systems total motor nameplate capacity \geq 40 hp | \$36 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Compressed Air Low Pressure Drop Filters | Per HP | No | No | Pressure drop \leq 1 psi when new and 3 psi at element change | \$12 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Compressed Air Mist Eliminations | Per HP | No | No | Installation of mist eliminator air filters for compressed air system with $<$ 1 psi pressure drop and $>$ 50 HP | \$1 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Efficiency Transformer | Per Product | No | Yes | More efficient than the federal standard | \$3,117 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Engine Block Heater Timer | Per Product | No | Yes | Commercial, industrial, and agricultural applications | \$17 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| High Frequency Battery Chargers | Per Product | No | Yes | Minimum power conversion efficiency of 90% and 8-hour shift operation five days per week | \$402 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Uninterruptible Power Supply (UPS) | Per Product | No | Yes | ENERGY STAR version 2.0 UPS alternating current output system $<$ 2 kW that connects to a 15A single phase 120V outlet (NEMA 5-15A) | \$47 | 7 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--|-------------|--------------------|--|---|----------------------------|-----------------------|--|
| Building Operator Certification Training | Per Project | No | No | Training by an institution that is accredited by the National BOC Advisory Commission, with certificate of completion. Applicable to buildings that exceed 20,000 sq ft | \$4,299 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Photovoltaic (PV) Solar Generation | Per Project | No | Yes, when combined with other measures | Installation of a photovoltaic solar system that uses generated power to offset concurrent building loads and feeds onto the local power grid through net metering. All projects must receive an interconnection agreement and comply with all EDC requirements | \$895,750 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Automatic Milker Takeoffs | Per Product | No | No | Installation of automatic milker take-offs that determine milking end time, with a vacuum pump system serving the impacted milking units that is equipped with a variable speed drive | \$3,004 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Dairy Scroll Compressors | Per Product | No | Yes | Replaces an existing reciprocating compressor or installed in a new construction application | \$557 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ag High-Efficiency Ventilation Fans With and Without Thermostats | Per Product | No | Yes | Installation of high-efficiency ventilation fans to replace standard efficiency ventilation fans or the installation of a thermostat controlling either new efficient fans or existing fans. Equipment must be purchased through a commercial channel for installation at a farm. | \$281 | 13 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ag Heat Reclaimers | Per Product | No | Yes | Installation of heat recovery equipment on dairy parlor milk refrigeration systems to pre-heat hot water. Must have electric water heating equipment | \$5,840 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Ag High Volume Low Speed Fans | Per Product | No | No | Replaces conventional circulating fans, meets federal baseline standards with a ceiling fan | \$7,010 | 15 | Up to \$0.75/kWh and/or up to |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|---|-------------|--------------------|-----------------------|--|----------------------------|-----------------------|--|
| | | | | energy index that ≥ 1.31 at 40% rated RPM and has a CEI ≥ 1.00 at 100% rated RPM | | | \$2500/kW first year savings |
| Livestock Waterer | Per Product | No | No | Thermostatically controlled with 2-inches or more of factory-installed insulation. | \$553 | 10 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps | Per Product | No | Yes | Installation of a VSD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability | \$5,052 | 14 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Low Pressure Irrigation System | Per Product | No | Yes | $\geq 50\%$ reduction in irrigation pumping pressure, pre- and post-retrofit pump pressure measurements are required | \$1,138 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM HVAC | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$317,277 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM AGRICULTURE | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$455,253 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM MOTORS / COMPRESSED AIR | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$151,016 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| CUSTOM REFRIGERATION | Per Project | No | No | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$256,736 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |

| Measure | Unit | Low-Income Measure | Comprehensive Measure | Eligibility Requirements | Incremental Cost (\$/unit) | Estimated Useful Life | Incentive Amount or Incentive Range (\$/unit) |
|--------------------------------------|--------------------------|--------------------|-----------------------|---|----------------------------|-----------------------|--|
| Custom CHP | Per Project | No | Yes | Projects may be required to meet minimum TRC requirements | \$5,710,026 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Custom Other | Per Project | No | Yes | Eligibility determined by project type; may be subject to incentive caps by project and/or per site | \$513,825 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Financing Buy Down | Per Loan | No | No | Meets third-party eligibility | \$86,329 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Technical Audits/Feasibility Studies | Per Audit | No | No | None, by customer request | \$25,000 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Strategic Energy Management | Per Participant | No | No | None, by customer request | \$9,795 | 15 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| Compressed Air Challenge | Per Participant | No | No | Opt-in | \$495 | 5 | Up to \$0.75/kWh and/or up to \$2500/kW first year savings |
| C&I Load Shift | Per Participant & Per kW | No | No | LCI customer sector and available usage and billing data | \$37,500 | 1 | Up to \$100/kW, up to \$100,000 per participant |

Deadline for Rebate Applications

All rebate and program applications must be associated with projects, installations, or treatments completed between June 1, 2026, and May 31, 2031. Applications must be submitted within 180 days of installation for all measures except comprehensive measures, as defined by the Commission in the plan template, though it will also include solar PV installations. The rebate application deadline for these measure categories may be extended up to 365 days due to potential delays from issues like supply chain changes, to allow time for proper documentation or quality control and assurance activities. The Company may waive the application requirement for any measure at its discretion based on customer need or other factors. PPL Electric Utilities, at its discretion, may allow customers to request project preapproval to lock in the stipulated incentive level and guarantee project funding or approve any rebate application that exceeds application deadlines to ensure customer satisfaction. Pre-approval requirements may be set or removed for any measure, at the Company's discretion. For any proposed changes to pre-approval or application deadlines, the Company will strive to provide a 30-day notification, though it reserves the right to make immediate changes based on the Company's discretion. Final program year rebate applications must be submitted by May 31, 2031.

Administrative Requirements

Internal staffing requirements for program administration, management, and other required activities include four and a half FTEs plus a variety of as-needed support staff from across the Company. External staffing requirements for all CSPs include 51 FTEs.

Estimated Savings and Participation

Table 48 and Table 49 show the participation, energy savings, and coincident peak demand estimates for the Small and Large Commercial and Industrial Business Solutions components. The estimates may change based on market conditions, customer preference, new technologies, regulations, local, state, or federal guidelines, or for any other reason. PPL Electric Utilities will manage the components to maximize customer satisfaction, overall program performance, and ensure cost-effective delivery of the portfolio.

Table 48. Pa PUC Table 9 – Small C&I Estimated Savings and Participation

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|--------------------------------------|-----------|-----------|-----------|-----------|-----------|--------------------|
| Lighting Retrofits | 3.1.1 | Energy Savings (MWh) | 44,040.13 | 42,969.59 | 41,614.16 | 36,439.64 | 29,107.31 | 194,170.84 |
| | | Summer Demand Reduction (MW) | 7.2830 | 7.1298 | 6.9081 | 6.0469 | 4.8301 | 32.1979 |
| | | Winter Demand Reduction (MW) | 4.2526 | 4.1653 | 4.0363 | 3.5329 | 2.8220 | 18.8091 |
| | | Projected Participation ² | 184,319 | 175,251 | 169,964 | 145,801 | 114,771 | 790,106 |
| New Construction Lighting | 3.1.2 | Energy Savings (MWh) | 2,158.93 | 3,598.21 | 3,598.21 | 2,698.66 | 1,979.02 | 14,033.02 |
| | | Summer Demand Reduction (MW) | 0.3844 | 0.6406 | 0.6406 | 0.4804 | 0.3523 | 2.4983 |
| | | Winter Demand Reduction (MW) | 0.3842 | 0.6404 | 0.6404 | 0.4803 | 0.3522 | 2.4974 |
| | | Projected Participation | 12 | 20 | 20 | 15 | 11 | 78 |
| Lighting Controls | 3.1.3 | Energy Savings (MWh) | 448.93 | 507.56 | 611.68 | 511.01 | 378.86 | 2,458.05 |
| | | Summer Demand Reduction (MW) | 0.0857 | 0.0968 | 0.1165 | 0.0973 | 0.0722 | 0.4684 |
| | | Winter Demand Reduction (MW) | 0.0638 | 0.0720 | 0.0866 | 0.0724 | 0.0537 | 0.3485 |
| | | Projected Participation | 564 | 629 | 737 | 619 | 466 | 3,015 |
| LED Exit Signs | 3.1.4 | Energy Savings (MWh) | 28.17 | 27.89 | 28.17 | 22.64 | 16.57 | 123.44 |
| | | Summer Demand Reduction (MW) | 0.0037 | 0.0037 | 0.0037 | 0.0030 | 0.0022 | 0.0163 |
| | | Winter Demand Reduction (MW) | 0.0033 | 0.0033 | 0.0033 | 0.0026 | 0.0019 | 0.0144 |
| | | Projected Participation | 102 | 101 | 102 | 82 | 60 | 447 |
| LED Refrigeration Display Case Lighting | 3.1.5 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.62 | 0.62 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|------------------------------------|-------------------------|------------------------------|-----------|-----------|-----------|-----------|-----------|--------------------|
| Midstream Lighting | 3.1.6 | Energy Savings (MWh) | 13,253.05 | 13,253.05 | 12,857.86 | 12,324.36 | 11,265.71 | 62,954.03 |
| | | Summer Demand Reduction (MW) | 3.3994 | 3.3994 | 3.2977 | 3.1614 | 2.8897 | 16.1477 |
| | | Winter Demand Reduction (MW) | 3.3817 | 3.3817 | 3.2807 | 3.1448 | 2.8746 | 16.0635 |
| | | Projected Participation | 102,281 | 102,281 | 99,214 | 95,122 | 86,940 | 485,838 |
| Indoor Horticultural Lighting | 3.1.7 | Energy Savings (MWh) | 486.99 | 929.71 | 1,372.43 | 1,372.43 | 1,815.15 | 5,976.71 |
| | | Summer Demand Reduction (MW) | 0.1026 | 0.1960 | 0.2893 | 0.2893 | 0.3826 | 1.2597 |
| | | Winter Demand Reduction (MW) | 0.1026 | 0.1960 | 0.2893 | 0.2893 | 0.3826 | 1.2597 |
| | | Projected Participation | 2 | 3 | 4 | 4 | 5 | 18 |
| ASHP and Air Source AC | 3.2.1 | Energy Savings (MWh) | 11.69 | 14.67 | 31.46 | 35.80 | 41.46 | 135.09 |
| | | Summer Demand Reduction (MW) | 0.0042 | 0.0044 | 0.0096 | 0.0108 | 0.0124 | 0.0414 |
| | | Winter Demand Reduction (MW) | 0.0012 | 0.0073 | 0.0167 | 0.0200 | 0.0229 | 0.0682 |
| | | Projected Participation | 12 | 8 | 11 | 11 | 14 | 56 |
| ASHP and Air Source AC - Midstream | 3.2.2 | Energy Savings (MWh) | 0.00 | 199.48 | 199.48 | 199.48 | 22.90 | 621.33 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0664 | 0.0664 | 0.0664 | 0.0073 | 0.2066 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0837 | 0.0837 | 0.0837 | 0.0135 | 0.2647 |
| | | Projected Participation | 0 | 84 | 84 | 84 | 4 | 256 |
| Electric Chiller | 3.2.3 | Energy Savings (MWh) | 123.41 | 53.54 | 97.60 | 35.69 | 61.90 | 372.15 |
| | | Summer Demand Reduction (MW) | 0.0534 | 0.0245 | 0.0446 | 0.0163 | 0.0283 | 0.1671 |
| | | Winter Demand Reduction (MW) | 0.0024 | 0.0011 | 0.0020 | 0.0007 | 0.0013 | 0.0075 |
| | | Projected Participation | 5 | 3 | 4 | 2 | 2 | 16 |
| | 3.2.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 1.91 | 0.00 | 1.91 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0001 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| Ground or Groundwater Source Heat Pump | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0007 | 0.0000 | 0.0007 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |
| Ductless Mini-Split Heat Pump | 3.2.5 | Energy Savings (MWh) | 18.96 | 28.43 | 38.86 | 23.70 | 9.48 | 119.43 |
| | | Summer Demand Reduction (MW) | 0.0175 | 0.0262 | 0.0358 | 0.0218 | 0.0087 | 0.1100 |
| | | Winter Demand Reduction (MW) | 0.0133 | 0.0199 | 0.0272 | 0.0166 | 0.0066 | 0.0837 |
| | | Projected Participation | 20 | 30 | 41 | 25 | 10 | 126 |
| Midstream Mini-Split Heat Pump | 3.2.6 | Energy Savings (MWh) | 0.00 | 5.10 | 5.10 | 5.10 | 0.00 | 15.29 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0047 | 0.0047 | 0.0047 | 0.0000 | 0.0142 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0036 | 0.0036 | 0.0036 | 0.0000 | 0.0108 |
| | | Projected Participation | 0 | 6 | 6 | 6 | 0 | 18 |
| Small C&I HVAC Refrigerant Charge Correction | 3.2.7 | Energy Savings (MWh) | 3.11 | 0.00 | 0.00 | 0.00 | 0.00 | 3.11 |
| | | Summer Demand Reduction (MW) | 0.0012 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0012 |
| | | Winter Demand Reduction (MW) | 0.0007 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0007 |
| | | Projected Participation | 2 | 0 | 0 | 0 | 0 | 2 |
| HVAC Tune Up | 3.2.8 | Energy Savings (MWh) | 6,015.81 | 5,241.17 | 5,158.76 | 3,757.82 | 2,422.81 | 22,596.38 |
| | | Summer Demand Reduction (MW) | 1.8351 | 1.5988 | 1.5737 | 1.1463 | 0.7391 | 6.8931 |
| | | Winter Demand Reduction (MW) | 0.1298 | 0.1408 | 0.1395 | 0.1182 | 0.1967 | 0.7249 |
| | | Projected Participation | 365 | 318 | 313 | 228 | 147 | 1,371 |
| Room Air Conditioner | 3.2.9 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.02 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| HVAC Controls: Guest Room Occupancy Sensor | 3.2.10 | Energy Savings (MWh) | 1.28 | 1.28 | 1.28 | 0.86 | 0.43 | 5.14 |
| | | Summer Demand Reduction (MW) | 0.0003 | 0.0003 | 0.0003 | 0.0002 | 0.0001 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0000 | 0.0000 | 0.0002 |
| | | Projected Participation | 3 | 3 | 3 | 2 | 1 | 12 |
| HVAC Controls: Economizer | 3.2.11 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Computer Room Air Conditioner | 3.2.12 | Energy Savings (MWh) | 0.00 | 0.00 | 12.09 | 0.00 | 0.00 | 12.09 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0149 | 0.0000 | 0.0000 | 0.0149 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0149 | 0.0000 | 0.0000 | 0.0149 |
| | | Projected Participation | 0 | 0 | 6 | 0 | 0 | 6 |
| Electronically Commutated Plug Fans on Computer Room Air Conditioner/Handler | 3.2.13 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 1.88 | 1.88 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 | 0.0002 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| VSD on Computer Room Air Conditioner or Handler Fan Motor | 3.2.14 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 2.28 | 2.28 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0003 | 0.0003 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0003 | 0.0003 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Circulation Fan: High-Volume Low-Speed | 3.2.15 | Energy Savings (MWh) | 22.26 | 26.71 | 31.16 | 22.26 | 17.81 | 120.20 |
| | | Summer Demand Reduction (MW) | 0.0121 | 0.0146 | 0.0170 | 0.0121 | 0.0097 | 0.0656 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0048 | 0.0058 | 0.0068 | 0.0048 | 0.0039 | 0.0261 |
| | | Projected Participation | 5 | 6 | 7 | 5 | 4 | 27 |
| Demand Controlled Ventilation | 3.2.16 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 3 | 3 |
| Advanced Rooftop Controls | 3.2.17 | Energy Savings (MWh) | 0.00 | 2.59 | 0.00 | 0.00 | 0.00 | 2.59 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0012 | 0.0000 | 0.0000 | 0.0000 | 0.0012 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 1 | 0 | 0 | 0 | 1 |
| ENERGY STAR Connected Thermostat | 3.2.18 | Energy Savings (MWh) | 0.62 | 0.32 | 0.66 | 0.32 | 0.62 | 2.55 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0001 | 0.0000 | 0.0001 | 0.0003 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 2 | 2 | 3 | 2 | 2 | 11 |
| Adjustment to Programmable Thermostats | 3.2.19 | Energy Savings (MWh) | 1.70 | 0.00 | 1.70 | 0.00 | 0.00 | 3.40 |
| | | Summer Demand Reduction (MW) | 0.0004 | 0.0000 | 0.0004 | 0.0000 | 0.0000 | 0.0008 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0002 |
| | | Projected Participation | 1 | 0 | 1 | 0 | 0 | 2 |
| Duct Sealing And Insulation | 3.2.20 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.82 | 0.00 | 0.82 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0004 | 0.0000 | 0.0004 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Chilled Water Pipe Insulation | 3.2.21 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Premium Efficiency Motors | 3.3.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.13 | 0.13 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 5 | 5 |
| VFD Improvements | 3.3.2 | Energy Savings (MWh) | 310.05 | 452.63 | 563.08 | 424.12 | 310.05 | 2,059.93 |
| | | Summer Demand Reduction (MW) | 0.0362 | 0.0533 | 0.0655 | 0.0498 | 0.0362 | 0.2410 |
| | | Winter Demand Reduction (MW) | 0.0778 | 0.1130 | 0.1416 | 0.1060 | 0.0778 | 0.5162 |
| | | Projected Participation | 10 | 15 | 18 | 14 | 10 | 67 |
| ECM Circulating Fan | 3.3.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.68 | 0.00 | 0.00 | 0.68 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| VSD on Kitchen Exhaust Fan | 3.3.4 | Energy Savings (MWh) | 13.27 | 44.23 | 44.23 | 44.23 | 30.96 | 176.93 |
| | | Summer Demand Reduction (MW) | 0.0023 | 0.0075 | 0.0075 | 0.0075 | 0.0053 | 0.0301 |
| | | Winter Demand Reduction (MW) | 0.0019 | 0.0063 | 0.0063 | 0.0063 | 0.0044 | 0.0252 |
| | | Projected Participation | 3 | 10 | 10 | 10 | 7 | 40 |
| ECM Circulator Pump | 3.3.5 | Energy Savings (MWh) | 0.00 | 0.00 | 5.17 | 0.00 | 0.00 | 5.17 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0011 | 0.0000 | 0.0000 | 0.0011 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|------------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0007 | 0.0000 | 0.0000 | 0.0007 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| High Efficiency Pumps | 3.3.6 | Energy Savings (MWh) | 0.00 | 0.00 | 6.96 | 0.00 | 0.00 | 6.96 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0013 | 0.0000 | 0.0000 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0010 | 0.0000 | 0.0000 | 0.0010 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Heat Pump Water Heaters | 3.4.1 | Energy Savings (MWh) | 2.73 | 0.00 | 0.00 | 0.00 | 2.73 | 5.45 |
| | | Summer Demand Reduction (MW) | 0.0009 | 0.0000 | 0.0000 | 0.0000 | 0.0009 | 0.0018 |
