FirstEnergy Pennsylvania Electric Company Act 129 Phase V Energy Efficiency & Conservation Plan	Docket No.: M-2025-3057327
Initial Telephonic Evidentiary Hearing	

Pages 48 - 75

Judge's Chambers

State Office Building

801 Market Street

Philadelphia, PA

Thursday, January 29, 2026

Commencing at 10:02 a.m.

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Docket No. M-2025-3057327

Hearing Date: January 29, 2026

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EXHIBIT 1

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November 26, 2025

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

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

Dear Secretary Homsher:

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

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

Should you have any questions, please contact me.

Sincerely,

Shane P. Simon

Shane P. Simon

SPS/FCN
Encls.

cc. Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
M-2025-3052826

CERTIFICATE OF SERVICE

I hereby certify that I have this 26th day of November, 2025 served a true copy of the **Petition** upon the persons listed below *via Electronic Mail*:

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Shane P. Simon

Shane P. Simon

Date: November 26, 2025

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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

I. INTRODUCTION

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

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

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

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

II. BACKGROUND AND HISTORY

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

2. The Company's attorneys are:

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

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

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

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

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

[3] *Energy Efficiency and Conservation Programs,* Docket Nos. M-2012-2289411 and M-2008-2069887 (Implementation Order entered August 3, 2012) ("Phase II Implementation Order").
[4] *Id.* at 24.
[5] *Id.* at 32.

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

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

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

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[6] *See Energy' Efficiency and Conservation Program,* Docket Nos. M-2012-2289411 and M-2008-2069887 (Secretarial Letter served Mar. 4, 2011).

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

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

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

Study") using proposed load curtailment models.[10] The SWE submitted its final version of the DR Potential Study to the Commission on February 25, 2015.[11]

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

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

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[10] *See Energy Efficiency and Conservation Program,* Docket Nos. M-2012-2289411 and M-2008-2069887 (Order entered Feb. 20, 2014) ("PDR Cost Effectiveness Determination Final Order").
[11] *See* DR Potential Study.
[12] *See Proposal to Pennsylvania Public Utility Commission — Statewide Evaluator RFP*, submitted by GDS Associates, Inc, *et al*., January 11, 2013.
[13] *See* EE Potential Study.
[14] *See Energy Efficiency and Conservation Program,* Docket No. M-2014-2424864 (Implementation Order entered June 19, 2015) ("Phase III Implementation Order").
[15] *Id;* In response to a Petition filed by the Energy Association of Pennsylvania, the Commission modified the Phase III Implementation Order to measure compliance with DR targets based on EDC performance during the second, third, and fourth program years of Phase III, and permitted EDCs to implement approved DR programs for the fifth program year on a voluntary basis. *See Petition to Amend the Commission's June 19, 2015 Implementation Order*, Docket No. M-2014-2424844 (Order entered June 3, 2020).
[16] *Id*. at 45.
[17] *Id.*

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

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

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

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

[20] *See* 66 Pa.C.S. § 2806.1(a).

[21] *See Implementation of Act 129 of 2008 - Total Resource Cost (TRC) Test,* Docket No. M-2009-2108601 (Order entered June 23, 2009) ("2009 TRC Test Order").

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

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

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

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

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

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

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

- FirstEnergy Pennsylvania Electric Company Statement No. 2, Direct Testimony of Stephanie R. Zieger (Phase IV Final Cost Collection, Phase V Cost Recovery Mechanism and Initial Rates, Program Cost Reconciliation Process).

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

Resource Cost (TRC) Test, Docket No. M-2019-3006868 (Order entered Dec. 19, 2019) ("2021 TRC Test Order").
[24] Phase V Implementation Order at 13-14.

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

III. LEGAL REQUIREMENTS

A. ADDITIONAL INCREMENTAL REDUCTIONS IN CONSUMPTION AND DEMAND

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

19. The Commission also established a peak demand reduction requirement of 191 Megawatts for the Company.[27]

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

B. SPENDING

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

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[25] By Order entered on December 7, 2023, at Docket No. A-2023-3038771 *et al.*, the Commission approved the consolidation of Met-Ed, Penelec, Penn Power, and West Penn into Rate Districts of FE PA. For Phase V, the Company proposes to use consolidated EE&C Charge Phase V Riders ("Phase V EE&C-C Riders").
[26] Phase V Implementation Order at 12.
[27] *Id.*
[28] *Id.* at 48, 146.
[29] Phase V Implementation Order at 143.
[30] 66 Pa.C.S. § 2806.1(g).

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

23. The Company's five-year spending cap, as established in the Phase V Implementation Order is $390,320,135.[32]

C. OTHER LEGAL REQUIREMENTS

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

IV. PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN

A. OVERVIEW OF THE PLAN

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

[31] Phase V Implementation Order at 234-5.
[32] Phase V Implementation Order at 34.
[33] 66 Pa.C.S. § 2806.1(b)(l)(i)(H); Phase V Implementation Order at 244-45.
[34] *See* 66 Pa.C.S. § 2806.l(a)(11); Phase V Implementation Order at 54; 73.
[35] *See 66* Pa.C.S. § 2806.1(b)(l)(i)(G).
[36] *See 66* Pa.C.S. § 2806.1(a)(5); Phase V Implementation Order at 68-69.
[37] *See 66* Pa.C.S. § 2806.1 (a)(5); Phase V Implementation Order at 198.
[38] *See* Phase V Implementation Order at 52.

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

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

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

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

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

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

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

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

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

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

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

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

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

B. DESCRIPTION OF THE PROPOSED PLAN

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

Residential Programs:

- Energy Solutions Program
- Low-Income Energy Efficiency Program

Small and Large Commercial and Industrial Programs:

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

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

[40] *See* Appendix B, Table 10 of the Phase V Plan.
[41] *See* Appendix B, Table 7 of the Phase V Plan.

C. PHASE V ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDERS

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

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

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

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

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

[42] 66 Pa.C.S. § 2806.1(k)
[43] 66 Pa.C.S. § 2806.1(b)(1)(i)(F).
[44] *See* Phase V Implementation Order at 34.

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

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

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

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

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

D. IMPLEMENTATION

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

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

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

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

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

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

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

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

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

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

E. PROCEDURAL TIMELINE

52. In accordance with Act 129 and the Commission's Phase V Implementation Order,[45] the Company anticipates the following approximate procedural timeline to address the Proposed Plan:

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

F. PUBLIC INTEREST

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

[45] Phase V Final Implementation at 198.

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

V. CONCLUSION

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

Respectfully submitted,

Dated: November 26, 2025

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Docket No. M-2025-3057327

Phase V Energy Efficiency & Conservation Plan

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

November 26, 2025

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

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

Mapping of Program Years to Dates

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

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1. OVERVIEW OF PLAN

Introduction

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

Historic Background

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

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

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[1] 66 Pa.C.S. §2806.1 *et seq*.
[2] 2026 Total Resource Cost Test Final Order, Docket No. M-2024-3048998 (Order entered November 7, 2024).
[3] 66 Pa.C.S. § 2806.1.
[4] 66 Pa.C.S. § 2806.1(c) (3).
[5] *See Energy Efficiency and Conservation Program* Implementation Order, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order Entered August 3, 2012).
[6] *See Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Consolidation of Proceedings and Approval of its Act 129 Phase II Energy Efficiency and Conservation Plans*, Docket Nos. M-2012-2334387, M-2012-2334392, M-2012-2334395 and M-2012-2334398 (Opinion and Order entered March 14, 2013)).

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

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

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

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

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

[9] *See Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2020-3015228 (Order entered June 18, 2020).

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

[11] *See Energy Efficiency and Conservation Program Implementation Order*, Docket No. M-2025-3052826 (Order entered June 18, 2025).

[12] Phase V Implementation Order at 13-14.

[13] On January 1, 2024, FirstEnergy Corp.'s Pennsylvania operating companies (i.e., Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) merged into

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

Objectives:

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

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

Description of the Plan and Strategy for Success:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FE PA Table 1: Program Summary Descriptions

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

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

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

FE PA Table 2: Program Delivery Channels

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

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

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

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

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

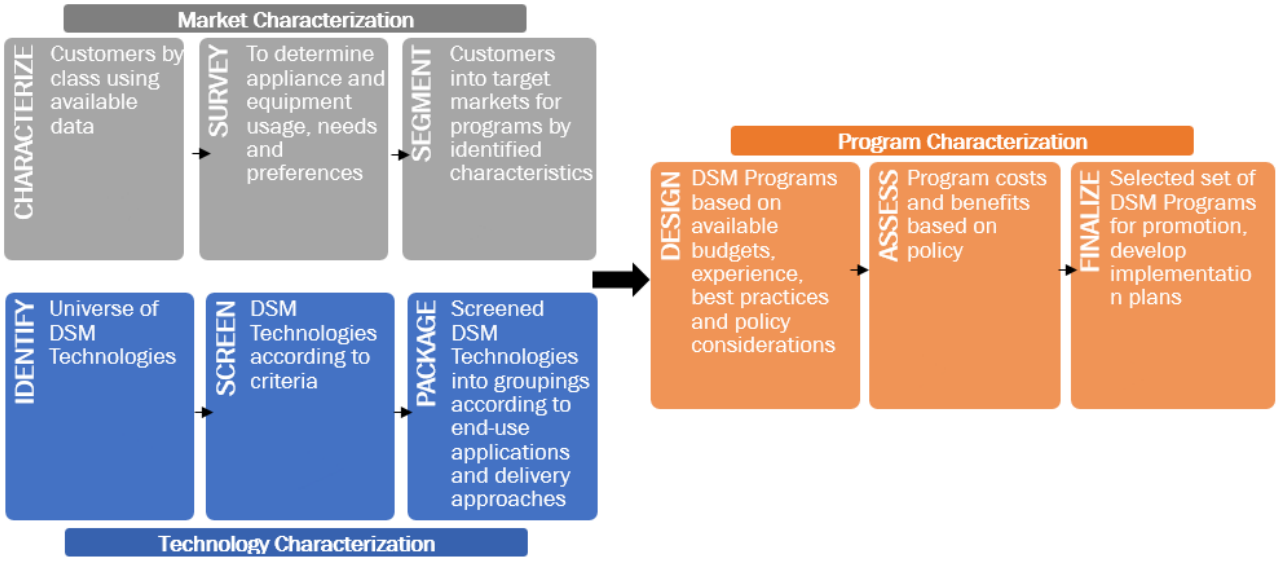
The Company believes it has developed a successful strategy to achieve its Phase V goals. This strategy includes offering a broad range of energy efficiency and demand response program opportunities through a variety of delivery channels, continued use of outsourced vendors with expertise in program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

1.2 Summary description of process used to develop the EE&C plan and key assumptions used in preparing the plan. Provide the basis for key assumptions and discuss sources of uncertainty that may affect the plan. This summary should include a description of the EDC's process for stakeholder engagement during both the development and implementation of the EE&C Plan.

Process

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

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



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

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

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

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

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

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

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

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

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

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

1.3 Summary tables of portfolio savings goals, budget, and cost-effectiveness (see Tables 1, 2, 3 and 4 of the EE&C Plan Template Tables Excel Workbook).5 Introduce Table 2 with a high-level overview of Act 129 energy accounting (incremental annual, gross vs. net, meter-level savings vs. system-level savings, weather-normalization of savings estimates, etc.). Introduce Tables 3 and 4 with a summary of the key peak demand accounting elements for Phase V (2025 IO at 147-157). FirstEnergy should also provide Table 2a showing the expected first-year MWh and budget by rate district.

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

[15] *See Comments of FirstEnergy Pennsylvania Electric Company to the Tentative Implementation Order Regarding Phase V of the Act 129 Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (April 7, 2025).
[16] In addition to the tables required by the Commission (which are designated as "PUC Tables" and provided in Appendix B to the Phase V Plan), the Company developed additional tables that have been included as additional support.

FE PA Table 3: Phase V Order Targets

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

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

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

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

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

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

[17] PA Implementation Order at 147 through 157.

1.4 Summary of program implementation schedule over the five-year plan period. Utilize the Mapping of Program Years to Dates table above to align calendars with Act 129 program years.

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

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

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

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

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

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

1.5 Summary description of the EDC implementation strategy to acquire at least 15% of its portfolio consumption reduction and peak demand reduction target in each program year.

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

1.6 Summary description of the EDC implementation strategy to acquire at least 75% of the portfolio MW compliance target in each season. (2025 IO at 142) If an alternative summer or winter performance window is proposed for daily load shifting programs, provide a rationale for the alternative window.[18] If the proposal calls for differentiated windows based on local distribution system needs, summarize the proposed taxonomy and prepare a supplemental table that maps distribution assets or transmission zones to peak demand performance windows. (2025 IO at 154)

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

[18] Alternative windows must still include four performance hours per day.

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

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

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

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

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

1.8 Summary description of EDC's data management, quality assurance and evaluation processes; include how EE&C programs will be updated and refined based on evaluation results and plans for secure data sharing with other program administrators.

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

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

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

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

1.9 Summary description of cost recovery mechanism. FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class and the rationale for separating or consolidating rate districts from a cost recovery standpoint.

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

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

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

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

2.1 Market Rate Residential (exclusive of Low-Income), Residential Low-Income, Small Commercial and Industrial, and Large Commercial and Industrial Sector Summaries (see Table 6).

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

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

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

2.3 Budget and Parity Analysis (see Table 7). EDC total annual revenue is inclusive of collections on behalf of Electric Generation Suppliers. (2009 IO at 35) EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total annual sales should include both bundled and delivery-only sales.

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

3. PROGRAM DESCRIPTIONS

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

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

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

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

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

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

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

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

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

- The EE&C Team reviewed potential program offerings based on identification by, or feedback from: (i) stakeholders and vendors; (ii) FirstEnergy's energy efficiency implementation team; and (iii) evaluation contractor and energy efficiency consultant. The team also reviewed other industry sources, the PA TRM, and the PA MPS, along with the programs and measures currently being offered through the Existing Plan and by its affiliates and other utilities.

- The potential program measures and services underwent a screening process carried out by the EE&C Team, which included, among other things, consideration of the anticipated participation, implementation requirements, market applicability, savings and cost impacts. Program measures were grouped by: (i) sectors, such as residential and C&I; (ii) end uses, such as appliances and HVAC; and (iii) program types, such as home performance, and efficient products. Potential program components and measures were reviewed with the Company's stakeholders, implementation team, and its energy efficiency consultant.

- Program cost characteristics were developed, including, for example, incentive levels; marketing and vendor costs; incremental measure costs; and the availability of other benefits. The value of benefits was developed from savings estimates or formulas that were included in the PA TRM and the SWE Database for those measures covered, historic actual results, and from other industry sources, primarily including TRMs from other states.

- The economic modeling was completed on an iterative basis, and the savings, cost, and PA TRC values were determined. Once all programs were designed and modeled, the Phase V Plan as a whole was evaluated to balance results and costs to ensure reasonableness and compliance in a cost-effective manner. The results from the PA MPS were also used to refine the program designs and assumptions. The projections and results were reviewed with the Company's implementation team and energy efficiency consultant, incorporating, when appropriate, suggestions for refinement. The PA TRC results for each of the programs included in this plan can be found in Appendix B, Table 14.

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

3.1.1 Describe portfolio objectives and metrics that define program success (e.g., energy and demand savings, customers served, number of units installed, market transformation).

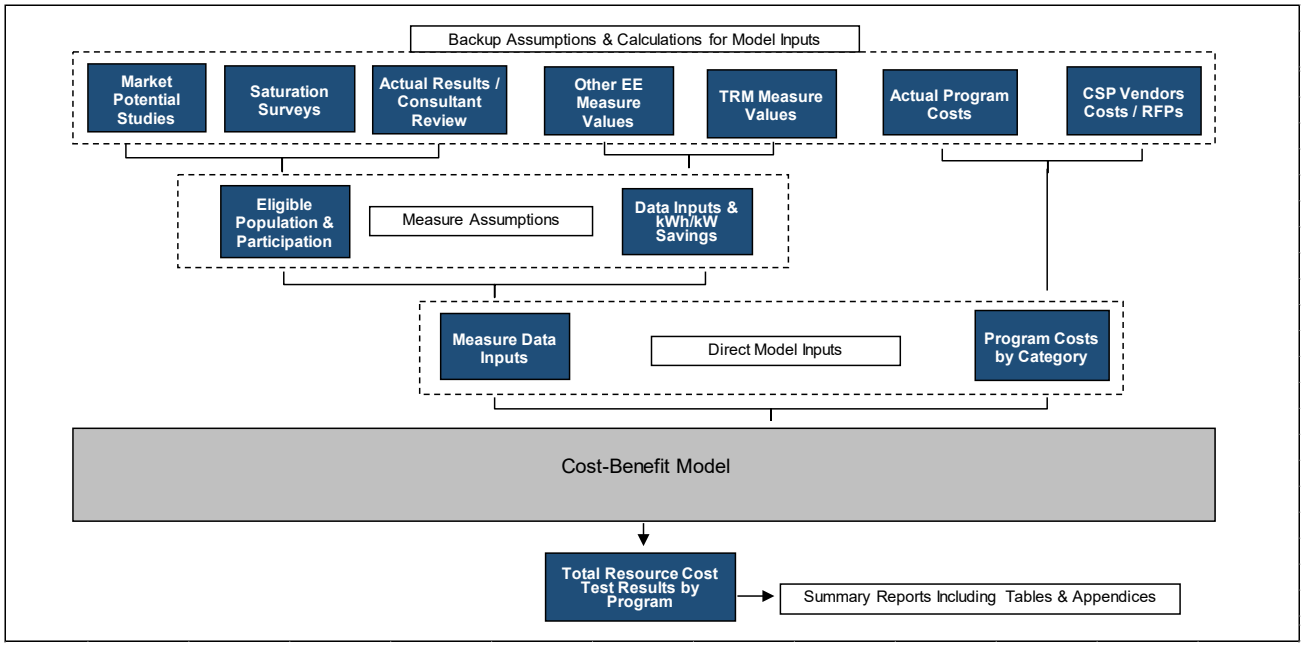
The portfolio design criteria and objectives are discussed in Section 3.1 above. General metrics that define success for each program are associated with the number of participants, kWh savings, kW reductions, dollars spent and cost-effectiveness. See Appendices B and D for the projected metrics associated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

3.1.2 Describe how programs were constructed for each sector to provide market coverage sufficient to reach overall energy and demand savings goals. Describe analyses and/or

research that were performed (e.g., benchmarking of other jurisdictions, best practices, requests for information from CSPs).

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

FE PA Figure 2: Model Process Diagram



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

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

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

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

3.1.3 Describe how different components such as energy-efficiency, combined heat and power, renewables, load-shifting, and other measures are included in the portfolio of programs as applicable.

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

3.1.4 If the plan includes measures that promote fuel switching from electricity to fossil fuel, include a proposed minimum standard and provide justification for the threshold to receive program support. Combined heat and power projects are considered fuel switching. (TRC Test Order at 84)

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

3.1.5 Confirm that the plan includes high-efficiency heat pump and heat pump water heater measures available to HEAR and other non-Act 129 program participants. (2025 IO at 174) Describe how program delivery will target these bundled, or interwoven, funding opportunities for measures that encourage fuel switching from fossil fuels to electricity. Summarize how efficiency requirements or qualified product lists for heat pumps and heat pump water heaters will be aligned with non-Act 129 programs.