| | | Winter Demand Reduction (MW) | 0.0004 | 0.0000 | 0.0000 | 0.0000 | 0.0004 | 0.0008 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 1 | 2 |
| Low Flow Pre-Rinse Spray Valves | 3.4.2 | Energy Savings (MWh) | 4.14 | 4.14 | 4.14 | 4.14 | 4.14 | 20.70 |
| | | Summer Demand Reduction (MW) | 0.0012 | 0.0012 | 0.0012 | 0.0012 | 0.0012 | 0.0058 |
| | | Winter Demand Reduction (MW) | 0.0006 | 0.0006 | 0.0006 | 0.0006 | 0.0006 | 0.0032 |
| | | Projected Participation | 2 | 2 | 2 | 2 | 2 | 10 |
| Domestic Hot Water Pipe Insulation | 3.4.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Freezer Case | 3.5.1 | Energy Savings (MWh) | 0.00 | 0.34 | 0.15 | 0.63 | 4.20 | 5.33 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0005 | 0.0007 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0005 | 0.0007 |
| | | Projected Participation | 0 | 2 | 1 | 2 | 8 | 13 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| High Efficiency Evaporator Fan Motors for Walk-in or Reach-in Cases | 3.5.2 | Energy Savings (MWh) | 32.16 | 39.96 | 42.88 | 37.04 | 31.19 | 183.23 |
| | | Summer Demand Reduction (MW) | 0.0040 | 0.0050 | 0.0053 | 0.0046 | 0.0039 | 0.0227 |
| | | Winter Demand Reduction (MW) | 0.0040 | 0.0050 | 0.0053 | 0.0046 | 0.0039 | 0.0227 |
| | | Projected Participation | 33 | 41 | 44 | 38 | 32 | 188 |
| Evaporator Fan Controllers | 3.5.3 | Energy Savings (MWh) | 2.09 | 2.22 | 2.32 | 2.22 | 1.40 | 10.26 |
| | | Summer Demand Reduction (MW) | 0.0008 | 0.0009 | 0.0009 | 0.0009 | 0.0005 | 0.0041 |
| | | Winter Demand Reduction (MW) | 0.0008 | 0.0009 | 0.0009 | 0.0009 | 0.0005 | 0.0041 |
| | | Projected Participation | 9 | 10 | 9 | 10 | 7 | 45 |
| Floating Head Pressure Control | 3.5.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.58 | 0.58 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Anti-Sweat Heater Control | 3.5.5 | Energy Savings (MWh) | 11.72 | 14.66 | 17.59 | 14.66 | 14.66 | 73.28 |
| | | Summer Demand Reduction (MW) | 0.0004 | 0.0006 | 0.0007 | 0.0006 | 0.0006 | 0.0028 |
| | | Winter Demand Reduction (MW) | 0.0003 | 0.0004 | 0.0004 | 0.0004 | 0.0004 | 0.0018 |
| | | Projected Participation | 4 | 5 | 6 | 5 | 5 | 25 |
| Evaporator Coil Defrost Control | 3.5.6 | Energy Savings (MWh) | 0.31 | 0.62 | 0.77 | 0.46 | 0.31 | 2.47 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 2 | 4 | 5 | 3 | 2 | 16 |
| | 3.5.7 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.70 | 0.70 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Variable Speed Refrigeration Compressor | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Strip Curtains for Walk-in Cooler or Freezer | 3.5.8 | Energy Savings (MWh) | 12.75 | 96.27 | 133.52 | 83.51 | 83.51 | 409.57 |
| | | Summer Demand Reduction (MW) | 0.0023 | 0.0173 | 0.0211 | 0.0150 | 0.0150 | 0.0707 |
| | | Winter Demand Reduction (MW) | 0.0023 | 0.0173 | 0.0211 | 0.0150 | 0.0150 | 0.0707 |
| | | Projected Participation | 1 | 10 | 18 | 9 | 9 | 47 |
| Night Covers for Display Cases | 3.5.9 | Energy Savings (MWh) | 0.00 | 0.00 | 4.35 | 0.00 | 0.00 | 4.35 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Auto Closer for Cooler or Freezer | 3.5.10 | Energy Savings (MWh) | 0.00 | 15.51 | 23.26 | 15.51 | 15.51 | 69.79 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0043 | 0.0065 | 0.0043 | 0.0043 | 0.0194 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0043 | 0.0065 | 0.0043 | 0.0043 | 0.0194 |
| | | Projected Participation | 0 | 8 | 12 | 8 | 8 | 36 |
| Door with Low or No Anti-Sweat Heat for Reach-In Cooler or Freezer | 3.5.11 | Energy Savings (MWh) | 0.00 | 0.00 | 0.83 | 0.00 | 0.00 | 0.83 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Suction Pipe Insulation for Walk-In Cooler or Freezer | 3.5.12 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.16 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|---------|--------------------|
| Refrigerated Display Case with Doors Replacing Open Case | 3.5.13 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 80.73 | 80.73 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | -0.0017 | -0.0017 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0341 | 0.0341 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 220 | 220 |
| Adding Doors to Existing Refrigerated Display Case | 3.5.14 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 68.84 | 68.84 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | -0.0032 | -0.0032 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0285 | 0.0285 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 220 | 220 |
| Refrigerated Case Light Occupancy Sensors | 3.5.15 | Energy Savings (MWh) | 0.00 | 0.00 | 0.10 | 0.00 | 0.00 | 0.10 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Novelty Cooler Shutoff Timer | 3.5.16 | Energy Savings (MWh) | 0.00 | 0.00 | 0.07 | 0.00 | 0.00 | 0.07 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| ENERGY STAR Clothes Washer | 3.6.1 | Energy Savings (MWh) | 0.00 | 0.32 | 0.09 | 0.09 | 0.09 | 0.60 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 3 | 1 | 1 | 1 | 6 |
| ENERGY STAR Bathroom Ventilation | 3.6.2 | Energy Savings (MWh) | 0.00 | 0.06 | 0.00 | 0.00 | 0.00 | 0.06 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Fan in Commercial Application | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 1 | 0 | 0 | 0 | 1 |
| ENERGY STAR Ice Machines | 3.7.1 | Energy Savings (MWh) | 0.90 | 0.00 | 1.79 | 0.00 | 0.90 | 3.59 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0002 | 0.0000 | 0.0001 | 0.0003 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0002 |
| | | Projected Participation | 1 | 0 | 2 | 0 | 1 | 4 |
| Beverage and Snack Machine Controls | 3.7.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.54 | 0.00 | 0.00 | 0.54 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| ENERGY STAR Electric Steam Cooker | 3.7.3 | Energy Savings (MWh) | 5.97 | 0.00 | 11.94 | 0.00 | 5.97 | 23.88 |
| | | Summer Demand Reduction (MW) | 0.0012 | 0.0000 | 0.0024 | 0.0000 | 0.0012 | 0.0049 |
| | | Winter Demand Reduction (MW) | 0.0008 | 0.0000 | 0.0016 | 0.0000 | 0.0008 | 0.0031 |
| | | Projected Participation | 1 | 0 | 2 | 0 | 1 | 4 |
| ENERGY STAR Combination Oven | 3.7.4 | Energy Savings (MWh) | 0.43 | 0.28 | 0.97 | 0.28 | 0.43 | 2.39 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0002 | 0.0001 | 0.0001 | 0.0005 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0001 | 0.0000 | 0.0001 | 0.0003 |
| | | Projected Participation | 3 | 1 | 7 | 1 | 3 | 15 |
| ENERGY STAR Commercial Convection Oven | 3.7.5 | Energy Savings (MWh) | 6.29 | 0.00 | 7.26 | 0.00 | 0.97 | 14.52 |
| | | Summer Demand Reduction (MW) | 0.0013 | 0.0000 | 0.0015 | 0.0000 | 0.0002 | 0.0030 |
| | | Winter Demand Reduction (MW) | 0.0008 | 0.0000 | 0.0009 | 0.0000 | 0.0001 | 0.0019 |
| | | Projected Participation | 3 | 0 | 4 | 0 | 1 | 8 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| ENERGY STAR Commercial Fryer | 3.7.6 | Energy Savings (MWh) | 4.11 | 2.68 | 5.01 | 2.68 | 2.68 | 17.17 |
| | | Summer Demand Reduction (MW) | 0.0008 | 0.0005 | 0.0010 | 0.0005 | 0.0005 | 0.0035 |
| | | Winter Demand Reduction (MW) | 0.0005 | 0.0003 | 0.0007 | 0.0003 | 0.0003 | 0.0022 |
| | | Projected Participation | 4 | 3 | 5 | 3 | 3 | 18 |
| ENERGY STAR Commercial Hot Food Holding Cabinet | 3.7.7 | Energy Savings (MWh) | 5.37 | 0.22 | 0.22 | 5.14 | 0.22 | 11.18 |
| | | Summer Demand Reduction (MW) | 0.0011 | 0.0000 | 0.0000 | 0.0010 | 0.0000 | 0.0023 |
| | | Winter Demand Reduction (MW) | 0.0007 | 0.0000 | 0.0000 | 0.0007 | 0.0000 | 0.0015 |
| | | Projected Participation | 4 | 1 | 1 | 3 | 1 | 10 |
| ENERGY STAR Commercial Dishwasher | 3.7.8 | Energy Savings (MWh) | 15.20 | 32.54 | 183.69 | 15.20 | 19.48 | 266.11 |
| | | Summer Demand Reduction (MW) | 0.0031 | 0.0066 | 0.0374 | 0.0031 | 0.0040 | 0.0542 |
| | | Winter Demand Reduction (MW) | 0.0020 | 0.0042 | 0.0242 | 0.0020 | 0.0025 | 0.0350 |
| | | Projected Participation | 2 | 3 | 13 | 2 | 3 | 23 |
| ENERGY STAR Commercial Griddle | 3.7.9 | Energy Savings (MWh) | 0.00 | 0.00 | 5.73 | 0.00 | 0.00 | 5.73 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0012 | 0.0000 | 0.0000 | 0.0012 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0007 | 0.0000 | 0.0000 | 0.0007 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Commercial Induction Cooktops | 3.7.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.01 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Ceiling & Wall Insulation | 3.8.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Advanced Power Strips | 3.9.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.08 | 0.00 | 0.08 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |
| ENERGY STAR Server | 3.9.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 15.68 | 0.00 | 15.68 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0020 | 0.0000 | 0.0020 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0021 | 0.0000 | 0.0021 |
| | | Projected Participation | 0 | 0 | 0 | 3 | 0 | 3 |
| Server Virtualization | 3.9.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.46 | 0.00 | 0.46 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |
| Cycling Refrigerated Thermal Mass Dryer | 3.10.1 | Energy Savings (MWh) | 0.00 | 1.82 | 1.82 | 1.82 | 1.82 | 7.28 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0004 | 0.0004 | 0.0004 | 0.0004 | 0.0016 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0019 |
| | | Projected Participation | 0 | 60 | 60 | 60 | 60 | 240 |
| Air-Entraining Air Nozzle | 3.10.2 | Energy Savings (MWh) | 1.49 | 0.00 | 0.00 | 0.00 | 4.46 | 5.94 |
| | | Summer Demand Reduction (MW) | 0.0003 | 0.0000 | 0.0000 | 0.0000 | 0.0010 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0004 | 0.0000 | 0.0000 | 0.0000 | 0.0012 | 0.0016 |
| | | Projected Participation | 2 | 0 | 0 | 0 | 6 | 8 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| No-Loss Condensate Drain | 3.10.3 | Energy Savings (MWh) | 2.43 | 4.86 | 12.15 | 4.86 | 6.07 | 30.37 |
| | | Summer Demand Reduction (MW) | 0.0005 | 0.0011 | 0.0027 | 0.0011 | 0.0013 | 0.0066 |
| | | Winter Demand Reduction (MW) | 0.0006 | 0.0013 | 0.0032 | 0.0013 | 0.0016 | 0.0080 |
| | | Projected Participation | 2 | 4 | 10 | 4 | 5 | 25 |
| Air Tanks for Load/No Load Compressors | 3.10.4 | Energy Savings (MWh) | 0.00 | 3.35 | 3.35 | 3.35 | 32.14 | 42.20 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0007 | 0.0007 | 0.0007 | 0.0083 | 0.0104 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0007 | 0.0007 | 0.0007 | 0.0083 | 0.0104 |
| | | Projected Participation | 0 | 15 | 15 | 15 | 17 | 62 |
| Variable-Speed Drive Air Compressor | 3.10.5 | Energy Savings (MWh) | 339.61 | 341.50 | 341.50 | 338.98 | 338.35 | 1,699.95 |
| | | Summer Demand Reduction (MW) | 0.0747 | 0.0752 | 0.0752 | 0.0746 | 0.0745 | 0.3741 |
| | | Winter Demand Reduction (MW) | 0.0747 | 0.0752 | 0.0752 | 0.0746 | 0.0745 | 0.3741 |
| | | Projected Participation | 93 | 96 | 96 | 92 | 91 | 468 |
| Compressed Air Controller | 3.10.6 | Energy Savings (MWh) | 0.00 | 2.24 | 2.24 | 2.24 | 2.24 | 8.94 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0020 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0020 |
| | | Projected Participation | 0 | 20 | 20 | 20 | 20 | 80 |
| Compressed Air Low Pressure Drop Filters | 3.10.7 | Energy Savings (MWh) | 0.00 | 1.09 | 1.09 | 1.09 | 1.09 | 4.35 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0009 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0009 |
| | | Projected Participation | 0 | 45 | 45 | 45 | 45 | 180 |
| Compressed Air Mist Eliminations | 3.10.8 | Energy Savings (MWh) | 0.00 | 0.48 | 0.48 | 0.48 | 0.53 | 1.98 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0004 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0004 |
| | | Projected Participation | 0 | 10 | 10 | 10 | 11 | 41 |
| High Efficiency Transformer | 3.11.1 | Energy Savings (MWh) | 0.49 | 0.99 | 0.99 | 0.99 | 0.49 | 3.95 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0005 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0005 |
| | | Projected Participation | 1 | 2 | 2 | 2 | 1 | 8 |
| | | | | | | | | |
| Engine Block Heater Timer | 3.11.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.80 | 0.00 | 0.00 | 0.80 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| High Frequency Battery Chargers | 3.11.3 | Energy Savings (MWh) | 7.00 | 8.76 | 10.51 | 8.76 | 7.00 | 42.03 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0001 | 0.0001 | 0.0000 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0001 | 0.0001 | 0.0000 | 0.0002 |
| | | Projected Participation | 4 | 5 | 6 | 5 | 4 | 24 |
| Uninterruptible Power Supply (UPS) | 3.11.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.45 | 0.00 | 0.00 | 0.45 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 3 | 0 | 0 | 3 |
| Building Operator Certification Training | 3.11.5 | Energy Savings (MWh) | 934.07 | 934.07 | 700.55 | 700.55 | 467.04 | 3,736.28 |
| | | Summer Demand Reduction (MW) | 0.0680 | 0.0680 | 0.0510 | 0.0510 | 0.0340 | 0.2719 |
| | | Winter Demand Reduction (MW) | 0.0480 | 0.0480 | 0.0360 | 0.0360 | 0.0240 | 0.1921 |
| | | Projected Participation | 40 | 40 | 30 | 30 | 20 | 160 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|-----------|-----------|-----------|----------|----------|--------------------|
| Photovoltaic (PV) Solar Generation | 3.11.6 | Energy Savings (MWh) | 11,478.92 | 13,392.07 | 12,541.78 | 7,652.61 | 1,488.01 | 46,553.38 |
| | | Summer Demand Reduction (MW) | 4.0236 | 4.6943 | 4.3962 | 2.6824 | 0.5216 | 16.3181 |
| | | Winter Demand Reduction (MW) | 0.6273 | 0.7318 | 0.6853 | 0.4182 | 0.0813 | 2.5439 |
| | | Projected Participation | 54 | 63 | 59 | 36 | 7 | 219 |
| Automatic Milker Takeoffs | 4.1.1 | Energy Savings (MWh) | 3.38 | 0.00 | 0.00 | 0.00 | 0.00 | 3.38 |
| | | Summer Demand Reduction (MW) | 0.0006 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0006 |
| | | Winter Demand Reduction (MW) | 0.0006 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0006 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| Dairy Scroll Compressors | 4.1.2 | Energy Savings (MWh) | 0.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.79 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| Ag High-Efficiency Ventilation Fans With and Without Thermostats | 4.1.3 | Energy Savings (MWh) | 8.83 | 8.83 | 11.07 | 8.83 | 8.83 | 46.40 |
| | | Summer Demand Reduction (MW) | 0.0019 | 0.0019 | 0.0024 | 0.0019 | 0.0019 | 0.0100 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 8 | 8 | 10 | 8 | 8 | 42 |
| Ag Heat Reclaimers | 4.1.4 | Energy Savings (MWh) | 0.00 | 0.00 | 7.12 | 0.00 | 0.00 | 7.12 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0013 | 0.0000 | 0.0000 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0014 | 0.0000 | 0.0000 | 0.0014 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Ag High Volume Low Speed Fans | 4.1.5 | Energy Savings (MWh) | 1,043.14 | 1,326.89 | 1,340.74 | 1,150.49 | 874.51 | 5,735.78 |
| | | Summer Demand Reduction (MW) | 0.5367 | 0.6800 | 0.6871 | 0.5906 | 0.4496 | 2.9439 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------|-------------------------|---|----------|----------------------|----------|----------|---------------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 112 | 152 | 154 | 128 | 94 | 640 |
| Livestock Waterer | 4.1.6 | Energy Savings (MWh) | 0.00 | 0.00 | 0.65 | 0.00 | 0.00 | 0.65 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0004 | 0.0000 | 0.0000 | 0.0004 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| | | Variable Speed Drive (VSD) Controller on Dairy Vacuum Pumps | 4.1.7 | Energy Savings (MWh) | 20.39 | 30.38 | 30.38 | 20.39 |
| Summer Demand Reduction (MW) | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0002 | |
| Winter Demand Reduction (MW) | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0002 | |
| Projected Participation | 2 | 3 | | 3 | 2 | 3 | 13 | |
| Low Pressure Irrigation System | 4.1.8 | Energy Savings (MWh) | 0.00 | 0.31 | 0.00 | 0.00 | 0.00 | 0.31 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0009 | 0.0000 | 0.0000 | 0.0000 | 0.0009 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 1 | 0 | 0 | 0 | 1 |
| CUSTOM HVAC | Custom | Energy Savings (MWh) | 1,130.98 | 1,130.98 | 1,130.98 | 1,130.98 | 1,130.98 | 5,654.88 |
| | | Summer Demand Reduction (MW) | 0.2086 | 0.2086 | 0.2086 | 0.2086 | 0.2086 | 1.0432 |
| | | Winter Demand Reduction (MW) | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0021 | 0.0104 |
| | | Projected Participation | 5 | 5 | 5 | 5 | 5 | 25 |
| CUSTOM AGRICULTURE | Custom | Energy Savings (MWh) | 419.64 | 419.64 | 419.64 | 839.28 | 419.64 | 2,517.84 |
| | | Summer Demand Reduction (MW) | 0.0881 | 0.0881 | 0.0881 | 0.1761 | 0.0881 | 0.5284 |
| | | Winter Demand Reduction (MW) | 0.0881 | 0.0881 | 0.0881 | 0.1761 | 0.0881 | 0.5284 |
| | | Projected Participation | 1 | 1 | 1 | 2 | 1 | 6 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------|-------------------------|------------------------------|----------|-----------|-----------|-----------|----------|--------------------|
| CUSTOM MOTORS / COMPRESSED AIR | Custom | Energy Savings (MWh) | 4,688.76 | 4,688.76 | 4,688.76 | 4,688.76 | 4,688.76 | 23,443.82 |
| | | Summer Demand Reduction (MW) | 0.6701 | 0.6701 | 0.6701 | 0.6701 | 0.6701 | 3.3507 |
| | | Winter Demand Reduction (MW) | 0.6701 | 0.6701 | 0.6701 | 0.6701 | 0.6701 | 3.3507 |
| | | Projected Participation | 11 | 11 | 11 | 11 | 11 | 55 |
| CUSTOM REFRIGERATION | Custom | Energy Savings (MWh) | 3,177.37 | 3,177.37 | 3,177.37 | 3,177.37 | 3,177.37 | 15,886.85 |
| | | Summer Demand Reduction (MW) | 0.4442 | 0.4442 | 0.4442 | 0.4442 | 0.4442 | 2.2209 |
| | | Winter Demand Reduction (MW) | 0.1777 | 0.1777 | 0.1777 | 0.1777 | 0.1777 | 0.8884 |
| | | Projected Participation | 7 | 7 | 7 | 7 | 7 | 35 |
| Custom CHP | Custom | Energy Savings (MWh) | 0.00 | 8,967.96 | 4,483.98 | 4,483.98 | 4,483.98 | 22,419.91 |
| | | Summer Demand Reduction (MW) | 0.0000 | 1.1602 | 0.5801 | 0.5801 | 0.5801 | 2.9005 |
| | | Winter Demand Reduction (MW) | 0.0000 | 1.1602 | 0.5801 | 0.5801 | 0.5801 | 2.9005 |
| | | Projected Participation | 0 | 2 | 1 | 1 | 1 | 5 |
| Custom Other | Custom | Energy Savings (MWh) | 4,919.05 | 10,248.02 | 11,887.71 | 10,248.02 | 6,148.81 | 43,451.61 |
| | | Summer Demand Reduction (MW) | 0.7086 | 1.4763 | 1.7125 | 1.4763 | 0.8858 | 6.2594 |
| | | Winter Demand Reduction (MW) | 0.7086 | 1.4763 | 1.7125 | 1.4763 | 0.8858 | 6.2594 |
| | | Projected Participation | 12 | 25 | 29 | 25 | 15 | 106 |
| Virtual RCx | Custom | Energy Savings (MWh) | 1,495.00 | 4,485.00 | 4,945.00 | 4,945.00 | 4,025.00 | 19,895.00 |
| | | Summer Demand Reduction (MW) | 0.2163 | 0.6489 | 0.7155 | 0.7155 | 0.5824 | 2.8785 |
| | | Winter Demand Reduction (MW) | 0.2163 | 0.6489 | 0.7155 | 0.7155 | 0.5824 | 2.8785 |
| | | Projected Participation | 13 | 39 | 43 | 43 | 35 | 173 |
| Benchmarking | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 50 | 100 | 125 | 100 | 50 | 425 |
| Financing Buy Down | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 13 | 14 | 15 | 12 | 3 | 57 |
| Facility Assessments | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 12 | 12 | 12 | 12 | 6 | 54 |
| Technical Audits/Feasibility Studies | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 3 | 5 | 7 | 10 | 5 | 30 |
| C&I Load Shift | 3.12.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.00 | 4.08 | 6.12 | 0.00 | 0.00 | 2.0391 |
| | | Winter Demand Reduction (MW) | 0.00 | 4.08 | 6.12 | 0.00 | 0.00 | 2.0391 |
| | | Projected Participation | 0 | 2 | 3 | 0 | 0 | 3 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 46.

Table 49. Pa PUC Table 9 – Large C&I Estimated Savings and Participation

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|--------------------------------------|-----------|-----------|-----------|-----------|-----------|--------------------|
| Lighting Retrofits - Interior | 3.1.1 | Energy Savings (MWh) | 15,949.77 | 15,499.91 | 15,036.87 | 14,888.37 | 13,770.67 | 75,145.59 |
| | | Summer Demand Reduction (MW) | 2.6192 | 2.5914 | 2.5136 | 2.4796 | 2.3289 | 12.5328 |
| | | Winter Demand Reduction (MW) | 1.5277 | 1.5157 | 1.4702 | 1.4495 | 1.3645 | 7.3276 |
| | | Projected Participation ² | 67,915 | 65,910 | 63,931 | 64,992 | 62,148 | 324,896 |
| New Construction Lighting | 3.1.2 | Energy Savings (MWh) | 2,878.57 | 2,878.57 | 2,698.66 | 2,878.57 | 2,878.57 | 14,212.93 |
| | | Summer Demand Reduction (MW) | 0.5125 | 0.5125 | 0.4804 | 0.5125 | 0.5125 | 2.5304 |
| | | Winter Demand Reduction (MW) | 0.5123 | 0.5123 | 0.4803 | 0.5123 | 0.5123 | 2.5294 |
| | | Projected Participation | 16 | 16 | 15 | 16 | 16 | 79 |
| Lighting Controls | 3.1.3 | Energy Savings (MWh) | 330.74 | 330.74 | 318.97 | 330.74 | 330.74 | 1,641.91 |
| | | Summer Demand Reduction (MW) | 0.0633 | 0.0633 | 0.0610 | 0.0633 | 0.0633 | 0.3140 |
| | | Winter Demand Reduction (MW) | 0.0472 | 0.0472 | 0.0456 | 0.0472 | 0.0472 | 0.2345 |
| | | Projected Participation | 434 | 434 | 422 | 434 | 434 | 2,158 |
| LED Exit Signs | 3.1.4 | Energy Savings (MWh) | 4.14 | 4.14 | 3.87 | 2.21 | 1.66 | 16.02 |
| | | Summer Demand Reduction (MW) | 0.0005 | 0.0005 | 0.0005 | 0.0003 | 0.0002 | 0.0021 |
| | | Winter Demand Reduction (MW) | 0.0005 | 0.0005 | 0.0005 | 0.0003 | 0.0002 | 0.0019 |
| | | Projected Participation | 15 | 15 | 14 | 8 | 6 | 58 |
| LED Refrigeration Display Case Lighting | 3.1.5 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.62 | 0.62 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|------------------------------------|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| Midstream Lighting | 3.1.6 | Energy Savings (MWh) | 8,836.36 | 8,569.82 | 8,394.40 | 7,954.34 | 7,510.29 | 41,265.22 |
| | | Summer Demand Reduction (MW) | 2.2666 | 2.1985 | 2.1531 | 2.0398 | 1.9263 | 10.5843 |
| | | Winter Demand Reduction (MW) | 2.2547 | 2.1868 | 2.1419 | 2.0294 | 1.9163 | 10.5292 |
| | | Projected Participation | 68,188 | 66,141 | 64,779 | 61,372 | 57,958 | 318,438 |
| Indoor Horticultural Lighting | 3.1.7 | Energy Savings (MWh) | 0.00 | 442.72 | 486.99 | 929.71 | 442.72 | 2,302.14 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0933 | 0.1026 | 0.1960 | 0.0933 | 0.4852 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0933 | 0.1026 | 0.1960 | 0.0933 | 0.4852 |
| | | Projected Participation | 0 | 1 | 2 | 3 | 1 | 7 |
| ASHP and Air Source AC | 3.2.1 | Energy Savings (MWh) | 32.60 | 6.08 | 17.06 | 13.99 | 23.10 | 92.82 |
| | | Summer Demand Reduction (MW) | 0.0107 | 0.0020 | 0.0056 | 0.0041 | 0.0073 | 0.0297 |
| | | Winter Demand Reduction (MW) | 0.0137 | 0.0019 | 0.0051 | 0.0069 | 0.0088 | 0.0364 |
| | | Projected Participation | 14 | 5 | 10 | 9 | 12 | 50 |
| ASHP and Air Source AC - Midstream | 3.2.2 | Energy Savings (MWh) | 0.00 | 132.98 | 132.98 | 132.98 | 0.00 | 398.95 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0443 | 0.0443 | 0.0443 | 0.0000 | 0.1329 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0558 | 0.0558 | 0.0558 | 0.0000 | 0.1675 |
| | | Projected Participation | 0 | 56 | 56 | 56 | 0 | 168 |
| Electric Chiller | 3.2.3 | Energy Savings (MWh) | 0.00 | 0.00 | 105.56 | 0.00 | 0.00 | 105.56 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0453 | 0.0000 | 0.0000 | 0.0453 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0020 | 0.0000 | 0.0000 | 0.0020 |
| | | Projected Participation | 0 | 0 | 4 | 0 | 0 | 4 |
| | 3.2.4 | Energy Savings (MWh) | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.91 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Ground or Groundwater Source Heat Pump | | Winter Demand Reduction (MW) | 0.0007 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0007 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| Ductless Mini-Split Heat Pump | 3.2.5 | Energy Savings (MWh) | 4.74 | 4.74 | 4.74 | 4.74 | 4.74 | 23.70 |
| | | Summer Demand Reduction (MW) | 0.0044 | 0.0044 | 0.0044 | 0.0044 | 0.0044 | 0.0218 |
| | | Winter Demand Reduction (MW) | 0.0033 | 0.0033 | 0.0033 | 0.0033 | 0.0033 | 0.0166 |
| | | Projected Participation | 5 | 5 | 5 | 5 | 5 | 25 |
| Midstream Mini-Split Heat Pump | 3.2.6 | Energy Savings (MWh) | 0.00 | 3.40 | 3.40 | 3.40 | 0.00 | 10.19 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0032 | 0.0032 | 0.0032 | 0.0000 | 0.0095 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0024 | 0.0024 | 0.0024 | 0.0000 | 0.0072 |
| | | Projected Participation | 0 | 4 | 4 | 4 | 0 | 12 |
| HVAC Tune Up | 3.2.8 | Energy Savings (MWh) | 164.82 | 164.82 | 164.82 | 164.82 | 164.82 | 824.08 |
| | | Summer Demand Reduction (MW) | 0.0503 | 0.0503 | 0.0503 | 0.0503 | 0.0503 | 0.2514 |
| | | Winter Demand Reduction (MW) | 0.0405 | 0.0405 | 0.0405 | 0.0405 | 0.0405 | 0.2027 |
| | | Projected Participation | 10 | 10 | 10 | 10 | 10 | 50 |
| Room Air Conditioner | 3.2.9 | Energy Savings (MWh) | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| HVAC Controls: Guest Room Occupancy Sensor | 3.2.10 | Energy Savings (MWh) | 0.43 | 0.86 | 0.86 | 0.43 | 0.43 | 3.00 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0002 | 0.0002 | 0.0001 | 0.0001 | 0.0008 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 1 | 2 | 2 | 1 | 1 | 7 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| HVAC Controls: Economizer | 3.2.11 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Computer Room Air Conditioner | 3.2.12 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 12.09 | 12.09 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0149 | 0.0149 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0149 | 0.0149 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 6 | 6 |
| Electronically Commutated Plug Fans on Computer Room Air Conditioner/Handler | 3.2.13 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 1.88 | 1.88 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 | 0.0002 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| VSD on Computer Room Air Conditioner or Handler Fan Motor | 3.2.14 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 2.28 | 2.28 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0003 | 0.0003 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0003 | 0.0003 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Circulation Fan: High-Volume Low-Speed | 3.2.15 | Energy Savings (MWh) | 13.36 | 13.36 | 13.36 | 13.36 | 13.36 | 66.78 |
| | | Summer Demand Reduction (MW) | 0.0073 | 0.0073 | 0.0073 | 0.0073 | 0.0073 | 0.0364 |
| | | Winter Demand Reduction (MW) | 0.0029 | 0.0029 | 0.0029 | 0.0029 | 0.0029 | 0.0145 |
| | | Projected Participation | 3 | 3 | 3 | 3 | 3 | 15 |
| Demand Controlled Ventilation | 3.2.16 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 3 | 3 |
| Advanced Rooftop Controls | 3.2.17 | Energy Savings (MWh) | 2.59 | 0.00 | 0.00 | 0.00 | 2.59 | 5.19 |
| | | Summer Demand Reduction (MW) | 0.0012 | 0.0000 | 0.0000 | 0.0000 | 0.0012 | 0.0023 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0002 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 1 | 2 |
| ENERGY STAR Connected Thermostat | 3.2.18 | Energy Savings (MWh) | 0.62 | 0.32 | 0.16 | 0.32 | 0.16 | 1.59 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 2 | 2 | 1 | 2 | 1 | 8 |
| Duct Sealing and Insulation | 3.2.20 | Energy Savings (MWh) | 0.82 | 0.00 | 0.00 | 0.00 | 0.00 | 0.82 |
| | | Summer Demand Reduction (MW) | 0.0004 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0004 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1 | 0 | 0 | 0 | 0 | 1 |
| Chilled Water Pipe Insulation | 3.2.21 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Premium Efficiency Motors | 3.3.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.13 | 0.13 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 5 | 5 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| VFD Improvements | 3.3.2 | Energy Savings (MWh) | 281.54 | 281.54 | 334.95 | 281.54 | 281.54 | 1,461.10 |
| | | Summer Demand Reduction (MW) | 0.0328 | 0.0328 | 0.0382 | 0.0328 | 0.0328 | 0.1692 |
| | | Winter Demand Reduction (MW) | 0.0708 | 0.0708 | 0.0852 | 0.0708 | 0.0708 | 0.3683 |
| | | Projected Participation | 9 | 9 | 10 | 9 | 9 | 46 |
| ECM Circulating Fan | 3.3.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.68 | 0.00 | 0.00 | 0.68 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| VSD on Kitchen Exhaust Fan | 3.3.4 | Energy Savings (MWh) | 0.00 | 44.23 | 44.23 | 44.23 | 44.23 | 176.93 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0301 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0063 | 0.0063 | 0.0063 | 0.0063 | 0.0252 |
| | | Projected Participation | 0 | 10 | 10 | 10 | 10 | 40 |
| ECM Circulator Pump | 3.3.5 | Energy Savings (MWh) | 0.00 | 0.00 | 5.17 | 0.00 | 0.00 | 5.17 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0011 | 0.0000 | 0.0000 | 0.0011 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0007 | 0.0000 | 0.0000 | 0.0007 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| High Efficiency Pumps | 3.3.6 | Energy Savings (MWh) | 0.00 | 0.00 | 6.96 | 0.00 | 0.00 | 6.96 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0013 | 0.0000 | 0.0000 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0010 | 0.0000 | 0.0000 | 0.0010 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Heat Pump Water Heaters | 3.4.1 | Energy Savings (MWh) | 0.00 | 0.00 | 2.73 | 0.00 | 0.00 | 2.73 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0009 | 0.0000 | 0.0000 | 0.0009 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0004 | 0.0000 | 0.0000 | 0.0004 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Low Flow Pre-Rinse Spray Valves | 3.4.2 | Energy Savings (MWh) | 2.07 | 2.07 | 2.07 | 2.07 | 2.07 | 10.35 |
| | | Summer Demand Reduction (MW) | 0.0006 | 0.0006 | 0.0006 | 0.0006 | 0.0006 | 0.0029 |
| | | Winter Demand Reduction (MW) | 0.0003 | 0.0003 | 0.0003 | 0.0003 | 0.0003 | 0.0016 |
| | | Projected Participation | 1 | 1 | 1 | 1 | 1 | 5 |
| Domestic Hot Water Pipe Insulation | 3.4.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| ENERGY STAR Freezer Case | 3.5.1 | Energy Savings (MWh) | 2.59 | 5.18 | 5.18 | 5.18 | 5.18 | 23.30 |
| | | Summer Demand Reduction (MW) | 0.0003 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0030 |
| | | Winter Demand Reduction (MW) | 0.0003 | 0.0007 | 0.0007 | 0.0007 | 0.0007 | 0.0030 |
| | | Projected Participation | 6 | 12 | 12 | 12 | 12 | 54 |
| High Efficiency Evaporator Fan Motors for Walk-in or Reach-in Cases | 3.5.2 | Energy Savings (MWh) | 7.80 | 8.77 | 8.77 | 8.77 | 7.80 | 41.91 |
| | | Summer Demand Reduction (MW) | 0.0010 | 0.0011 | 0.0011 | 0.0011 | 0.0010 | 0.0052 |
| | | Winter Demand Reduction (MW) | 0.0010 | 0.0011 | 0.0011 | 0.0011 | 0.0010 | 0.0052 |
| | | Projected Participation | 8 | 9 | 9 | 9 | 8 | 43 |
| Evaporator Fan Controllers | 3.5.3 | Energy Savings (MWh) | 0.49 | 0.49 | 0.98 | 0.98 | 0.64 | 3.59 |
| | | Summer Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0004 | 0.0004 | 0.0002 | 0.0014 |
| | | Winter Demand Reduction (MW) | 0.0002 | 0.0002 | 0.0004 | 0.0004 | 0.0002 | 0.0014 |
| | | Projected Participation | 2 | 2 | 4 | 4 | 3 | 15 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Floating Head Pressure Control | 3.5.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.58 | 0.58 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Anti-Sweat Heater Control | 3.5.5 | Energy Savings (MWh) | 2.93 | 5.86 | 5.86 | 5.86 | 2.93 | 23.45 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0002 | 0.0002 | 0.0002 | 0.0001 | 0.0009 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0006 |
| | | Projected Participation | 1 | 2 | 2 | 2 | 1 | 8 |
| Evaporator Coil Defrost Control | 3.5.6 | Energy Savings (MWh) | 0.15 | 0.31 | 0.31 | 0.31 | 0.31 | 1.39 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1 | 2 | 2 | 2 | 2 | 9 |
| Variable Speed Refrigeration Compressor | 3.5.7 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.70 | 0.70 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| Strip Curtains for Walk-in Cooler or Freezer | 3.5.8 | Energy Savings (MWh) | 12.75 | 12.75 | 18.63 | 12.75 | 12.75 | 69.64 |
| | | Summer Demand Reduction (MW) | 0.0023 | 0.0023 | 0.0034 | 0.0023 | 0.0023 | 0.0124 |
| | | Winter Demand Reduction (MW) | 0.0023 | 0.0023 | 0.0034 | 0.0023 | 0.0023 | 0.0124 |
| | | Projected Participation | 1 | 1 | 4 | 1 | 1 | 8 |
| Night Covers for Display Cases | 3.5.9 | Energy Savings (MWh) | 0.00 | 0.00 | 4.35 | 0.00 | 0.00 | 4.35 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|---------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Auto Closer for Cooler or Freezer | 3.5.10 | Energy Savings (MWh) | 0.00 | 0.00 | 3.88 | 0.00 | 0.00 | 3.88 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0011 | 0.0000 | 0.0000 | 0.0011 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0011 | 0.0000 | 0.0000 | 0.0011 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Door with Low or No Anti-Sweat Heat for Reach-In Cooler or Freezer | 3.5.11 | Energy Savings (MWh) | 0.00 | 0.00 | 0.83 | 0.00 | 0.00 | 0.83 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Suction Pipe Insulation for Walk-In Cooler or Freezer | 3.5.12 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.16 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Refrigerated Display Case with Doors Replacing Open Case | 3.5.13 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 80.73 | 80.73 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | -0.0017 | -0.0017 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0341 | 0.0341 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 220 | 220 |
| Adding Doors to Existing Refrigerated Display Case | 3.5.14 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 68.84 | 68.84 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | -0.0032 | -0.0032 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0285 | 0.0285 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 220 | 220 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Refrigerated Case Light Occupancy Sensors | 3.5.15 | Energy Savings (MWh) | 0.00 | 0.00 | 0.05 | 0.00 | 0.00 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Novelty Cooler Shutoff Timer | 3.5.16 | Energy Savings (MWh) | 0.00 | 0.00 | 0.07 | 0.00 | 0.00 | 0.07 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| ENERGY STAR Clothes Washer | 3.6.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.32 | 0.00 | 0.00 | 0.32 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 0 | 3 | 0 | 0 | 3 |
| ENERGY STAR Bathroom Ventilation Fan in Commercial Application | 3.6.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.06 | 0.00 | 0.00 | 0.06 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| ENERGY STAR Ice Machines | 3.7.1 | Energy Savings (MWh) | 0.00 | 1.79 | 0.00 | 0.90 | 0.00 | 2.69 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0002 | 0.0000 | 0.0001 | 0.0000 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 2 | 0 | 1 | 0 | 3 |
| Beverage and Snack Machine Controls | 3.7.2 | Energy Savings (MWh) | 0.00 | 0.54 | 0.00 | 0.00 | 0.00 | 0.54 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 2 | 0 | 0 | 0 | 2 |
| ENERGY STAR Electric Steam Cooker | 3.7.3 | Energy Savings (MWh) | 0.00 | 11.94 | 0.00 | 5.97 | 0.00 | 17.91 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0024 | 0.0000 | 0.0012 | 0.0000 | 0.0037 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0016 | 0.0000 | 0.0008 | 0.0000 | 0.0023 |
| | | Projected Participation | 0 | 2 | 0 | 1 | 0 | 3 |
| ENERGY STAR Combination Oven | 3.7.4 | Energy Savings (MWh) | 0.45 | 0.45 | 0.08 | 0.00 | 0.08 | 1.05 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0002 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 3 | 3 | 1 | 0 | 1 | 8 |
| ENERGY STAR Commercial Convection Oven | 3.7.5 | Energy Savings (MWh) | 6.29 | 6.29 | 0.00 | 0.00 | 0.00 | 12.58 |
| | | Summer Demand Reduction (MW) | 0.0013 | 0.0013 | 0.0000 | 0.0000 | 0.0000 | 0.0026 |
| | | Winter Demand Reduction (MW) | 0.0008 | 0.0008 | 0.0000 | 0.0000 | 0.0000 | 0.0016 |
| | | Projected Participation | 3 | 3 | 0 | 0 | 0 | 6 |
| ENERGY STAR Commercial Fryer | 3.7.6 | Energy Savings (MWh) | 2.33 | 2.33 | 0.00 | 0.00 | 0.00 | 4.65 |
| | | Summer Demand Reduction (MW) | 0.0005 | 0.0005 | 0.0000 | 0.0000 | 0.0000 | 0.0009 |
| | | Winter Demand Reduction (MW) | 0.0003 | 0.0003 | 0.0000 | 0.0000 | 0.0000 | 0.0006 |
| | | Projected Participation | 2 | 2 | 0 | 0 | 0 | 4 |
| ENERGY STAR Commercial Hot Food Holding Cabinet | 3.7.7 | Energy Savings (MWh) | 5.14 | 5.14 | 0.00 | 0.00 | 0.00 | 10.28 |
| | | Summer Demand Reduction (MW) | 0.0010 | 0.0010 | 0.0000 | 0.0000 | 0.0000 | 0.0021 |
| | | Winter Demand Reduction (MW) | 0.0007 | 0.0007 | 0.0000 | 0.0000 | 0.0000 | 0.0013 |
| | | Projected Participation | 3 | 3 | 0 | 0 | 0 | 6 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|-----------------------------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| ENERGY STAR Commercial Dishwasher | 3.7.8 | Energy Savings (MWh) | 3.94 | 17.31 | 121.91 | 33.89 | 10.92 | 187.97 |
| | | Summer Demand Reduction (MW) | 0.0008 | 0.0035 | 0.0248 | 0.0069 | 0.0022 | 0.0383 |
| | | Winter Demand Reduction (MW) | 0.0005 | 0.0023 | 0.0162 | 0.0044 | 0.0014 | 0.0248 |
| | | Projected Participation | 1 | 1 | 9 | 2 | 1 | 14 |
| ENERGY STAR Commercial Griddle | 3.7.9 | Energy Savings (MWh) | 0.00 | 0.00 | 5.73 | 0.00 | 0.00 | 5.73 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0012 | 0.0000 | 0.0000 | 0.0012 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0007 | 0.0000 | 0.0000 | 0.0007 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Commercial Induction Cooktops | 3.7.10 | Energy Savings (MWh) | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.01 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Ceiling & Wall Insulation | 3.8.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 2 | 2 |
| Advanced Power Strips | 3.9.1 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.08 | 0.00 | 0.08 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |
| ENERGY STAR Server | 3.9.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 15.68 | 0.00 | 15.68 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0020 | 0.0000 | 0.0020 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|---|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0021 | 0.0000 | 0.0021 |
| | | Projected Participation | 0 | 0 | 0 | 3 | 0 | 3 |
| Server Virtualization | 3.9.3 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.46 | 0.00 | 0.46 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 0 | 0 | 1 | 0 | 1 |
| Cycling Refrigerated Thermal Mass Dryer | 3.10.1 | Energy Savings (MWh) | 0.00 | 1.82 | 1.82 | 1.82 | 1.82 | 7.28 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0004 | 0.0004 | 0.0004 | 0.0004 | 0.0016 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0019 |
| | | Projected Participation | 0 | 60 | 60 | 60 | 60 | 240 |
| Air-Entraining Air Nozzle | 3.10.2 | Energy Savings (MWh) | 0.00 | 0.00 | 1.49 | 0.00 | 0.00 | 1.49 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0003 | 0.0000 | 0.0000 | 0.0003 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0004 | 0.0000 | 0.0000 | 0.0004 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| No-Loss Condensate Drain | 3.10.3 | Energy Savings (MWh) | 0.00 | 0.00 | 1.21 | 0.00 | 0.00 | 1.21 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0003 | 0.0000 | 0.0000 | 0.0003 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0003 | 0.0000 | 0.0000 | 0.0003 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Air Tanks for Load/No Load Compressors | 3.10.4 | Energy Savings (MWh) | 0.00 | 3.35 | 3.35 | 3.35 | 31.92 | 41.98 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0007 | 0.0007 | 0.0007 | 0.0082 | 0.0104 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0007 | 0.0007 | 0.0007 | 0.0082 | 0.0104 |
| | | Projected Participation | 0 | 15 | 15 | 15 | 16 | 61 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Variable-Speed Drive Air Compressor | 3.10.5 | Energy Savings (MWh) | 326.38 | 326.38 | 326.38 | 326.38 | 326.38 | 1,631.88 |
| | | Summer Demand Reduction (MW) | 0.0719 | 0.0719 | 0.0719 | 0.0719 | 0.0719 | 0.3593 |
| | | Winter Demand Reduction (MW) | 0.0719 | 0.0719 | 0.0719 | 0.0719 | 0.0719 | 0.3593 |
| | | Projected Participation | 72 | 72 | 72 | 72 | 72 | 360 |
| Compressed Air Controller | 3.10.6 | Energy Savings (MWh) | 0.00 | 2.24 | 2.24 | 2.24 | 2.24 | 8.94 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0020 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0005 | 0.0005 | 0.0005 | 0.0005 | 0.0020 |
| | | Projected Participation | 0 | 20 | 20 | 20 | 20 | 80 |
| Compressed Air Low Pressure Drop Filters | 3.10.7 | Energy Savings (MWh) | 0.00 | 0.72 | 0.72 | 0.72 | 0.72 | 2.90 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0006 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0006 |
| | | Projected Participation | 0 | 30 | 30 | 30 | 30 | 120 |
| Compressed Air Mist Eliminations | 3.10.8 | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 0.05 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 0 | 0 | 1 | 1 |
| High Efficiency Transformer | 3.11.1 | Energy Savings (MWh) | 0.49 | 0.99 | 0.49 | 0.49 | 0.49 | 2.96 |
| | | Summer Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0004 |
| | | Winter Demand Reduction (MW) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0004 |
| | | Projected Participation | 1 | 2 | 1 | 1 | 1 | 6 |
| Engine Block Heater Timer | 3.11.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.80 | 0.00 | 0.00 | 0.80 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|----------|-----------|-----------|----------|----------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| High Frequency Battery Chargers | 3.11.3 | Energy Savings (MWh) | 3.50 | 5.25 | 5.25 | 3.50 | 1.75 | 19.26 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 2 | 3 | 3 | 2 | 1 | 11 |
| Uninterruptible Power Supply (UPS) | 3.11.4 | Energy Savings (MWh) | 0.00 | 0.00 | 0.45 | 0.00 | 0.00 | 0.45 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 3 | 0 | 0 | 3 |
| Building Operator Certification Training | 3.11.5 | Energy Savings (MWh) | 1,167.59 | 1,167.59 | 934.07 | 700.55 | 467.04 | 4,436.84 |
| | | Summer Demand Reduction (MW) | 0.0850 | 0.0850 | 0.0680 | 0.0510 | 0.0340 | 0.3229 |
| | | Winter Demand Reduction (MW) | 0.0600 | 0.0600 | 0.0480 | 0.0360 | 0.0240 | 0.2281 |
| | | Projected Participation | 50 | 50 | 40 | 30 | 20 | 190 |
| Photovoltaic (PV) Solar Generation | 3.11.6 | Energy Savings (MWh) | 8,192.13 | 10,532.73 | 17,554.56 | 8,192.13 | 4,681.21 | 49,152.75 |
| | | Summer Demand Reduction (MW) | 2.8398 | 3.6512 | 6.0854 | 2.8398 | 1.6228 | 17.0390 |
| | | Winter Demand Reduction (MW) | 0.4427 | 0.5692 | 0.9487 | 0.4427 | 0.2530 | 2.6563 |
| | | Projected Participation | 7 | 9 | 15 | 7 | 4 | 42 |
| Automatic Milker Takeoffs | 4.1.1 | Energy Savings (MWh) | 0.00 | 0.00 | 3.38 | 0.00 | 0.00 | 3.38 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0006 | 0.0000 | 0.0000 | 0.0006 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0006 | 0.0000 | 0.0000 | 0.0006 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| Dairy Scroll Compressors | 4.1.2 | Energy Savings (MWh) | 0.00 | 0.00 | 0.79 | 0.00 | 0.00 | 0.79 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0001 | 0.0000 | 0.0000 | 0.0001 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Ag High-Efficiency Ventilation Fans With and Without Thermostats | 4.1.3 | Energy Savings (MWh) | 0.00 | 0.00 | 2.24 | 0.00 | 0.00 | 2.24 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0005 | 0.0000 | 0.0000 | 0.0005 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Ag Heat Reclaimers | 4.1.4 | Energy Savings (MWh) | 0.00 | 0.00 | 7.12 | 0.00 | 0.00 | 7.12 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0013 | 0.0000 | 0.0000 | 0.0013 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0014 | 0.0000 | 0.0000 | 0.0014 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Ag High Volume Low Speed Fans | 4.1.5 | Energy Savings (MWh) | 303.28 | 314.92 | 330.45 | 314.92 | 314.92 | 1,578.49 |
| | | Summer Demand Reduction (MW) | 0.1572 | 0.1632 | 0.1712 | 0.1632 | 0.1632 | 0.8180 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 31 | 32 | 34 | 32 | 32 | 161 |
| Livestock Waterer | 4.1.6 | Energy Savings (MWh) | 0.00 | 0.00 | 0.65 | 0.00 | 0.00 | 0.65 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0004 | 0.0000 | 0.0000 | 0.0004 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| Variable Speed Drive (VSD) Controller on | 4.1.7 | Energy Savings (MWh) | 0.00 | 0.00 | 19.98 | 0.00 | 0.00 | 19.98 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------|-------------------------|------------------------------|----------|----------|----------|----------|----------|--------------------|
| Dairy Vacuum Pumps | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 2 | 0 | 0 | 2 |
| Low Pressure Irrigation System | 4.1.8 | Energy Savings (MWh) | 0.00 | 0.00 | 0.31 | 0.00 | 0.00 | 0.31 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0009 | 0.0000 | 0.0000 | 0.0009 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 0 | 0 | 1 | 0 | 0 | 1 |
| CUSTOM HVAC | Custom | Energy Savings (MWh) | 678.59 | 678.59 | 678.59 | 678.59 | 678.59 | 3,392.93 |
| | | Summer Demand Reduction (MW) | 0.1252 | 0.1252 | 0.1252 | 0.1252 | 0.1252 | 0.6259 |
| | | Winter Demand Reduction (MW) | 0.0013 | 0.0013 | 0.0013 | 0.0013 | 0.0013 | 0.0063 |
| | | Projected Participation | 3 | 3 | 3 | 3 | 3 | 15 |
| CUSTOM AGRICULTURE | Custom | Energy Savings (MWh) | 419.64 | 419.64 | 419.64 | 1,258.92 | 1,258.92 | 3,776.76 |
| | | Summer Demand Reduction (MW) | 0.0881 | 0.0881 | 0.0881 | 0.2642 | 0.2642 | 0.7926 |
| | | Winter Demand Reduction (MW) | 0.0881 | 0.0881 | 0.0881 | 0.2642 | 0.2642 | 0.7926 |
| | | Projected Participation | 1 | 1 | 1 | 3 | 3 | 9 |
| CUSTOM MOTORS / COMPRESSED AIR | Custom | Energy Savings (MWh) | 3,410.01 | 3,410.01 | 3,410.01 | 3,410.01 | 3,410.01 | 17,050.05 |
| | | Summer Demand Reduction (MW) | 0.4874 | 0.4874 | 0.4874 | 0.4874 | 0.4874 | 2.4369 |
| | | Winter Demand Reduction (MW) | 0.4874 | 0.4874 | 0.4874 | 0.4874 | 0.4874 | 2.4369 |
| | | Projected Participation | 8 | 8 | 8 | 8 | 8 | 40 |
| CUSTOM REFRIGERATION | Custom | Energy Savings (MWh) | 2,269.55 | 2,269.55 | 2,269.55 | 2,269.55 | 2,269.55 | 11,347.75 |
| | | Summer Demand Reduction (MW) | 0.3173 | 0.3173 | 0.3173 | 0.3173 | 0.3173 | 1.5864 |
| | | Winter Demand Reduction (MW) | 0.1269 | 0.1269 | 0.1269 | 0.1269 | 0.1269 | 0.6345 |
| | | Projected Participation | 5 | 5 | 5 | 5 | 5 | 25 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|--------------------------------------|-------------------------|------------------------------|----------|----------|-----------|-----------|----------|--------------------|
| Custom CHP | Custom | Energy Savings (MWh) | 0.00 | 7,540.60 | 7,540.60 | 15,081.20 | 7,540.60 | 37,702.99 |
| | | Summer Demand Reduction (MW) | 0.0000 | 1.0808 | 1.0808 | 2.1616 | 1.0808 | 5.4039 |
| | | Winter Demand Reduction (MW) | 0.0000 | 1.0808 | 1.0808 | 2.1616 | 1.0808 | 5.4039 |
| | | Projected Participation | 0 | 1 | 1 | 2 | 1 | 5 |
| Custom Other | Custom | Energy Savings (MWh) | 4,099.21 | 9,018.26 | 10,248.02 | 9,018.26 | 6,148.81 | 38,532.56 |
| | | Summer Demand Reduction (MW) | 0.5905 | 1.2991 | 1.4763 | 1.2991 | 0.8858 | 5.5508 |
| | | Winter Demand Reduction (MW) | 0.5905 | 1.2991 | 1.4763 | 1.2991 | 0.8858 | 5.5508 |
| | | Projected Participation | 10 | 22 | 25 | 22 | 15 | 94 |
| Financing Buy Down | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 1 | 1 | 1 | 1 | 0 | 4 |
| Technical Audits/Feasibility Studies | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 8 | 12 | 15 | 10 | 5 | 50 |
| Strategic Energy Management | Custom | Energy Savings (MWh) | 1,001.75 | 1,803.15 | 3,005.25 | 3,806.65 | 4,407.70 | 14,024.50 |
| | | Summer Demand Reduction (MW) | 0.1573 | 0.2831 | 0.4718 | 0.5976 | 0.6919 | 2.2015 |
| | | Winter Demand Reduction (MW) | 0.1573 | 0.2831 | 0.4718 | 0.5976 | 0.6919 | 2.2015 |
| | | Projected Participation | 5 | 9 | 15 | 19 | 22 | 70 |
| Compressed Air Challenge | Custom | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| Measure | 2026 TRM Measure Number | Metric | PY18 | PY19 | PY20 | PY21 | PY22 | Total ¹ |
|----------------|-------------------------|------------------------------|--------|--------|--------|--------|--------|--------------------|
| | | Winter Demand Reduction (MW) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| | | Projected Participation | 10 | 10 | 10 | 10 | 10 | 50 |
| C&I Load Shift | None | Energy Savings (MWh) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | Summer Demand Reduction (MW) | 0.00 | 0.00 | 4.08 | 6.12 | 0.00 | 2.0391 |
| | | Winter Demand Reduction (MW) | 0.00 | 0.00 | 4.08 | 6.12 | 0.00 | 2.0391 |
| | | Projected Participation | 0 | 0 | 2 | 3 | 0 | 3 |

¹Total values may not equal the sum of all program year values due to rounding.

²Projected participation is based on the unit value for the corresponding measure in Table 47.

Business Pilot Programs

Description

PPL Electric Utilities may allot up to \$1 million total, inclusive of small and large C&I customers, for a C&I Peak Load Shift Pilot. Given the lack of market data on C&I daily load shifting, a key research question will be to understand if C&I daily load shifting is cost-effective in the Company's territory, while assessing customer experience and cost-effectiveness to inform a potential expanded program. The CSP will recruit a cohort to participate in the pilot by leveraging existing building management systems, process load control, battery storage, thermal storage, on-site generation, or other methodologies. Metrics to be tracked will be determined by pilot design and technology employed, though they will include participation, customer satisfaction, customer utilized product or software viability, and cost-effectiveness. The pilot may run between 12 and 24 months, depending on the final pilot design. At the conclusion of the pilot, the EM&V CSP will include evaluation results as part of the annual reporting process. PPL Electric Utilities may choose to continue pilot programs, in alignment with stated Pa PUC directives on plan changes, and with contingency funding if it is determined that the program provides a benefit to customers and/or helps the Company meet compliance targets.

PPL Electric Utilities reserves the right to propose additional pilots as deemed necessary by the Company to demonstrate new technology, methods, program design, or for any other reason, utilizing allocated technology and pilot funding, as is allowable through the Commission's Implementation Order. All proposed pilots will be filed with the Commission for review, as is outlined in the Final Implementation Order.