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

3.1.6 Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan and the expected contribution to portfolio MWh and MW savings and disclose all non-Act 129 funding sources the EDC plans to leverage for FTM measure installation. Note that the contribution of FTM measures is limited to ten percent of total plan savings. (2025 IO at 78)

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

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

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

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

3.1.7 Describe how the EDC defines "comprehensive" in the context of EE&C plan design and delivery and the comprehensive program(s) to be offered to the residential and non-residential rate classes. Describe the measure mix or delivery mechanism that qualifies each program as comprehensive consistent with the requirements of the Phase V Implementation Order. Refer to the "Table 8 Addendum" in the Microsoft Excel version of the template tables for a list of residential measures designated as "comprehensive." (2025 IO at 49-52 and 72)

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

3.1.8 If Time of Use rate(s) are part of the portfolio, describe how Act 129 support will lead to improved outcomes over simply offering the time-varying tariff through rates. (2025 IO at 124)

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

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

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

FE PA Table 4: Residential Program & Descriptions

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

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

Program Name and Program years during which program will be implemented

Residential Energy Solutions Program

Program years during which program will be implemented-

June 2026 - May 2031

Objective(s)

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

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

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

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

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

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

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

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

If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports

Program description

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

Products:

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

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

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

HVAC and Solar:

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

Behavioral:

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

Comprehensive Audit:

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

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

Multifamily:

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

New Homes:

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

Front-Of-The-Meter ("FTM"):

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Program issues and risks and risk management strategy

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

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

- **Initial Cost of Energy Efficient Products and or Home Retrofits:** Relative to the market baseline, energy efficient products often carry a higher upfront cost but a lower lifetime operating cost, and home retrofits are more expensive and more involved than purchasing efficient equipment. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to also lead to higher upfronts costs for efficient equipment. Therefore, customers may not appreciate the lifetime operating cost advantage of energy efficient products and, consequently, a higher upfront cost is a barrier to purchasing energy efficient products. Home retrofits often require more participant investment, time and commitment, and thus this additional investment and commitment is a barrier. To address these barriers, the company is working to ensure incentives align with incremental costs to help reduce the initial cost of equipment and retrofits.

- **Customer Awareness and Engagement:** Residential customers may not be aware of the benefits of installing energy efficient opportunities and products for their home, and/or lack the time and resources to pursue energy efficient products when replacing existing equipment. To address this barrier, the Company will educate customers on the benefits of installing energy efficient products through targeted marketing, ensure that incentives are easily accessible, and encourage market transformation and stocking of energy efficient products through midstream incentives. Educational materials will focus on the lower operating costs and the savings customers may obtain from making the choice to purchase eligible high efficiency products. Through outreach efforts, the Company will seek to partner with retail and wholesale entities to promote program offerings, to coordinate with other conservation programs, and also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of available incentives. The Company will cross-promote programs to spread awareness of the range of energy efficiency opportunities and incentives proposed in this Plan.

- **Sufficient Stocking and Availability of Energy Efficient Products:** The Company will look for opportunities to develop and promote a midstream component for specific products to encourage high levels of participation by incenting midstream market actors and/or directly discounting the cost of the energy efficient products at the time of sale. In addition, stocking and availability of energy efficient products may be challenged in relation to supply chain disruptions resulting from potential policy decisions related to newly imposed tariffs.

- **Trade Ally Awareness and Training:** To meet certain program component participation goals, sufficient contractors must be available to undertake the work. The Company will work with the implementation CSP(s) to address this barrier by trying to engage and recruit more program and trade allies to participate in select program components.

- **Daily Load-Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty with customer participation and program component performance in the DLS program design and for winter demand response. More specifically, it is unknown how customers and the program components will perform in daily load-shifting across over 400 hours per year and in the winter period, both of which are new to PA and across the industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

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

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

Anticipated costs to participating customers

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

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

Ramp up strategy

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

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

Marketing strategy

EE&C Program Components:

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

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

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

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

EE&C Program Component Marketing activities may include:

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

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

Daily Load-Shifting and Peak Demand Reduction Program Component:

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

Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., $ per measure, $ per kWh or MW saved) See Table 8

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Key schedule milestones

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

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

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

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

Products:

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

Appliance Recycling:

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

Behavioral:

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

Comprehensive Audit and Multifamily:

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

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

New Homes:

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

Front-Of-The-Meter:

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

DLS and PDR:

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

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

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

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

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

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

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

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

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

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

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

Please see Appendix B, Table 9.

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

Kindly refer to Appendix B, Table 10.

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

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

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

Estimated percentage of sector budget attributed to program

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

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

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

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

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

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

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

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

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

Other information deemed appropriate

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

Products:

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

HVAC and Solar Component

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

Behavioral

- No changes from Phase IV

Multifamily – Res

- Updated incentive amounts

New Homes - Res

- Updated incentive amounts

Comprehensive Audits

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

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

Daily Load-Shifting and Peak Demand Reduction

- New Component offering

Front of Meter (FTM) Program

- New Component offering

3.2.1 Low-Income Sub-Sector (as defined by 66 Pa. C.S. § 2806.1) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs.

Program Name and Program years during which program will be implemented

Low-Income Energy Efficiency Program

Program years during which program will be implemented

June 2026 - May 2031

Objective(s)

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

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

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

If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or

sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports

Program description

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

Products:

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

HVAC:

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

Braided Funding Audits:

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

Behavioral:

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

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

Multifamily:

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

New Homes:

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

Weatherization:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Program issues and risks and risk management strategy

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

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

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

- **Customer Awareness and Engagement:** Low-income customers may not be fully aware of energy efficiency opportunities for their or home, and many customers, in general, are unaware of the "whole house" approach to energy-efficiency. The Company will work to address this by:
    - Targeted outreach and community engagement activities
    - Providing customers energy efficiency and energy usage education and specific tips and recommendations that promote energy efficiency and conservation opportunities and available program services;
    - Highlighting the training and BPI certification that contractors must have;
    - Identifying how the shell measure improvements can improve their comfort within the home;
    - Reinforcing that the installation of equipment and shell measures may increase the value of their home;
    - Collaborating and coordinating with Company's LIURP and PCAP programs, DCED Weatherization Assistance Program, NGDCs or other providers, and other conservation programs to raise awareness of Act 129 programs and services.

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront cost but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Low-income customers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, select measures are provided at no additional cost and enhanced incentives are provided on other select measures to reduce the initial cost to income-qualified customers.

- **Cost of Home Retrofits:** Low-income customers may not have the financial ability to invest in home retrofits. The Company addresses this barrier by providing direct install measures and whole home/comprehensive solutions at no-cost to promote and achieve participation by low-income customers.

- **Subcontractor and Trade Ally Awareness and Training:** To meet certain program component participation goals, sufficient auditors and contractors must be available to undertake the work. The Company will work with its implementation CSP(s) to address this barrier by trying to engage and recruit more qualified program allies and trade allies to participate in select program components.

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

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

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

Anticipated costs to participating customers

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

Ramp up strategy

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

Marketing strategy

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

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

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

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

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

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

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

- Targeted outreach through direct mailings, energy efficiency kits and presentations to inform customers, builders, developers, property owners, property managers, apartment associations, tenant groups, municipalities and community organizations about the benefits of the low-income program offerings and participation processes.
- Printed collateral highlighting the benefits and features of the program components as well as the enrollment and participation processes.
- Website content providing program component information resources and contact information.
- In-person visits by program representatives to qualified customers.
- Energy assessments of properties may include the direct installation of standard energy savings measures to engage, educate, and promote participation by the customer, building owner, or facility manager in the other program component offerings, thereby targeting deeper savings.
- School or community-based engagement events, energy efficiency awareness programs, promotional initiatives, and energy efficiency measure giveaways.

- Increase focus on Company Act 129 program benefits through collaboration, coordination, and training of other income qualified service providers including but not limited to Company's LIURP and PCAP programs, DCED Weatherization Assistance Program, NGDC programs or other providers, and other conservation programs.

Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., $ per measure, $ per kWh or MW saved) See Table 8

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

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

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

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

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

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

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

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

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

Key schedule milestones

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

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

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

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

Products and HVAC:

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

Behavioral:

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

Multifamily and Weatherization:

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

New Homes:

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

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

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

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

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

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

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

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

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

These details are set forth in Appendix B, Table 9.

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

See Appendix B, Table 9 and 10.

Estimated percentage of sector budget attributed to program

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

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

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

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

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

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

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

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

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

Other information deemed appropriate

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

Products:

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

HVAC:

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

Braided Funding Audit:

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

Weatherization:

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

EE Kits:

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

School Education:

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

- ***Details on how the plan will meet the proportionate number of measures requirement.***

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

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

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

- ***Include estimates of any applicable low-income carryover savings from Phase IV. Carryover savings from Phase IV may not exceed 20% of the Phase V low-income compliance target.***

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

3.3 Small C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net)

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

FE PA Table 5: New Small C/I Programs

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

[20] ACT 129 Phase IV Semi & Annual Reports - PA PY16 Annual Report

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

Program Name and Program years during which program will be implemented

C&I Energy Solutions Program – Small

Program years during which program will be implemented

June 2026 - May 2031

Objective(s)

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

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

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

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

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

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

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

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

If the program is an umbrella program list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports

Program Description

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

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

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

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

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

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

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

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

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

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

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

proper operation of fans and motors, and minor repairs to refrigerant lines and coils.
  - Calibration of building systems and controls, including energy management systems, lighting, and HVAC.
  - Diagnostic and function tests of applicable major systems and equipment.
  - Comprehensive application/installation of equipment or building measures such as:
    - HVAC controls to optimize Roof Top Units ("RTU")/Air Handling Units ("AHU").
    - Refrigeration controls to optimize refrigeration equipment.
    - Lighting upgrades, including the application of lighting controls and optimization of installations.
    - Chiller system controls to optimize chiller performance.
    - Building shell and weatherization measures
    - Electrification measures
    - Other program eligible energy saving measures identified through a building assessment (e.g. HVAC, refrigeration, food-service equipment, appliance replacement/recycling, EMS/BAS) .
  - Building Operations Training for qualified personnel to obtain Building Operations Certification ("BOC") through a certified training program or other training programs related to the efficient design, operations, and maintenance of buildings.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Program issues and risks and risk management strategy

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

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

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Conversely, the business or economic climate may require customer incremental costs or contributions to be reduced in order to encourage participation. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels including midstream and downstream.

- **Customer Awareness and Engagement:** Smaller businesses and GNI customers may have limited resources and time to consider, pursue, or prioritize energy efficiency and may have efficiency needs not well aligned with traditional EE&C programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation. In addition to limited resources and time, other small customers may not be aware of the benefits of installing efficient equipment or completing other energy efficiency improvements. To address awareness and educational barriers, the Company will educate small customers on the program opportunities and the benefits of installing efficient equipment or completing other efficiency improvement through targeted marketing and outreach, providing program

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

- **Business/Operational Constraints:** Facilities often have unique operational constraints that act as a barrier to implement energy-efficiency projects and the maintenance of equipment. This barrier will be addressed by ensuring the program component operates cooperatively with participants, provides technical assistance and support, provides maintenance services, and offers timely incentives.

- **Sufficient Stocking and Availability of Efficient Products:** To support a robust marketplace for efficient equipment, the Company may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of and/or for marking down the cost of the efficient equipment at the point of sale.

- **Daily Load Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty of customer participation and program component performance with daily load shifting and demand response during summer and winter demand peak periods. More specifically, it is unknown how customers and the program components will perform in daily load shifting across over 400 hours per year and in the winter period, both of which are new to PA and across the industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across the 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

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

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

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

Anticipated costs to participating customers

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

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

Ramp up strategy

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

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

Marketing strategy

EE&C Program Components:

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

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

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

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

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

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

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

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

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

Daily Load Shifting and Peak Demand Reduction Program Component:

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

Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., $ per measure, $ per kWh or MW saved) See Table 8

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

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

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

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

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

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

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

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

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

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

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

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

Key schedule milestones

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

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

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

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

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

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

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

For the FTM component of this program, the Company, in coordination with its Independent EM&V Contractor, will analyze FTM EE&C measures as they are designed and implemented to calculate energy savings and peak load reductions and will include the results in its subsequent semi-annual reports. This will include a description of the completed FTM EE&C measures and the calculated energy savings and peak load reductions.
For the DLS and PDR component, the Connected Device subcomponent will utilize AMI, and/or device data analytics to evaluate the usage reduction during peak load events. The Custom Demand Response and Connected Device measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments.
As part of the monitoring process, the Company plans to use selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate.

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

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

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

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

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

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

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

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

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

See Appendix B, Table 9

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

Please reference Appendix B, Table 10.

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

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

Estimated percentage of sector budget attributed to program

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

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

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

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

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

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

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

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

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

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

Other information deemed appropriate

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

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

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

<u>Appliance Recycling SCI Program Component:</u>

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

<u>Appliance Rebate SCI Program Component:</u>

- Updated incentive amounts

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

Consumer Electrics Component – Removed

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

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

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

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

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

Strategic Energy Management Program Component
- Updated incentive amounts
- Expanded customer engagement through targeted outreach, energy audits, advisory, consultation and technical support services

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

Front of Meter (FTM) Program – New Component
- Through implementation of the Company's LTIIP, O&M plans, and other Company or project developer initiatives, improvements to the Company's energy delivery systems and installation of equipment (e.g., solar photovoltaic and battery energy storage systems) will

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

3.4 Large C&I Sector (as defined by EDC Tariff) Programs – include formatted descriptions of each program organized under the same headings as listed above for residential programs. Additionally, include Tables 8, 9, 10, 14 (Gross) and 14 (Net).

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

FE PA Table 6: New Large C/I Programs

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

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

Program Name and Program years during which program will be implemented

C&I Energy Solutions Program - Large

Program years during which program will be implemented

June 2026 - May 2031

Objective(s)

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

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

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

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

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

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

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

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

If the program is an umbrella program (e.g., a wide-ranging residential program that includes upstream measures, home energy reports, appliance recycling, kits, efficient product rebates, and new construction), list and describe all program sub-components (or sub-programs, initiatives, solutions, etc.) that make up the program. Note that EDCs will be required to report impacts and financials separately for each program sub-component in their annual reports.

Program description

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Custom: The Custom subcomponent targets Commercial and Industrial customers to reduce load during peak load hours on a daily, scheduled, or event basis during the PA Act 129 summer and winter peak load periods through behavioral messaging, operations or

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Program issues and risks and risk management strategy

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

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

- **Initial Cost of Efficient Equipment:** Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Inflationary pressure, along with the potential for costs to increase to customers due to changing government policies and the impact of tariffs, has and may continue to lead to higher upfronts costs for efficient equipment. Conversely, the business or economic climate may require customer costs or contributions to be reduced in order to encourage participation. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels, including at midstream and downstream.

- **Customer Awareness and Engagement:** Businesses and GNI customers may have limited resources and time to consider, pursue, or prioritize energy efficiency and may have efficiency needs not well aligned with traditional EE&C programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation. In addition to limited resources and time, other large customers may not be aware of the benefits of installing efficient equipment or completing other energy efficiency improvements. To

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

- **Business/Operational Constraints:** Facilities often have unique operational constraints that act as a barrier to implement energy-efficiency projects and the maintenance of equipment. This barrier will be addressed by ensuring the program component operates cooperatively with participants, provides technical assistance and support, provides maintenance services, and offers timely incentives.

- **Sufficient Stocking and Availability of Efficient Products:** To support a robust marketplace for efficient equipment, the Company may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of and/or for marking down the cost of the efficient equipment at the point of sale.

- **Dailey Load Shifting and Peak Demand Reduction Program Component:** Issues and risks are primarily associated with the uncertainty of customer participation and program component performance with daily load shifting and demand response during summer and winter demand peak periods. More specifically, it is unknown how customers and the program components will perform in daily load shifting across over 400 hours per year and in the winter period, both of which are new to PA and across industry. The significant hours involved raise concerns with customer fatigue and sensitivity in achieving load impacts that are weather dependent across the 400 hours. The Company plans to use well established and innovative customer education, engagement and marketing techniques to achieve and sustain participation in this program component. In addition, the Company will actively monitor the program component performance and adjust customer education, marketing, equipment control schemes, incentives and/or other aspects of the offerings where applicable to mitigate these risks.

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

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

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

Anticipated costs to participating customers

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

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

Ramp up strategy

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

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

Marketing strategy

EE&C Program Components:

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

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

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

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

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

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

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

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

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

Daily Load Shifting and Peak Demand Reduction Program Component:

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

Eligible measures and incentive strategy showing incremental cost assumptions, gross measure-level TRC ratio, and incentive levels (e.g., $ per measure, $ per kWh or MW saved). See Table 8

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

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

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

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

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

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

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

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

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

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

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

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

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

Key schedule milestones

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

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

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

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

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

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

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

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

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

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

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

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

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

Savings projections – include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category. Include forecasted summer and winter demand reduction separately. Compliance demand savings are the average of summer and winter MW savings at the system-level. See Table 9

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

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

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

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

See Appendix B, Table 9.

Estimated program budget (total) by year – include table with budget per year. See Table 10. The table should also show what percentage of the budget goes to incentive costs and what percentage goes to non-incentive costs. At least 50% of plan spending should be attributed to incentives. (2025 IO at 232)

Please refer to Appendix B, Table 10.

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

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

Estimated percentage of sector budget attributed to program

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

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

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

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

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

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

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

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

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

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

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

Prescriptive and Custom– Consolidated under one program but otherwise a continuation of the programs and program components from the Phase IV Plan with the following key changes:
<u>Appliance Recycling Program Component:</u>

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

<u>Appliance Rebate Program Component:</u>

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

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

Consumer Electrics Component – Removed

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

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

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

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

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

Strategic Energy Management Program Component
- Updated incentive amounts
- Expanded customer engagement through targeted outreach, energy audits, advisory, consultation and technical support services

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

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

3.5 Government/Nonprofit/Institutional Sector (as defined by 66 Pa. C.S. § 2806.1) – Qualitatively describe how the Government/Nonprofit/Institutional Sector will be served.

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

4. PROGRAM MANAGEMENT AND IMPLEMENTATION STRATEGIES

4.1 Overview of EDC Management and Implementation Strategies:

4.1.1 Describe the types of services to be provided by the EDC, as well as consultants, trade allies, and CSPs. Indicate which organizations will provide which services and the basis for outsourcing versus staffing in-house. Reference reporting and EM&V information from Sections 5 and 6 below.

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

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

4.1.2 Describe how the risk categories of performance, technology, market, policy, and evaluation can affect the programs and any risk management strategies that will be employed to mitigate those risks

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.1.3 Describe how the EDC plans to address human resource and contractor resource constraints to ensure that adequate personnel and contractors are available to implement the EE&C plan successfully.

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

4.1.4 Describe "early warning systems" that will be utilized to indicate progress towards the goals and whether they are likely to be met. Describe the EDC's approach and process for shifting goals and funds, as needed, between programs and adding new measures/programs.

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

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

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

- Shift the focus of underperforming program components or measures to other program components or measures that have a higher adoption rate. The Company's Phase V Plan provides a large number of measures that are rolled up into programs which provides flexibility to shift emphasis to leverage successful measures as needed to achieve program energy savings goals.