3.5. Government, Non-Profit, and Institutional Sector

The Company's Business Energy Efficiency Program will again be offered to all large and small commercial and industrial customers, including those defined as government, non-profit, and institutional ("GNI"). PPL Electric Utilities has a history of completing projects and maintaining partnerships with healthcare facilities, educational organizations, and other GNI customers across our territory. PPL Electric Utilities has included measures applicable to a variety of GNI customers, dependent on end-use, and will develop communications and marketing strategies to ensure awareness of these offerings. Where applicable, the Company will work with the selected CSPs for tailored outreach, including in the master metered income-eligible multifamily space, to ensure housing authorities and other providers receive an opportunity to participate.

4. Program Management and Implementation Strategies

PPL Electric Utilities has successfully engaged customers, provided meaningful energy efficiency opportunities, and met every requirement set forth by the Pa PUC throughout the history of Act 129. As an organization, we have a wealth of applicable experience, community connections, strong relationships with key market actors, and high-performing CSPs that deliver a customer-centric implementation approach. The Company’s EE&C staff will lead and manage our partners, CSPs, trade allies, and others, as we leverage these assets for a successful Phase V.

4.1. Overview of EDC Management and Implementation Strategies

4.1.1. Organization of Services

PPL Electric Utilities will partner with highly qualified, Pa-registered CSPs with a local presence and knowledge of the Commonwealth to provide all program implementation in Phase V. The Company will also leverage and grow existing partner networks, which include contractors, trade allies, distributors, raters, builders, and other critical market actors to educate customers, install measures, and ensure program success. The Company, where possible, will support the market through training, economic development, and educational opportunities to foster market transformation. In addition to program implementation CSPs, the Company will utilize a separate, independent third-party EM&V consultant to ensure accurate program reporting. Details about reporting and tracking systems are included in Section 5, and QA/QC and EM&V details are included in Section 6. PPL Electric Utilities will provide overall strategic management and oversight and will ensure adherence to the Plan and Pa PUC requirements at all times, as well as ensure a premier customer experience (see Table 50).

Table 50. Organizational Structure

| Function | Responsible Organization(s) | | |
|---|---|---|--|
| Plan Design | PPL Electric Utilities | | |
| Research & Development | | | |
| Implementation & Marketing Strategy | | | |
| Overall Customer Care & Experience | | | |
| Database Management & Program Tracking | | | |
| Financial Review and Approval | | | |
| CSP Management & Coordination | | | |
| Trade Ally & Distributor Network Management | Residential Energy Efficiency Program CSP | Resource Constrained Energy Efficiency Program (Low-Income) CSP | Business Energy Efficiency Program CSP |
| Direct Program Marketing & Advertising | | | |
| Customer Verification, Intake & Routing | | | |
| Project Delivery | | | |
| Application Review & Approval | | | |
| Incentive Processing | | | |
| Energy Efficiency Related Customer Care | | | |

| Function | Responsible Organization(s) |
|---|---|
| QA/QC | Implementation CSPs, PPL Electric Utilities, and EM&V CSP |
| Measurement & Verification | |
| Evaluation and Pa PUC Annual/ Mid-Year Reports | EM&V CSP, PPL Electric Utilities |

4.1.2. Risk Management

As noted elsewhere in this Plan, energy efficiency programs in the Commonwealth have a long history and a record of success in facilitating positive changes in the market, as well as updated efficiency standards. In the coming years, the Company agrees with the Pa PUC’s assessment of likely higher upfront costs for comprehensive measures and less opportunity from low-cost, high-impact measures. There are significant uncertainties at the federal level with changes in structure, priorities, and funding, as well as standards management and programs, such as ENERGY STAR. The implementation environment for Phase V has created a number of potential risks; overall compliance targets may be lower, though they are no easier to accomplish.

Performance

As the Pa PUC’s Market Potential Study indicated, Phase V will be heavily dependent on more comprehensive measures, such as HVAC, which have a higher barrier to entry. This creates a scenario where a variety of actors and market forces could potentially impact program, component, or channel performance. In addition, as PPL Electric Utilities noted during the Phase V Implementation Order comment period, the available demand response opportunities are not known or proven, as is the case with commercial and industrial peak load shifting. The Company has allocated additional resources for peak load shaving activities, including additional internal staff in the form of a Demand Response Program Manager, as well as a highly specialized subcontractor that is an industry leader in this critical space. As noted below in Section 4.1.4, PPL Electric Utilities has a variety of early warning capabilities that will be brought to bear to monitor, measure, and respond to performance issues, allowing the Company and CSPs to pivot where necessary. Our strong market actor relationships will give us early insight into coming changes, of which the Company may otherwise be unaware.

Technology

Technology is moving at ever-increasing speeds, including for clean energy, efficiency, and leveraging new data opportunities. This can cause market disruption and confusion. New technology is also often more expensive prior to full market adoption, though it can prove to be beneficial as EDCs prepare for future implementation, both later in Phase V and beyond. Understanding how these technologies can benefit consumers, as well as preventing potential disruption or confusion in the market, is essential. The Company plans to investigate several new technologies in Phase V through limited pilots with the potential for scaling. Details on all pilot programs can be found in Section 3. Finally, PPL Electric Utilities will continue to offer advanced education tools, such as the Energy Analyzer, which leverages customer

data, to educate and empower our customers to use energy safely and efficiently. As new opportunities arise, the Company will evaluate for inclusion in our offerings, with consultation with the SWE and/or Pa PUC.

Market

The cost of generation continues to accelerate, a cost outside of EDC's control. This has created concern in the market related to affordability. This is compounded by potential inflationary pressures that may create an environment where customer participation may be reduced due to upfront costs. The Company has considered this in our Plan and has included third-party financing options, a moderate-income tier within the residential program, as well as additional pathways of participation for income-eligible customers. The Company will also provide broad awareness campaigns related to energy efficiency offerings to promote customer awareness of cost-lowering energy efficiency offerings that can assist customers who are concerned about overall price increases.

Policy

Changes at the federal level, including supply chain disruptions due to tariffs, may make products unavailable or more costly. The Company stays in close contact with key market actors to understand product availability, costs, and other determinative metrics that can provide insight into the changing landscape. PPL Electric Utilities has adjusted our expected project completion times to account for this volatility, which ensures that our forecasts will remain accurate. The Company will continually monitor and adjust as needed.

Evaluation

There are multiple new elements within Phase V that create uncertainty in evaluation, especially related to demand response and peak load shifting. There are also new offerings where evaluation methodologies must be reviewed and approved, including conservation voltage reduction. PPL Electric Utilities will work closely with the EM&V CSP to ensure program activities are aligned with existing evaluation frameworks and new offerings have reviewed and approved evaluation plans to ensure appropriate reporting of savings.

4.1.3. Personnel Constraints

The Company maintains an appropriately sized internal staff to provide appropriate resources for all required activities, while contractually obligating and monitoring CSPs to maintain adequate staffing levels across all areas of program implementation. PPL Electric Utilities will also ensure consistent engagement with trade allies by providing meaningful training, education, program materials, and incentives to ensure participation throughout the phase. As an extension of our efforts in Phase IV, PPL Electric Utilities will expand our trade ally networks to include a new heat pump installer network, offering specialized training and incentives related to this core technology. Finally, the Company successfully kept all program and channel options available through the end of Phase IV, building trust with contractors, trade allies, and distributors, which in turn will encourage investment in the territory.

PPL Electric Utilities will continue to communicate in a transparent and timely manner, gathering actionable feedback from all partners through roundtables, surveys, and other forums, to ensure we are meeting the needs of those organizations that are instrumental to success in Phase V.

4.1.4. Early Warning Systems

PPL Electric Utilities is involved at every level of program implementation and evaluation, closely monitoring all financials, energy savings, participation, satisfaction, and performance. Daily, weekly, and monthly status updates, supported by robust CSP reporting and dashboards, will allow the Company to have real-time insight into program performance in a way that allows us to be proactive and make key decisions to avoid potential issues with compliance with Act 129. The Company also utilizes sophisticated modeling and forecasting approaches separate from our CSPs, which provide verification of progress and early warning capabilities. The Company will respond to changing market conditions by moving funding between channels and components, if necessary, always ensuring customer recovery by sector. If the Company determines that a specific change requires a major or minor plan change, the Company will follow the Pa PUCs established plan change process. PPL Electric Utilities will follow Commission guidance on EE&C plan changes whenever required.

4.1.5. Implementation Schedule and Milestones

PPL Electric Utilities has selected CSPs for EM&V, as well as the Residential, Business, and Resource Constrained Energy Efficiency Programs, though contracts were not finalized for program implementation vendors as of the filing deadline. All selected CSPs are returning incumbents from Phase IV, allowing for a seamless transition to Phase V. The Phase V EE&C Plan is required to be submitted to the Pa PUC by December 1, 2025, and the Company expects all programs to launch at the start of the phase on June 1, 2026. Annual reports will be submitted per the Phase V Implementation Order guidance until the conclusion of Phase V on May 31, 2031.

4.1.6. Stakeholder Engagement

PPL Electric Utilities will continue to update stakeholders twice annually through stakeholder presentations tied to the semiannual and annual reports, and as requested by individual stakeholders. The Company will also continue to host Act 129 information on a dedicated stakeholder website. This website may include the EE&C Plan, annual reports, and other information of potential interest to stakeholders. The Company will ensure that low-income advocates and stakeholders are aware of all stakeholder interaction opportunities, and the Company will encourage participation. PPL Electric Utilities will also make EE&C leadership available by request for additional meetings with low-income stakeholders.

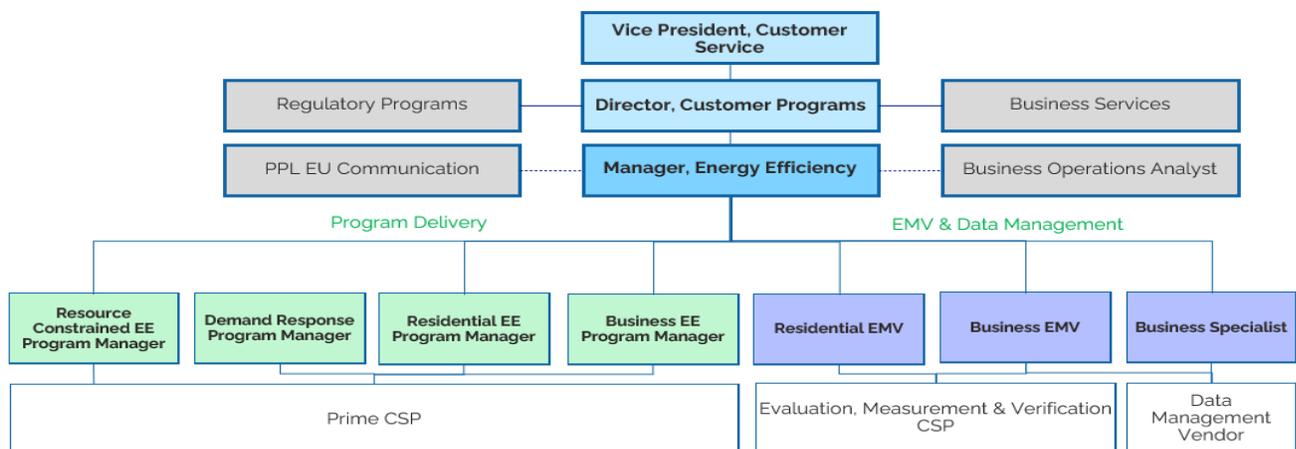
4.2. Executive Management Structure

4.2.1. EDC Structure

PPL Electric Utilities will continue to provide strategic oversight over all areas of Phase V programs, including the design and management of all programs, components, and channels, while also providing

overarching marketing and customer support and education. Critical to these functions is the Director of Customer Programs, responsible for Act 129 Energy Efficiency Programs, Regulatory Programs, and Business Services. The Manager of Energy Efficiency is the primary administrator for all Act 129 programs, including portfolio strategy, planning, budgeting and financial management, review of program metrics, development, implementation, operations, evaluation, reporting, and compliance with Act 129. These roles are supported by task-specific program managers responsible for program implementation, as well as sector-specific EM&V engineers responsible for quality assurance and control, and a database administrator for program tracking and reporting. The PPL Electric Utilities Communications team is responsible for external communications. The Company Supply team is ultimately responsible for procurement. Figure 1 summarizes the management structure for Phase V.

Figure 1. PPL Electric Utilities EE&C Plan Management Structure



4.2.2. CSP Performance

All CSPs and subcontractors providing services to PPL Electric Utilities will be contractually obligated to meet performance, customer satisfaction, cybersecurity, and every other applicable standard deemed appropriate by the Company to successfully support Act 129 implementation in Phase V. All partners will be actively monitored by Company staff through daily, weekly, and monthly reporting, dashboards, and both regular and *ad hoc* meetings. PPL Electric Utilities plans to use a single prime CSP with specialized subcontractors for both administrative efficiencies and cost savings, but also organizational consistency, transparency, and control. The EM&V CSP will independently evaluate all programs, components, and channels to verify reported savings, cost-effectiveness, customer satisfaction, and other key performance metrics. PPL Electric Utilities will update any aspect of the portfolio found to be underperforming as necessary.

4.2.3. Administrative Budgets

PPL Electric Utilities developed administrative budgets that include all EDC costs to develop, implement, and manage the Plan; direct staff labor and material costs, as well as full time equivalent hours of supporting labor, such as key account managers, CSP labor and materials, all marketing, QA/QC

activities, EM&V, tracking system, legal services, and SWE costs. The administrative budget excludes payments to customers/trade allies in the form of services, rebates, and/or incentives.

4.3. Conservation Service Providers

4.3.1. CSP Selection Process

PPL Electric Utilities issued RFPs for implementation CSPs (for Residential, Business, and Resource Constrained (Low-Income) Energy Efficiency Programs) and one CSP to provide EM&V. PPL Electric Utilities conducted its RFP processes in accordance with the procedures approved by the Commission. As of the date of the Phase V EE&C Plan's submission, PPL Electric Utilities is still preparing the implementation CSP contracts. The division of responsibilities between the Company and CSPs generally follows the successful framework from Phase IV. CSPs are selected primarily for implementation services, to ensure customer awareness, participation, forecasting, marketing insight, and properly attributed savings within Company-defined parameters, including specific budget limits. PPL Electric Utilities retains all strategic planning, program development, and design, as well as all internal EM&V activities. These EDC-specific activities cannot be done by a CSP, as that would lessen program oversight and control, as well as accountability.

4.3.2. CSPs Selected

The Company selected CLEAResult Consulting as the primary portfolio CSP for the Residential, Business, and Resource Constrained (Low-Income) Energy Efficiency Programs through a competitive bidding process. CLEAResult will subcontract key elements of the Resource Constrained Energy Efficiency Program to CMC Energy Services. In addition, the primary CSP will utilize other subcontractors for specific services, where appropriate, including for demand response activities. PPL Electric Utilities also selected Cadmus as the third-party EM&V CSP. All CSPs selected for Phase V are incumbents with a track record of successful program implementation in Pennsylvania, supporting PPL Electric Utilities to meet all compliance targets cost-effectively. All contracts, which are confidential, will be submitted to the Pa PUC for approval. PPL Electric Utilities does not plan to forego the competitive bidding process for any contract.

4.3.3. Pending CSP Contracts

PPL Electric Utilities will solicit bids from qualified and Pa-registered CSPs to provide overarching marketing support as well as database services. These RFPs were issued in the third and fourth quarter of 2025, respectively.

4.4. Coordination with Other State Conservation Programs

4.4.1. Collaboration Plans

The Company and selected CSP will work with all external program implementation vendor(s) to ensure the best possible customer experience and appropriate incentive allocation to reduce customer costs. Due to uncertainty around program viability and funding, PPL Electric Utilities' Plan is not dependent on

external coordination to meet goals, though it welcomes opportunities to recognize savings for which the Company's programs contribute applicable measures. This includes coordination with gas and water utilities within the Company's service territory, as applicable. No joint or coordinated marketing is planned for Phase V with any external, non-Company administered programs, though the Company may reference available external funding opportunities to customers, including the Penn Energy Savers website, to help educate customers on both Home Efficiency Rebates ("HER") and Home Electrification and Appliance Rebates ("HEAR") programs. For the HER program, the Company will provide and accept multifamily building leads to the program implementer, while also sharing program and customer data as directed by the Pa PUC and approved by the Company. PPL Electric Utilities may provide in-unit services and treatment to multifamily sites identified by the HER program implementer, claiming 100% savings for all Act 129-compliant energy reduction measures performed. The Company may contribute up to \$75,000 for the completion of American Society of Heating, Refrigerating and Air-Conditioning Engineers ("ASHRAE") level 2 audits, up to 100% of the audit costs, at up to ten properties where in-unit work is available and for which the Company can claim savings. This will create additional, low-administrative-burden benefits for customers. For HEAR, the Company may provide lead lists of prior Resource Constrained Single and Multifamily Assessment participants with fossil fuel heating, with a focus on trucked fuels such as propane and fuel oil. For projects with electric heat and/or water heating that exceed external limitations, and where both product and customers meet Resource Constrained Program eligibility, the Company may provide bridging funding to cover up to 100% of the cost of the measure while claiming applicable Act 129 energy and peak demand reductions. Coordination on data sharing requested by external program implementers for customer bill analysis will be provided as directed by the Pa PUC, and if approved by the Company based on customer data security considerations. If PPL Electric Utilities receives data related to outside funding on shared participants, either from the customer, vendor, or other agency, the Company will retain and report on this information, as is required. The Company will seek to minimize administrative burdens for customers while maximizing all available benefits to reduce project costs and extend funding availability.

4.4.2. Funding Availability

If provided with the requisite information, the Company will provide links to available external funding for Act 129 customers on Company or CSP-hosted websites and may provide leave-behind materials for program participants. Select information about external funding may be included in webinars, marketing and outreach materials, or through other means, as the Company deems appropriate and where such additions will not cause customer confusion or attribution concerns.

4.4.3. AEPS Registration Support

Customers participating in programs with measures that meet AEPS eligibility requirements will be provided with information on registration, encouragement to take advantage of available benefits, and technical assistance, if requested by the customer. This will be provided as part of an overall concierge service through the Business Energy Efficiency Program. The selected CSP will be provided with training

from the Company on appropriate protocols for providing AEPS registration support to eligible customers. The Company does not expect additional costs for this effort.

4.4.4. Health and Safety Issues

PPL Electric Utilities plans to allocate up to \$1.5 million to mitigate health and safety issues preventing comprehensive measure installation for income-eligible customers through the Resource Constrained Energy Efficiency Program. Based on the results of the Phase IV pilot, the Company forecasts that this amount will be adequate to address issues that arise for income-eligible customers within Act 129, though may allot additional funding if necessary and available, based on customer need. As always, PPL Electric Utilities will provide customers with applicable and helpful referrals to other agencies, as identified or requested.

4.4.5. Dual Participation Issues

PPL Electric Utilities will request aggregate, anonymous participation data, by sector, for external funding from known and available programs, through the program administrator or its agent, to calculate the leverage ratio for reporting. This will prevent potentially compromising customer information during data transfer and simplify reporting, while showing overall braiding performance. While the Company will request external program participation through surveys and/or application materials for additional verification purposes, relying on program participants to provide information concerning external program participation and/or funding is likely to lead to incomplete and/or inaccurate reporting. This approach does not preclude the Company's participation in additional data sharing activities, if agreed upon by the Company, through the data sharing working groups facilitated by the Pa PUC. PPL Electric Utilities will use the most appropriate, Company-approved, and available data collection method during each annual reporting period.

5. Reporting and Tracking System

5.1. Annual Reporting

PPL Electric Utilities will provide semiannual and annual reports to the Commission and/or SWE in accordance with the milestones outlined in Table 23 of the Pa PUC's Final Implementation Order. The Company will assess and respond to *ad hoc* reporting requests in good faith, as it is able.

5.2. Project Management Tracking System

5.2.1. Overview of System

PPL Electric Utilities will utilize a comprehensive tracking database provided by the selected database CSP to maintain a record of all program-relevant implementation activities, support evaluation and measurement efforts, and calculate reported savings. This database is supported by a Company accounting system that will be used to track Act 129 cost information, as well as various business intelligence and visualization applications. Together, these systems will allow for analysis and required reporting to all applicable entities.

5.2.2. Software Format, Database Structure, and Data Exchange

Software Format, Structure, and Functionality

The tracking database is a proprietary, secure environment that allows both the Company and implementation CSPs to input, track, calculate energy savings, review, approve, and report at multiple levels of detail. Key data will be collected, including but not limited to demographic information, account details, measure details, such as efficiency, life, cost, and count, building and equipment details, and more. The data collected is configurable at multiple levels, including measure level, ensuring alignment with the Pa TRM and data availability needed to ensure verification of energy savings.

The tracking database allows users to navigate and analyze various, customizable data layers and resolutions, such as measure, sector, project, program, component, and channel, through drop-down lists, menus, and various shortcuts. The system can provide standard, recurring, and customized reports for PPL Electric Utilities' day-to-day portfolio analysis and management.

5.2.3. CSP System Integration

PPL Electric Utilities' tracking system provides accessibility via web or direct links that are controlled via assigned security rights, while logging user access. CSPs and other authorized users can securely upload data and customer transactions, calculate and allocate energy savings, and extract data for external parties, such as the EM&V CSP and SWE. This data can be augmented through the digital storage of ancillary documentation. The system allows data parameters to be set for most data elements, which prevents user input errors while also providing alerts for potential duplicate submissions. All transactions and workflows are logged and are reportable, providing a comprehensive audit trail of activities.

5.2.4. Mechanism for Access for Pa PUC and Statewide Evaluator

Direct access will not be provided to the Pa PUC or the SWE because they would need significant training to understand and utilize the system appropriately. PPL Electric Utilities will provide data extracts as needed. The Company will fulfill all quarterly and annual data requests issued by the Commission and its SWE in a timely manner.

5.2.5. Cybersecurity

PPL Electric Utilities requires and utilizes robust cybersecurity policies, processes, software, and hardware to ensure that all sensitive information is kept secure. These requirements are also placed upon all CSPs, subcontractors, and vendors. All sensitive information must be kept confidential by CSPs and may not be used for any purpose other than performing or providing the energy efficiency-related products and services. Access to sensitive data is on a need-to-know basis only, and CSPs are responsible for ensuring that their employees, personnel, and subcontractors are authorized.

All Company-supplied customer data file transfers will be secure and encrypted. All CSPs and subcontractors will ensure that the necessary infrastructure and/or development is in place and active before receiving sensitive information to support the encryption methodology approved by the Company. If the Contractor utilizes subcontractors and shares Company data, subcontractors must encrypt files in the same manner, as well as follow the same policies and procedures. In addition, all CSPs will utilize the minimum number of fields in Company-supplied customer data files, only necessary to perform energy efficiency-related services.

6. Quality Assurance and Control

6.1.1. Approach to Quality Assurance and Control

PPL Electric Utilities' approach to quality assurance and control is an integral component of program success, working seamlessly to create an environment of continuous improvement that touches all aspects of program delivery – rebate processing, installation practices, customer experience, and energy savings verification. This ensures accurate, consistent, and participant-focused results. The Company's quality assurance process takes a proactive approach by embedding standards and protocols into CSP implementation workflows to prevent errors and promote consistency from the start. The quality control process complements this by focusing on post-implementation verification, identifying, and correcting issues that may impact energy savings accuracy or participant satisfaction. This results in a virtuous cycle of consistent design, excellent implementation, proper analysis of activities, and incremental improvements to inform future design and planning.

Quality Assurance

The Company's quality assurance process starts with standardized documents and eligibility requirements based on component and channel-level logic models. Building on this foundation, ongoing training is planned not only for CSPs but also for all participating contractors and trade allies to ensure correct and consistent installation, safe operation, and portfolio-wide best practices are utilized. All program staff, field teams, communications, trade allies, etc., will be rigorously screened, with additional scrutiny for those who interact directly with customers.

Quality assurance also includes validation of deemed and calculated savings algorithms, variables, and measure assumptions to ensure reported savings are built on accurate methodologies. PPL Electric Utilities' program administration staff will review and consult with the CSPs on program workflows to identify trends and opportunities for improvement for all documented data collection protocols, implementation activities, customer interactions and experience, etc.

Quality Control

PPL Electric Utilities' quality control function is a follow-up, verification-driven process that ensures program implementation meets all requirements, converting reported outcomes into verified results. The Company employs quality control functions that ensure program activities align with existing quality assurance procedures at all levels. Activities include desktop engineering review and verification of statistically valid samples to ensure submitted values and documentation support reported savings, which may include dates, customer sign-off, eligibility, incentive payments, energy savings calculations, and other project-specific data. This is supported by virtual and in-person field inspections to confirm equipment and product specifications, as well as appropriate installation best practices. Quality control teams will also reinforce post-installation participant education to ensure participants realize the benefits of the installation and the measure life is appropriate. Customer experience and satisfaction

will be continually monitored and evaluated using follow-up communications and surveys to identify opportunities to improve the effectiveness of all offerings.

6.2. Measure and Project Installation Verification, QA/QC, and Savings Documentation

PPL Electric Utilities documents and tracks all component, program, and portfolio activity through its participant tracking database, which can record and/or calculate reported gross energy savings. The Company designed the tracking system with input interfaces customized to individual components and coordinated with EM&V personnel so that they could collect appropriate data to feed into the evaluation processes and to meet the needs of the SWE. PPL Electric Utilities trains implementation CSPs to use the tracking system. In cases where a turnkey CSP delivers all aspects of a component, the Company will expect that the CSP track all activity via secure Internet access or upload. CSPs may also collect and store additional data required for evaluation in their internal tracking systems. The EM&V CSP will develop detailed EM&V plans describing all evaluation activities and sampling plans for the impact and process evaluations.

6.3. Process for Collecting and Addressing Feedback

PPL Electric Utilities provides the public, including stakeholders and customers, access to annual and semi-annual reports, stakeholder presentations, and our EE&C Plan on our Company website, along with contact information that allows for feedback. All CSPs' informational and participation websites also have customer feedback options, including phone, email, and web comments. All feedback is logged and receives a timely follow-up, if necessary.

In addition, the Company and EM&V CSP will implement an evaluation plan for each program and/or component, which may include customer and trade ally surveys as part of impact and process evaluations. This effort is supplemented by implementation CSP customer satisfaction surveys used for program enhancements.

6.4. Planned Market and Process Evaluations

The EM&V CSP will conduct process evaluations, designed to improve component operations and service delivery, for the PPL Electric Utilities program components. These evaluations provide insight into component performance and provide context for the impact evaluation results. In addition, the process evaluations highlight areas of achievement or areas of opportunity, alignment with program logic models, and effectiveness in measure adoption, market impacts, and customer satisfaction. This may lead to better identification of market barriers and improve overall market penetration for each component. The process evaluations will be implemented in a manner that maximizes their program impact and provides adequate time for CSPs to make the recommended changes, where appropriate, and may vary by component and program year to ensure actionable results.

The process evaluation relies on documentation review, PPL Electric Utilities, and implementation CSP staff interviews, insights provided by key market actors (trade allies, distributors, manufacturers,

retailers, etc.), and participant and non-participant surveys. The EM&V CSP will design and implement survey sample plans to meet the necessary statistical confidence and precision that aligns with the Act 129 Evaluation Framework. Samples may be stratified by customer sector, market segment, project size, or other criteria as determined by the Company to ensure samples are representative of the populations.

In addition to the process evaluation, PPL Electric Utilities and/or the EM&V CSP may conduct internal research studies to complement the formal baseline and market potential studies completed by the SWE for the Pa PUC. The Company may update these studies to aid in program implementation throughout the phase.

6.5. Strategy for Coordinating with the Statewide Evaluator

PPL Electric Utilities and the EM&V CSP will align all efforts with the SWE's Phase V Evaluation Framework, including annual reporting, data formatting, and savings protocols. This includes adhering to the reporting and data calendar outlined in the Implementation Order.

The Company's impact evaluations are the primary method for verifying installation of all program measures and quantifying the energy consumption and peak demand reductions. The approach to measuring and verifying impacts will be in accordance with the Pa TRM and the Evaluation Framework, though methods may vary by program, component, sector, or other criteria, as is necessary. All Evaluation plans will be updated annually, if necessary, and will detail methodology, sampling, and verification, which will be reviewed for approval by the SWE.

PPL Electric Utilities will coordinate and attend quarterly and/or *ad hoc* working sessions with the SWE to discuss important updates, TRM-related issues, energy and peak demand savings approaches, or other critical matters. The Company and EM&V CSP will communicate with the SWE, where necessary, in an open and collaborative manner for clarification on various protocols, decisions, or any other relevant matter.

6.6. Process for Incorporating Code and Standards Changes

PPL Electric Utilities will follow all SWE guidance memos and directives regarding codes and standards, changes to the Pa TRM, or evaluation methodologies, as required. This includes any potential changes to ENERGY STAR. Updates to codes and standards generally make available products more efficient, thereby lowering available savings. As such, the Company will evaluate and update eligibility, incentive, or measure availability following any code or standard change impacting measures offered.

7. Cost Recovery Mechanism

7.1. EE&C Costs

EE&C plans cannot exceed 2% of the EDC's total annual revenue as of December 31, 2006. PPL Electric Utilities' total annual revenues for calendar year 2006 were approximately \$3 billion. Accordingly, the 2% cost cap established by Act 129 is approximately \$61.5 million annually, or \$307.5 million for Phase V. PPL Electric Utilities' stated budget for Phase V aligns with all requirements.

The Implementation Order states that the 2% budgetary cap applies to the EDC's annual budget and that certain implementation costs recoverable under Act 129 are not subject to the 2% cost cap, including PPL Electric Utilities' share of the costs for the SWE.

7.2. Plan to Fund EE&C Plan

PPL Electric Utilities will allocate the entirety of the available \$307.5 million budget on implementation, EM&V, and other related tasks in Phase V. This includes costs related to the development and modification of the EE&C Plan, as outlined in the Implementation Order. The Company proposes to amortize and recover those deferred costs ratably over the 60-month life of its Phase V EE&C Plan from June 1, 2026, through May 31, 2031.

7.3. Cost Recovery Tables

Table 51 shows a summary of PPL Electric Utilities' Phase V EE&C costs by sector and program.

Table 51. Pa PUC Table 11 – Summary of EE&C Costs by Sector and Program

| Sector | EE&C Program | Cost Elements (\$) | | | | | | | Total Cost ¹ | Expected Acquisition Cost (\$/MWh) ² | Levelized Cost (\$/MWh) ³ | Expected Acquisition Cost (\$/MW) |
|--|---------------------------------------|---------------------|--------------------|---------------------|--------------------|---------------------|--------------------|--------------------|-------------------------|---|--------------------------------------|-----------------------------------|
| | | Incentives | Program Design | Administrative | EDC Delivery Costs | CSP Delivery Fees | Marketing | Other ⁵ | | | | |
| Residential Portfolio (incl. Low-Income) | Residential Energy Efficiency Program | \$29,930,963 | \$1,450,748 | \$10,905,234 | \$1,012,819 | \$18,148,431 | \$3,191,645 | \$1,160,598 | \$65,800,438 | \$390 | \$74 | \$1,943,011 |
| | Resource Constrained Program | \$28,585,742 | \$770,411 | \$5,571,527 | \$600,000 | \$11,545,223 | \$1,671,725 | \$607,270 | \$49,351,899 | \$653 | \$43 | \$4,505,063 |
| | Small C&I Business Solutions | \$166,750 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$166,750 | \$136 | \$56 | \$617,476 |
| | Sector Total | \$58,683,455 | \$2,221,159 | \$16,476,761 | \$1,612,819 | \$29,693,654 | \$4,863,370 | \$1,767,868 | \$115,319,087 | \$470 | \$63 | \$3,378,300 |
| Small C&I | Small C&I Business Solutions | \$53,647,997 | \$1,660,645 | \$11,420,813 | \$1,303,905 | \$14,159,646 | \$4,676,933 | \$2,283,249 | \$89,153,188 | \$179 | \$75 | \$1,086,114 |
| | Residential Energy Efficiency Program | \$56,494 | \$0 | \$0 | \$0 | \$1,697,234 | \$0 | \$0 | \$1,753,728 | \$1,109 | \$8 | \$6,105,406 |
| | Resource Constrained Program | \$582,500 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$582,500 | \$1,518 | \$1,396 | N/A |
| | Sector Total | \$54,286,991 | \$1,660,645 | \$11,420,813 | \$1,303,905 | \$15,856,880 | \$4,676,933 | \$2,283,249 | \$91,489,415 | \$183 | \$75 | \$1,110,688 |
| Large C&I | Large C&I Business Solutions | \$32,900,615 | \$1,304,663 | \$7,740,432 | \$1,064,267 | \$9,675,123 | \$3,844,411 | \$2,068,867 | \$58,598,377 | \$182 | \$63 | \$1,103,066 |
| | Sector Total⁴ | \$32,900,615 | \$1,304,663 | \$7,740,432 | \$1,064,267 | \$9,675,123 | \$3,844,411 | \$2,068,867 | \$58,598,377 | \$182 | \$63 | \$1,103,066 |

¹ Common Costs are not included in this table.

² The numerator in the acquisition cost calculation is the full direct program cost. Acquisition costs based on first-year savings.

³ Levelized costs are lifetime.

⁴ Total values may not equal the sum of all sector values or cost elements due to rounding.

⁵ Indirect CSP Delivery Costs, e.g., fleet vehicles, subscriptions, IT.

Table 52 shows the allocation of common costs by customer sectors.

Table 52. Pa PUC Table 12 – Allocation of Common Costs to Applicable Customer Sectors

| Common Cost Element | Total Cost (\$) | Basis for Cost Allocation | Sector Cost Allocation (\$) | | |
|---------------------------|---------------------|--|-------------------------------|---------------------|---------------------|
| | | | Residential Incl. Low-Income) | Small C&I | Large C&I |
| Program Design | \$1,100,000 | % of Direct Program Cost | \$477,949 | \$379,185 | \$242,866 |
| Administrative | \$3,000,000 | % of Direct Program Cost | \$1,303,498 | \$1,034,141 | \$662,361 |
| EDC Delivery Costs | \$9,500,000 | % of Direct Program Cost | \$4,127,743 | \$3,274,781 | \$2,097,476 |
| Marketing | \$15,000,000 | % of Direct Program Cost | \$6,517,489 | \$5,170,707 | \$3,311,804 |
| EM&V | \$12,000,000 | % of Direct Program Cost | \$5,213,991 | \$4,136,566 | \$2,649,443 |
| Major Accounts | \$1,500,000 | Estimated % of KAM time with customer sectors (excluding residential) ¹ | \$0 | \$450,000 | \$1,050,000 |
| Totals² | \$42,100,000 | | \$17,640,669 | \$14,445,380 | \$10,013,950 |
| SWE Cost | \$5,000,000 | % of Direct Program Cost | \$2,172,496 | \$1,723,569 | \$1,103,935 |

¹ KAM is Key Account Managers

² Total values may not equal the sum of all sector values or cost elements due to rounding.

Table 53 shows the overview of portfolio costs by sector.

Table 53. Pa PUC Table 13 – Summary of Portfolio EE&C Costs

| Portfolio | Total Sector Portfolio-specific Costs | Total Common Costs | Total of All Costs |
|------------------------------------|---------------------------------------|---------------------|----------------------|
| Residential (Including Low-Income) | \$115,319,087 | \$17,640,669 | \$132,959,756 |
| Small C&I | \$91,489,415 | \$14,445,380 | \$105,934,796 |
| Large C&I | \$58,598,377 | \$10,013,950 | \$68,612,328 |
| Totals¹ | \$265,406,880 | \$42,100,000 | \$307,506,880 |

¹ Total values may not equal the sum of all sector values or cost elements due to rounding.

The total resource costs by program and for the portfolio are included in Table 56 and Table 57 in Section 8.

7.4. Tariffs and Costs Recovery Mechanism

Section 2806.1(k)(1) of the Public Utility Code authorizes EDCs to recover the costs of their EE&C plan through a reconcilable adjustment clause under Section 1307 of the Public Utility Code. All programs in PPL Electric Utilities' EE&C Plan will benefit both generation rate shopping and non-shopping customers; the cost recovery mechanism cannot be bypassed. The Act 129 Compliance Rider for Phase V (ACR-V) will be calculated separately for PPL Electric Utilities' three major customer classes in a similar manner to Phase IV—residential, inclusive of low-income customers, small C&I, and large C&I. For residential

customers, PPL Electric Utilities will apply the cost recovery mechanism as a cents per kWh component of the distribution charge. For small C&I customers, the Company will apply the cost recovery mechanism as a cents per kWh charge as a separate line item on the customers' bills. For large C&I customers, PPL Electric Utilities will apply the cost recovery mechanism as a dollars per kW charge, as a separate line item on the customers' bills, where the demand (kW) is a customer's PJM peak load contribution (which may change yearly).

PPL Electric Utilities proposes to calculate the ACR-V on an annual basis according to the forecasted program costs that it anticipates it will incur during that Phase V program year. The Company will complete an annual reconciliation of the ACR-V for each customer class by comparing ACR-V revenues to actual expenses and will recover or refund any over- or under-collections in the next ACR-V year. If the Company determines that a customer class's ACR-V rate, if left unchanged, would result in a material over- or under-collection of Phase V Act 129 costs incurred or expected to be incurred during the current 12-month period, the Company, in its discretion, may file with the Commission for an interim revision of the ACR-V rate.

Program cost calculation methods and assumptions are described in Appendix B, in Section 10.2.

7.5. Customer Classes

Section 2806.1(a)(11) of the Public Utility Code requires that EE&C measures be paid for by the same customer class that receives the energy and peak demand reduction through demand response, or measures and conservation benefits. PPL Electric Utilities will directly assign costs to the customer class that receives the benefits of the EE&C measures whenever those costs can be directly assigned, regardless of program, component, or channel.

Certain costs, such as common costs and/or portfolio-level costs, relate to EE&C measures that are applicable to more than one customer class or that provide systemwide benefits. In Phases I, II, III, and IV, the Commission directed PPL Electric Utilities to allocate those costs and general administrative costs, using reasonable and generally acceptable cost of service principles that are commonly utilized in base rate proceedings. In Phase V, the Company will allocate such costs using an allocation factor equal to the percentage of the total actual EE&C costs directly assigned to each customer class.

7.6. Phase V Cost Accounting

PPL Electric Utilities will account for Phase V costs separately from those incurred in Phase IV or other phases using separate and distinct accounting numbers that correctly identify and organize charges by program, sector, and cost category. The Company will use different accounting numbers for Phase V from those used in prior phases. Any costs associated with energy efficiency measures installed and operable on or before May 31, 2026, will be accounted for as Phase IV costs. Any costs associated with energy efficiency measures installed and operable after May 31, 2026, will be accounted for as Phase V costs.

8. Cost Effectiveness

8.1. Avoided Cost Calculator

PPL Electric Utilities used the 2026 Avoided Cost Calculator provided by the SWE to calculate avoided costs and review the cost effectiveness of its Phase V EE&C Plan.¹ The Company calculated the avoided costs of delivered electricity for a 15-year planning horizon in three segments, as follows:

- **Years 1-4 (June 2027-May 2031).** The Company used the NYMEX Electricity Futures Price at the PJM West Hub as of July 7, 2025, and applied a locational basis adjustment from PJM West Hub to the Company's Zone.
- **Years 5-10 (June 2031-May 2037).** PPL Electric Utilities used NYMEX Henry Hub Natural Gas Futures and the EIA AEO Natural Gas Price Forecast for Mid-Atlantic Region as of July 7, 2025 and converted to electric prices using an on-peak and off-peak heat rate and spark spread.
- **Years 11-20 (June 2037-May 2046).** PPL Electric Utilities used Middle Atlantic Natural Gas Prices for Electric Power from the Energy Information Administration Annual Energy Outlook, Energy Prices by Sector and Source, converted to electric prices using the on-peak and off-peak heat rate and including on-peak and off-peak spark price spreads.

The Company estimated avoided generation capacity costs using PJM base residual auction results for 2026/2027. Subsequent years are inflated by the rate of inflation specified in the Phase V TRC Test Order. Avoided T&D costs are from the SWE Avoided Cost of Transmission and Distribution Capacity Study. Avoided transmission costs are escalated at the rate of inflation, but avoided distribution costs change by varying rates based on the outcomes of the probabilistic deferral analysis methodology.² Avoided T&D costs are provided by EDC and year in the 2026 Avoided Cost Calculator. Inflation rates and line loss values used in calculating avoided costs are summarized in Table 54.

Table 54. Inflation Rates and Line Loss Values Used in Avoided Costs and TRC Calculations

| | Description | Rate and TRC |
|------------------------|-----------------------------------|--------------|
| Inflation ¹ | Avoided generation capacity costs | 2.0% |
| | Avoided T&D costs | 2.0% |

¹ Pennsylvania Public Utility Commission. Accessed October 2025. "Total Resource Cost Test." <https://www.puc.pa.gov/filing-resources/issues-laws-regulations/act-129/total-resource-cost-test/>

² Demand Side Analytics. July 2024. *Avoided Cost of Transmission and Distribution Capacity Study*. <https://www.puc.pa.gov/pdocs/1855615.pdf>

| | Description | Rate and TRC |
|--------------------------|------------------------|--------------|
| Line Losses ² | Energy | |
| | Residential | 1.0875 |
| | Commercial (Small C&I) | 1.0875 |
| | Industrial (Large C&I) | 1.0420 |
| | Demand | |
| | Residential | 1.0875 |
| | Commercial (Small C&I) | 1.0875 |
| | Industrial (Large C&I) | 1.0420 |

¹ Inflation rates are consistent with the rate provided on page 15 of the Phase V TRC Test Order

² Line losses are consistent with those provided in the 2026 TRM Volume 1 Table 1-5. The line loss factor in this table represents meter to the generator.

Table 55 shows PPL Electric Utilities’ calculated avoided costs of delivered electricity for a 15-year planning horizon.

Table 55. Overall Avoided Costs (All Sectors)¹

| Year | PPL Zone Summer (\$/MWh) | | PPL Zone Winter (\$/MWh) | | PPL DLC Zone Shoulder (\$/MWh) | | PPL Generation Capacity (\$/kW/year) | | PPL Transmission Capacity (\$/kW/year) | | PPL 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 | |
| 2027 | \$82.19 | \$59.95 | \$97.91 | \$86.11 | \$74.95 | \$62.96 | \$99.25 | \$99.25 | \$48.00 | \$48.00 | \$25.11 | \$32.44 | \$0.78 |
| 2028 | \$94.71 | \$72.11 | \$111.09 | \$99.63 | \$87.06 | \$75.10 | \$70.55 | \$70.55 | \$49.16 | \$49.16 | \$26.68 | \$36.48 | \$0.58 |
| 2029 | \$104.92 | \$81.35 | \$121.85 | \$109.70 | \$97.04 | \$84.42 | \$72.36 | \$72.36 | \$50.35 | \$50.35 | \$29.00 | \$39.40 | \$0.43 |
| 2030 | \$105.88 | \$81.50 | \$121.55 | \$110.70 | \$96.90 | \$84.65 | \$73.94 | \$73.94 | \$51.57 | \$51.57 | \$31.55 | \$41.88 | \$0.31 |
| 2031 | \$65.59 | \$44.21 | \$108.67 | \$90.96 | \$58.97 | \$48.39 | \$33.15 | \$33.15 | \$52.82 | \$52.82 | \$33.94 | \$44.30 | \$0.49 |
| 2032 | \$63.71 | \$42.97 | \$138.31 | \$111.41 | \$57.49 | \$47.41 | \$33.95 | \$33.95 | \$54.10 | \$54.10 | \$34.76 | \$45.38 | \$1.03 |
| 2033 | \$59.77 | \$40.30 | \$174.33 | \$136.27 | \$55.08 | \$45.80 | \$34.77 | \$34.77 | \$55.41 | \$55.41 | \$35.60 | \$46.48 | \$1.61 |
| 2034 | \$57.24 | \$38.61 | \$211.64 | \$162.01 | \$53.87 | \$45.01 | \$35.61 | \$35.61 | \$56.75 | \$56.75 | \$36.46 | \$47.60 | \$2.31 |
| 2035 | \$55.40 | \$37.39 | \$249.55 | \$188.16 | \$53.45 | \$44.78 | \$36.48 | \$36.48 | \$58.12 | \$58.12 | \$37.35 | \$48.76 | \$3.07 |
| 2036 | \$53.60 | \$36.20 | \$286.32 | \$213.54 | \$53.09 | \$44.58 | \$37.36 | \$37.36 | \$59.53 | \$59.53 | \$38.25 | \$49.94 | \$3.81 |
| 2037 | \$52.00 | \$35.15 | \$318.87 | \$236.01 | \$52.65 | \$44.33 | \$38.27 | \$38.27 | \$60.97 | \$60.97 | \$39.18 | \$51.15 | \$4.46 |
| 2038 | \$52.70 | \$35.68 | \$313.61 | \$232.43 | \$53.14 | \$44.71 | \$39.19 | \$39.19 | \$62.45 | \$62.45 | \$40.13 | \$52.38 | \$4.37 |
| 2039 | \$53.27 | \$36.13 | \$309.66 | \$229.77 | \$53.55 | \$45.05 | \$40.14 | \$40.14 | \$63.96 | \$63.96 | \$41.10 | \$53.65 | \$4.30 |
| 2040 | \$53.28 | \$36.19 | \$311.59 | \$231.15 | \$53.62 | \$45.15 | \$41.11 | \$41.11 | \$65.51 | \$65.51 | \$42.09 | \$54.95 | \$4.33 |
| 2041 | \$52.68 | \$35.83 | \$319.74 | \$236.82 | \$53.33 | \$45.01 | \$42.11 | \$42.11 | \$67.10 | \$67.10 | \$43.11 | \$56.28 | \$4.46 |
| 2042 | \$51.99 | \$35.42 | \$328.83 | \$243.14 | \$52.99 | \$44.83 | \$43.13 | \$43.13 | \$68.72 | \$68.72 | \$44.16 | \$57.65 | \$4.62 |
| 2043 | \$51.29 | \$34.99 | \$338.19 | \$249.64 | \$52.63 | \$44.64 | \$44.17 | \$44.17 | \$70.39 | \$70.39 | \$45.23 | \$59.04 | \$4.78 |
| 2044 | \$50.91 | \$34.79 | \$344.19 | \$253.84 | \$52.48 | \$44.60 | \$45.24 | \$45.24 | \$72.09 | \$72.09 | \$46.32 | \$60.47 | \$4.88 |
| 2045 | \$50.70 | \$34.70 | \$348.53 | \$256.88 | \$52.43 | \$44.62 | \$46.34 | \$46.34 | \$73.84 | \$73.84 | \$47.45 | \$61.94 | \$4.95 |

| | | | | | | | | | | | | | |
|-------------|---------|---------|----------|----------|---------|---------|---------|---------|---------|---------|---------|---------|--------|
| 2046 | \$49.79 | \$34.14 | \$360.11 | \$264.92 | \$51.96 | \$44.36 | \$47.46 | \$47.46 | \$75.63 | \$75.63 | \$48.59 | \$63.44 | \$5.14 |
|-------------|---------|---------|----------|----------|---------|---------|---------|---------|---------|---------|---------|---------|--------|

¹Data in this table excludes avoided energy costs from the Arrearages study. Separate avoided costs were used for low income programs, in accordance with the Pa PUC 2026 Avoided Cost Calculator.

8.2. Real Discount and Nominal Discount Rates

PPL Electric Utilities applied a 3% real discount rate and a 5% nominal discount rate in TRC testing, as per the TRC Test Order (page 15).

8.3. TRC Cost Testing

As per the Pa PUC's Total Resource Cost Test Final Order, PPL Electric Utilities has developed a portfolio of programs that provides benefits greater than the cost to implement at the portfolio level. Historically, the Company has had very cost-effective programs, and through program year 16 of Phase IV, the Company has achieved a TRC ratio of 1.42. This promotes both energy consumption reduction as directed by the Pa PUC, while protecting customer affordability. PPL Electric Utilities has selected measures for Phase V that will be beneficial to customers, are in line with Act 129, and will allow the Company to continue to meet cost-effectiveness thresholds. The cost-effectiveness of the portfolio was demonstrated in the data presented in Table 55 for each program in the EE&C Plan; the Company has demonstrated that the Plan is cost-effective in accordance with the Commission's 2026 TRC Test Order. PPL Electric Utilities assessed the cost-effectiveness of each program in the Plan by quantifying the value of the total resource benefits ("TRC Benefits") over the life of each available measure, for a maximum of 15 years as directed in the 2026 TRC Test Order. The Company then determined each program's total resource costs ("TRC Costs") using the SWE Team Incremental Measure Cost Database and program delivery and administration costs. The 2026 TRC Test Order indicates that the portfolio of programs is cost-effective if its TRC Benefits exceed its TRC costs or the benefit/cost ratio is at least 1.0, as shown by the following equations: $\text{TRC Benefits}/\text{TRC Costs} \geq 1$ and $\text{TRC Benefits} - \text{TRC Costs} \geq 0$. The TRC Benefits data are estimates based on the planning assumptions in this EE&C Plan. The Company will utilize the 2026 TRC test to monitor programs and portfolio cost-effectiveness annually and ensure TRC results are above 1.0 at the portfolio level. Table 56 and Table 57 provide TRC benefits data for each program component and sector. Each table caption includes a reference to the corresponding table number provided in the EE&C plan template.

8.4. TRC Net and Gross Data Tables

Table 56 presents net TRC benefits by program and total portfolio, while Table 57 presents gross TRC benefits by program and total portfolio. Net benefits include adjustments for the effects of free riders, changes in codes and standards, market effects, participant and nonparticipant spillover, and other causes of changes in energy consumption or demand not directly attributable to the EE&C program, whereas gross benefits include all benefits that result directly from program-related actions taken by participants in an EE&C program, regardless of why they participated.