- Shift the focus or expand program measures to include new measures that may not have been well known, tested, accepted by the market, or readily available in the market at the time this Plan was designed and submitted for approval. The Company will continue to monitor the market for new measures for potential inclusion throughout the duration of the Phase V Plan.

- Adjust program delivery processes utilized in order to enhance market penetration. Options here may include: (i) having vendors add field staff to handle more inquiries or shorten response times; (ii) eliminating or adjusting project requirements if bottlenecks appear to be stalling progress; (iii) streamline or improve efficiency of implementation processes; or (iv) implementing other program implementation adjustments such as any improvements identified by process evaluations.
- Investigate issues that program allies or customers have with programs and, if deemed appropriate, modify delivery based upon the results.
- Shift program delivery or add or expand delivery channels to more aggressively promote measures.
- In extreme cases, replace non-performing program components or measures with other program components or measures that show the potential for greater success.
- Shift resources to higher performing program components. This Plan assumes customer participation based on current experience of the Company and its consultant, which, in turn, is based on, among other things, customer participation in existing programs. To the extent actual customer participation significantly differs from these assumptions, the Phase V Plan's resources may need to be rebalanced among program components or sectors to ensure that the Phase V Plan's overall objectives are met.

- Adjust rebate levels on a temporary (e.g., limited time offer or special promotion) or long-term basis to affect market response.

What mid-course corrections could be implemented? In addition to the steps discussed above, the Company believes that certain program components may be able to be ramped up through enhanced marketing efforts to drive projected kWh and kW impacts to offset underperforming program components. This may require a re-balancing of program goals and budgets. Notwithstanding, the Company's active oversight of the Phase V Plan and its program tracking and reporting processes will provide guidance for making such mid-course decisions and adjustments. The Company has human resources and infrastructure in place for analysis of such information and the development and resolution of recommendations arising from such analysis.

How will the appropriate mid-course corrections be identified? On a monthly basis, the Company conducts an internal evaluation as part of its active oversight of the Phase V Plan that reviews the progress of each program from both an energy savings and budget perspective that provides early warning for potential performance issues requiring correction. In addition, the Company will use process evaluations to determine progress and to help identify any necessary corrective actions. Process evaluations will be performed using a combination of participant satisfaction and key customer perception surveys - all performed using statistically significant samples along with a kWh and kW impact/cost analysis in which each program's performance is compared with Plan expectations.

4.1.5 Provide implementation schedules with milestones. Describe the status of CSP solicitations and transition plans for programs or sectors that change CSPs from Phase IV to Phase V.

The Company's EM&V Request for Proposal "RFP" was issued on September 10, 2025. The Company has selected a successful bidder and submitted the proposed CSP contract for EM&V services for the Phase V Plan to the Commission for approval as discussed in Section 4.3.2. The Company has also issued a RFP for program implementation CSP(s) for its Commercial and Industrial programs on October 24, 2025 and plans to issue a RFP for program implementation CSP(s) for its Residential programs in the 4th quarter of 2025. The Company plans to complete its competitive bidding process for the Phase V Plan, select the CSPs and submit the CSP contracts to the Commission for approval in the 1st quarter of 2026.[21] This supports the CSP finalizing staffing, program planning, set-up, marketing development and start-up activities supporting the seamless transition from the Phase IV to Phase V programs with implementation of the Phase V program components beginning June 1, 2026. The Company's Supply Chain group will be involved in the competitive bidding process to select the CSP(s) for the Phase V programs. The Company plans for all program components to be implemented at the beginning of PY18 and continuing through PY22, subject to any program modifications or other adjustments that are made throughout the Phase V Period. Please see Sections 4.1.2, 4.1.4 and 6.4 for more information regarding potential program modifications and adjustments.

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

[21] Secretarial Letter issued September 8, 2025 approving the Act 129 Conservation Service Provider ("CSP") Contracts RFP Procedure for FirstEnergy's Phase V EE&C Plan, filed with the Commission on August 25, 2025 pursuant to the Act 129 Phase V Energy Efficiency and Conservation Program Final Implementation Order at Docket No. M-2025-3052826.

towards and compliance with its Phase IV targets. The Company's implementation strategy for this Phase V Plan will rely on the use of CSP(s), partners, program allies, community-based organizations, and other entities engaged in energy efficiency to promote, communicate, deliver, and support the effective transition, deployment and implementation of the Phase V program measures and services and the suspension of any program measures and services not being continued from Phase IV.

Program implementation processes will be leveraged to the extent practical to support timely program transition from the Phase IV programs and implementation of the Phase V programs beginning June 1, 2026. The Company will use multiple CSPs to transition and implement the various programs identified in the Phase V Plan. These CSPs will be responsible for the design of the transition and start-up plan for the Phase V program offerings and measures that will be performed in an organized and efficient manner and that strives to maintain and strengthen constructive relationships with the Phase V Plan and program management, customers, program allies, and contractors.

The transition and start-up planning includes program set-up activities and will commence following Company selection of the CSP(s) for Phase V. This set-up/start-up planning will outline a process to develop the systems and procedures needed to implement and operate the various program components for the Company. The transition and start-up plan of the Phase V program offerings and measures will include, at a minimum, the identification of appropriate staffing skills and levels and the hiring of the same, the development of website(s), promotional strategies and plans, and processes ensuring quality and other controls supporting successful program transition and implementation. The transition and start-up plan will include, at a minimum:

- An organization chart and description of management roles and responsibilities;
- A description of program measures and services and dates of milestone objectives and program launch;
- A description of an implementation and operational plan for use by any subcontractor;
- A plan to facilitate or support program component tracking and reporting;
- A determination of the required information transfers between the CSPs, the Company, and the Company's other energy efficiency or tracking system contractors;
- A plan for creating, installing, and testing necessary data collection systems for program operation and evaluation;
- The establishment of a call center and the processes needed for the Company to transfer calls they receive related to the programs;
- The development of detailed processes for providing and managing rebate/incentive applications, rebate/incentive payment processes, other program services, reporting procedures, data collection and data recording processes, internal billing and related documentation to be sent to the Company for processing;

- The identification of potential CSPs and the development of processes for transactions between the two, including electronic payments between the Company and the CSPs;
- A marketing, promotion and communication plan, which includes a website strategy;
- The creation of a check processing system (if appropriate); and
- A summary of any other program specific preparations needed before the programs are launched.

The CSPs' transition and start-up will include communication and coordination with Company personnel so as to: (i) present a seamless transition for customers and program allies who either wish to participate or continue participation in programs during Phase V; (ii) maximize process efficiency and controls; and (iii) leverage the Company's relationships and communications with customers. During program transition and start-up, the CSPs will meet with the Company and its evaluation and tracking system contractors as necessary and appropriate to properly integrate the applicable program components into the Company's overall comprehensive Phase V Plan. The start-up period will include milestone objectives and targets along the timeline to completion of program startup.

Consistent with the Phase V Implementation Order, the Company will not begin implementation of the Phase V programs prior to Commission approval of the program and CSP contracts. The Company will initiate controls to ensure that the incentives and rebates offered under the Phase V programs apply to only those measures installed and commercially operable on or before May 31, 2031. Applications completed and processed for program measures installed and commercially operable on or before May 31, 2026, as well as CSP or administrative fees related to Phase IV, are considered Phase IV expenses and will be tracked and reported accordingly. Applications completed and processed after May 31, 2026 for program measures installed and commercially operable on or before May 31, 2031, as well as CSP or administrative fees related to Phase V, are considered Phase V expenses and will also be tracked and reported accordingly. Phase V costs will be accounted for separately from Phase IV costs. Details surrounding cost recovery are set forth in Section 1.9 and Section 7.

4.1.6 Provide a brief overview of how stakeholders will be engaged throughout Phase V. Describe how low-income communities and other marginalized populations will be represented in stakeholder engagement.

During the development of this Plan, the Company sought and obtained feedback on the proposed EE&C programs from stakeholders through a variety of methods. Stakeholder meetings discussing the Phase V Plan's development, program design, and soliciting stakeholder input were held on July 30, 2025, and September 11, 2025. The Company also met with individual interested stakeholders during development of the Phase V Plan to obtain and further discuss their input. The Company also participated in numerous meetings with other interested parties, including its current and potential CSPs and vendors. The Company further involves stakeholders and stakeholder input on an on-going

basis through outreach to both program allies and customers to inform program design and implementation – a practice the Company intends to continue during the Phase V Period.

During the Phase V Period, the Company plans to continue conducting stakeholder meetings each year, where the Company will review the performance, progress, and operation of the programs with stakeholders for collaborative discussion and feedback. The Company will also meet with stakeholders on an as-needed, requested, or on-going basis to discuss any Plan or program aspects that warrants discussion.

During the Phase V Period, the Company plans to continue engaging local contractors, quality assurance vendors, and CBOs in Advisory Panel meetings a few times each year to obtain feedback on how the low-income and multifamily programs are operating in the field and if any updates to processes or procedures are recommended. The Company also plans to continue holding Annual Meetings with all Act 129 and LIURP contractors, quality assurance vendors, and CBOs to share ideas on the program and collaborate on how to better serve customers in local communities.

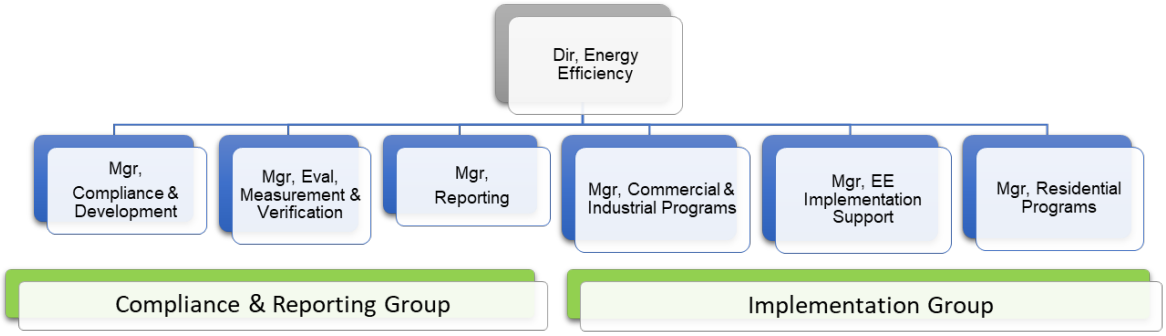
Multifamily stakeholder meetings will continue to be held during Phase V with parties such as the Pennsylvania Utility Law Project, PA Housing Alliance, National Housing Trust, National Resource Defense Council, Pennsylvania Housing Finance Agency, and others each year to obtain feedback and garner assistance from them on marketing opportunities to reach multifamily buildings owners and tenants.

4.2 Executive management structure:

4.2.1 Describe the EDC structure for addressing portfolio strategy, planning, review of program metrics, internal and external communications, budgeting and financial management, program implementation, procurement, program tracking and reporting, and quality assurance/quality control (QA/QC). Include the EDC organization chart for the management team responsible for implementing the EE&C plan.

The Energy Efficiency Department is entrusted with ensuring that the Company complies with all statutory energy efficiency and demand reduction requirements and that the approved programs are successfully implemented. This group also has responsibility for similar activities for FirstEnergy's other utility subsidiaries in other states. The organization chart set forth below depicts the management team of this group and primary areas of responsibility as they currently exist.

FE PA Figure 3: Organization Chart



The Energy Efficiency Implementation group is organized based on program management responsibilities across customer classes. Key activities include planning and executing marketing and outreach campaigns and overseeing and managing the program implementation CSPs to ensure successful program implementation. The Energy Efficiency Compliance and Reporting group is organized based on support functions that are common to all programs, such as Plan development, program evaluation, measurement and verification, and compliance tracking and reporting. The Implementation and Compliance and Reporting groups also receive support from areas, such as but not limited to Rates and Regulatory Affairs, Legal, Customer Service, Customer Support, Information Technology ("IT"), and Communications.

4.2.2 Describe the approach to overseeing the performance of CSPs and other contractors and how they can be managed to achieve results, within budget, and ensure customer satisfaction.

The Company will provide administrative, contract management, program implementation, and marketing oversight of the selected CSPs primarily through the Energy Efficient Department staff who are dedicated to this purpose. Not only will such monitoring be accomplished using the tracking and reporting system described in Section 5, but this dedicated staff will also provide:

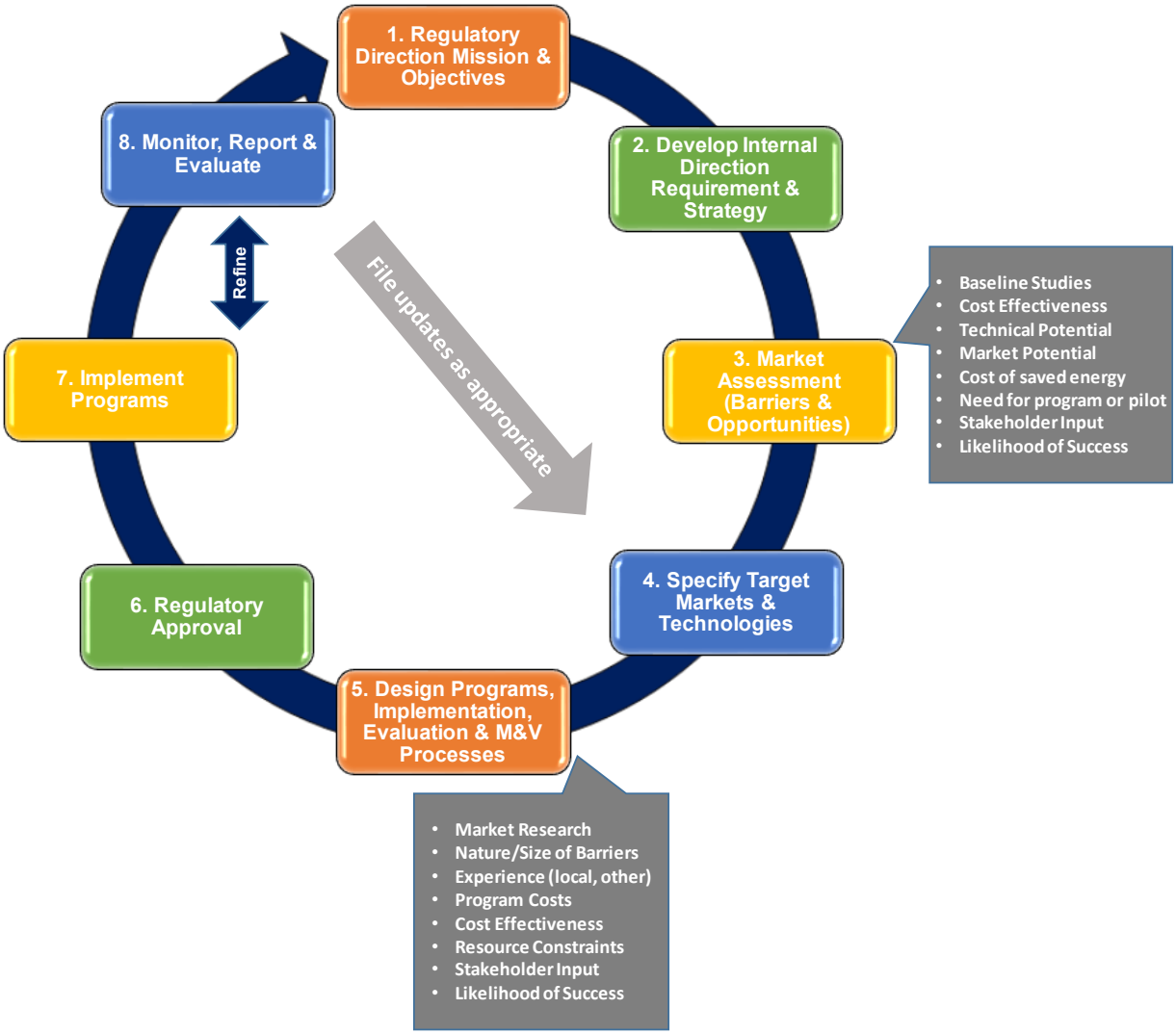
- Guidance and direction to the CSPs, including review and revision of proposed implementation plans and proposed milestones, marketing campaigns and, additionally, engage with the contractor team daily when working through strategy, policy, or implementation activities or issues.

- Review and approval of CSP invoices to ensure program activities are according to contract, within investment, and on schedule.

- Review of CSP operational databases for accuracy, ensuring incorporation of data into the Company's comprehensive tracking database to be used for overall tracking and reporting.
- Review and update of measure saving estimates maintained by the CSPs.
- Oversight and coordination of evaluation, measurement, and verification contractors.
- Participation in outreach to community groups, program allies and trade associations.
- Provision of guidance and direction on new initiatives or strategies proposed by the CSPs.
- Communication with CSPs advising of other initiatives that may provide opportunities for cross-program promotion.
- Review and approval of printed materials and advertising plans.
- Evaluation of portfolio and program effectiveness and recommendations regarding modifications to programs and program delivery as needed.
- Performance of periodic review of program metrics and evolving program design.

In addition to the comprehensive oversight activities described above, the Company will follow the overall planning, implementation, monitoring, and evaluation framework identified below to help guide its programs and contractors:

FE PA Figure 4: High Level Overview of EM&V



The Company believes that this framework, in conjunction with agility, flexibility, and a well-trained staff, will assist in its efforts to achieve the targets established by Act 129 and the Phase V Implementation Order in an efficient and cost-effective manner.

4.2.3 Describe the basis for administrative budgets and the proposed approach to accounting for EDC staff time who manage the EE&C plan.

The model used for developing the EE&C programs involves a build-up of sector specific costs based on program fixed costs and variable costs based on measure-level projections, both of which are then aggregated to the program level. Common costs are estimated at the State level and then allocated to each program based on each program's ratio of sector specific CSP Delivery Fees and Marketing costs.

Program cost elements are categorized into Incentives and Non-Incentives consistent with the Phase V Implementation Order and the Phase V Energy Efficiency and Conservation Plan Template, Table 10: Budget by Program,[22] including the following terms:

- **Incentives** – includes program specific costs for (1) rebates paid to customers, (2) upstream/midstream buydowns, (3) material cost of giveaways (e.g., kits), (4) program direct install labor and material cost provided to customers, and (5) Braided Funding Support Labor.

- **Non-Incentives** – includes both program specific and common costs associated with program design, (utility) administration, (CSP) delivery, marketing, EM&V, and other costs, as follows:

    - Program Design – includes common costs associated with the development of the Phase V Plan and programs, including costs incurred by the utility for employee labor, development, and research, design, and development related association fees.

    - Administration – includes common costs incurred by the utility for employee labor and expenses to oversee, administer and manage the portfolio, costs to develop and maintain a data collection, tracking, and reporting system, training and development, and costs to perform duties associated with activities such as regulatory reporting or meetings to support the Phase V Plan (e.g., Stakeholder meetings, technical utility staff meetings, program evaluation group meetings).

    - CSP Delivery Fees – includes program specific CSP administration costs associated with the set-up, implementation and ongoing management and delivery of programs, including staffing, contractors, websites(s), data collection and transfers, call centers, application and incentive processing, quality assurances, and control processes, and other program specific activities supporting successful program implementation.