Table 56. Pa PUC Table 14A – Net TRC Benefits, By Program and Total Portfolio

| Portfolio | NTGR & TRC Ratio | | | TRC Costs by Program Per Year (\$000) | | | | TRC Benefits by Program Per Year (\$000) | | | | |
|--|------------------|-------------|------------------------|---------------------------------------|----------------------|-----------------------------|-----------------|--|-----------------|--------------------------------|--------------|--------------------|
| | Program Year | NTGR | Net TRC ^{1,2} | 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 Program | PY18 | 0.59 | 1.23 | \$5,037 | \$5,317 | \$7,304 | \$17,658 | \$7,691 | \$13,372 | \$727 | \$0.0 | \$21,791 |
| Residential Energy Efficiency Program | PY19 | 0.59 | 1.20 | \$5,205 | \$5,431 | \$7,483 | \$18,119 | \$7,172 | \$13,887 | \$736 | \$0.0 | \$21,795 |
| Residential Energy Efficiency Program | PY20 | 0.59 | 1.21 | \$5,315 | \$5,348 | \$7,666 | \$18,328 | \$7,310 | \$14,065 | \$718 | \$0.0 | \$22,092 |
| Residential Energy Efficiency Program | PY21 | 0.59 | 1.08 | \$5,465 | \$5,410 | \$6,974 | \$17,849 | \$6,715 | \$11,806 | \$702 | \$0.0 | \$19,223 |
| Residential Energy Efficiency Program | PY22 | 0.59 | 1.06 | \$5,594 | \$5,292 | \$7,128 | \$18,014 | \$6,769 | \$11,712 | \$629 | \$0.0 | \$19,110 |
| Residential Energy Efficiency Program | Total | 0.59 | 1.16 | \$26,616 | \$26,798 | \$36,554 | \$89,968 | \$35,658 | \$64,841 | \$3,512 | \$0.0 | \$104,012 |
| Resource Constrained Program | PY18 | 1.0 | 2.47 | \$6,163 | \$120 | \$4,403 | \$10,685 | \$5,036 | \$20,713 | \$605 | \$0.0 | \$26,353 |
| Resource Constrained Program | PY19 | 1.0 | 2.42 | \$5,635 | \$120 | \$4,232 | \$9,987 | \$4,511 | \$19,059 | \$583 | \$0.0 | \$24,153 |
| Resource Constrained Program | PY20 | 1.0 | 2.54 | \$5,778 | \$120 | \$4,067 | \$9,965 | \$4,688 | \$20,002 | \$608 | \$0.0 | \$25,298 |
| Resource Constrained Program | PY21 | 1.0 | 2.50 | \$5,336 | \$120 | \$3,842 | \$9,299 | \$4,330 | \$18,343 | \$608 | \$0.0 | \$23,281 |
| Resource Constrained Program | PY22 | 1.0 | 2.31 | \$4,260 | \$120 | \$3,622 | \$8,001 | \$3,512 | \$14,340 | \$603 | \$0.0 | \$18,455 |
| Resource Constrained Program | Total | 1.0 | 2.45 | \$27,171 | \$600 | \$20,166 | \$47,937 | \$22,078 | \$92,456 | \$3,006 | \$0.0 | \$117,540 |
| Small C&I Business Solutions | PY18 | 0.66 | 1.64 | \$9,386 | \$40,647 | \$6,556 | \$56,588 | \$28,042 | \$65,041 | (\$248) | \$0.0 | \$92,836 |
| Small C&I Business Solutions | PY19 | 0.67 | 1.57 | \$11,494 | \$56,692 | \$7,248 | \$75,433 | \$35,460 | \$83,355 | (\$271) | \$0.0 | \$118,544 |

| Portfolio | NTGR & TRC Ratio | | | TRC Costs by Program Per Year (\$000) | | | | TRC Benefits by Program Per Year (\$000) | | | | |
|---|------------------|-------------|------------------------|---------------------------------------|----------------------|-----------------------------|------------------|--|------------------|--------------------------------|--------------|--------------------|
| Program | Program Year | NTGR | Net TRC ^{1,2} | 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 | | | | | | | |
| Small C&I Business Solutions | PY20 | 0.67 | 1.65 | \$11,223 | \$53,500 | \$7,172 | \$71,895 | \$35,702 | \$82,861 | (\$295) | \$0.0 | \$118,268 |
| Small C&I Business Solutions | PY21 | 0.67 | 1.69 | \$9,754 | \$45,952 | \$6,569 | \$62,276 | \$30,601 | \$74,928 | (\$296) | \$0.0 | \$105,233 |
| Small C&I Business Solutions | PY22 | 0.67 | 1.75 | \$7,618 | \$34,326 | \$5,657 | \$47,601 | \$24,003 | \$59,644 | (\$274) | \$0.1 | \$83,373 |
| Small C&I Business Solutions | Total | 0.67 | 1.65 | \$49,475 | \$231,118 | \$33,201 | \$313,794 | \$153,809 | \$365,829 | (\$1,384) | \$0.1 | \$518,255 |
| Large C&I Business Solutions | PY18 | 0.66 | 1.77 | \$4,646 | \$18,030 | \$4,057 | \$26,733 | \$12,383 | \$35,023 | (\$107) | \$0.0 | \$47,300 |
| Large C&I Business Solutions | PY19 | 0.68 | 1.72 | \$6,067 | \$26,751 | \$4,834 | \$37,652 | \$16,286 | \$48,639 | (\$116) | \$0.0 | \$64,809 |
| Large C&I Business Solutions | PY20 | 0.68 | 1.80 | \$6,914 | \$30,285 | \$5,360 | \$42,559 | \$19,838 | \$57,072 | (\$126) | \$0.0 | \$76,783 |
| Large C&I Business Solutions | PY21 | 0.69 | 1.89 | \$6,731 | \$29,847 | \$4,995 | \$41,572 | \$20,349 | \$58,454 | (\$138) | \$0.0 | \$78,665 |
| Large C&I Business Solutions | PY22 | 0.68 | 1.98 | \$5,001 | \$22,282 | \$4,387 | \$31,671 | \$15,541 | \$47,209 | (\$143) | \$0.1 | \$62,607 |
| Large C&I Business Solutions | Total | 0.68 | 1.83 | \$29,358 | \$127,195 | \$23,633 | \$180,187 | \$84,397 | \$246,396 | (\$629) | \$0.1 | \$330,164 |
| Total³ | | | 1.69 | \$132,620 | \$385,711 | \$113,555 | \$631,887 | \$295,942 | \$769,523 | \$4,506 | \$0.3 | \$1,069,971 |

¹ The TRC ratio compares the present value of the TRC benefits to the present value of the TRC costs with both costs and benefits expressed in \$2026.

² Does not include common portfolio costs; whereas Table 3 and Table 58 do.

³ Total values may not equal the sum of all program year or program values due to rounding.

Table 57. Pa PUC Table 14B – Gross TRC Benefits, By Program and Total Portfolio

| Portfolio | NTGR & TRC Ratio | | | TRC Costs by Program Per Year (\$000) | | | | TRC Benefits by Program Per Year (\$000) | | | | |
|--|------------------|------------|--------------------------|---------------------------------------|----------------------|-----------------------------|------------------|--|------------------|--------------------------------|--------------|--------------------|
| | Program Year | NTGR | Gross TRC ^{1,2} | 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 Program | PY18 | 1.0 | 1.45 | \$5,037 | \$12,272 | \$7,304 | \$24,613 | \$11,420 | \$22,979 | \$1,194 | \$0.0 | \$35,592 |
| Residential Energy Efficiency Program | PY19 | 1.0 | 1.42 | \$5,205 | \$12,594 | \$7,483 | \$25,282 | \$10,843 | \$23,842 | \$1,209 | \$0.0 | \$35,894 |
| Residential Energy Efficiency Program | PY20 | 1.0 | 1.43 | \$5,315 | \$12,585 | \$7,666 | \$25,565 | \$11,059 | \$24,247 | \$1,193 | \$0.0 | \$36,499 |
| Residential Energy Efficiency Program | PY21 | 1.0 | 1.25 | \$5,465 | \$12,824 | \$6,974 | \$25,264 | \$9,969 | \$20,334 | \$1,165 | \$0.0 | \$31,469 |
| Residential Energy Efficiency Program | PY22 | 1.0 | 1.23 | \$5,594 | \$12,731 | \$7,128 | \$25,453 | \$10,004 | \$20,170 | \$1,040 | \$0.0 | \$31,214 |
| Residential Energy Efficiency Program | Total | 1.0 | 1.35 | \$26,616 | \$63,007 | \$36,554 | \$126,177 | \$53,296 | \$111,572 | \$5,800 | \$0.0 | \$170,668 |
| Resource Constrained Program | PY18 | 1.0 | 2.47 | \$6,163 | \$120 | \$4,403 | \$10,685 | \$5,036 | \$20,713 | \$605 | \$0.0 | \$26,353 |
| Resource Constrained Program | PY19 | 1.0 | 2.42 | \$5,635 | \$120 | \$4,232 | \$9,987 | \$4,511 | \$19,059 | \$583 | \$0.0 | \$24,153 |
| Resource Constrained Program | PY20 | 1.0 | 2.54 | \$5,778 | \$120 | \$4,067 | \$9,965 | \$4,688 | \$20,002 | \$608 | \$0.0 | \$25,298 |
| Resource Constrained Program | PY21 | 1.0 | 2.50 | \$5,336 | \$120 | \$3,842 | \$9,299 | \$4,330 | \$18,343 | \$608 | \$0.0 | \$23,281 |
| Resource Constrained Program | PY22 | 1.0 | 2.31 | \$4,260 | \$120 | \$3,622 | \$8,001 | \$3,512 | \$14,340 | \$603 | \$0.0 | \$18,455 |
| Resource Constrained Program | Total | 1.0 | 2.45 | \$27,171 | \$600 | \$20,166 | \$47,937 | \$22,078 | \$92,456 | \$3,006 | \$0.0 | \$117,540 |
| Small C&I Business Solutions | PY18 | 1.0 | 1.71 | \$9,386 | \$66,855 | \$6,556 | \$82,796 | \$42,964 | \$99,261 | (\$387) | \$0.0 | \$141,838 |
| Small C&I Business Solutions | PY19 | 1.0 | 1.63 | \$11,494 | \$90,235 | \$7,248 | \$108,976 | \$53,154 | \$125,351 | (\$424) | \$0.0 | \$178,081 |

| Portfolio | NTGR & TRC Ratio | | | TRC Costs by Program Per Year (\$000) | | | | TRC Benefits by Program Per Year (\$000) | | | | |
|---|------------------|------------|--------------------------|---------------------------------------|----------------------|-----------------------------|------------------|--|--------------------|--------------------------------|--------------|--------------------|
| Program | Program Year | NTGR | Gross TRC ^{1,2} | 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 | | | | | | | |
| Small C&I Business Solutions | PY20 | 1.0 | 1.71 | \$11,223 | \$85,646 | \$7,172 | \$104,040 | \$53,356 | \$124,878 | (\$460) | \$0.0 | \$177,774 |
| Small C&I Business Solutions | PY21 | 1.0 | 1.77 | \$9,754 | \$73,335 | \$6,569 | \$89,659 | \$46,215 | \$112,560 | (\$462) | \$0.0 | \$158,312 |
| Small C&I Business Solutions | PY22 | 1.0 | 1.84 | \$7,618 | \$54,841 | \$5,657 | \$68,116 | \$36,202 | \$89,422 | (\$428) | \$0.2 | \$125,196 |
| Small C&I Business Solutions | Total | 1.0 | 1.72 | \$49,475 | \$370,911 | \$33,201 | \$453,587 | \$231,891 | \$551,472 | (\$2,162) | \$0.2 | \$781,202 |
| Large C&I Business Solutions | PY18 | 1.0 | 1.88 | \$4,646 | \$29,280 | \$4,057 | \$37,983 | \$18,826 | \$52,923 | (\$167) | \$0.0 | \$71,582 |
| Large C&I Business Solutions | PY19 | 1.0 | 1.82 | \$6,067 | \$41,845 | \$4,834 | \$52,745 | \$24,264 | \$71,977 | (\$181) | \$0.0 | \$96,061 |
| Large C&I Business Solutions | PY20 | 1.0 | 1.90 | \$6,914 | \$47,559 | \$5,360 | \$59,833 | \$29,289 | \$84,779 | (\$197) | \$0.0 | \$113,871 |
| Large C&I Business Solutions | PY21 | 1.0 | 1.99 | \$6,731 | \$45,957 | \$4,995 | \$57,682 | \$29,383 | \$85,450 | (\$215) | \$0.0 | \$114,619 |
| Large C&I Business Solutions | PY22 | 1.0 | 2.10 | \$5,001 | \$34,676 | \$4,387 | \$44,064 | \$23,092 | \$69,670 | (\$223) | \$0.2 | \$92,539 |
| Large C&I Business Solutions | Total | 1.0 | 1.94 | \$29,358 | \$199,316 | \$23,633 | \$252,308 | \$124,855 | \$364,799 | (\$982) | \$0.2 | \$488,672 |
| Total³ | | | 1.77 | \$132,620 | \$633,834 | \$113,555 | \$880,010 | \$432,120 | \$1,120,299 | \$5,662 | \$0.4 | \$1,558,081 |

¹The TRC ratio compares the present value of the TRC benefits to the present value of the TRC costs with both costs and benefits expressed in \$2026.

²Does not include common portfolio costs; whereas Table 3 and Table 58 do.

³Total values may not equal the sum of all program year or program values due to rounding.

Table 58 presents portfolio lifetime costs and benefits by offering category.

Table 58. Pa PUC Table 15 – Portfolio Summary of Lifetime Costs and Benefits by Category

| Category | Total Discounted Lifetime Costs (\$000) ¹ | Total Discounted Lifetime Benefits (\$000) | Present Value of Net Benefits (\$000) ² | Benefit-Cost Ratio (TRC Ratio) |
|--|--|--|--|--------------------------------|
| Market Rate EE (<i>exclusive of Low-Income</i>) ³ | \$658,049 | \$1,070,287 | \$412,238 | 1.63 |
| Low-Income | \$51,582 | \$107,568 | \$55,986 | 2.09 |
| Solar PV | \$70,660 | \$144,676 | \$74,016 | 2.05 |
| CHP | \$52,842 | \$80,768 | \$27,926 | 1.53 |
| Demand Response | \$13,010 | \$13,981 | \$971 | 1.07 |
| Total Portfolio⁴ | \$846,143 | \$1,417,280 | \$571,137 | 1.67 |

¹ Discounted common costs are included proportionately to direct costs in the sector totals.

² “Net” refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings.

³ The Implementation Order disallowed the inclusion of low-income participation in standard, non-low-income-specific residential programs in the calculation of savings towards the low-income carve-out.

⁴ Total values may not equal the sum of all category values due to rounding.

9. Plan Compliance Information and Other Key Issues

9.1. Plan Compliance Issues

9.1.1. Variety of Energy Efficiency Measures

PPL Electric Utilities evaluated every available measure for inclusion in our EE&C Plan, with a focus on equitable access and maximum customer options for all customer sectors. The result is an EE&C Plan that has a robust, comprehensive measure offering, as detailed in Section 3.1.7, provides new pathways for participation for income-eligible customers, and addresses barriers to energy efficiency measure access for each sector, while ensuring PPL Electric Utilities can ensure compliance with the Commission's Implementation Order.

9.1.2. 66 Pa. C.S. §§ 2806.1(c) & (d) Requirements

The Pa PUC requires PPL Electric Utilities to achieve 828,231 MWh/year, with 65,687 MWh/year of energy savings from the low-income sector, as well as 151 MW of peak demand reduction during Phase V. PPL Electric Utilities designed its Plan to achieve all objectives. As previously described, the Company has designed the Plan to modestly exceed targets to allow for uncertainties, such as changes in market conditions, customer preferences, codes or standards changes, or evaluation results.

9.1.3. Low-Income Requirements

As detailed in Section 3.3, the Company's Resource Constrained Energy Efficiency Program for income-eligible customers takes a new approach to energy assistance programs by aligning measure and channel delivery with the Residential Energy Efficiency Program, keeping the existing participation pathways available while expanding options for income-eligible customers. Income-eligible customers eligible for the Resource Constrained Energy Efficiency Program will be offered a similar customer journey and measure offerings as in the Residential Energy Efficiency Program, though at no cost. These offerings will be supported by robust single-family and multifamily support, a clear focus on comprehensive measures with health and safety funding to ensure a bridge to those measures. For measures that remain exclusive to Residential Energy Efficiency Program customers, income-eligible customers may still participate, though these savings will not be counted towards the low-income requirement. PPL Electric Utilities also plans to require the CSPs delivering both the Residential and Resource Constrained Energy Efficiency Programs to be highly integrated. This will ensure the Company can meet all Commission requirements.

As mentioned elsewhere, PPL Electric Utilities will build on the existing and successful collaboration with LIURP to ensure customers receive the maximum benefits available between both programs and to reduce customer acquisition costs. This includes a seamless customer experience, potentially joint funding of projects and/or split-measure costs, and integrated administration and marketing. PPL Electric Utilities will offer measures common to external programs, such as IRA offerings, including heat pumps and heat pump water heaters, and the Company and selected CSP will work with external

program implementation vendor(s) to ensure minimal impact to customers and appropriate incentive stacking. Referrals to external programs will be made where appropriate.

9.1.4. Experimental Equipment and Devices

The Company will strictly limit funding for pilots not currently described in this EE&C Plan, new technology, or experimental equipment to 2% of available funds, allocated to customer class, which is equal to \$2.5 million for residential and low-income sectors combined, \$2 million for small C&I and \$1.5 million for large C&I, for a total of \$6 million. The Company will manage any additional pilot or new technology expenditures to these values. Planned pilot descriptions, including objectives, key research questions, and metrics, can be found in Section 3.

9.1.5. Customers Receiving Supply from Electric Generation Suppliers

All programs, channels, and measures will be available to all customers regardless of their generation service status. It is important to note that while energy savings opportunities will be equitably accessible, actual costs and/or bill savings for customers with contracted generation that is competitively supplied may be different than default generation service customers, based on their rate.

9.1.6. Non-Residential Midstream Lighting

PPL Electric Utilities and the selected CSP will add screening attestation for participating distributors to ensure that incentivized products are not replacing existing LED lamps or fixtures. This will be supported by additional EM&V survey elements to monitor compliance and overall impact. The Company may initiate program, channel, or measure eligibility changes based on results.

9.2. Other Key Issues

9.2.1. Long-Term Energy Efficiency Savings

PPL Electric Utilities' wide array of offerings and commitment to comprehensive measures will not only help the Company to meet the savings requirements set in the Implementation Order but also provide meaningful market transformation across the Commonwealth. New technical support services for commercial and industrial customers will create a more knowledgeable customer base, while enhanced trade ally networks will empower the workforce of the future. This approach will also encourage customers to implement multiple measures, to continually reengage, and help mitigate resource adequacy issues. The Company continues to support distributors and expand our midstream offerings for both the Residential and Business Energy Efficiency Programs to include additional measures, such as HVAC, to encourage distributors to stock efficient products. This support approach extends to other retail point-of-sale opportunities, including dehumidifiers and other small appliances.

9.2.2. Leveraging External Funding

PPL Electric Utilities provides customers with information about external funding opportunities for EE&C on its energy efficiency website, including links to available application sites if available, while integrating potential funding into marketing outreach where appropriate. Due to the uncertainty around

external funding, it is not utilized when forecasting total Phase V energy reduction performance, but rather will be leveraged to potentially improve cost-effectiveness if available. As previously mentioned, the Company and selected CSPs will work with external program implementation vendor(s) to ensure minimal impact to customers and appropriate incentive stacking. Additional information about coordination, specifically with state programs, can be found in Section 4.4.1.

9.2.3. Consumer Education

Customer education is the bedrock on which our programs will find success and is integral in all aspects of program delivery, evaluation, and process improvement. Detailed information about customer education activities related to specific programs and sectors can be found in Section 3.

9.2.4. Program Results

PPL Electric Utilities will keep the Pa PUC, customers, stakeholders, and other appropriate market actors informed about program availability, incentive levels, and the results of the energy efficiency program components and progress toward Plan goals. PPL Electric Utilities will continue to host a dedicated section on the Company website that provides Act 129 information. The Company will host stakeholder meetings to review the results of the most recent semi-annual or annual report and post those reports on its website. These meetings will reference data from the reports, while also providing qualitative information related to customer satisfaction and experience.

10. Appendices

10.1. A. Approved CSP Contract(s) or CSP Contract Terms and Conditions

PPL Electric Utilities filed its EM&V CSP contract for Pa PUC approval on December 1, 2025. The Company is currently negotiating implementation CSP contracts to implement the Residential, Business, and Resource Constrained (Low-Income) Energy Efficiency Programs. Requests for proposals for Overarching Energy Efficiency Marketing and Database are pending. CSP contracts are confidential and are not included with this Plan filing.

10.2. B. Calculation Methods and Assumptions

PPL Electric Utilities based its savings and cost estimates on experience from Phase I, Phase II, Phase III, Phase IV, the TRM, and input from stakeholders and trade allies. The CSPs generated measure cost data using a variety of sources, including the SWE's Phase V incremental cost database, Phase IV program data, and for data not found in the incremental cost database, the CSPs used secondary sources, including the DOE's Technical Support Documents and other statewide TRMs.

Many variables can impact the cost and effectiveness of a measure or program, and these variables led to numerous TRM changes during Phase I, Phase II, Phase III, and Phase IV that influenced program savings, acquisition cost, and TRC test results. In Phase V, PPL Electric Utilities will use the experience and knowledge gained from prior phases to monitor and adjust measures and programs that help ensure the optimum balance of cost and benefits.

In most instances, the Company based the Phase V savings calculations on the 2026 TRM algorithms, Phase IV program data, SWE's Baseline Studies, and industry practices. For measures that were not in the TRM, PPL Electric Utilities worked with the CSPs or used its experience gained from delivering programs in prior phases to calculate measure- and program-level savings, such as the average savings per custom project.

The CSPs based incentive and rebate levels on the percentage of incremental cost or the first-year unit-energy and unit-demand savings potential from the SWE's Market Potential Studies, Phase IV evaluation results and net savings research, online research, and conversations with installation contractors, as well as prior phase experience. These incentive and rebate amounts ranged, on average, from 25% to 75% of the incremental cost of a measure (for Market Rate programs). Some measures require a higher incentive to motivate customer action, while others can have a lower incentive because market transformation and other factors can affect customer behavior.

Marketing and advertising costs for Phase V consist of two components:

- Sector-level CSPs calculated costs required for individual programs and cross-sector marketing to generate sufficient participation to meet the Act 129 targets, based on their implementation experience and knowledge of PPL Electric Utilities' market.

- PPL Electric Utilities allocated a portion of common costs for overarching marketing and advertising campaigns. This entails developing consistent messaging and branding guidelines, conducting market research to contribute to targeted messaging strategies, and providing direction and oversight to support sector-level CSP marketing efforts.

Finally, administrative costs include all utility costs to develop, implement, and manage the Plan, except payments to customers/trade allies (rebates and incentives). These costs include PPL Electric Utilities labor and materials, CSP labor and material, marketing, QA/QC and EM&V, tracking systems, legal, and the SWE costs. These Phase V costs were based on PPL Electric Utilities wage rates; tracking system cost from prior phases; and EM&V costs from prior phases to reflect efficiencies, lessons learned, and revisions to prior phase systems and processes to increase Phase V operational efficiency.

Attachment B

(PPL Electric's Direct Testimony and Exhibits)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation for
Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan**

Docket No. M-2025-3057329

PPL Electric Utilities Corporation

Statement No. 1

Direct Testimony of Thomas McAteer

List of Topics Addressed:

**Overview of the Filing
Summary of Phase V EE&C Plan and Programs
Details on CSP Contracts**

Date: December 1, 2025

Direct Testimony of Thomas McAteer

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Q. Please state your full name and business address.

A. My name is Thomas McAteer , and my business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

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

A. I am employed by PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) as Manager of Energy Efficiency.

Q. What are your duties as Manager of Energy Efficiency?

A. As Manager of Energy Efficiency for PPL Electric, I am responsible for driving the success of residential, commercial & industrial, and income-eligible energy efficiency programs. I lead the program implementation and evaluation, measurement, and verification teams, I am the primary conservation services provider contract manager and manage all aspects for Plan development, including research and design and data analysis.

Q. What is your educational background?

A. I have a Doctor of Business Administration from Wilmington University, a Masters of Education from Grand Canyon University, and a Bachelor of Liberal Studies from West Chester University of Pennsylvania. I am also a Pennsylvania certified energy auditor and have held Building Performance Institute certifications in Quality Control Inspection, Multifamily Building Analyst, Building Analyst, and Envelope Professional, and I am EPA Lead Safe certified.

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Q. Please describe your professional experience.

A. I have 17 years of experience in energy efficiency, including as a Weatherization Assistance Program auditor, a field team supervisor, a portfolio program manager for a conservation services provider (“CSP”) and as the principal energy efficiency administrator for PPL Electric for the last three years. I have designed and implemented a variety of pilots, performed energy assessments on thousands of homes and commercial buildings, and designed and implemented successful Act 129 programs and portfolios.

Q. Have you previously testified as a witness before the Pennsylvania Public Utility Commission (“Commission”)?

A. Yes. I testified on behalf of PPL Electric during Phase IV of its EE&C Plan at Docket No. M-2020-3020824, when the Company sought approval of certain changes to its Phase IV Plan,¹ as well as in a formal complaint proceeding, *Jesse Williams Epps v. PPL Electric Utilities Corporation*, at Docket No. C-2023-3041068. Before coming to PPL Electric, I also testified as a witness in support of another Pennsylvania electric distribution company (“EDC”) regarding a complaint filed against that EDC’s Low-Income Usage Reduction Program in my capacity as a program manager for the EDC’s CSP.

¹ See *Petition of PPL Electric Utilities Corporation for Approval of Changes to Its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020824 (Orders entered Apr. 27 and Aug.24, 2023).

1 **Q. Briefly describe the subject matter of your testimony in this proceeding.**

2 A. I will explain the objectives, philosophy, and process that PPL Electric applied to the
3 preparation of its Phase V EE&C Plan filing as required by Act 129 of 2008 (“Act 129”),
4 as well as the relevant Commission Orders for Phase V. *See Energy Efficiency and*
5 *Conservation Program*, Docket No. M-2025-3052826 (Order entered June 18, 2025)
6 (“*Phase V Implementation Order*”); *2026 Total Resource Cost (TRC) Test*, Docket No. M-
7 2024-3048998 (Order entered Nov. 7, 2024) (“*2026 TRC Test Order*”) (collectively,
8 “*Phase V Orders*”).

9

10 **Q. Please describe how PPL Electric’s EE&C Plan filing is organized.**

11 A. PPL Electric’s filing consists of the following documents:

- 12 1. A petition requesting approval of the EE&C Plan and the Company’s proposed
13 cost recovery mechanism.
- 14 2. The EE&C Plan (PPL Electric Exhibit 1);
- 15 3. The direct testimony of Thomas McAteer (PPL Electric Statement No. 1);
- 16 4. The direct testimony of Terry Fry (PPL Electric Statement No. 2); and
- 17 5. The direct testimony of Katelyn Arnold (PPL Electric Statement No. 3),
18 including PPL Electric Exhibit KA-1 (the *pro forma* tariff supplement for the
19 Company’s Act 129 Compliance Rider).

20 The Phase V EE&C Plan is structured consistent with the Template for Energy Efficiency
21 and Conservation Plans issued by the Commission via Secretarial letter dated September
22 8, 2025, at Docket No. M-2025-3052826. The EE&C Plan includes an overview of the
23 Plan; program summary tables and charts; program descriptions; program management and

1 implementation strategies; information about the reporting and tracking systems; the
2 Company's plans for quality assurance, evaluation, measurement, and verification; details
3 of the proposed cost recovery mechanism; an analysis of the EE&C Plan's and programs'
4 cost-effectiveness; and other information to support the EE&C Plan.

5
6 **Q. Are you sponsoring any exhibits in this proceeding?**

7 A. Yes. Katelyn Arnold, Terry Fry, and I are co-sponsoring PPL Electric Exhibit 1. Within
8 that exhibit, I am primarily responsible for and am sponsoring Sections 1 through 6 and
9 Sections 9 and 10. Katelyn Arnold is primarily responsible for and is sponsoring Section
10 7. Terry Fry is primarily responsible for and is sponsoring the calculations in Section 3
11 and Section 8.

12
13 **Q. Please provide a summary of PPL Electric's Phase V EE&C Plan.**

14 A. PPL Electric's Phase V EE&C Plan includes a portfolio of EE&C programs for PPL
15 Electric's customers that are designed to meet the Company's Phase V consumption
16 reduction and peak demand reduction targets and to comply with the other requirements
17 set forth in the Commission's *Phase V Orders*. As discussed below, the Phase V EE&C
18 Plan includes a range of EE&C programs for four customer sectors (*i.e.*, Residential, Low-
19 Income, Small Commercial and Industrial ("Small C&I"), and Large Commercial and
20 Industrial ("Large C&I")). These programs are designed as a portfolio of options, which
21 will offer PPL Electric's customers cost-effective and flexible choices and financial
22 incentives to reduce their electric consumption and peak demand, which ultimately will
23 help customers reduce their energy costs.

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Q. What are the primary objectives of the Phase V EE&C Plan?

A. PPL Electric aims to deliver a cost-effective portfolio of programs that will meet customers’ needs, fulfill the Company’s Phase V EE&C Plan objectives, and achieve the results required by Act 129 and the Commission’s *Phase V Implementation Order*, including the following:

- Achieve 828,231 MWh gross verified energy savings by May 31, 2026;
- Achieve 65,678 MWh gross verified energy savings from low-income customers by May 31, 2026;
- Achieve 151 MW of peak demand savings (measured at the generator level) by May 31, 2026;
 - Acquire at least 75% of the proposed peak demand reduction in each season (*i.e.*, in both the summer and winter seasons);
- Achieve at least 15% of the energy consumption and peak demand reduction targets in each program year;
- Demonstrate that the proportion of measures available to the low-income sector is at least 9.95% of the total measures available to all customer sectors;
- Have a portfolio of EE&C programs that is cost-effective as determined by the Total Resource Cost (“TRC”) Test; and
- Spend no more than \$307.5 million plus the costs for the Commission’s Statewide Evaluator (“SWE”), which PPL Electric estimates are approximately \$5 million. I note that at the time PPL Electric prepared its EE&C Plan, the Commission had not awarded the Phase V SWE contract.

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Q. Please describe PPL Electric’s overall strategy to achieve these objectives.

A. Section 1.1.2 of the EE&C Plan describes the Company’s strategy to achieve compliance targets. Specifically, PPL Electric will supplement its already successful approach to program delivery and build on prior phase infrastructure, best practices, and high customer satisfaction. The Company will maintain effective strategic administration while partnering with highly qualified CSPs to implement the programs. Key new strategies to meet the Commission’s compliance targets include removing barriers to participation, promoting program equity, providing new services, allowing flexibility and innovation, and enhancing our supply chain engagement.

Q. Please describe the process PPL Electric used to develop its Phase V EE&C Plan.

A. PPL Electric formed a project team consisting of the internal Energy Efficiency and Conservation Group (consisting of the program and evaluation, measurement, and verification teams), the Company’s third-party evaluator Cadmus Group LLC (“Cadmus”), and external consultant E-Source. The Company conducted a thorough review of: (1) the Phase V Market Potential Study; (2) the Commission’s *Phase V Orders*; (3) the 2026 Pennsylvania Technical Reference Manual (“TRM”); and (4) the results of PPL Electric’s Phase IV EE&C programs. PPL Electric established guiding principles, key objectives, and preliminary estimates of the savings and cost budgets for each customer sector (*i.e.*, Residential, Low-Income, Small C&I, and Large C&I) that would satisfy the overall savings and peak demand targets, develop a daily load shifting program, meet the Low-Income set-aside target, and provide a reasonable distribution of savings and costs across

1 the customer sectors. In addition, the Company maintains an ongoing research and
2 development cycle that allows program examples and best practices to be analyzed for the
3 potential benefit of our customers. This research also includes surveys of customers from
4 all sectors, trade allies, and other market actors. All available information was synthesized
5 into a Plan that is realistic, achievable, and meets all compliance requirements.

6 PPL Electric issued requests for proposals (“RFPs”) for its three program
7 implementation CSP contracts (*i.e.*, Residential, Resource Constrained (Low-Income), and
8 Business (Non-Residential)). Through the RFP process, CSPs were invited to submit
9 proposals to meet verified gross energy savings and coincident peak demand targets within
10 the available budget for direct program costs, while ensuring total portfolio cost-
11 effectiveness. The CSP submissions were compared to the Company’s baseline portfolio
12 model for alignment, and their portfolio approach was analyzed to ensure it met PPL
13 Electric Utilities’ stated core and new strategies and guiding principles. Other
14 requirements included a customer satisfaction target where at least 85% of customers rate
15 themselves as satisfied or very satisfied and capture at least 15% of the total cumulative
16 savings each program year. All CSP assumptions, estimates, and forecasts were required
17 to have supporting documentation or references to ensure feasibility. In addition, PPL
18 Electric solicited bids for a CSP to conduct an independent evaluation of its EE&C Plan.

19 PPL Electric developed the portfolio as a multiyear, comprehensive, and
20 collaborative undertaking. The Company utilized a data science approach, leveraging
21 existing program data elements, to determine preliminary sector budgets. The budgets,
22 cost estimates, and participation data were used to create an initial portfolio model that

1 was compared to the information available within the SWE’s Phase V studies and
2 supporting documentation.

3

4 **Q. Please describe the programs included in PPL Electric’s Phase V EE&C Plan.**

5 A. The programs in the Phase V EE&C Plan include the following:

6 • The Residential Energy Efficiency Program, which consists of the following
7 components:

8 ○ Energy Efficient Home. This program component provides incentives for energy
9 efficient equipment in a home, such as heating, cooling, water heating, smart
10 thermostats, appliances, insulation, and air sealing. This component is designed to
11 target residential homebuilders, all residential sector customers, and commercial
12 and industrial customers that may benefit from residential end-use measures, and is
13 available for all customer sectors. This component offers measures that are similar
14 to those delivered in Phase IV.

15 ○ Appliance Recycling. This program component provides incentives for customers
16 to remove and recycle refrigerators, freezers, windows, room air conditioners, and
17 dehumidifiers. This component is designed to target all residential customers and
18 commercial and industrial customers that may benefit from residential end-use
19 appliance recycling measures and is available for all customer sectors. This
20 component is similar to the Phase IV program.

21 ○ Student Energy Efficient Education. This program component provides energy
22 efficiency education and kits to students in grades K-12. This component is a
23 continuation of the Phase IV program.

1 ○ Persistent Demand Response. This new program component is designed to reduce
2 electric system demand during defined peak periods through the deployment of
3 thermostat optimization, managed electric vehicle (“EV”) charging, and battery
4 storage. This offering supports grid reliability, defers capacity investments, and
5 enhances the integration of variable renewable energy resources. This component
6 targets residential customers who have already opted into utility demand response
7 programs through an existing thermostat original equipment manufacturer
8 (thermostat optimization), with EVs and existing or newly purchased at-home
9 charging equipment that can be effectively networked into the component
10 (managed EV charging), or with an existing battery storage system (battery
11 storage). PPL Electric estimates that approximately 1.2 million residential
12 customers will be eligible for demand response incentives. This component is a
13 new offering in the Phase V Plan.

14 • The Resource Constrained Energy Efficiency Program (formerly known as the Low-
15 Income Program) takes a new approach to energy assistance programs by aligning
16 measure and channel delivery with the Residential Energy Efficiency Program, keeping
17 the majority of the existing participation pathways while expanding options for income-
18 eligible customers. The Resource Constrained Energy Efficiency Program includes
19 measures for customers at or below 150% of the federal poverty level. Only measures
20 outlined within this program will be attributed to the low-income carveout. This
21 program also includes several measures targeted toward owners of multifamily
22 buildings, who fall within the Small C&I customer sector. Specifically, the Resource
23 Constrained Program will consist of the following three components:

- 1 ○ Energy Efficient Homes. This program component includes a Single Family
2 Energy Assessment channel similar to the Phase IV Low-Income Assessment
3 component, which provides income-eligible customers with in-home or virtual
4 assessments, with a focus on home performance analysis that may lead to
5 comprehensive measures, including appliance replacement and a wide variety of
6 other direct install measures, for all eligible customers. The program component
7 also includes building shell and HVAC measures available for electric heat
8 customers and increased Health and Safety funding built upon the successful Phase
9 IV Health and Safety Pilot. The Company will also offer multifamily energy
10 assessments, ensuring that all occupants of multifamily buildings will have access
11 to the same measures as Single-Family Energy Assessment customers, including
12 comprehensive measures, when applicable. The Energy Efficient Homes
13 component is designed to target residential sector customers at or below 150% of
14 the federal poverty level and C&I multifamily housing customers serving income-
15 eligible tenants that may benefit from program measures.
- 16 ○ Appliance Recycling. This program component mirrors the Residential Energy
17 Efficiency Program and includes the scheduling, free pick-up, and environmentally
18 responsible recycling of a variety of appliances, including, though not limited to,
19 refrigerators and compact refrigerators, freezers, dehumidifiers, room air
20 conditioners, and other appliances deemed acceptable by the Company. This
21 component is designed to target all income-eligible residential customers and C&I
22 customers that own multifamily buildings that serve income-eligible tenants who
23 may benefit from residential end-use appliance recycling measures.

1 ○ Student Energy Efficiency Education. This program component mirrors the
2 Residential Study Energy Efficiency program and provides energy efficiency
3 education and kits to income-eligible students in grades K-12. The Student Energy
4 Efficiency Education component is designed to target residential sector customers
5 at or below 150% of the federal poverty guidelines.

6 • The Non-Residential Program, which consists of the following component:

7 ○ Small and Large C&I Business Solutions. This program component provides
8 incentives for energy efficient equipment, as well as educational and technical
9 assistance for all business types in the Company’s service territory. Measures may
10 include HVAC, refrigeration, solar, controls, lighting, appliances, motors and
11 drives, CHP, compressed air, and more. This program is available to all non-
12 residential customers, regardless of industry and sector, as well as residential
13 customers (*e.g.*, those who own farms) that may benefit from business energy
14 efficiency rebates. PPL Electric is also offering Business Support Services as a
15 new offering in Phase V, which is dedicated to increasing participation across all
16 industry sectors by offering administrative, technical, engineering, and design
17 support to businesses developing energy efficiency projects.

18
19 **Q. Is the Company proposing any pilot programs as part of its Phase V EE&C Plan?**

20 A. Yes. As part of the Residential Energy Efficiency Program, the Company is proposing a
21 Conservation Voltage Reduction (“CVR”) Pilot and a Peak Time Rebates Pilot, as
22 described on page 68 of the Plan. As described on page 103 of the Plan, the Company is
23 proposing a Window Saddle Heat Pump Pilot program for Resource Constrained customers

1 that reside in multifamily housing. As part of the Business Energy Efficiency Program,
2 the Company is proposing a Peak Load Shift Pilot, as described on page 176 of the Plan.

3

4 **Q. Is the Phase V EE&C Plan designed to meet the consumption reduction targets and**
5 **the peak demand reduction target within the designated expenditure cap?**

6 A. Yes. The EE&C Plan is designed to meet the overall consumption reduction target, the
7 Low-Income set-aside consumption reduction target, and the peak demand reduction
8 target, all within the expenditure cap. In fact, PPL Electric has designed its EE&C Plan to
9 exceed all of the compliance targets, within the expenditure cap, to account for risks and
10 uncertainties, such as evaluation results that differ from expectations.

11 As shown in Table 2 of the EE&C Plan, the estimated overall consumption
12 reduction is 1,066,059 MWh, which exceeds the 828,321 MWh overall compliance target
13 by approximately 29%. The estimated consumption reduction from low-income customers
14 is 75,623 MWh, which exceeds the 65,678 MWh Low-Income compliance target by
15 approximately 15%. The estimated overall peak demand reduction of 180.6 MW exceeds
16 the 151 MW peak demand reduction compliance target by approximately 20%.

17

18 **Q. Please describe the Company's strategy to ensure the EE&C Plan is designed to**
19 **achieve at least 15% of the total consumption reduction target in each program year.**

20 A. As shown on Table 5 of the EE&C Plan, PPL Electric has designed its EE&C Plan to
21 achieve 25% of the total consumption reduction target in Program Year 18, 29% in
22 Program Year 19, 29% in Program Year 20, 26% in Program Year 21, and 20% in Program
23 Year 22. PPL Electric Utilities will monitor program and channel performance and, if

1 necessary, adjust marketing and communications, incentive levels, eligibility requirements,
2 sector and program budgets, and/or measure offerings to manage participation as necessary
3 to achieve at least 15% of its portfolio target annually.
4

5 **Q. Please describe the Company’s strategy to ensure the EE&C Plan is designed to**
6 **achieve at least 75% of the peak demand reduction target in each season.**

7 A. As shown on Table 6 of the EE&C Plan, PPL Electric has designed its EE&C Plan to
8 achieve 140% of the peak demand reduction target in the summer season and 99% of the
9 peak demand reduction target in the winter season. PPL Electric Utilities has worked
10 closely with its selected CSPs to develop a selection of measures that offer benefits in both
11 seasons. In addition, the Company’s demand response activities will be available across
12 seasons, further supporting the Company’s plan to acquire 75% of the proposed peak
13 demand target in each season.
14

15 **Q. Does the EE&C Plan include at least one comprehensive program for residential**
16 **customers and at least one comprehensive program for non-residential customers?**

17 A. Yes. As described in Section 3.1 of the EE&C Plan, the EE&C Plan includes
18 comprehensive measures in its Residential, Resource Constrained (Low-Income), and
19 Business (Non-Residential) Programs. Specifically, both the Residential and Resource
20 Constrained Programs will provide a comprehensive mix of cost-effective energy
21 efficiency measures for all building types (single-family, multifamily, and manufactured
22 homes and existing and new construction). Both programs will offer in-home energy audits
23 that assess end uses, including weatherization, water heating, lighting, HVAC, and

1 appliances. All residential customers will receive energy efficiency and peak demand
2 education and be encouraged to implement multiple measures to take a comprehensive
3 approach to energy efficiency. Moreover, the Company's restructuring of its Resource
4 Constrained (Low-Income) offerings will create a more equitable experience for all
5 customers by providing income-eligible customers with access to measures available to
6 standard residential customers, as well as a similar customer journey. This includes a
7 selection of no-cost products through the Company's online marketplace, appliance
8 recycling, student energy efficiency education, and an expanded local contractor network.
9 The inclusion of additional health and safety funding will facilitate more comprehensive
10 projects for income-eligible customers. The Company will not cap participation for any
11 multifamily customers, including those residing in master metered low-income multifamily
12 buildings. In addition, the Residential and Resource Constrained Energy Efficiency
13 Programs will be closely coordinated by the selected CSPs to create a portfolio structure
14 that will allow for more efficient and flexible operations and marketing during
15 implementation.

16 For non-residential customers, PPL Electric's Business Program will target
17 business customers of all sizes and in every segment, as well as government and
18 educational institutions, with a comprehensive range of prescriptive measures (including
19 HVAC, lighting, and water heating) as well as opportunities to implement custom
20 efficiency projects for measures not included in the TRM. Custom component measures
21 cover a comprehensive set of non-residential needs, including CHP, advanced controls,
22 compressed air, and other projects that result in cost-effective energy efficiency savings.

1 In addition, customers of any sector can take advantage of any eligible measures in
2 the EE&C Plan across programs, with costs to be recovered by the appropriate customer
3 sector. This will allow measures to be applied as needed by the end-use customer, as
4 various residential measures can be useful to business customers and vice versa. This will
5 be an improved and more seamless customer experience in Phase V. For example,
6 residential customers who own farms can utilize agricultural business measures, and
7 business customers that own multifamily buildings can take advantage of popular
8 residential measures, such as appliance recycling. This approach promotes more
9 comprehensive measure use and provides a more balanced portfolio across customer
10 classes.

11
12 **Q. Is the Company proposing to sell peak demand into PJM Interconnection LLC’s**
13 **(“PJM”) Forward Capacity Market in Phase V?**

14 A. No. As noted in the *Phase V Implementation Order*, peak demand reductions from energy
15 efficiency programs are no longer eligible to participate in the PJM Forward Capacity
16 Market, so peak demand reduction sales are not included in the Company’s Phase V EE&C
17 Plan.

18
19 **Q. What process is the Company proposing to evaluate and update its EE&C Plan?**

20 A. PPL Electric’s staff plans to carefully monitor actual program performance compared to
21 estimates in the EE&C Plan. In addition, PPL Electric’s independent evaluator will
22 conduct an impact evaluation, an annual cost-effectiveness evaluation, and process
23 evaluations of each program and the overall portfolio. If actual performance deviates from

1 the estimates in the EE&C Plan, PPL Electric will work with its program implementation
2 CSPs to adjust the performance of programs or will recommend changes to the EE&C Plan.
3 This includes modifying marketing tactics, adjusting incentive levels within specified
4 ranges, offering different measures at different times, and offering multiple delivery
5 channels. To the extent that there are any changes that require Commission approval, PPL
6 Electric will seek approval of such changes in accordance with the EE&C Plan change
7 procedures outlined in the Commission’s *Minor Plan Change Order* entered on June 10,
8 2011, at Docket No. M-2008-2069887, and the *Phase V Implementation Order*.

9
10 **Q. Does the Phase V EE&C Plan offer at least one energy-efficiency program for**
11 **each customer sector?**

12 A. Yes. As shown in Tables 1 and 9 of the EE&C Plan (among numerous other tables and
13 sections), there is at least one program available for each of the four customer sectors --
14 Residential, Low-Income, Small C&I, and Large C&I.

15
16 **Q. Has PPL Electric competitively bid its relevant contracts for the Phase V EE&C**
17 **Plan?**

18 A. Yes. As mentioned previously, PPL Electric has issued competitive RFPs for all of its
19 CSPs and one CSP for Evaluation, Measurement, and Verification (“EM&V”). The
20 Company is finalizing its implementation CSP contracts for submittal to the Commission
21 for approval. The contracts for database and overarching marketing are currently in the
22 RFP process.

23

1 **Q. Does this conclude your direct testimony?**

2 **A.** Yes, it does. However, I reserve the right to supplement my testimony.

VERIFICATION

I, THOMAS J. McATEER, being the Manager-Energy Efficiency at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: December 1, 2025



Thomas J. McAteer

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation for
Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan**

Docket No. M-2025-3057329

PPL Electric Utilities Corporation

Statement No. 2

Direct Testimony of Terry Fry

List of Topics Addressed:

**Development of the Phase V EE&C Plan
Total Resource Cost (TRC) Test Calculations**

Date: December 1, 2025

Direct Testimony of Terry Fry

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Q. Please state your full name and business address.

A. My name is Terry Fry, and my business address is 800 N. Glebe Road, Suite 500, Arlington, VA 22203.

Q. On whose behalf are you presenting testimony in this proceeding?

A. I am testifying on behalf of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”).

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

A. I am employed by The Cadmus Group LLC (“Cadmus”) as Executive Vice President, Global Energy Strategy.

Q. What are your duties as Executive Vice President, Global Energy Strategy?

A. I am responsible for managing advising the firm’s global divisions on energy transition strategies, as well as consulting practices and providing technical leadership in utility planning, grid-edge technology deployment, and assessment, evaluation, measurement, and verification practice areas of the firm.

Q. What is your educational background?

A. I hold an MPhil degree in Economics and Politics of Development from Cambridge University and a BS in Mechanical Engineering from Stanford University.

1 **Q. Please describe your professional experience.**

2 A. Since 1987, I have worked in the energy utility industry in various capacities, including as
3 a researcher, consultant, educator, and policy advisor. With the assistance of my staff, I
4 have provided technical advice and consultation to energy utilities on matters related to
5 resource planning, load research, grid modernization, market assessment, energy
6 efficiency, demand response, portfolio assessment, and performance measurement and
7 verification. Before joining Cadmus in 2017, I was Senior Vice President for Utility
8 Services at Nexant from 2000 to 2017. I served as senior Project Director at Bechtel
9 Technology and Consulting (the parent of Nexant’s spin-out) from 1997-2000. Prior to
10 that, I served as a principal in the consulting firm of Barakat & Chamberlin, where I led
11 the firm’s utility planning and strategy practice. I have also served as an appointed Advisor
12 on renewable energy and energy efficiency to the US Department of Commerce Secretary
13 since 2008, completing a sixth term in 2023.

14

15 **Q. Have you previously testified as a witness before the Pennsylvania Public Utility
16 Commission (“Commission”)?**

17 A. Yes, I provided testimony on behalf of PPL Electric for its Phase IV EE&C Plan.

18

19 **Q. What is the purpose of your testimony?**

20 A. The purpose of my testimony is to provide supplemental information regarding PPL
21 Electric’s proposed Phase V Act 129 Energy Efficiency and Conservation Plan (“Phase V
22 EE&C Plan” or “EE&C Plan”), which is being submitted in accordance with Act 129 of
23 2008, P.L. 1592, 66 Pa. C.S. §§ 2806.1, 2806.2 (“Act 129”), the Commission’s June 18,

1 2025 Implementation Order at Docket No. M-2025-3052826 (“*Phase V Implementation*
2 *Order*”), and the Commission’s 2026 Total Resource Cost (“TRC”) Test Order entered on
3 November 7, 2024, at M-2024-3048998 (“*2026 TRC Test Order*”).
4

5 **Q. What was your role in preparation of PPL Electric’s proposed EE&C Plan?**

6 A. I and my staff, working under my supervision, provided PPL Electric with technical
7 information regarding the design of some of the programs in the proposed Phase V EE&C
8 Plan and assisted PPL Electric in preparing the portfolio, including the tables in the EE&C
9 Plan. I also oversaw the technical analyses and quantitative program and portfolio
10 summaries prepared in accordance with the Commission’s EE&C Plan Template issued on
11 September 8, 2025, at Docket No. M-2025-3052826, as well as the benefit-cost analyses
12 performed in accordance with the Commission’s *2026 TRC Test Order*.
13

14 **Q. Are you sponsoring any exhibits in the filing?**

15 A. Yes. As Thomas McAteer explains in PPL Electric Statement No. 1, Thomas McAteer,
16 Katelyn Arnold, and I are co-sponsoring PPL Electric’s Phase V EE&C Plan, which has
17 been identified as PPL Electric Exhibit 1. Specifically, I am responsible for and am
18 sponsoring Section 2, as well as calculations in Section 3 and Section 8 of that exhibit.
19

20 **Q. Please describe your responsibilities for each of these sections of the EE&C Plan.**

21 A. I, with support from my staff, made the following contributions to the various sections of
22 the EE&C Plan:

- 1 • **Section 2** - A quantitative overview of the entire Phase IV EE&C Plan for the five-
2 year period, in accordance with the Commission’s EE&C Plan Template. The
3 overview consists of the following tables:
 - 4 ○ **Table 8** – Summary of Portfolio Costs;
 - 5 ○ **Table 9** – Program Summaries;
 - 6 ○ **Table 10** – Budget and Parity Analysis Summary;
- 7 • **Section 3** - Review of program-specific costs, savings, and cost-effectiveness
8 calculations; and
- 9 • **Section 8** - Determination of avoided costs and cost-effectiveness analysis for each
10 program and the portfolio according to the Commission’s *2026 TRC Test Order*.