    - Marketing – includes common utility costs and program specific CSP costs associated with marketing the plan and programs, providing general awareness and education, including costs associated with developing and providing marketing/promotional strategies, advertising space and other advertising costs, and materials.

    - EM&V – includes program specific CSP costs associated with the evaluation, measurement, and verification of the programs, including evaluation activities, surveys, M&V processes, data transfer responsibilities and participation in evaluation or other program related meetings.

[22] *See Implementation of Act 129 of 2008 – Phase V Energy Efficiency and Conservation Plan Template*, Docket No. M-2025-3052826 (Secretarial Letter dated September 8, 2025).

- AEPS Registration Support – includes program specific CSP costs associated with coordinating with the Alternative Energy Portfolio Standards ("AEPS") program administrator and supporting customer registration of eligible projects.

- Other – includes other common costs associated with the development, regulatory review and implementation of the Phase V Plan, including outside consulting and outside legal fees.

As discussed in Section 4.2.1, the Company has an Energy Efficiency Department that is dedicated to the oversight and administration of the Company's EE&C Plan and for those of affiliate utilities. This group charges specific accounting established for the PA EE&C Plan for its time spent on the oversight and administration of the Act 129 programs, with these costs considered "Administration" costs for the Phase V Plan and programs.

4.3 Conservation Service Providers (CSPs):

4.3.1 Provide detailed justifications for why the EDC did or did not choose to use a CSP to perform specific EE&C plan functions. Identify whether the EDC or its CSP(s) will use Community Based Organizations (CBOs) to deliver its Act 129 programs and describe the expected role(s) for CBOs within the broader CSP strategy.

The Company will perform overall administration and oversight of the Phase V Plan and will contract with experienced CSP(s) to perform the EE&C plan functions. The Company also plans for the CSP(s) for its Low-Income Energy Efficiency Program to contract with CBOs for the delivery of certain program components including those coordinated with its LIURP. The Low-Income Program coordinates with the LIURP program to have the CSPs leverage CBOs for delivery of certain program measures (e.g. Warm Plus, Warm Extra Measures, etc.) in conjunction and coordination with the LIURP program delivery.

4.3.2 List any selected CSPs, describe their qualifications and basis for selection (include contracts in Appendix). If the EDC plans to forego the competitive bidding process for any CSP, describe the rationale. Confirm that the contract value of CSP contracts that are not bid competitively is less than 1% of the total plan budget. (2025 IO at 226)

The Company's Request for Proposal "RFP" for EM&V services for its Phase V Plan was issued on September 10, 2025. A team within the Company's EE&C department evaluated the response and the selection was made based upon the firm possessing substantial qualifications in energy efficiency and demand response evaluation, measurement and verification. The selected bidder, ADM Associates, Inc., has worked previously with the Company in Pennsylvania and its affiliates in other jurisdictions, and has demonstrated its experience and expertise in its field, under Act 129 in Pennsylvania and in the industry. The Company's CSP contract is being filed contemporaneously with this Plan on a CONFIDENTIAL basis, including their qualifications and basis for selection.[23] No other CSPs have been selected at this time and other CSPs will be selected through the same

[23] In accordance with Final Implementation Order at 227 and with Act 129 66 Pa. C.S. § 2806.1(b)(1)(i)(E).

approved RFP process, with exception of its Tracking and Reporting system vendor.[24] The contract for the Tracking and Reporting system will forgo the competitive bidding process, consistent with Commission directive,[25] as the Company plans to leverage its existing system, which contains historic data and contains established processes, interfaces and reports, and would require significant efforts and cost to change vendors.

The Company has and will continue to adhere to the requirements as set forth in the Phase V Implementation Order and will select all CSPs that provide consultation, design, administration and management, or advisory services to the Company through a competitive bidding process. The RFP(s) will be distributed to all qualified CSPs registered on the Commission's website, and the Company will try to acquire bids from minority or other special category businesses consistent with the Commission's Policy Statements at 52 Pa. Code §§ 69.804, 69.807 and 69.808.

4.3.3 Describe all pending CSP solicitations for which the EDC plans to retain CSP services but has not selected the winning bidder.

As discussed in Section 4.1.5, the Company has issued a RFP for program implementation CSP(s) for its Commercial and Industrial programs on October 24, 2025 and plans to issue a RFP for program implementation CSP(s) for its Residential programs in the 4th quarter of 2025. These RFPs include all program components, including EE&C, Behavioral, Multifamily, and Demand Response.

4.4 Coordination with Other State Conservation Programs:

4.4.1 Describe how the EDC plans to collaborate with gas and water utility and other state or federal programs to achieve savings, detailing coordinated program management, tracking and reporting of outside funds, and implementation strategies. EDCs may claim the full gross verified savings for any EE&C project they support if they also incentivize or directly install eligible electric measures. (2025 IO at 186-187)

The Company recognizes that leveraging other conservation programs and the availability of outside funding may help to achieve its Act 129 objectives within budgetary limitations, as outside funding combined with Act 129 opportunities will elevate general awareness, improve customers' benefit-to-cost ratios, minimize the up-front investment required by customers, encourage additional participation, and thus accelerate conservation programming in the State.

The Company will seek to identify federal, state, and local funding opportunities ("braided funding"), including programs of gas and water utilities within the Company's service territory, and will pursue collaboration and coordination with these programs to provide

[24] FIO at 226 ""EDC contracts pertaining to Act 129 activities such as tracking database services which do not cover implementation or EM&V may forgo the competitive bidding process with individual vendors if the cumulative value of contracts for that vendor's work does not amount to more than one percent of the EDC's Phase V budget." The Phase V Plan budget for the T&R contract is less than 1% of the Phase V budget.
[25] IBID.

educational and marketing campaigns to promote to customers and leverage these programs and braided funding from multiple sources as they are available and applicable to the Phase V Plan offerings. As new opportunities become available, the Company in coordination with its respective CSPs intends to collaborate with these program administrators to provide education, marketing and cross-promotion, and other assistance or support helping customers to maximize such incentives and drive overall program participation.

Specific to IRA incentives, in conjunction with the DEP and other Pennsylvania utilities, the Company plans to identify opportunities where federally funded initiatives through the IRA may complement Act 129 offerings. These programs focus on low-income customers (although not limited to) and thus will reduce low-income participants' required investment (incremental costs). The Company plans to consider complementing its program offerings with the IRA program opportunities throughout implementation of the Phase V Plan as IRA funds are available, to leverage this available funding to further promote customer participation in its programs. The Company will work with the Pennsylvania DEP as they finalize and implement the IRA programs.

The goal will be to collaborate and coordinate with the program administrators to communicate and inform those customers who may be eligible and qualify for Plan rebates and other program opportunities and braided funding incentives, including but not limited to IRA incentives, local gas and water utility programs or incentives, federal, and state programs or rebates, tax credits, and low interest loans, so that they understand the program opportunities and incentives available to them, further encouraging participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. As they are developed and made available, the Company and its contractors will also support customer participation in these complementary programs through education, information and awareness building campaigns and other collaborative opportunities that are identified throughout the Phase V Period.

4.4.2 Discuss how the EDC will highlight the availability of multiple funding sources and provide prospective Act 129 participants information where they can learn more about external funding opportunities. (2025 IO at 190)

As discussed above in Section 4.4.1, the Company will actively seek to identify other available conservation programs and braided funding sources external to its Act 129 offerings, as identified in the Commission's TO, and other programs as they are available and applicable. Relevant external program opportunities and braided funding will be communicated through the Company CSPs, program website, and marketing materials, and program processes. Additionally educating the installation contractors and/or point-of-sale personnel regarding the various program opportunities and braided funding sources is also planned as often the contractors and retail outlets are the ones in direct contact with customers. The Company plans to collaborate with the other program and braided funding administrators to promote and support participation amongst the mutually beneficial programs that align with the Company's Phase V Plan program offerings in an aligned and

efficient manner. Please see FE PA Table 7 below that identifies examples of the types collaborative opportunities currently available as identified in the Phase V Final Implementation Order, at 158, and in TIO at 54.

FE PA Table 7: External Funding

FE PA Table 7: External Funding				
External Program	**Administrator**	**Customer Segment**	**Descriptions of Eligible Technologies**	**Source**
Alternative Energy Portfolio Standards Act Credits	PAPUC Alternative Energy Credit Program	Residential and Commercial	Solar (Tier I), Demand Side Management projects, and Distributed Generations (i.e. CHP) (Tier II)	Home - Pennsylvania Alternative Energy Portfolio Standard Program
LIURP and LIHEAP	EDCs	Low Income Residential Customers	Customer education, Refrigerator/Freezer testing, Electric Water heater Inspections, Weatherization, Energy saving lightbulbs	WARM Program
DEP IRA Programs HER and HEAR	DEP	Residential Customers with a focus on Low Income	Heat Pump Water Heaters, HP Space Heating and Cooling, Electric Stove, Cooktop, Range, Oven, HP Clothes Dryers/Washer Dryer Combo, Electric Load Service Center, Insulation, Air Sealing & Ventilation, Electric Wiring	Penn Energy Savers
DEP Agricultural Energy Efficiency Rebate Program	DEP	Commercial Agricultural	State funding (grants, loans) for energy improvement projects (e.g. EE grain dryers), solar energy, LED lighting, clean fuel vehicles	Agriculture and Farming | Department of Environmental Protection | Commonwealth of Pennsylvania
DEP's Healthy Electrified Commercial Kitchen Rebate Program	DEP	Non profits, higher education, K-12 schools	Variety of combustion free cooking equipment, as well as associated electrical upgrades	
DEP's Reducing Industrial Sector Emissions in PA (RISE PA)	DEP	Industrial Customers	Grants for small, medium and large scale decarbonization projects	
DEP's Solar for All Program	DEP	Low Income Customers	Solar Installations	https://www.pa.gov/agencies/dep/programs-and-services/energy-programs-office/financial-options/energy-accelerator-program/solar-for-all

4.4.3 Propose a process to facilitate Alternative Energy Portfolio Standards ("AEPS") registration for C&I participants of Act 129 programs to register their energy-efficiency projects and take advantage of the elevated AEC pricing. EDCs can design this support in a way that aligns with the needs of its customers and treat the cost of AEPS registration support as a recoverable administrative cost. (2025 IO at 182-184)

In accordance with the AEPS Act, for Tier II Alternative Energy Credits ("AECs") and for solar PV project Tier I credits, the Company plans to promote the availability of and support registrations for C&I participants of its Act 129 programs with applicable eligible energy-efficiency projects. The Company plans to collaborate and coordinate with the DEP and its AEPS program administrator to promote and facilitate the registrations, such as but not limited to, obtaining customers authorization to share and provide project information to the AEPS program administrator.

In more detail, the Company anticipates providing AEPS program information to customers from their eligible projects during its program processes to educate customers on the AEPS program and the potential AECs from eligible demand side management, energy efficiency measures and solar PV projects that are implemented. The Company plans to collaborate and coordinate with the AEPS Program Administrator to establish the promotional, educational, other information and support to be provided such as but not limited to obtaining customer authorization to share information to facilitate the registration of their eligible projects in accordance and alignment with the State's AEPS program.

4.4.4 Describe plans to address health and safety issues that arise in the delivery of Act 129 services. Identify whether any programs will provide health and safety measures or services. Discuss any plans to refer Act 129 participants that could not be treated due to health and safety issues to other program administrators.

The Company plans to coordinate with and refer participants to its LIURP or other external programs for possible eligible remediation of health and safety issues that arise in the delivery of its low-income program offerings if applicable. In addition, while the Company did not explicitly budget for health and savings remediation due to budget constraints, the Company may include health and safety remediations, if necessary, subject to available program budgets and determination that the expenditures will produce justifying meaningful energy savings to the participant.

The Company will also track and report in its Annual Reports the number of homes deferred and referred due to health and safety issues.[26] and any additional requirements for tracking and reporting in accordance with the Commission's FIO or other directives.

4.4.5 Discuss strategies to collect information about dual participation to facilitate accurate reporting on braided funding opportunities and calculation of the "leverage ratio" by

[26] Phase V Final Implementation Order at 168

program. The Phase V Implementation Order defines the leverage ratio as the amount of known external funding for Phase V EE&C

The Company will track and report participation and funding from other external conservation programs by source, as well as calculate the leverage ratio for each program as defined in the TO[27] and the administrative costs associated with the Company's incremental administrative efforts to support the coordination with these programs and braiding of funds.

5. REPORTING AND TRACKING SYSTEMS

5.1 Indicate that the EDC will provide semiannual and annual reports as prescribed in the June 18, 2025, Implementation Order.

The Company will comply with the Commission's reporting requirements as prescribed in the Phase V Implementation Order, including both the semiannual and annual reports. As discussed in Section 4.3.2, the Company plans to continue using the Phase IV T&R CSP and the current T&R System to provide the required reports as prescribed. The System provides the ability to monitor the progress of the various programs being offered, supporting the Company's oversight and administration of the programs, and to generate the reports as required by the Commission.

Standard reports will be updated for the new requirements as outlined in the Final Implementation Order and will be provided as necessary. The format and content will be consistent with that defined by the Commission and the SWE. The System also produces customized reports using a report writing tool. Summaries, dashboards, or other reporting formats will continue to be used by the Company to monitor program performance on an on-going basis.

5.2 Program Tracking Systems:

5.2.1 Provide a brief overview of the data tracking system for managing and reporting measure, project, program, and portfolio activities, status, and performance, as well as EDC and CSP performance and expenditures.

The comprehensive T&R System will report and track activities and results associated with the Company's Phase V EE&C programs. The System has the ability to track a customer through program-specific statuses. The System provides standard status reports both for individual participants and at the program level. Additional enhancements will be made to the System as deemed necessary for Phase V and the additional Phase V Implementation Order requirements, including but not limited to additional reporting requirements for comprehensive program offerings, summer and winter PDR reporting requirements, and as deemed necessary for any future requirements. In addition, the Company will continue to

[27] TO at 55.

utilize SAP[28] enterprise software for financial management and reporting of program costs, including administrative costs associated with braided funding.

5.2.2 Describe the software format, data exchange format, and database structure the EDC will use for tracking participant and savings data. Provide examples of data fields captured.

The T&R System is web-based, allowing for access from any internet connection. The System will exchange data with implementation CSP databases as necessary to gather data to upload key program metrics on a routine scheduled basis (e.g., daily, weekly or monthly) and will ensure data integrity through routine scheduled reconciliation processes. The Company will work with the implementation CSPs and the Company's EM&V consultant on a regular basis to verify the accuracy of data transferred from implementation CSP databases to the T&R System. Not only will this reduce paperwork and minimize data entry, but it will support quality control and allow for easy access to track goal attainment and budget variances. The tracking and reporting system will store various data fields where appropriate, including but not limited to:

- Customer name
- Customer contact info
- Customer type
- Customer ID number
- Account number
- Premise number
- Project/Program name
- Contractor/Retailer
- Measure
- Service address
- Job status
- Completion date
- Install Date
- Measures implemented
- Rate Code
- kWh savings
- kW savings
- Incentive

5.2.3 Describe how CSPs will integrate with the tracking system and the procedures to ensure the upload and exchange of data from CSPs to the EDCs is sound.

During the set-up period of each program, the Company's implementation and evaluation teams will work with the implementation CSP to define the list of data fields that the CSP will send to the Company's T&R System. This Data Mapping Document will include, at a minimum, all the vendor's fields, the Company's fields that they map to, and a definition of what that field is called in the vendor's source system for all the required fields. The

[28] SAP, which stands for System Applications and Products, is FirstEnergy's Enterprise Resource Planning (ERP) software.

CSPs are required to pass this data through an XML interface and to format program participation data as defined by this interface.

A File Transfer Protocol (FTP) process will be established to exchange the data between the implementation CSP and Company's T&R System. During program start-up, a testing process including test files for the data exchange will be completed, and the test data will be validated by the implementation CSP, the Company's T&R System CSP, and the Company's Energy Efficiency Reporting team. Once technical testing is successful, an upload schedule is established, and data uploads will be scheduled on a minimum monthly basis but can be more frequent as determined by the Company to support successful program implementation.

Once production data exchanges begin with each implementation CSP, monthly validation occurs by the Company's Energy Efficiency Reporting team to ensure the data between the implementation CSP's system and Company's T&R System reconcile. Additional QA / QC validations occur for key required fields, missing document attachments where applicable, and kWh and kW reasonability. Any discrepancies that are identified between the implementation CSP's source system and Company's T&R System are reviewed and reconciled on an on-going basis between the implementation CSP and the Company's implementation, evaluation and/or reporting teams as necessary.

5.2.4 Indicate that the EDC will fulfill all quarterly and annual data requests issued by the Commission and its SWE. Describe the level of access and mechanism for access for the Commission and its SWE.

The Company will comply with the Commission's reporting requirements as prescribed in the Phase V Implementation Order, including both the semiannual and annual reports. The Company will contract with the current CSP to leverage the current T&R System for Phase V to provide the required reports, as described in Section 4.3.2. The format and content will be consistent with that defined by the Commission and the SWE. The T&R System is web based, thus requiring an internet connection for access. The System is be designed to allow for varying levels of security-controlled access, and access for others, such as Commission staff and the SWE, will be provided as required.

5.2.5 Describe the cybersecurity procedures the EDC will use to protect the personally identifiable information of program participants.

The Company may gather customer-specific data during the operation of the Phase V Programs and may provide it to its CSPs, the Commission or its contractors, or other parties to support implementation and EM&V of the Company's programs. The Company will also submit non-customer-specific data to the Commission in compliance with reporting requirements, as established by the Commission. Any customer specific data will only be provided after the execution of Non-Disclosure Agreements and Company review and approval of the Commission's and/or third party's cyber and data security protocols. The Company will not share or use customer-specific data for non-utility specific Act 129 programs.

The Company will enforce privacy and data handling policies and procedures for the Phase V Programs that are consistent with FE PA's customer data security protections, the Final Implementation Order, and any applicable Commission regulations and statutory obligations. In the event of any breach of confidentiality by a CSP to deliver the Phase V programs or to evaluate the programs, the Company commits to enforcing the contractual confidentiality requirement. Any breach of security with respect to customers' personal information will be addressed in full compliance with all applicable Pennsylvania laws.

6. QUALITY ASSURANCE AND EVALUATION, MEASUREMENT AND VERIFICATION

6.1 Describe the overall approach to quality assurance and quality control.

During the development of this Plan, the following includes specific steps that the Company took toward quality assurance and quality control:

- Use of qualified and experienced personnel, including the Company's expert consultant, to provide input to the design of the EE&C programs;
- Selection of EE&C measures compliant with the requirements of the PA TRM or otherwise proven in the industry;
- Use of multiple approaches and strategies, and proven technologies where available, to reach both the energy savings and demand reduction targets set for the Company;
- Communication with interested parties, vendors and other stakeholders on the program designs and objectives throughout the program development process; and
- Validation of EE&C program projections and assumptions with the Company's expert consultant and implementation team.

In preparation for the implementation phase of this Plan, the Company intends to contract with experienced implementation CSPs who will provide not only the experience to support successful program implementation but also processes that accurately document and verify participation data to support achieving verified energy savings and peak load reductions – all of which will be subject to audit and review by both the Company's EM&V contractor and the SWE. The Company will also perform, directly or through third-party evaluators, its own quality assurance and control processes, including but not limited to the review and evaluation of CSP systems, in order to ensure the accuracy and reliability of the reported data and savings. Such evaluations will have the following key characteristics:

- Both deemed and custom measures will be included in the evaluation universe;
- The statistically valid sample size may cover a subset or the entire population for a particular measure;
- The frequency and sample size of these evaluations will vary based on the significance of any findings; and
- The control points used in the evaluations will target specific risks associated with the design or implementation of EE&C measures.