11
12 **Q. Does the Phase V EE&C Plan contain a process for conducting an annual cost-**
13 **effectiveness evaluation of the EE&C Plan in accordance with the Commission’s 2026**
14 ***TRC Test Order*?**

15 A. Yes. The Phase V EE&C Plan outlines a process for conducting an annual cost-
16 effectiveness evaluation of the EE&C Plan in accordance with the Commission’s *2026*
17 *TRC Test Order*. See Section 1.8.3 of the Phase V EE&C Plan.

18
19 **Q. What method was used to estimate the cost-effectiveness of the Phase V EE&C Plan**
20 **and its individual programs?**

21 A. For each program in the Phase V EE&C Plan and for the entire EE&C Plan (including
22 portfolio-level common costs), cost-effectiveness was estimated in accordance with the

1 procedures described in the Commission’s *2026 TRC Test Order* and industry documents
2 such as the *California Standard Practice Manual*.¹

3
4 **Q. Is the proposed Phase V EE&C Plan cost-effective, as a whole, based on the TRC**
5 **criteria?**

6 A. Yes. The cost-effectiveness of the proposed portfolio is demonstrated using data presented
7 in the Phase V EE&C Plan, specifically in Section 3 and in Tables 56 and 57 in Section 8.
8 For each program in the Phase V EE&C Plan, PPL Electric determined cost-effectiveness
9 in accordance with the Commission’s *2026 TRC Test Order*.

10 PPL Electric’s proposed Phase V EE&C Plan is cost-effective as a whole. *See*
11 Section 8 of the Phase V EE&C Plan. Specifically, the TRC benefit-to-cost ratio for the
12 overall Phase V EE&C Plan, inclusive of energy efficiency and demand response, is 1.67.
13 This well exceeds the value of 1.0 required by Act 129 and is consistent with the benefit-
14 cost ratio of well-performing programs in other states, especially considering
15 Pennsylvania’s set-aside savings requirement for the Low-Income customer sector.

16 Tables 3 and 4 in the Phase V EE&C Plan provide summaries of first-year and
17 lifetime costs and benefits used to compute each program’s cost-effectiveness from a TRC
18 perspective. I note that PPL Electric determined the unit savings, unit counts, and effective
19 useful life (“EUL”) for each measure. To determine lifetime savings, the Company
20 validated unit savings and EULs for each measure by assessing conformity with the
21 Commission’s 2026 TRM Update Final Order entered on September 12, 2024, at Docket

¹ The *California Standard Practice Manual for Economic Analysis of Demand-Side Management Programs and Projects*, California Energy Commission, July 2002. See http://www.calmac.org/events/SPM_9_20_02.pdf.

1 M-2023-3044491, and Phase IV program data. The Company then determined incremental
2 costs and avoided cost benefits for each measure.

3

4 **Q. How did the Company assess the cost-effectiveness for each program?**

5 A. Assessment of cost-effectiveness for each program in the Phase V EE&C Plan began with
6 determining each program’s total resource benefits (“TRC Benefits”) based on the savings
7 of the individual measures over their lives, for a maximum of 15 years as directed in the
8 *2026 TRC Test Order*,² as well as the program’s total resource costs (“TRC Costs”). A
9 program was deemed cost-effective if its TRC Benefits exceeded its TRC Costs or the
10 benefit-to-cost ratio exceeded 1.0.

11 The TRC data used in this assessment were estimates based on the planning
12 assumptions in this Phase V EE&C Plan. The Company will utilize the 2026 TRC test to
13 monitor programs and portfolio cost-effectiveness annually and ensure TRC results are
14 above 1.0 at the portfolio level.

15

16 **Q. Please describe the calculation of avoided costs of supplying electricity.**

17 A. PPL Electric Utilities used the 2026 Avoided Cost Calculator provided by the SWE to
18 calculate avoided costs and review the cost effectiveness of its Phase V EE&C plan. The
19 Company calculated the avoided costs of delivered electricity for a 15-year planning
20 horizon in three segments, as follows:

² *2026 TRC Test Order* at 16-17.

- 1 • *Years 1-4 (June 2027-May 2031)*. The Company used the NYMEX Electricity Futures
2 Price at the PJM West Hub as of July 7, 2025, and applied a locational basis adjustment
3 from PJM West Hub to the Company’s Zone.
 - 4 • *Years 5-10 (June 2031-May 2037)*. PPL Electric used NYMEX Henry Hub Natural
5 Gas Futures and the EIA AEO Natural Gas Price Forecast for Mid-Atlantic Region as
6 of July 7, 2025 and converted to electric prices using an on-peak and off-peak heat rate
7 and spark spread.
 - 8 • *Years 11-15 (June 2037-May 2046)*. PPL Electric used Middle Atlantic Natural Gas
9 Prices for Electric Power from the Energy Information Administration Annual Energy
10 Outlook, Energy Prices by Sector and Source, converted to electric prices using the on-
11 peak and off-peak heat rate and including on-peak and off-peak spark price spreads.
- 12 The Company estimated avoided generation capacity costs using PJM base residual auction
13 results for 2026/2027. Subsequent years are inflated by the rate of inflation specified in
14 the Phase V TRC Test Order. Avoided transmission and distribution (“T&D”) costs are
15 from the SWE Avoided Cost of Transmission and Distribution Capacity Study. Avoided
16 transmission costs are escalated at the rate of inflation, but avoided distribution costs
17 change by varying rates based on the outcomes of the probabilistic deferral analysis
18 methodology. Avoided T&D costs are provided by EDC and year in the 2026 Avoided
19 Cost Calculator.

20

1 **Q. What are the sources for the Company’s estimates of savings, incremental cost, and**
2 **measure life?**

3 A. PPL Electric based its savings and cost estimates on experience from Phase I, Phase II,
4 Phase III, Phase IV, the TRM, and input from stakeholders and trade allies. The CSPs
5 generated measure cost data using a variety of sources, including the SWE’s Phase V
6 incremental cost database, Phase IV program data, and for data not found in the incremental
7 cost database, the CSPs used secondary sources, including the DOE’s Technical Support
8 Documents, ENERGY STAR documentation, and other statewide TRMs and incremental
9 cost studies.

10

11 **Q. What benefits were used in the TRC calculation?**

12 A. The benefits used in the TRC calculation include the full value of time and seasonally
13 differentiated avoided generation, transmission and distribution, and capacity costs. These
14 benefits also accounted for avoided line losses. To capture the full value of time and
15 seasonal impacts of each program measure, the annual generation capacity value was
16 assigned to each program measure according to the hourly load shape of the end user
17 affected by the measure. The Company factored fossil fuel savings and non-energy
18 benefits, such as water and operations and maintenance (“O&M”) savings, into the
19 calculation of benefits.

20

21 **Q. What was included in the cost component of the TRC analysis?**

22 A. The cost component of the TRC analysis included: (1) incremental measure costs; and (2)
23 electric distribution company (“EDC”) costs.

1 Incremental measure costs are the expenses associated with the installation of
2 energy efficiency measures and ongoing O&M costs, where applicable. The incremental
3 measure costs were obtained primarily from the SWE’s Phase V incremental cost database.
4 Measure costs not included in this study were obtained from a variety of sources, including
5 PPL Electric’s actual experience, the results of the Company’s Phase IV evaluations (such
6 as the actual project cost for an average custom commercial and industrial project), the
7 Department of Energy Technical Support Documents, ENERGY STAR documentation,
8 and other statewide TRMs and incremental cost studies.

9 EDC costs are costs that are in the EE&C Plan budget subject to the funding cap
10 plus SWE costs that are not subject to the funding cap. EDC costs consist of expenses
11 associated with program development, delivery, and ongoing operation, specifically: (1)
12 EDC labor, material, and supplies; (2) customer incentives³; (3) CSP labor, materials, and
13 supplies; and (4) marketing.

14 PPL Electric’s EDC costs fall into two general categories:

- 15 • **Direct Program Costs:** The costs that are directly related to and charged to a specific
16 program; and
- 17 • **Common Costs (or “Portfolio-level Costs”):** The costs that are applicable to more
18 than one customer class or more than one program, or that provide portfolio-wide
19 benefits.]

20

³ Customer incentives are not included in calculation of TRC costs, in accordance with procedures described in the Commission’s 2026 TRC Test Order.

1 **Q. Does this conclude your direct testimony?**

2 **A.** Yes, it does. However, I reserve the right to supplement my testimony.

VERIFICATION

I, TERRY FRY, being the Executive Vice President, Global Energy Strategy at The Cadmus Group, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: December 1, 2025

Terry Fry

Terry Fry (Dec 1, 2025 08:41:27 PST)

Terry Fry

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation for
Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan**

Docket No. M-2025-3057329

PPL Electric Utilities Corporation

Statement No. 3

Direct Testimony of Katelyn Arnold

**List of Topics Addressed:
Spending Cap for the Phase V EE&C Plan
Phase V EE&C Cost Recovery Mechanism**

Date: December 1, 2025

Direct Testimony of Katelyn Arnold

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Q. Please state your full name and business address.

A. My name is Katelyn Arnold, and my business address is 827 Hausman Road, Allentown, PA 18104-9392.

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

A. I am employed by PPL Services Corporation (“PPL Services”), a subsidiary of PPL Corporation and an affiliate of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) as Manager – Regulatory Strategy & Rates.

Q. What are your duties as Manager – Regulatory Strategy & Rates?

A. I am responsible for the development and execution of rate filings, including the Act 129 Compliance Rider (“ACR”), rate-related revenue analysis and reporting, including auditing controls and requirements, rate compliance, rate case success for the regulated electric business, and ad-hoc analysis to optimize business planning.

Q. What is your educational background and experience?

A. I graduated from Lafayette College in 2017 with a Bachelor of Arts in Government & Law and Economics. I graduated from Lehigh University in 2022 with a Master of Business Administration degree.

1 **Q. Please describe your professional experience.**

2 A. In 2018, I was employed by PPL Services as a Financial Analyst in the Treasury
3 Department where I supported the Accounts Payable function. In 2020, I moved into a
4 Regulatory Policy Specialist role in PPL Services. In 2022, I was promoted to Sr.
5 Regulatory Policy Specialist. In 2023, I assumed the role of Manager – Regulatory
6 Strategy & Compliance, and in July 2024 my role was expanded to Manager – Regulatory
7 Strategy & Rates, which is my current role.

8

9 **Q. Have you previously testified as a witness before the Commission?**

10 A. Yes. I have testified before this Commission in PPL Electric’s base rate case proceeding
11 at Docket No. R-2025-3057164.

12

13 **Q. Briefly describe the subject matter of your testimony in this proceeding.**

14 A. I will describe the calculation of PPL Electric’s spending cap for the programs in its Phase
15 V Energy Efficiency and Conservation Plan (“Phase V EE&C Plan” or “EE&C Plan”). I
16 also will explain the Company’s proposed mechanism for recovering the costs of its Phase
17 V EE&C Plan.

18

19 **Q. Are you sponsoring any exhibits in this proceeding?**

20 A. Yes. I am primarily responsible for and sponsoring Section 7 of PPL Electric Exhibit 1,
21 the Company’s Phase V EE&C Plan. I also am sponsoring PPL Electric Exhibit KA-1,
22 which is a copy of the proposed *pro forma* tariff supplement for the Company’s Act 129
23 Compliance Rider – Phase 5 (“ACR-5”), which is PPL Electric’s proposed non-bypassable

1 surcharge that will recover the costs associated with the Phase V EE&C Plan consistent
2 with Sections 1307 and 2806.1(k)(1) of the Public Utility Code.

3

4 **Q. What is the spending cap for PPL Electric’s Phase V EE&C Plan?**

5 A. The spending cap for PPL Electric’s Phase V EE&C Plan is \$307,506,880, excluding
6 approximately \$5 million for the Company’s share of the Statewide Evaluator (“SWE”)
7 costs. The SWE costs are not subject to the cost cap per the Commission’s Implementation
8 Order entered on June 18, 2025, at Docket No. M-2020-3015228 (“*Phase V*
9 *Implementation Order*”). Thus, the Company’s total budget for its five-year Phase IV
10 EE&C Plan is approximately \$312.5 million when including the SWE costs.

11

12 **Q. How was that spending cap calculated?**

13 A. The \$307,506,880 cap is based on 2% of the Company’s total annual revenue as of
14 December 31, 2006, which was \$3,075,068,825. The Commission stated in its *Phase IV*
15 *Implementation Order* that the 2% cap applies to the annual budget and not the budget for
16 the entire phase of the EE&C Plan and made no updates to this policy in the *Phase V*
17 *Implementation Order*. Therefore, the approximately \$307.5 million budget is for the full
18 five-year period, derived from the 2% cap multiplied by \$3,075,068,825 (\$61,501,376 per
19 year for five years).

20

1 **Q. How are the costs to design and develop the Company’s Phase V EE&C Plan reflected**
2 **in its budget for the EE&C Plan?**

3 A. The Commission has allowed the Company to include the costs to design and develop its
4 Phase V EE&C Plan, and those costs incurred prior to the start of the Plan are permitted to
5 be deferred. These costs are included in the \$312.5 million budget. PPL Electric proposes
6 to amortize and recover those costs ratably over the five-year, or 60-month, life of its Phase
7 V EE&C Plan.

8
9 **Q. Please describe the Company’s proposed rate mechanism for recovering the costs of**
10 **its Phase V EE&C Plan.**

11 A. The Company plans to use the proposed ACR-5, which is a non-bypassable cost recovery
12 mechanism under Section 2806.1(k)(1) of the Public Utility Code and is designed
13 consistent with Section 1307 of the Public Utility Code. The Company will calculate its
14 ACR-5 rate for each of its three customer classes in a similar manner to Phase IV –
15 Residential, Small C&I, and Large C&I. For Residential customers, the ACR-5 will be
16 recovered as a cents per kilowatt hour (“kWh”) component included in the distribution
17 charge on the customer’s bill. For Small C&I customers, the ACR-5 will be recovered as
18 a cents per kWh component and will be shown as a separate line item from other charges
19 but combined with any Act 129 Compliance Rider – Phase 4 (“ACR-4”) charges, which
20 have been recovering the costs associated with PPL Electric’s currently-effective Phase IV
21 EE&C Plan. In other words, a Small C&I customer will see a single line item on the bill
22 for all Act 129 charges. For Large C&I customers, the ACR-5 will be recovered as a cents
23 per kilowatt (“kW”) component of the customer’s bill and will be identical to the Small

1 C&I bill presentment. All Act 129 charges (including ACR-4 and ACR-5) will be
2 identified as a single ACR line item shown separately from other distribution charges. For
3 Large C&I customers, the demand (kW) is the customer's PJM Interconnection LLC
4 ("PJM") peak load contribution and may change yearly.

5
6 **Q. How many different rates will be reflected in the ACR-5?**

7 A. Three different rates will be reflected in the Company's ACR-5. The three rates will be
8 for each of the Company's customer classes – Residential, Small C&I, and Large C&I.

9
10 **Q. Please describe how PPL Electric will set the annual rates under the ACR-5.**

11 A. PPL Electric Utilities proposes to calculate the ACR-5 on an annual basis according to the
12 forecasted program costs during that Phase V program year. The Company will complete
13 an annual reconciliation of the ACR-5 for each customer class by comparing ACR-5
14 revenues to actual expenses and will recover or refund any over- or under-collections in
15 the next ACR-5 year. If the Company determines that a customer class's ACR-5 rate, if
16 left unchanged, would result in a material over- or under-collection of Phase V Act 129
17 costs incurred or expected to be incurred during the current 12-month period, the Company,
18 in its discretion, may file with the Commission for an interim revision of the ACR-5 rate.

19 The Company also will include in each customer class's ACR-5 rate calculation the
20 E-factor or prior period over or undercollection for the respective customer class. This
21 over or undercollection will also be divided by expected kWh usage or kW demand for the
22 customer class. The current period rate and the E-factor rate will be combined and include

1 an adjustment for gross receipts tax to obtain the ACR-5 rate for the customer class for the
2 period.

3

4 **Q. Please describe PPL Electric’s proposed reconciliation mechanism for the ACR-5.**

5 A. In accordance with the Commission’s *Phase V Implementation Order*, the Company
6 proposes to file with the Commission a report of collections within 30 days following the
7 end of each application year. This report will reconcile the ACR-5 for each of the three
8 customer classes (*i.e.*, Residential, Small C&I, and Large C&I). The reconciliation will
9 compare the actual expenses incurred and the actual revenues received for each of the
10 customer classes for the period running April 1st to March 31st. No interest will be included
11 monthly on the over or under collections, as directed by the Commission on page 248 of
12 the *Phase V Implementation Order*.

13

14 **Q. Will the Phase V cost recovery mechanism be a separate mechanism from the Phase
15 IV cost recovery mechanism?**

16 A. PPL Electric proposes to include any remaining ACR-4 over or undercollections in its
17 ACR-5 E-factor, as described on pages 248 and 249 of the *Phase V Implementation Order*.
18 This will effectively combine the ACR-4 with the ACR-5 effective June 1, 2026.

19

20 **Q. Is the Company proposing to include any capital costs as part of its ACR-5?**

21 A. No.

22

1 **Q. Is the Company proposing to include any EE&C Plan-related costs that have been**
2 **claimed and permitted recovery in base rates?**

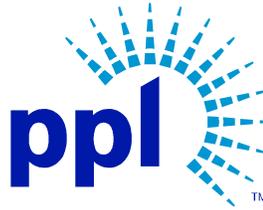
3 A. No.

4

5 **Q. Does this conclude your direct testimony?**

6 A. Yes, it does. However, I reserve the right to supplement my testimony.

PPL Electric Exhibit KA-1



PPL Electric Utilities Corporation

GENERAL TARIFF

RULES AND RATE SCHEDULES FOR ELECTRIC SERVICE

In the territory listed on pages 4, 4A, and 4B
and in the adjacent territory served.

ISSUED: TBD

EFFECTIVE: TBD

CHRISTINE M. MARTIN, PRESIDENT

827 Hausman Road
Allentown, PA 18104

NOTICE

THIS TARIFF MAKES CHANGES **(C)** IN EXISTING RATES. SEE PAGE TWO.

PPL Electric Utilities Corporation

ACT 129 COMPLIANCE RIDER – PHASE 5

A Phase 5 Act 129 Compliance Rider (ACR 5) shall be applied, on a non-bypassable basis, to charges for electricity supplied to customers who receive distribution service from the Company under this Tariff. The ACR 5 will be implemented beginning June 1, 2026.

The ACR 5 shall be computed separately for each of the following three customer classes:

- (1) Residential: Consisting of Rate Schedules RS and RTS (R),
- (2) Small Commercial and Industrial (Small C&I): Consisting of Rate Schedules GS-1, GS-3, BL, SA, SM (R), SHS, SLE, SE, TS (R), and GH-2 (R), and
- (3) Large Commercial and Industrial (Large C&I): Consisting of Rate Schedules LP-4, LP-5, LPEP, and L5S.

The ACR 5 will be computed for each customer receiving distribution service from the Company using the formulae described below. For residential customers, the ACR 5 charge shall be included in the distribution charges on a kWh basis of the monthly bill. For all other customers, the ACR charge shall be listed as a separate charge on the monthly bill. All charges shall be reconciled on an annual basis for undercollections and overcollections experienced during the previous year. Charges set forth in the residential rate schedules in this tariff have been adjusted to reflect application of the currently effective ACR 4.

The ACR 5 for the Residential class and the Small C&I class shall be computed using the following formula:

$$\text{ACR 5} = [\text{ACc/S} - \text{E/S}] \times 1 / (1-\text{T})$$

The ACR 5 for the Large C&I class shall be computed using the following formula:

$$\text{ACR 5} = [\text{ACc/D} - \text{E/D}] \times 1 / (1-\text{T})$$

Where:

ACc = An annual budget of all costs required for the Company to implement its proposed Phase 5 Energy Efficiency and Conservation (EE&C) Plan during a compliance year. A compliance year is the 12-month period beginning June 1 of each calendar year and ending May 31 of the following calendar year. The annual project program cost is the sum of all direct and indirect costs (including all deferred design and development costs, general administrative costs, and applicable statewide evaluator costs) required to implement the Company's EE&C Plan divided by the number of months in the Company's EE&C Plan for the given application year. All deferred design and development cost, general administrative costs, and applicable statewide evaluator costs will be amortized over a 60-month period.

The costs of each EE&C program available to only one customer class will be directly assigned to that customer class. Costs of EE&C programs which cannot be directly assigned to one customer class will be allocated to the customer classes benefiting from those programs using an allocation factor determined by dividing the EE&C costs directly assigned to each customer class by the total of the Company's EE&C Plan costs directly assigned to all customer classes.

(Continued)

PPL Electric Utilities Corporation

ACT 129 COMPLIANCE RIDER – PHASE 5 (CONTINUED)

- D = For the Large C&I customer class, the total of the monthly billing demands for all customers in the class, projected for the computation year. The peak demand will be based on the customer's peak load contribution to the PJM peak load during the prior PJM Planning Year.
- E = Net over or undercollection of the ACR 5 charges as of the end of the 12-month period ending March 31 immediately preceding the next compliance year. Reconciliation of the ACR 5 will be conducted separately for each of the three customer classes based upon the actual expenses incurred and actual revenues received for each customer class. No interest shall be computed monthly on over or undercollections. The reconciliation of ACR 4 revenues and expenses shall be adjusted during the 2027 – 2028 ACR 5 application year to reflect actual data for the months of April and May 2026, as well as any expenses incurred prior to May 31, 2026, but paid after that date.
- S = The Company's total billed KWH sales in each customer class who receive distribution service under this tariff (including distribution losses), projected for the computation year.
- T = The total Pennsylvania gross receipts tax rate in effect during the billing period, expressed in decimal form.

The ACR 5 shall be filed with the Pennsylvania Public Utility Commission (Commission) by May 1 of each year. The ACR 5 charge shall become effective for distribution service provided to all customers on or after the following June 1, unless otherwise ordered by the Commission, and shall remain in effect for a period of one year, unless revised on an interim basis subject to the approval of the Commission. Upon determination that a customer class's ACR 5, if left unchanged, would result in a material over or undercollection of Phase 5 Act 129 Compliance costs incurred or expected to be incurred during the current 12-month period ending May 31, the Company may file with the Commission for an interim revision of the ACR 5 to become effective ten (10) days from the date of filing, unless otherwise ordered by the Commission.

At the conclusion of the Phase 4 EE&C Plan on May 31, 2026, collections under the ACR 4 for each customer class will be reconciled to the total cost of the EE&C Plan allowed by the Commission for that customer class. Overcollections or undercollections will be reflected as a separate line item in the E factor calculation and will be refunded or recovered through application of the ACR 5 rate effective June 1, 2026 through May 31, 2027. If any over/under collection balance is expected to remain after March 31, 2027, the collection will be included in the ACR 5 rate going forward.

Minimum bills shall not be reduced by reason of the ACR 5 nor shall charges hereunder be a part of the monthly rate schedule minimum. The ACR 5 shall not be subject to any credits or discounts. The State Tax Adjustment Surcharge (STAS) included in this Tariff is applied to charges under this Rider. Charges under ACR 4 and ACR 5 will be combined for billing purposes only.

The Company shall file a report of collections under the ACR 5 within thirty (30) days following the conclusion of each compliance-year.

Application of the ACR 5 shall be subject to review and audit by the Commission at intervals it shall determine. The Commission shall review the level of charges produced by the ACR 5 and the costs included therein.

(Continued)

PPL Electric Utilities Corporation

ACT 129 COMPLIANCE RIDER – PHASE 5 (CONTINUED)

ACT 129 COMPLIANCE RIDER – PHASE 5 CHARGE

Charges under the ACR 5 for the period June 1, 2026 through May 31, 2027, as set forth in the applicable Rate Schedules.

| Customer Class | Large C&I - | Small I&C | Residential |
|------------------------|---------------------|------------------------------|-----------------|
| Rate Schedule / Charge | LP4, LP-5, and LPEP | GS-1, GS-3, BL, and GH-2 (R) | RS and RTS (R) |
| | \$X.XXX /KW | \$X.XXXXX /KWH | \$X. XXXXX /KWH |

| Small C&I – Street Lights | | | | | | | | | | |
|---------------------------|----------------|------------------|----------------|---------|----------------|---------|----------------|------------|--------|---------|
| Rate Schedule/ Charge | SA | | SM (R) | | SHS | | SLE | | SE | TS (R) |
| | Nominal Lumens | Charge | Nominal Lumens | \$/Lamp | Nominal Lumens | \$/Lamp | Nominal Lumens | \$/Fixture | \$/KWH | \$/Watt |
| | HPS 9,500 | X.XXX \$/Lamp | 3,350 | X.XXX | 5,800 | X.XXX | 2,600 | X.XXX | X.XXX | X.XXX |
| 6,650 | | | X.XXX | 9,500 | X.XXX | 3,300 | X.XXX | | | |
| 10,500 | | | X.XXX | 16,000 | X.XXX | 3,800 | X.XXX | | | |
| X.XXX \$/Fixture | | 20,000 | X.XXX | 25,500 | X.XXX | 4,900 | X.XXX | | | |
| | | 34,000 | X.XXX | 50,000 | X.XXX | 7,500 | X.XXX | | | |
| | | 51,000 | X.XXX | | | 15,000 | X.XXX | | | |
| | | | | 20,000 | X.XXX | | | | | |

VERIFICATION

I, KATELYN ARNOLD, being the Manager-Regulatory Strategy and Rates at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: December 1, 2025

Katelyn Arnold
Katelyn Arnold (Dec 1, 2025 10:22:37 EST)

Katelyn Arnold