6.2 Describe procedures for measure and project installation verification, quality assurance and control, and savings documentation.

EM&V efforts evolve over time and change as programs move from initial roll-out to full-scale implementation. The Company has engaged an experienced EM&V CSP who will develop and implement EM&V processes and procedures. While EM&V plans are written on a program-by-program basis, the Company intends to utilize synergies among programs to reduce redundant work. EM&V plans may be refined over time to include best practices and lessons learned – issues periodically reviewed by the Company and its EM&V CSP. The EM&V CSP will utilize the format required by the SWE for evaluation plans and will include the following topics:

Introduction and Program Background

Includes program description, measures covered, markets targeted, program implementation activities, applicable budgets, and expected program participation.

Evaluation Objectives

The overall objective for the impact evaluation is to quantify and validate the extent of energy saved and demand reduced as a result of a program. Process evaluation is viewed as providing the explanatory depth to improve program processes, better understand market barriers and opportunities, and support identification of opportunities for improving program implementation, including marketing and promotion, delivery, tracking, and verification. Thus, impact evaluation identifies how much of an impact a program has, while process evaluation tells you why. The Company intends to leverage results from both impact and process evaluations conducted throughout the Phase. Used in conjunction with one another, the results at a minimum will inform development of additional QA/QC initiatives, changes to implementation strategies or approaches, and/or improvements to savings documentation to ensure the success of the programs.

Overall Evaluation Approach

The Company will perform processes to meet standards specified in the Evaluation Framework and consistent with the PA TRM. Programs include documentation requirements supporting expected ("ex-ante") impact estimates following protocols defined in the PA TRM. Samples of participant applications are selected for EM&V. After the statistically valid samples of projects are selected, and the implementation CSP provides documentation pertaining to the projects, the first step in the EM&V effort is to review the documentation. Documentation that is reviewed for all projects selected for the sample may include program forms, databases, reports, billing data, logger data, weather data, and any other potentially useful data. The Company will support metering studies independently or in coordination with other EDCs as appropriate.

Program-level gross ex post savings are calculated by applying achieved savings realization rates calculated for the analysis sample to program-level data for reported savings. Realization rates describe the relationship between verified savings and program

forecasted savings estimates. The realization rates are calculated as the ratio of the EM&V CSP's calculated measure savings to the ex-ante reported savings.

Sampling Plan

Residential Programs

Statistically valid sampling of program participants (and in some cases non-participants) will vary among the programs according to participants, measures, and methods of installation. Where appropriate, the sample will be stratified by measure using proportional stratification. The advantage of a proportionally stratified random sample is that greater precision can be achieved than a simple random sample of the same size. Additionally, proportional stratification guards against an underrepresentation of any one particular measure. Sample stratification is particularly useful when there are clear differences in energy savings between each stratum, and when each stratum is relatively homogenous.

Commercial & Industrial Programs

EM&V sampling will occur in stages consistent with program implementation. Projects are added to the program tracking system as they are submitted and accumulate over time. As a result, sample selection is spread over the entire program year.

Stratified sampling is performed to account for skewed distributions of savings and to reduce the sample sizes required to satisfy the desired precision requirements. By developing strata such that the projects within each stratum are relatively homogeneous with respect to expected kWh savings, a smaller sample is required from each stratum in order to arrive at desired precision estimates. When performing sampling for a skewed population, stratified sampling methods are preferred because a group of projects with less variance in expected savings requires a relatively smaller sample size in order to reach a given precision and level of confidence.

Projects with high kWh and kW savings contribute significantly to the variance in expected savings and are included in the sample with certainty. The EM&V CSP will select a site-level ex ante kWh and kW threshold above which all projects at a site will be selected for the sample with certainty. The remaining projects will then be assigned to a kWh and/or kW stratum according to the level of the expected site-level kWh and kW savings and are chosen at random within each stratum.

6.3 Describe the process for collecting and addressing participating customer, contractor, and trade ally feedback (e.g., suggestions and complaints).

Process evaluations will be performed periodically to support program performance. Where applicable, the EM&V CSP may incorporate program manager interviews, participant (and in some cases non-participant) customer surveys, and trade ally surveys. Program manager interviews explore researchable issues and help inform the customer survey design. The interviews identify stated program goals and objectives, assess the effectiveness of the programs' operations relative to the defined program goals and objectives, capture program processes and flows, and explore potential ways to improve

implementation of the programs. Surveys are used to gather data on decision-making criteria and on the attitudes and behavior of decision-makers. Participants are questioned regarding their knowledge of the program, their level of interest in the program, and their reasons for participating, and market or process barriers that could be addressed in the program design or implementation plan.

Throughout the implementation phase of this plan, the Company will obtain additional direct input from various sources, including but not limited to the implementation CSPs, stakeholders and other EDCs for relevant developments, as well as the PUC and the SWE for insights into the evolution of the process.

6.4 Describe any planned market and process evaluations and how results will be used to improve programs.

There is a feedback loop among program design and implementation, impact evaluation, and process evaluation. Program design, implementation, and evaluation are elements in a cyclical feedback process. Initial program design is informed by prior baseline and market potential studies. Ongoing impact evaluation quantifies whether a program is meeting its goals and may raise questions related to program processes and design. Process evaluation tells the story behind how the impact was achieved and points the way toward improving program impacts by providing insight into program operations. Thus, the three elements work together to create a better, more effective program.

The Company's EM&V CSP will conduct process evaluations to identify issues that may require correction, gauge progress toward goals, and measure customer, trade ally, and vendor knowledge and satisfaction with various program features. The evaluations will help identify possible ways to improve implementation of the programs, including potential market or process barriers that could be addressed in the program design or implementation plan.

6.5 Describe strategy for coordinating with the EDC EM&V contractor and the SWE.

A representative from the Company's evaluation team, as well as the EM&V CSP, will attend formal evaluation and/or Program Evaluation Group meetings with the SWE to support development, ensure compliance with statewide EM&V directives, share ideas and suggestions regarding the approach being taken by the Company, and otherwise assist the Company in shaping and performing a prudent and effective evaluation strategy in collaboration and coordination with the SWE and other EDCs. Informal meetings and/or discussions with Company's representatives will also be arranged upon request of the SWE.

Additionally, the EM&V CSP will conduct evaluations on each program included in the Phase V Plan as approved, while coordinating efforts with the SWE to minimize duplication of work. Documentation required by the SWE to fulfill its responsibilities will be provided as requested.

The EM&V planning process will also include the SWE to incorporate where appropriate its advice and consent to enhance EM&V efforts. The EM&V CSP will facilitate ongoing

communications with the SWE and the Company's representatives to ensure a high practicable level of coordination, particularly for any EM&V field activities and other time-sensitive EM&V tasks and processes.

6.6 Describe the approach to incorporating changes to codes and standards which may occur during Phase V of Act 129. (TRM Order at 12-14)

During the planning process, the Company has identified several measures with anticipated efficiency standards upgrades within the Phase V Period. These measures include refrigerators, freezers, clothes dryers and heat pump water heaters. The modeling to calculate efficiency savings and demand reductions assumes current baseline standards until the anticipated date of the upgrade, at which time the modeling assumes the new efficiency standard as the baseline used in calculating savings. During the course of implementation, the Company's EM&V process will ensure that efficiency savings and demand reductions are calculated based on codes and standards consistent with the 2026 TRM and evaluation guidance.

7. COST RECOVERY MECHANISM

7.1 Provide the total allowable EE&C costs based on 2% of 2006 revenue. Confirm alignment with the EDC budget limit specified in the 2025 IO Section A.2.

The Company's Total Allowable Plan Costs pursuant to Act 129 are $390,320,135. This amount reflects the annual amount determined by the Commission in the Phase V Implementation Order (Table 24 at page 232).

7.2 Description of plan to fund the EE&C plan in accordance with 66 Pa. C.S. §§ 1307 and 2806.1. Plan costs include both incentives and administrative costs. Administrative costs may include capital expenditures for any equipment and facilities that may be required to implement the EE&C plan, as well as depreciation, operating and maintenance expenses, a return component based on the EDC's weighted cost of capital, and taxes. (2025 IO at 231) Demonstrate that all such costs are reasonable and prudent considering the goals of Act 129.

Please refer to Section 4.2.3 for the budgeting process used to identify the funding for the Company's Phase V EE&C Plan programs and measures. See Section 7.4 for a complete description of the cost recovery mechanism proposed by the Company. The cost recovery mechanism will include all costs as described in Section 4.2.3, including administrative costs currently incurred by the Company in connection with the development of this Plan. The costs to design, create, and obtain Commission approval of the Company's Phase V EE&C Plan include consultant costs, outside legal fees, and other specific and common costs associated with the development and implementation of the Company's Plan consistent with Commission directives.

7.3 Provide data tables (see Tables 10, 11, 12, 13 and 14).

Tables 10, 11, and 12, 13 and 14 are provided in Appendix B.

7.4 Provide and describe tariff and a Section 1307 cost recovery mechanism, in accordance with 66 Pa. C.S. § 1307, that will be specific to Phase V Program costs. Provide all calculations and supporting documentation.

See Exhibit SRZ-1 and SRZ-2

7.4.1 FirstEnergy should make clear whether cost recovery will occur by rate district in addition to rate class, and the rationale for separating or consolidating rate districts from a cost recovery standpoint.

The Company's *pro forma* tariff supplement for its proposed cost recovery mechanism ("Phase V EE&C-C Rider") is included in FE PA Statement No. 2. Consistent with Act 129, the Company's tariff will contain a Section 1307 cost recovery mechanism for the recovery of all Phase V Energy Efficiency and Conservation program costs. There is also a provision in the rider to allow for a reconciliation adjustment to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period. This component will be shown as a separate E factor (E^2) and will be in place through May 31, 2028.

Under the Company's proposal, the Phase V EE&C-C Rider would remain in effect during the Phase V Period (June 1, 2026 through May 31, 2031).[29] On an annual basis, to be effective June 1 of each year starting June 1, 2026, the Company will file by May 1st of the same year the following information:

- A reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs for the Phase V EE&C-C Reconciliation Period, as adjusted for removal of gross receipts tax. Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates for the period June 1, 2026 through May 31, 2027. Such reconciliations will be provided starting in Program Year 2 for rates to be effective June 1, 2027.
- Any adjustment to the forecasted Phase V EE&C-C revenues anticipated to be billed during April and May of the applicable program year, as adjusted for the removal of Gross Receipts Tax ("GRT"). Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates being proposed for the period June 1, 2026 through May 31, 2027. Such adjustments will be provided starting in Program Year 2 of Phase V.
- The Phase V EE&C budget estimate for the forthcoming Phase V EE&C-C Computational Period by rate class.
- A reconciliation adjustment for any remaining Phase IV EE&C costs that were not collected by the end of the Phase IV Period. This adjustment will only be included in

[29] If the Commission concludes that additional cost-effective energy efficiency and/or demand reduction can be attained post Phase V, the Company anticipates recovering any Phase V costs not recovered by the end of Phase V through a Phase VI cost recovery mechanism. Should there be no Phase VI of the Commission's EE&C Program, the Company reserves the right herein to request through a separate filing approval from the Commission to extend the Phase V EE&C-C Rider beyond the end of Phase V in order to collect any remaining Phase V costs and/or to recover any remaining costs through another surcharge mechanism.

the initial EE&C-C rate that will become effective on June 1, 2026, and the subsequent EE&C-C rate that will be in effect for the period June 1, 2027 through May 31, 2028. The reconciliation process is described in Section 7.6 below.

The Company's proposed Phase V EE&C-C Rider include the corresponding rates to be charged during Program Year 1 of the Phase V Plan. The Company is requesting approval of both the rider and related rates as part of this proceeding. Worksheets demonstrating how these rates were determined are set forth in Exhibit SRZ-2, which is attached to the direct testimony of Stephanie R. Zieger (FE PA Statement No. 2).

As can be seen in the *pro forma* tariff supplement, the Phase V EE&C-C rates are expressed as a price per kWh for the residential, commercial and street lighting classes. The industrial class will be billed based upon the individual customer's Peak Load Contribution ("PLC") kW. The Phase V EE&C-C rates will be calculated and stated separately for the residential, commercial, street lighting, and industrial customer classes. The rate schedules that comprise the residential, commercial, street lighting, and industrial customer classes are identified on page 1 of the Company's Phase V EE&C-C Rider.

The Phase V EE&C-C rates to be billed to the residential, commercial, street lighting, and industrial classes consist of three principal components. The first is the EEC_C or "current cost" component; the second is the reconciliation component or "E" factor for Phase V costs; and the third is a second "E" Factor (E^2) for collection of Phase IV related costs remaining to be collected after May 31, 2026.

The EEC_C component represents the recovery of estimated costs to be incurred during the Annual Computation Period or "Computational Period," in which the Phase V EE&C-C rates will be in effect for each customer class. As shown on the second and third pages of the Company's Phase V EE&C-C Rider tariff supplements, the EEC_C component is customer class specific. The costs included in each customer class's EEC_C rate are identified as EEC_{Exp1}, EEC_{Exp2}, and EEC_{Exp3}.

- EEC_{Exp1} represents customer class specific costs that will be associated with the customer class specific EE&C programs as approved by the Commission. These costs will also include an allocated portion of any common costs, such as administrative and marketing costs, that will be incurred by the Company.
- EEC_{Exp2} represents the incremental administrative start-up costs incurred by the Company, allocated to each customer class, in connection with the development of the Company's Phase V EE&C Plan and related programs in response to the Commission's orders and guidance in its Phase V Implementation Order. These costs are incurred to design, create, and obtain Commission approval of the Company's Phase V EE&C Plan, and include, but are not limited to, consultant costs, outside legal fees, and other specific and common costs associated with the development and implementation of the Company's Phase V EE&C programs in compliance with Commission directives.

- EEC_{Exp3} represents the costs allocated to each customer class for the funding of the Commission's statewide evaluator contract. These costs are not subject to the 2% spending cap imposed by Act 129.[30]

The E-factor component of the Company's residential, commercial, street lighting, and industrial class specific Phase V EE&C-C rates represents a reconciliation of actual Phase V EE&C program costs incurred by customer class to actual Phase V EE&C revenues billed by customer class on a monthly basis. This monthly reconciliation by specific customer class will result in either an over-collection of costs by customer class (revenues billed, excluding GRT, greater than actual costs) or an under-collection by customer class (revenues billed, excluding GRT, less than actual costs). The E-factor component will be applied on a customer class specific basis.

The second E-factor component ("E2") is a reconciliation adjustment that will be in effect through the determination of rates to be effective June 1, 2027, in order to collect any remaining Phase IV Period costs not recovered prior to the end of the Phase IV Period. The remaining Phase IV Period costs will continue to be reconciled by customer class, at the Rate District level.

The Phase V EE&C-C Rider will include a reconciliation process that will calculate annual over-or under-collection by rate class.

All Plan costs (net-of-tax) and revenues included in the Company's EE&C revenues will be excluded from distribution base rate treatment and subject to Commission review and audit. Further, to the extent that the Company is reimbursed through the Phase V EE&C-C Rider for Company-owned property, such reimbursement will be treated as a contribution-in-aid-of-construction resulting in a net-of-tax reduction in amounts capitalized for those assets. As a result, these costs will be excluded from rate base in determining future distribution base rate case revenue requirements.

7.5 Describe how the cost recovery mechanism will ensure that measures are financed by the same customer class that will receive the direct energy and conservation benefits.

Consistent with the Phase V Implementation Order and Act 129, the Company's proposed Phase V EE&C-C Rider will permit the Company to bill annual, levelized Phase V EE&C-C rates on a per kWh or kW basis, as applicable to all residential, commercial, street lighting, and industrial customers. Throughout the Phase I, II, III, and IV Periods, the Predecessor Companies have had in place a tracking and reporting system and related processes and procedures, all of which have proven to be effective in tracking program specific costs during these earlier phases of the Commission's EE&C Program. The Company will continue to utilize this system and related processes and procedures to track customer participation in each program, such that cost allocations are done in a manner that ensures that there are no cross subsidies. The rates will be calculated specifically for each customer class to recover the costs of this plan as approved by the Commission and

[30] Phase V Implementation Order at 235.

in compliance with 66 Pa.C.S. § 1307. Coupled with the reconciliation provisions by customer class included in the Company's proposed Phase V EE&C-C Rider, the Phase V EE&C-C rates will provide full, equitable, and timely cost recovery of actual EE&C program costs incurred by the Company for each customer class's available EE&C programs as approved by the Commission in this proceeding.

7.6 Describe how Phase V costs will be accounted for separately from costs incurred in prior phases.

Because the rider filings are generally filed with the Commission on May 1st of each year to be in effect on June 1st of that same year, the Phase IV costs will be reconciled in two distinct steps. The first step will reconcile the total actual recoverable Phase IV Plan expenditures incurred through March 31, 2026, to the actual Phase IV Plan revenues collected through March 31, 2026. Since the Phase IV Rider will end on May 31, 2026, the result of the Phase IV reconciliation through March 31, 2026, will appear as a separate line item in the Phase V EE&C-C Rider, which will go into effect on June 1, 2026. The second step will account for all actual Phase IV revenues and expenses that are realized after April 1, 2026, in a final reconciliation. The final over/under collection that results from this reconciliation will also be included as a separate line item in the Phase V EE&C-C rate calculation that will be effective on June 1, 2027.

8. COST EFFECTIVENESS

8.1 Provide in table format the values contained in the Outputs tab of the Avoided Cost Calculator. Additionally, a completed copy of the Avoided Cost Calculator should be provided with the filing. FirstEnergy should prepare and submit a single avoided cost forecast for FirstEnergy PA that combines values for the four legacy EDCs. (TRC Test Order at 99-100) Discuss any sensitivities or key considerations associated with the forecast of avoided costs.

The PA TRC Order included a companion Avoided Costs Calculator ("ACC") tool. The ACC was provided by the SWE to develop the avoided energy and capacity costs for the PA TRC test calculations. This calculator also includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standard ("AEPS") within the avoided energy cost calculations and avoided natural gas. The Company used the ACC to develop the Phase V forecasts of avoided costs used in the cost-effectiveness testing of the EE&C Plan and programs. [31]

In accordance with the PA TRC Order, the Company completed the ACC for each FE PA Rate District and aggregated the results for cost-effectiveness testing of the Company's Plan. See Exhibits ACC-Met Ed, ACC-Penelec, ACC-Penn Power, and ACC-West Penn for a complete ACC for each of the FE PA Rate District. Also see Exhibit ACC-FE PA for the weighted averaging calculation of the FE PA Rate Districts, as prescribed in the PA

[31] Note that the SWE issued guidance memos with direction on updates to the ACC, (August 29, 2025 PA SWE Memo Use of the Avoided Cost Calc Q and A) and September 17, 2025 SWE Guidance Memo on TRC Order Avoided Cost Calculator.". The Company included these updates to the ACC.

TRC Order at 100. ACC – FE PA also provides the weighted average FE PA avoided cost values consistent in format with the output tabs in the ACC, for both non low-income and low-income programs.

The sensitivities associated with the forecast of avoided cost depend largely on economic conditions, technological advancements, and policy decisions that could affect fundamental assumptions as prescribed in the Commission's TRC Order. Factors such as inflation, customer demand, technological developments (e.g. as with renewable energy and storage solutions), economic downturn, etc., could have significant impacts on the actual avoided costs, particularly for avoided energy, avoided capacity, avoided AEPs costs, and DRIPE effects as assumed in the ACC model.

8.2 Confirm the use of a 3% real discount rate and a 5% nominal discount rate. (TRC Test Order at 15)

The Company used a 3% real discount rate in its calculations pursuant to the PA TRC Order and a 5% nominal discount rate where appropriate.

8.3 Explain and demonstrate how the proposed plan will be cost-effective as defined by the TRC Test specified by the Commission. (TRC Test Order at 17)

The projected savings generated and evaluated through this Plan are based upon the requirements and guidance of the PA TRM, the PA TRC Order, and other sources, which have been used in developing the key inputs to the analysis of the programs and measures proposed in this plan. See Appendix C, FE PA Table C-2 for the Measure Assumptions including other sources relied on in the Company's modelling.

The PA TRC test considers the combined effects of this Plan on both participating and non-participating customers. The sum of costs incurred by both the Company and any participating customers were used to calculate the costs. The benefits calculated in the PA TRC test include the avoided costs of supplying electricity; including avoided electric energy, avoided generation, transmission, and distribution capacity costs, price suppression effects on both energy and generation capacity (DRIPE), fossil fuel and water savings, and operations and maintenance benefits as prescribed in the PA TRC Order.

Avoided costs are calculated using the ACC tool as set forth in the PA TRC Order. The calculator developed by the SWE executes the methodology to develop avoided energy supply costs, including AEPS compliance, avoided capacity costs including generation, transmission, and distribution, and avoided natural gas for the PA TRC calculations. The energy prices were calculated by the ACC using futures prices quoted by the Intercontinental Exchange ("ICE") on August 21, 2025. Other inputs to the ACC were as provided or prescribed in the PA TRC Order.

Avoided operation and maintenance costs were included as a benefit where quantified in the PA SWE database. Additionally, any measures that produced "reasonably

quantifiable" savings in fossil fuel and water were also included as a benefit, as prescribed in the PA TRM and TRC Orders.

The Company used the line loss factors as provided in Table 1-5 of the PA TRM.

The Company escalated cost projections by the 2% inflation rate and included the application of any additional escalation as directed by the Commission in the PA TRC Order.

The total benefits were then calculated using the projected measure kWh and kW net verified savings multiplied by the assumed number of measure units and the avoided capacity and energy costs. The value of the benefits per year was then discounted by taking a Net Present Value ("NPV") over the measure lifetime using 3% real discount rate (5% nominal discount rate).

On the costs side, the PA TRC test includes the costs of the various programs incurred by the Company and the participating customers, including program administration and overhead costs (i.e., treated as a PA TRC cost regardless of whether the labor, materials, and other fees are incurred by participating customers, EDC staff, a CSP, or evaluation contractor) and incremental customer costs. The cost of kits and shipping costs, as well as directly installed equipment and labor costs are treated as incentives, as directed by the PA TRC Order, at 74. Any administrative costs incurred to support the braiding of funds are classified as incentives as directed by the Final Implementation Order at 168.

Program costs are budgeted by year, but operation and maintenance costs are based on measure life and are discounted using NPV back to the program year installed.

The Company also included estimated NTG ratios and realization rates based on previous program evaluations, consultant input or other industry experience in planning and in performing cost-effectiveness calculations on a net basis as prescribed in the PA TRC Order. NTG ratios depend on assumptions for effects from free ridership, spillover and rebound effects. Estimates for these factors are difficult to quantify and can change over time. The SWE acknowledges this in its 2011 report: "NTGRs [Net to Gross ratios] based on spillover, free ridership factors, etc. can represent oversimplifications that are highly dependent upon scale, program implementation dynamics, and technology." [32] Methods for measuring NTG ratios range from inexpensive surveys to more complex econometric modeling. Inherent issues with surveying such as biased and subjective responses, identifying correct respondents, etc., create uncertainty in the resulting values. While the econometric modeling may result in more accurate results, it is expensive, complex, and thus not typically performed on an annual basis. This leads to results that do not reflect any changes over time, such as economic or technological changes, participant cost, etc. The SWE further states that "[t]he challenge of interpreting the NTG studies and converting study results and observations into NTGR is a complex process riddled with

[32] *Net Savings: An Overview, GDS Associates, Inc., Nexant & Mondre Energy, October 19, 2011*

uncertainty and subjective judgment."[33] Therefore in the evaluation of any TRC results that incorporate NTG ratios, the speculative nature of the ratios should be recognized.

The results of the PA TRC test as described above are presented in Tables 1 & 14 located in Appendix B of this Plan and are expressed as both a net present value and a benefit-cost ratio and on both a net and gross basis.

8.4 Provide TRC data tables on a gross and net TRC basis. See Tables 14, Gross and Net versions

See Appendix B, Tables 14, for the PA TRC test results of the Company's Plan and programs on both a gross and net TRC basis.

9. PLAN COMPLIANCE INFORMATION AND OTHER KEY ISSUES

9.1 Plan Compliance Issues

9.1.1 Describe how the plan provides a variety of energy-efficiency and conservation measures and will provide the measures equitably to all classes of customers in accordance with the 2025 IO.

As demonstrated throughout this Plan, a variety of program components and measures are being offered to each customer class, with at least one comprehensive program for the residential and non-residential customer classes. As discussed in detail in Section 1.1 the Phase V Plan includes a comprehensive portfolio of program offerings for the residential, small commercial and industrial, large commercial and industrial, and low-income sectors. The Phase V Plan includes program measures that will target all customer sectors to engage customers, provide energy efficiency education, and provide information regarding program services and opportunities upon which they can act. The Phase V Plan incorporates a variety of measures that offer a broad range of measures and services and incorporates both near-term and longer-term energy saving opportunities for customers, including single and prescriptive measures, multiple prescriptive and custom measures, direct install, and comprehensive whole building and energy management solutions. The residential, low-income and commercial and industrial programs are also designed to serve multifamily buildings. As a result, the Phase V Plan was designed to provide opportunities for all customer classes to participate in EE and PDR programs. And the Phase V Plan relies on experienced outsourced CSPs and leverages prior experiences and a variety of delivery channels that will support customer participation across all classes of customers.

Collectively, the proposed programs across all sectors cover all the major energy-consuming devices in the home, building, or business, thus increasing the opportunity for more customers to participate and benefit from one or more programs. Furthermore, the proposed programs promote and support comprehensive whole home/whole building/comprehensive solutions for both the residential and non-residential customer

[33] *Net Savings: An Overview, GDS Associates, Inc., Nexant, & Mondre Energy, October 19, 2011.*

classes. Section 1, FE PA Table 1 presents a summary description of the programs by sector, and detailed descriptions and a listing of measures are provided in Section 3.

9.1.2 Provide a statement delineating the way the EE&C plan will achieve the requirements of the program under 66 Pa. C.S. §§ 2806.1(c) & (d).

The Phase V Plan has been developed to incorporate a comprehensive set of program components and measures and a variety of delivery channels that, based on known conditions, are designed to allow the Company to achieve the goals for energy and coincident demand reductions as set forth in the Phase V Implementation Order. The Phase V Plan also includes contracting with experienced CSPs and includes implementation flexibility including the ability to shift budgets between sectors and programs, adjust measures and adjust incentives within ranges, that combined with the Company's active oversight of the programs will allow it to make adjustments to timely react to changing market and economic conditions and other risks that arise over the Phase V Period. Taken collectively, the design of the Company's Plan improves the ability of the Company to achieve its goals within the Phase V budget. See Appendix B Tables 2 and 3 for the projected energy and demand reductions by each year and in total and Appendix B, Table 4 for Demand Savings by winter/summer, for the Phase V Plan.

9.1.3 Provide a statement delineating how the EE&C plan will achieve the low-income requirements prescribed in the 2025 IO. Additionally, describe any EDC plans to harmonize the Act 129 program delivery with low-income usage reduction programs and other external energy-efficiency, conservation, and healthy housing programs (such as the weatherization assistance program).

There are two low-income targets more fully described in the Phase V Implementation Order. The first requires the Company to obtain a minimum amount of its consumption reduction requirements from programs specifically targeted to the low-income sector or low-income participation in multifamily housing. The second low-income target requires that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG, in proportion to that sector's share of the total energy usage in the EDC's service territory.[34] FE PA Table 8 below provides the Low-Income targets established in the Phase V Implementation Order:

[34] 66 Pa. C.S. § 2806.1(b)(1)(i)(G)

FE PA Table 8: Phase IV Low-Income Savings Targets

FE PA Table 8: Phase V Low-Income Savings Targets		
EDC	Proportionate Number of Measures (%)	Low Income Savings Target (MWh)
FE PA	9.33	86,913

As discussed in detail in Section 1.1 and 3.2.1, the Phase V Plan includes a comprehensive suite of program components and measures within the Low-Income Energy Efficiency Program and for low-income participation in multifamily housing that are collectively designed to achieve the consumption reduction requirements.

The Low-Income Energy Efficiency Program outlined in this Phase V Plan will serve a dual purpose of contributing to Act 129 goal attainment and minimizing the percentage of low-income household income that is devoted to energy costs. Basic, enhanced, and comprehensive services and education will be offered in the low-income portfolio to help low-income households to save energy and have more control over energy spending. The Low-Income Energy Efficiency Program includes a variety of program services, delivery channels, and vendors to support customer outreach and engagement, education, and participation to achieve energy savings in low-income households. The program includes direct or targeted offerings that engage customers and serve as a portal for other program offerings. The Company will also continue to coordinate the Low-Income Energy Efficiency Program with the Company's existing LIURP. LIURP has offered comprehensive energy efficiency services to eligible Pennsylvania households for years. This aspect of the Phase V Plan continues to enhance and accelerate the deployment of services to LIURP-eligible households under the Company's Phase V Plan.

Appendix B, Table 2 provides the projected savings from the Low-Income Energy Efficiency Program. Appendix C, FE PA Table 1 provides the projected savings from Multifamily program components of the Small and Large, C&I Energy Solutions programs that will both be collectively implemented with the residential Multifamily program components and targeted for low-income participation. The combined projections from the Low-Income Energy Efficiency Program and the Multifamily program components of the Small and Large, C&I Energy Solutions programs exceeds the consumption reduction requirements from the low-income sector.

The requirement that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the FPIG in proportion to that sector's share of the total energy usage in the EDC's service territory has been achieved by including measures that number at least proportional to low-income sector energy usage in the program targeted directly to low-income customers. Appendix B, Table 8 and FE PA Table 9 below lists a total of 48 measures that are provided directly or targeted to Low-Income customers through the Phase V Plan. The measures listed in Table 8 in Appendix B include a total of

135 additional non-low-income measures (without double counting measures offered in multiple sectors or measure tiers) resulting in a total of 183 measures, of which low-income represents 26%, significantly greater than the 9.33% target.

FE PA Table 9: Residential Low-Income WARM Measures

Available to Low-Income Customers
Air Sealing
Appliance Timers
Caulk
Central Air Conditioner
Clothes Washer
Dehumidifier
Door Repair or Replacement
Duct Insulation
Duct Sealing
Electric Baseboard Heater Replacement
Electric Clothes Dryer
Electric Dryer Venting Repair or Replacement
Electric Ductless Mini-Split Heat Pumps
Electric Furnace
Electric Heat Pumps
Electrical Repairs
Energy Education
Faucet Aerator – Energy Saving
Freezer Replacement
Health and Safety Measures
Heat Pump Water Heater
Heated Waterbed Mattress Replacement
HVAC System - Filter Replacement and Tune-Up
Insulation (attic, wall, floor, band joist, basement, crawl space)
LED Nightlight
LEDs
Pipe Insulation
Plumbing Repairs
Refrigerator Replacement
Roof Coating
Room Air Conditioner Cover
Room Air Conditioner Replacement
Room Thermometer
Sash locks
Shower Head – Energy Saving
Smart Power Strip
Storm Windows & Doors
Tank Temperature Set-Back
Thermostat Replacement and Repair
Thermostatic Shower Valves
Vapor Barrier
Vents (Roof, Gable, Soffit and Ridge)
Weather Stripping
Window Quilt / Tint

The Company has been harmonizing, coordinating, and leveraging its LIURP and Act 129 low-income offerings and funding, and it intends to continue those efforts during Phase V as follows:

- The Company's Act 129 low-income direct install programs fully harmonize with the LIURP by using the same website for both programs and conducting joint outreach and marketing; and
- The Company's LIURP contractors are engaged to complete additional projects or measures funded by the Act 129 low-income programs for income-qualifying homes. This allows both programs to coordinate funding sources and more comprehensively serve the low-income customers' homes than would have occurred if each program worked independently.

In addition, the Company's Act 129 low-income programs further harmonize and coordinate with the LIURP offerings by:

- Referring customers whose incomes are above 150% of FPIG (and do not qualify for Act 129 low-income programs) to LIURP;
- Referring customers to LIURP to leverage LIURP funding; and
- Referring customers who do not qualify for the LIURP program to the Company's Act 129 low-income programs for service.

Harmonizing, coordinating, and leveraging both Act 129 low-income and LIURP offerings and funding allow the Company to serve the needs of its unique income-qualifying customers comprehensively and efficiently.

In addition to coordination with the LIURP offerings, the Company also coordinates on the delivery of its low-income programs with other external programs. Some examples of this coordination include the following:

- Vendors who implement low-income programs are required to use commercially reasonable efforts to coordinate program services and installations with other conservation programs such as the PA State Weatherization Assistance Program, and NGDC located within the Company's service territory.
- A Company representative participates in a Pennsylvania Weatherization Advisory Council's Coordination Committee, in which barriers to coordination of all low-income programs have been identified and are being resolved by the group.
- The Company's program website allows efficient coordination through the on-line application process by obtaining the customer's NGDC information and the customer's sign off allowing the Company to share customer information. The customer information is then automatically sent to the appropriate NGDC in an e-mail at the same time the application is received by the Company.
- Existing relationships are leveraged with the overlapping NGDCs and have agreed upon joint procedures.

The Company believes that efforts to coordinate both with the LIURP and with external programs has been successful to date, and plans to continue these efforts.

9.1.4 Describe how the EDC will ensure that no more than two percent of funds available to implement the plan shall be allocated for experimental equipment or devices. Describe any planned pilot programs in Phase V and list the key research questions and metrics that will be used to assess the viability of each pilot program.

The Phase V Plan focuses on encouraging the accelerated adoption of commercially available technologies for achieving the energy efficiency and demand response requirements in a cost effective manner. See Table 8 in Appendix B for the measures included in the Phase V Plan and their eligibility requirements.

While the Phase V Plan includes no budgets for pilots or experimental equipment or devices, recognizing the five-year duration of Phase V, the EE&C Team plans to continue collaborating with the EPRI and may participate in research projects, demonstrations, and/or pilots on technological advancements in efficient measures that are eligible under the Phase V Plan, and within approved program budgets but at less than two percent of the total funds available to implement the plan. To ensure that the Company does not exceed this limitation, the EE&C Team will continuously monitor costs incurred for the implementation of various aspects of the Company's EE&C Plan and will ensure that no more than two percent of the funds available to implement the plan is spent on any such initiatives.

9.1.5 Describe how the plan will be competitively neutral to all distribution customers even if they are receiving supply from an EGS.

All programs are available to retail customers who receive distribution electric service from the Company regardless of that customer's source of generation service and, thus, will be offered on a non-discriminatory basis. Likewise, the Phase V EE&C-C tariff will collect the costs from like customers, thereby assuring the Phase V Plan is competitively neutral.

9.1.6 If the plan includes midstream delivery of non-residential lighting, include a description of how participating distributors will document that the replaced lighting equipment is not LED.

The Company will work with participating distributors to incorporate into the application process documentation that the customer equipment being replaced is not LED.

9.2 Other Key Issues:

9.2.1 Describe how this EE&C plan will lead to long-term, sustainable energy-efficiency savings in the EDC's service territory and in Pennsylvania.

The Company's Phase V Plan is designed to: (i) elevate customers' awareness of energy efficiency opportunities so that they become more conscious of their choices involving energy usage; and (ii) establish ongoing energy saving habits through market transformation by first providing introductory products and educational materials and then moving customers from behavioral and basic measures to more sophisticated and comprehensive energy efficiency options. In addition, many measures installed as a result

of the Phase V Plan have lengthy lifetimes. The measures will save energy for years to come, bridging customers to even better and more efficient technologies as they become available over time. Thus, the EE&C Plan leads to long-term sustainable energy efficiency savings through the ongoing customer education and awareness and participation by customers.

9.2.2 Describe, by sector, how the EDC will address consumer education for its programs.

A concurrent marketing and educational campaign are essential to the success of these programs. The Company will continue to market its existing programs and measures to build awareness and interest in both the existing programs and the programs proposed under the Phase V Plan. Since the Phase V Plan leverages many of the programs currently being offered through the Phase IV Plan, and the response to many of the Phase IV programs has been positive, the Company plans to leverage and build upon the marketing and education strategy and its experience for Phase V.

Once the Commission approves the Phase V Plan, the Company will pursue educational and marketing efforts to build awareness and interest in the new or revised program offerings. Included in each program's budget is a marketing budget for promoting the offerings for each year of the Phase V Plan to ensure adequate outreach for achieving program goals. The Company's implementation CSPs will be required to develop and execute a marketing plan that will include a requirement that the CSP has educational expertise in social marketing and consumer behavior change. In addition, the Company assigns program managers to oversee the implementation of the program including customer communication and education efforts, in coordination with the Company's communications staff. This staff will be tasked with continually evaluating and, when appropriate, modifying the energy efficiency education messages and delivery strategies.

The Company and/or the implementation CSPs will develop educational materials to be distributed during customer interactions in specific programs. These materials may include promotional materials, equipment fact sheets, installation and maintenance guides, and other materials.

The Company's main program website, energysavepa.com, contains information and tools to support customer energy-efficiency strategies, including information regarding existing programs. The Company will increase the information available on its website for the Phase V Plan by posting customer educational and marketing materials developed for its Phase V programs, components and measures.

9.2.3 Describe how the EDC will provide the public with information about the results from the programs.

The Company provides reports to the Commission as part of its regular reporting responsibilities, which are then posted on the Commission's website. These reports will also be posted on the Company's website for review by the public.

10. APPENDICES

A. Approved CSP contract(s) or CSP contract terms and conditions.

The Commission approved the Company's Act 129 Conservation Service Provider ("CSP") Contracts RFP Procedure for FirstEnergy's Phase V EE&C Plan, filed with the Commission on August 25, 2025 pursuant to the Act 129 Phase V Energy Efficiency and Conservation Program Final Implementation Order, by Secretarial Letter issued September 8, 2025 at Docket No. M-2025-3052826. The Company's proposed CSP contract for EM&V services for the Phase V Plan is being filed contemporaneously with this Plan as discussed in more detail in Section 4.3.2.

B. Calculation methods and assumptions. Describe methods used for estimating all program costs, including administrative, marketing, and incentives costs; include key assumptions. Describe assumptions and present all calculations, data and results in a consistent format.

Appendix B:
PUC Tables 1-15

Table 1: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Sector	Total Discounted Lifetime Costs ($000)	Total Discounted Lifetime Benefits ($000) [3]	Present Value of Net[1] Benefits ($000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate Residential (exclusive of Low-Income)[2]	$236,618	$255,609	$18,991	1.1
Residential Low-Income	$69,638	$80,373	$10,735	1.2
Small Commercial & Industrial	$366,833	$427,391	$60,558	1.2
Large Commercial & Industrial	$381,610	$401,116	$19,507	1.1
Total Portfolio	$1,054,699	$1,164,489	$109,790	1.1

1 "Net" refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

2 The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

3 Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

Table 2: Summary of Portfolio Energy Savings

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh [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
Baseline[1]	54,975,912		54,975,912		54,975,912		54,975,912		54,975,912		54,975,912	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	55,429	491,758	67,497	517,939	59,440	495,503	57,241	422,680	52,376	404,240	291,982	2,332,119
Residential Low-Income Sub-Sector – Projected Incremental Savings[5]	13,992	116,978	15,182	118,168	14,773	117,759	13,488	114,350	13,050	113,912	70,486	581,167
Small C&I Sector – Projected Incremental Savings	72,447	972,748	72,447	972,748	72,447	972,748	72,447	972,748	72,447	972,748	362,235	4,863,741
Large C&I Sector – Projected Incremental Savings	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	394,329	5,585,577
EE&C Plan Total – Projected Incremental Savings	220,734	2,698,599	233,992	2,725,970	225,526	2,703,125	222,041	2,626,893	216,739	2,608,015	1,119,031	13,362,603
EE&C Plan Total – Projected Cumulative Savings[6]	220,734	2,698,599	454,725	5,424,570	680,252	8,127,694	902,293	10,754,588	1,119,031	13,362,603	1,119,031	13,362,603
EE&C Plan Total – Percentage of Target to be Met[2]	20%		41%		62%		82%		102%		102%	
Estimated Phase IV Carryover Savings[3]											0	
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	220,734		233,992		225,526		222,041		216,739		1,119,031	
Cumulative Percent Reduction from Baseline	0.4%		0.8%		1.2%		1.6%		2.0%		2.0%	
Commission-Identified Goal											1,097,605	

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

2 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

3 The Phase V Implementation Order limits energy carryover to 20% of an EDC's Phase V compliance target.

4 MWh saved are on a gross-verified basis.

5 Per the Phase V Implementation Order, the low-income savings target includes savings from programs solely directed at low-income customers or low-income-verified participants in multifamily housing programs. For the Company, this includes the Low-Income Energy Efficiency Program as well as the Multifamily component of the Commercial & Industrial Energy Solutions Programs, Small and Large, under which the Company projects savings of approximately 17,600 MWh from low-income customer participation, which combined with the Low Income Energy Efficiency Program exceeds its low-income savings target.

6 1st-Year MWh-Total for the EE&C Plan Total – Projected Cumulative Savings value is the result of a formula correction

Table 2a: Summary of Portfolio Energy Savings and Spending (FirstEnergy ONLY)

FirstEnergy Rate District [2]	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh [1]	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)
Met-Ed	61,770	$22,646	65,537	$22,123	63,173	$21,922	62,237	$21,273	60,744	$21,371	313,461	$109,334
Penelec	55,720	$20,428	58,690	$19,812	56,228	$19,512	55,096	$18,832	53,575	$18,848	279,310	$97,432
West Penn Power	83,354	$30,559	88,573	$29,899	85,578	$29,697	84,377	$28,840	82,490	$29,021	424,372	$148,017
Penn Power	19,889	$7,291	21,193	$7,154	20,547	$7,130	20,331	$6,949	19,929	$7,011	101,888	$35,536
FirstEnergy PA Total	220,734	$80,924	233,992	$78,988	225,526	$78,262	222,041	$75,894	216,739	$76,251	1,119,031	$390,320

1 MWh saved are on a gross-verified basis.

2 Annual Rate District level energy savings and spending are based on the Company's Plan projections and allocated to the Rate District level based on its most recent sales forecast dated June 2025

Table 3: Summary of Portfolio Demand Savings

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW [4]	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
Baseline[1]	9,515	9,515	9,515	9,515	9,515	9,515
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Annual Savings	10.2	12.2	11.3	10.0	8.4	52.1
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	3.1	3.1	3.2	3.0	2.8	15.1
Small C&I Sector – Projected Incremental Annual Savings	10.3	10.3	10.3	10.3	10.3	51.3
Large C&I Sector – Projected Incremental Annual Savings	10.7	10.7	10.7	10.7	10.7	53.5
Coincident Demand Reduction From EE Subtotal	**34.2**	**36.3**	**35.4**	**34.0**	**32.1**	**172.0**
Residential Load Shifting - Projected MW Savings	15.1	15.8	16.7	17.5	18.4	16.7
Small C&I Sector Load Shifting – Projected MW Savings	2.0	2.1	2.1	2.1	2.2	2.1
Large C&I Sector Load Shifting – Projected MW Savings	2.2	2.2	2.3	2.3	2.3	2.3
Daily Load Shifting Subtotal	**19.4**	**20.1**	**21.0**	**22.0**	**22.8**	**21.0**
Cumulative Projected Compliance Savings[2]	**38.1**	**78.4**	**118.0**	**156.4**	**193.0**	**193.0**
Cumulative EE&C Plan Total – Percentage of Target to be Met[3]	20%	41%	62%	82%	101%	101%
Estimated Phase IV Carryover Savings [5]						**0**
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	**38.1**	**78.4**	**118.0**	**156.4**	**193.0**	**193.0**
Cumulative Percent Reduction from Baseline	0.4%	0.8%	1.2%	1.6%	2.0%	2.0%
Commission-Identified Goal[1]						191.0

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

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

3 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

4 MW saved are on a gross-verified basis.

5 50% of any excess Phase IV demand reduction can be claimed as carryover.

Table 4: Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW [1]	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW
Coincident Reduction from EE - Residential	15.6	11.0	17.6	13.0	16.8	12.2	15.7	10.4	13.8	8.5	79.4	55.0
Coincident Reduction from EE - Non-Residential	25.1	16.9	25.1	16.9	25.1	16.9	25.1	16.9	25.1	16.9	125.3	84.3
Daily Load Shifting - Residential [3]	12.4	17.8	12.7	18.8	13.3	20.1	13.9	21.2	14.5	22.2	13.3	20.0
Daily Load Shifting - Non-Residential	4.2	4.3	4.2	4.4	4.3	4.4	4.3	4.5	4.4	4.5	4.3	4.4
Total											222.4	163.7
Phase V Peak Demand Reduction Target											191.0	
Percentage of Goal In Season [2]											116%	86%

1 MW saved are on a gross-verified basis, and MW are at the system-level.

2 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year. The cells with the percentage of goal in each season (M12 and N12) will appear green if this condition has been met.

3 Daily load-shifting savings average across the phase, EE sums across the phase.

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	$000	%	$000	%	$000	%	$000	%	$000	%	$000	%
Residential Market Rate	$23,305	29%	$23,384	30%	$23,038	29%	$20,692	27%	$20,885	27%	$111,305	28.5%
Residential Low-Income	$10,618	13%	$10,408	13%	$10,458	13%	$10,383	14%	$10,287	13%	$52,154	13.4%
Small C&I	$22,916	28%	$22,306	28%	$22,320	29%	$22,346	29%	$22,366	29%	$112,254	28.8%
Large C&I	$19,272	24%	$18,843	24%	$18,846	24%	$18,863	25%	$18,871	25%	$94,694	24.3%
Common Costs	$4,814	6%	$4,047	5%	$3,601	5%	$3,610	5%	$3,843	5%	$19,913	5.1%
Total Portfolio Budget [1]	**$80,924**	**100%**	**$78,988**	**100%**	**$78,262**	**100%**	**$75,894**	**100%**	**$76,251**	**100%**	**$390,320**	**100%**
SWE Cost[2]	$800		$800		$800		$800		$800		**$4,000**	

1 Cells with total percentages in row 11 will be green when the totals are above 99.9% and below 100.1%. All of these cells should be green once filled out to ensure correct cell values.

2 Company Assumption Based on PH IV allocation of existing SWE contract

Table 6: Program Summaries

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) [2]	
Market Rate Residential Programs (exclusive of Low-Income)	Residential Energy Solutions Program	Residential	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	291,982	2,332,119	68.8	26%	36%
								0%	0%
								0%	0%
	Totals for Residential Sector				291,982	2,332,119	68.8	**26%**	**36%**
Residential Low-Income Programs	Low Income Energy Efficiency Program	Residential	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.	17	70,486	581,167	15.1	6%	8%
								0%	0%
								0%	0%
	Totals for Low-Income Sector				70,486	581,167	15.1	**6%**	**8%**

Table 6: Program Summaries

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) [2]	
Small C&I Programs	C&I Energy Solutions Program - Small	Small C&I[3]	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissiong and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	362,235	4,863,741	53.4	32%	28%
								0%	0%
								0%	0%
	Totals for Small C&I Sector				362,235	4,863,741	53.4	**32%**	**28%**
Large C&I Programs	C&I Energy Solutions Program - Large	Large C&I	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissiong and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	394,329	5,585,577	55.8	35%	29%
								0%	0%
								0%	0%
	Totals for Large C&I Sector				394,329	5,585,577	55.8	**35%**	**29%**
Totals for Plan [1]					1,119,031	13,362,603	193.0	**100%**	**100%**

1 Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

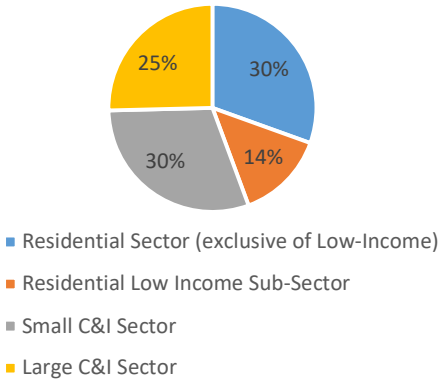
2 If rows need to be added to accommodate more than 3 programs per sector, ensure total and percentage formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

3 Includes projected participation of Low Income households living in Multifamily housing.

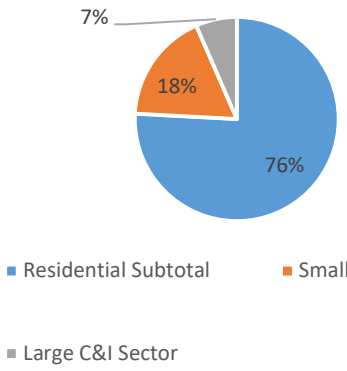
Table 7: Budget and Parity Analysis Summary

Customer Sector	Phase V EE&C Budget (inclusive of allocated common cost)	% of Total EDC EE&C Budget	% of EDC Total Annual Revenue [1]	% of EDC Total MWh Sales
Residential Sector (*exclusive of Low-Income*)	$118,927,997	30%	76%	37%
Residential Low Income Sub-Sector	$54,246,395	14%		
Residential Subtotal	$173,174,392	44%	76%	37%
Small C&I Sector	$118,074,265	30%	18%	21%
Large C&I Sector	$99,070,866	25%	7%	42%
Non-Residential Subtotal	$217,145,131	56%	24%	63%
EDC TOTAL [3]	**$390,319,523**	**100%**	**100%**	**100%**
EDC TOTAL as Share of Budget Ceiling	**100.0%**			

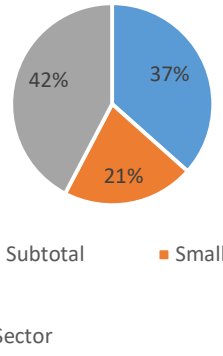
% Budget by Customer Sector (populates when data is entered above)



% Revenue by Customer Sector



% MWh Sales by Customer Sector



1 EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total revenue should be inclusive of collections on behalf of competitive generation suppliers.

2 Budget amounts in this table should exclude SWE costs.

3 Cells F10, G10 and H10 will be green when the totals are above 99.9% and below 100.1%. All cells should be green once filled out to ensure correct subtotals.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	Freezer Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$60.00	5	$100.00
Residential Energy Solutions Program	Products	Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$60.00	6	$100.00
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$30.00	3	$50.00
Residential Energy Solutions Program	Products	Dehumidifier Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$30.00	4	$50.00
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$30.00	5	$50.00
Residential Energy Solutions Program	Products	Cooler Recycling	1 Unit	No	No	PA TRM	$30.00	5	$50.00
Residential Energy Solutions Program	Products	Clothes Washer	1 Unit	No	No	ENERGY STAR or PA TRM	$35.72	14	$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	14	$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	14	$100.00
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	11	$75.00
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	11	$75.00
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	1 Unit	No	No	ENERGY STAR or PA TRM	$206.34	14	$100.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	1 Unit	No	No	ENERGY STAR or PA TRM	$206.34	14	$100.00
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	1 Unit	No	No	PA TRM	$39.00	9	$40.00
Residential Energy Solutions Program	Products	Room Air Conditioner	1 Unit	No	Yes	PA TRM	$95.08	9	$50.00
Residential Energy Solutions Program	Products	Dehumidifier	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	12	$50.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	1 Unit	No	No	ENERGY STAR or PA TRM	$218.07	10	$400.00
Residential Energy Solutions Program	Products	Dishwasher	1 Unit	No	No	ENERGY STAR or PA TRM	$79.45	10	$75.00
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	1 Unit	No	No	ENERGY STAR or MA TRM	$143.00	10	$150.00
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncs	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	$103.53	9	$100.00
Residential Energy Solutions Program	Products	Cooler	1 Unit	No	No	ENERGY STAR or PA TRM	$281.84	14	$100.00
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	1 Unit	No	No	ENERGY STAR	$242.06	14	$200.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	LED Linear	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	1 Unit	No	No	PA TRM	$2.60	8	$5.00
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	100 Light String	No	No	PA TRM	$0.67	10	$5.00
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	1 Unit	No	No	PA TRM	$40.91	5	$25.00
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	1 Unit	No	No	PA TRM	$24.51	8	$30.00
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Residential Energy Solutions Program	Products	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	$20.80	7	$0.20 per kWh and/or $550 per kW saved
Residential Energy Solutions Program	Products	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	$9,025.00	10	$975.00
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	$557.44	15	$650.00
Residential Energy Solutions Program	Products	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	$226.20	13	$640.00
Residential Energy Solutions Program	Products	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	$5,839.98	15	$975.00
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	$5,607.89	15	$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	$552.98	10	$350.00
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	$6,716.86	15	$1,500.00
Residential Energy Solutions Program	Products	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	$13,745.19	5	$0.20 per kWh and/or $550 per kW saved
Residential Energy Solutions Program	Products	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
Residential Energy Solutions Program	Products	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	$16.64	15	$25.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$417.59	15	$1,500.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$1,043.99	15	$2,000.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$417.59	15	$750.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$1,043.99	15	$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	$710.54	15	$1,500.00
Residential Energy Solutions Program	HVAC & Solar	PTAC	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$521.99	15	$500.00
Residential Energy Solutions Program	HVAC & Solar	PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$521.99	15	$750.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	1- 3 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$18,664.80	15	$7,500.00
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	1 Unit	No	No	PA TRM	$196.11	5	$150.00
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	$103.53	9	$100.00
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	1 - Unit	No	No	PA TRM	$141.40	3	$150.00
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	1-20 CFM unit	No	No	ENERGY STAR or PA TRM	$52.42	15	$25.00
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	1 - Unit	No	Yes	PA TRM	$1,227.74	9	$500.00
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$2,087.94	15	$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	$3,552.72	15	$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$2,609.93	15	$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Solar	1 kW DC Installed Capacity	No	No	PA TRM	$1,910.63	15	$500.00
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	1 - Audit w DI & Wgtd Retrofits	No	Yes	In-Home Audit w/ direct install measures. Also provides incentive for program measures meeting program, PA TRM or evaluation requirements.	$2,929.17	5	Audit - Up to $750 for the cost of the audit with direct install measures, plus up to $2,500 for audit recommended measures and additional incentives
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	1 kW DC Installed Capacity	No	Yes	PA TRM	$1,910.63	15	$500.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$730.79	15	$2,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$730.79	15	$1,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	$1,915.00	10	$1,000.00
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Up to $250 for the cost of an audit with direct install measures
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	Per HH	No	No	Residential customer meeting program requirements	$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	Per HH	No	No	Residential customer meeting program requirements	$0.00	2	NA

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	Per HH	No	No	Residential customer meeting program requirements	$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	Per HH	No	No	Residential customer meeting program requirements	$0.00	2	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	Per HH	No	No	Residential customer meeting program requirements	$0.00	1	NA
Residential Energy Solutions Program	Behavioral	On-Line Audit	Per HH	No	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	$0.00	1	NA
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	NC Townhouse and Duplex	No	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$2,000.00
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	NC Two on Two Cond Units	No	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	NC Single Family Detached	No	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	NC MultiFamily Low Rise	No	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	NC Mfg Housing	No	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	$2,802.97	14	$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	NC MultiFamily Low Rise	No	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	Vendor	No	No	Active residential customers with AMI, sufficient usage and usage history, and meets participation or other program requirements.	$0.00	1	NA
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	Vendor	No	No	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$250.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	DLS & DR - Res	Storage	Vendor	No	No	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$1,000.00
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	Vendor	No	No	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$50.00
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Summer	Vendor	No	No	Smart thermostats installed on electric cooling systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	NA
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Winter	Vendor	No	No	Smart thermostats installed on electric heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	NA
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	$0.00	-	$0.00
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	1 Tenant Space	Yes	Yes	In-Home Audit w/ direct install measures or a welcome kit. Eligible to single family home customers.	$172.50	13	NA
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	1-1.25 Ton Unit	Yes	Yes	Direct installation of heat pumps for water and space heating with in 5 years of being weatherized by LIURP	$3,600.00	15	NA
Low Income Energy Efficiency Program	Weatherization	WARM Plus	Per HH	Yes	Yes	WARM Plus - Weatherization services provided to customers that qualify at or below 150% of the Federal Poverty Income Guidelines in coordination with the Low Income Usage Reduction program	$1,275.00	13	NA
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	Per HH	Yes	Yes	WARM - Extra Measures - additional energy efficiency measures provided in coordination with the Low Income Usage Reduction program--measures above and beyond what that program provides. For customers who qualify at or below 150% of the Federal Poverty Income Guidelines	$1,032.50	13	NA
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$60.00	5	$125.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$60.00	6	$125.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$30.00	3	$75.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$30.00	4	$75.00
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$30.00	5	$75.00
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	1 Unit	Yes	No	PA TRM	$30.00	5	$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer LI	1 Unit	-	-	ENERGY STAR or PA TRM	$35.72	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	11	$75.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	11	$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$206.34	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$206.34	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	1 Unit	-	-	PA TRM	$39.00	9	$40.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	1 Unit	-	-	PA TRM	$95.08	9	$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	12	$50.00
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$79.45	10	$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	1 Unit	-	-	ENERGY STAR	$242.06	14	$200.00
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	Per 4' Unit	-	-	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mrktplace) - LI	1 Unit	Yes	No	PA TRM	$2.60	8	$5.00
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mrktplace) - LI	100 Light String	Yes	No	PA TRM	$0.67	10	$5.00
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	1 Unit	Yes	No	PA TRM	$40.91	5	$25.00
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	1 Unit	Yes	No	PA TRM	$24.51	8	$30.00
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mrktplace) - LI	Per 4' Unit	Yes	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	1- 2.75 ton unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	$1,148.37	15	$2,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	$1,684.76	10	$1,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	$1,684.76	10	$1,000.00

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Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	-	Yes	No	Audit meeting IRA - HER program requirements	$0.00	-	$1,500.00
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	Per HH	Yes	No	#N/A	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	Per HH	Yes	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	$0.00	1	NA
Low Income Energy Efficiency Program	LI - New Homes	NC -Townhouse and duplex units - LI	NC Townhouse and Duplex	Yes	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$2,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	NC Two on Two Cond Units	Yes	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	NC Single Family Detached	Yes	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise LI	NC MultiFamily Low Rise	Yes	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	NC Mfg Housing	Yes	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	$2,802.97	14	$3,000.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	NC MultiFamily Low Rise	Yes	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - DI - Res - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Multi-Family Tenant Space Audit w/ direct install measures.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - DI - Res - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Prescriptive - Res - LI	1-50 gal unit	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Prescriptive - Res - LI	1 Unit	Yes	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Custom - Res - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Custom - Res - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Multi-Family Tenant Space Audit w/ direct install measures.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	1-50 gal unit	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	1 Unit	Yes	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Up to $250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 <=5.4 Tn - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$2,087.94	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 >5.4 < 20 Tn - SCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	$1,859.85	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning Level 1 >=20 Tn - SCI	1- 20 ton unit	No	N/A	ENERGY STAR or PA TRM	$709.41	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	$555.71	15	500/Ton

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$31,108.00	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP – SCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	$710.54	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$168.79	15	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$139.92	15	$750.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner-SCI	1-1 ton unit	No	N/A	PA TRM	$95.08	9	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	$75.97	11	$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom - SCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	$66.31	15	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	1-5 Ton Unit	No	N/A	PA TRM or evaluation guidelines	$437.79	3	$300.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	1 Unit	No	N/A	PA TRM	$395.48	5	$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	$52.67	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	Per sq-ft of building lighting controlle	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	$0.68	8	$0.60 Per Watt Controlled

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$206.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$68.67	15	$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$412.44	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$466.23	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$430.37	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzer Light - SCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$58.68	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzer Occupancy Sensor - SCI	1 Unit	No	N/A	PA TRM	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$39,799.72	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	$198,998.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$30.53	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$243.80	14	$0.20 per kWh and/or $550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$122.11	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt)- SCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	$504.02	12	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$353.45	15	$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$766.60	15	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	$682.94	12	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	$453.12	12	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	$79.31	9	$22.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls SCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	$1,119.27	12	$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	$10.02	4	$7.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$381.47	10	$590 0-500 lbs $980 501-1000 lbs $1100 over 1000 lbs
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$234.30	5	$125.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	1- unit	No	N/A	ENERGY STAR or PA TRM	$2,537.60	12	$150/pan
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,903.20	12	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,289.28	12	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	$549.55	12	$500 - full size $375 - 3/4 size $225 - 1/2 size
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,898.69	12	$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	$1,118.48	12	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,539.87	10	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	$573.73	10	$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	$112.90	8	$175.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	5	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	6	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	3	$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	4	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	5	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	1 Unit	No	N/A	PA TRM	$30.00	5	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	$143.00	10	$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$35.72	14	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$206.34	14	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	14	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	11	$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	12	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	$46.80	7	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	$20.80	7	$0.20 per kWh and/or $550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	$9,025.00	10	$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	$557.44	15	$650.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	$226.20	13	$640.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	$5,839.98	15	$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	$5,607.89	15	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	$552.98	10	$350.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	$6,716.86	15	$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	$13,745.19	5	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	$16.64	15	$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Utility Owned(EMU))	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	15	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Customer Owned(MU))	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	15	$100.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	$46,284.92	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	1 kW DC Installed Capacity	No	N/A	PA TRM	$1,928.12	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	$4,529,325.97	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	$149,387.80	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	$29,997.08	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,225.00	1	$1,500.00
C&I Energy Solutions Program - Small	Energy Management SCI	Building Tune Up - SCI	1 Project	No	N/A	Portfolio of measures and services that focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency, including the installation of energy efficiency measures.	$37,782.88	13	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Energy Management SCI	Virtual/Meter Data Commissioning SCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	$1,172.74	2	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Energy Management SCI	Retrocommissioning - SCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	$5,863.72	3	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Energy Management SCI	Building Operations Training - SCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE $1000 per person.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Energy Management SCI	Customer Concierge - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$3,500.00	1	NA
C&I Energy Solutions Program - Small	Energy Management SCI	Energy Consultation - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$1,225.00	1	NA
C&I Energy Solutions Program - Small	Energy Management SCI	Audits - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,225.00	1	$1,500.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$250.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$1,000.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$50.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$0.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	Vendor	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements.	$0.00	1	$20,000.00
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	$0.00	-	$0.00
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Up to $250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 <=5.4 Tn - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$2,087.94	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 >5.4 < 20 Tn - LCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	$1,859.85	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning Level 1 >=20 Tn - LCI	1- 20 ton unit	No	N/A	ENERGY STAR or PA TRM	$709.41	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	$555.71	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$31,108.00	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP – LCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	$710.54	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$168.79	15	$500.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$139.92	15	$750.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner- LCI	1-1 ton unit	No	N/A	PA TRM	$95.08	9	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	$75.97	11	$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom - LCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	$66.31	15	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	1-5 Ton Unit	No	N/A	Maintenance services applicable to C&I customers for documented tune-ups of packaged and split systems up to 20 Tons (following PA TRM guidelines.)	$437.79	3	$300.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	1 Unit	No	N/A	PA TRM	$395.48	5	$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	1 unit controlle r	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	$52.67	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	Per sq-ft of building lighting controlle	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	$0.68	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$206.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$68.67	15	$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$412.44	14	$0.20 per kWh and/or $550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$466.23	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$430.37	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzer Light - LCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$58.68	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzer Occupancy Sensor - LCI	1 Unit	No	N/A	PA TRM	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$39,799.72	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	$198,998.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$30.53	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$243.80	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$122.11	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS-LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and fixture controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	$504.02	12	$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$353.45	15	$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$766.60	15	$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	$682.94	12	$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	$453.12	12	$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	$79.31	9	$22.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	$1,119.27	12	$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	$10.02	4	$7.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$381.47	10	$590 0-500 lbs $980 501-1000 lbs $1100 over 1000 lbs
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$234.30	5	$125.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	1- unit	No	N/A	ENERGY STAR or PA TRM	$2,537.60	12	$150/pan
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,903.20	12	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,289.28	12	$500.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	$549.55	12	$500 - full size $375 - 3/4 size $225 - 1/2 size
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,898.69	12	$1,500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	$1,118.48	12	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,539.87	10	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	$573.73	10	$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	$112.90	8	$175.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	5	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	6	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	3	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	4	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	5	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	1 Unit	No	N/A	PA TRM	$30.00	5	$50.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	$143.00	10	$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$35.72	14	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$206.34	14	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	14	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	11	$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	12	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	$46.80	7	$200.00
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	$47,090.03	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	$91,959.50	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	1 kW DC Installed Capacity	No	N/A	PA TRM	$1,928.12	15	$0.20 per kWh and/or $550 per kW saved

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	$4,529,325.97	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems. Including a focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency	$149,387.80	15	$0.20 per kWh and/or $550 per kW saved and/or Up to 80% of the project cost
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	$29,997.08	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,225.00	1	$1,500.00
C&I Energy Solutions Program - Large	Energy Management LCI	Virtual/Meter Data Commissioning - LCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	$1,172.74	2	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Energy Management LCI	Retrocommissioning - LCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	$58,637.21	3	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Energy Management LCI	Building Operations Training - LCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE $1000 per person.
C&I Energy Solutions Program - Large	Energy Management LCI	Customer Concierge - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$3,500.00	1	NA
C&I Energy Solutions Program - Large	Energy Management LCI	Energy Consultation - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$1,750.00	1	NA
C&I Energy Solutions Program - Large	Energy Management LCI	Audits - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,750.00	1	$1,500.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$250.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$1,000.00

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	-	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements.	$0.00	1	$50,000.00
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	$0.00	-	$0.00

1 Indicate whether the measure counts towards the "proportionate number of measures" requirement.
2 Indicate whether the measure will be part of comprehensive measure reporting.
3 For Comprehensive Measures, see 'Table 8 Addendum' tab for a designation of measures by TRM number
4 Measure eligibility may change during the term of the plan to address market uncertainty and changes and or where supported by evaluation.
5 All values listed are "Up to Values". The Company may provide tiered, blocked, prescriptive, and/or performance-based incentives that are within the amounts listed based on varying measure characteristics, market conditions, or other factors.

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Freezer Recycling	*2.4.3*	Energy Savings (MWh) [2]	1,514.51	1,514.51	1,514.51	1,514.51	1,514.51	**7,572.56**
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.92**
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	**0.66**
		Projected Participation [3]	2,000	2,000	2,000	2,000	2,000	**10,000**
Refrigerator Recycling	*2.4.3*	Energy Savings (MWh)	3,786.81	3,786.81	3,786.81	3,786.81	3,786.81	**18,934.06**
		Summer Demand Reduction (MW)	0.56	0.56	0.56	0.56	0.56	**2.81**
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	**2.10**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
Room Air Conditioner Recycling	*2.2.8*	Energy Savings (MWh)	765.21	765.21	765.21	765.21	765.21	**3,826.04**
		Summer Demand Reduction (MW)	2.08	2.08	2.08	2.08	2.08	**10.40**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7,250	7,250	7,250	7,250	7,250	**36,250**
Dehumidifier Recycling	*2.4.12*	Energy Savings (MWh)	3,561.93	3,561.93	3,561.93	3,561.93	3,561.93	**17,809.63**
		Summer Demand Reduction (MW)	1.38	1.38	1.38	1.38	1.38	**6.88**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7,250	7,250	7,250	7,250	7,250	**36,250**
LV Refrigerator Recycling	*2.4.4*	Energy Savings (MWh)	78.45	78.45	78.45	78.45	78.45	**392.25**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	200	200	200	200	200	**1,000**
Cooler Recycling	*2.4.6*	Energy Savings (MWh)	5.20	5.20	5.20	5.20	5.20	**26.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Clothes Washer	*2.4.8*	Energy Savings (MWh)	195.55	195.55	195.55	195.55	195.55	**977.76**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	1,750	1,750	1,750	1,750	1,750	**8,750**
Refrigerator - PY18 to PY20	*2.4.1*	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	**112.72**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	500	500	500	0	0	**1,500**
Refrigerator - PY21 & PY22	*2.4.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	**0.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Freezer - PY18 to PY20	*2.4.2*	Energy Savings (MWh)	2.03	2.03	2.03	0.00	0.00	**6.09**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	0	0	**150**
Freezer - PY21 & PY22	*2.4.2*	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	**0.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Clothes Dryer - PY18 & PY19	*2.4.9*	Energy Savings (MWh)	37.18	37.18	0.00	0.00	0.00	**74.36**
		Summer Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	**0.01**
		Projected Participation	500	500	0	0	0	**1,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Clothes Dryer - PY20 to PY22	*2.4.9*	Energy Savings (MWh)	0.00	0.00	16.68	16.68	16.68	**50.03**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	0	0	500	500	500	**1,500**
Air Purifier / Cleaner	*2.4.14*	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	**1,287.05**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.21**
		Projected Participation	1,500	1,500	1,500	1,500	1,500	**7,500**
Room Air Conditioner	*2.2.7*	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	**216.48**
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,300	3,300	3,300	3,300	3,300	**16,500**
Dehumidifier	*2.4.11*	Energy Savings (MWh)	73.93	73.93	73.93	73.93	73.93	**369.66**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	500	500	500	500	500	**2,500**
Heat Pump Water Heater - PY18 to PY20	*2.3.1*	Energy Savings (MWh)	9,310.57	9,310.57	9,310.57	0.00	0.00	**27,931.70**
		Summer Demand Reduction (MW)	1.08	1.08	1.08	0.00	0.00	**3.23**
		Winter Demand Reduction (MW)	1.79	1.79	1.79	0.00	0.00	**5.38**
		Projected Participation	4,750	4,750	4,750	0	0	**14,250**
Heat Pump Water Heater - PY21 & PY22	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	11.55	11.55	**23.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	50	50	**100**
Pool Pump Variable Speed	*2.8.1 & 2.8.2*	Energy Savings (MWh)	5.50	5.50	5.50	5.50	5.50	**27.48**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Dishwasher	*2.4.10*	Energy Savings (MWh)	98.34	98.34	98.34	98.34	98.34	**491.69**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	2,000	2,000	2,000	2,000	2,000	**10,000**
EV Charging Cord - Level 2 - Res	*MA TRM V11*	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	**0.55**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Smart Thermostat - Aplncs	*2.2.12*	Energy Savings (MWh)	1,686.00	1,686.00	1,686.00	1,686.00	1,686.00	**8,430.00**
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	**1.69**
		Winter Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	**0.71**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**
Cooler	*2.4.5*	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	**0.23**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Clothes Washer/Dryer Combo	*2.4.8 & 2.4.9*	Energy Savings (MWh)	21.76	21.76	21.76	21.76	21.76	**108.82**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	150	150	150	150	150	**750**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
LED Linear	*2.1.1*	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	**506.58**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
LED Nightlights (Mrktplace)	*2.1.3*	Energy Savings (MWh)	107.14	107.14	107.14	107.14	107.14	**535.71**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7,500	7,500	7,500	7,500	7,500	**37,500**
Holiday Lights (Mrktplace)	*2.1.4*	Energy Savings (MWh)	132.00	132.00	132.00	132.00	132.00	**660.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10,000	10,000	10,000	10,000	10,000	**50,000**
Smart Strip Plug Outlet	*2.5.1*	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	**1,559.26**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.20**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.25**
		Projected Participation	2,750	2,750	2,750	2,750	2,750	**13,750**
Residential Occupancy Sensor	*2.1.2*	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	**101.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
LED Linear (Mrktplace)	*2.1.1*	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	**506.58**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
Agricultural Process Lighting	*3.1.7*	Energy Savings (MWh)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Auto Milker Takeoff	*4.1.1*	Energy Savings (MWh)	1.94	1.94	1.94	1.94	1.94	**9.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dairy Scroll Compressor	*4.1.2*	Energy Savings (MWh)	0.80	0.80	0.80	0.80	0.80	**3.99**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
HE Ventilation Fans	*4.1.3*	Energy Savings (MWh)	3.28	3.28	3.28	3.28	3.28	**16.39**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Heat Reclaimer	*4.1.4*	Energy Savings (MWh)	5.06	5.06	5.06	5.06	5.06	**25.28**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
High Volume Low Speed Fan	*4.1.5*	Energy Savings (MWh)	43.00	43.00	43.00	43.00	43.00	**215.00**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Livestock Waterer	*4.1.6*	Energy Savings (MWh)	1.00	1.00	1.00	1.00	1.00	**5.02**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dairy Vac Pump VSD Control	*4.1.7*	Energy Savings (MWh)	10.08	10.08	10.08	10.08	10.08	**50.38**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1	1	1	1	1	**5**
Low Pressure Irrigation	*4.1.8*	Energy Savings (MWh)	12.98	12.98	12.98	12.98	12.98	**64.92**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Custom - Agricultural	*1.17*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Projected Participation	1	1	1	1	1	**5**
Engine Block Heater Timer	*3.11.2*	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	**3.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Heat Pump - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	141.64	141.64	141.64	141.64	141.64	**708.19**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	250	250	250	250	250	**1,250**
Heat Pump - Most Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	36.68	36.68	36.68	36.68	36.68	**183.39**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	25	25	25	25	25	**125**
Central Air Conditioner - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	88.91	88.91	88.91	88.91	88.91	**444.55**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	300	300	300	300	300	**1,500**
Central Air Conditioner - Most Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	5.96	5.96	5.96	5.96	5.96	**29.78**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Ductless Mini-Split Heat Pump	*2.2.1 & 2.2.2*	Energy Savings (MWh)	127.82	127.82	127.82	127.82	127.82	**639.09**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	125	125	125	125	125	**625**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
PTAC	*2.2.1 & 2.2.2*	Energy Savings (MWh)	8.67	8.67	8.67	8.67	8.67	**43.34**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
PTHP	*2.2.1 & 2.2.2*	Energy Savings (MWh)	17.62	17.62	17.62	17.62	17.62	**88.10**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	80	80	80	80	80	**400**
Heat Pump - Water & GeoT	*2.2.1 & 2.2.2*	Energy Savings (MWh)	83.39	83.39	83.39	83.39	83.39	**416.93**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	55	55	55	55	55	**275**
Furnace Fan (Retrofit or New to ECM)	*2.2.4*	Energy Savings (MWh)	4.89	4.89	4.89	4.89	4.89	**24.44**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	25	25	25	25	25	**125**
Smart Thermostat - HVAC	*2.2.12*	Energy Savings (MWh)	7.94	7.94	7.94	7.94	7.94	**39.71**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	25	25	25	25	25	**125**
AC or HP Maintenance	*2.2.6*	Energy Savings (MWh)	101.99	101.99	101.99	101.99	101.99	**509.96**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	800	800	800	800	800	**4,000**
HE Bathroom Fans	*2.2.14*	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	**0.60**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Window Heat Pump	*2.2.9*	Energy Savings (MWh)	39.94	39.94	39.94	39.94	39.94	**199.69**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Projected Participation	100	100	100	100	100	**500**
REH to Heat Pump	*2.2.1 & 2.2.2*	Energy Savings (MWh)	3,214.59	3,214.59	3,214.59	3,214.59	3,214.59	**16,072.94**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.33**
		Winter Demand Reduction (MW)	1.09	1.09	1.09	1.09	1.09	**5.43**
		Projected Participation	450	450	450	450	450	**2,250**
REH to DMS Heat Pump	*2.2.1 & 2.2.2*	Energy Savings (MWh)	2,367.20	2,367.20	2,367.20	2,367.20	2,367.20	**11,835.98**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.26**
		Winter Demand Reduction (MW)	0.92	0.92	0.92	0.92	0.92	**4.58**
		Projected Participation	600	600	600	600	600	**3,000**
REH to PTHP	*2.2.1 & 2.2.2*	Energy Savings (MWh)	89.89	89.89	89.89	89.89	89.89	**449.47**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	25	25	25	25	25	**125**
Solar	*2.8.3*	Energy Savings (MWh)	10,107.92	10,107.92	10,107.92	10,107.92	10,107.92	**50,539.60**
		Summer Demand Reduction (MW)	2.62	2.62	2.62	2.62	2.62	**13.08**
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	**1.74**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Comprehensive Audit	*Actuals & 2.6*	Energy Savings (MWh)	570.03	570.03	570.03	570.03	570.03	**2,850.13**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.89**
		Projected Participation	400	400	400	400	400	**2,000**
Comp Audit - Solar	*2.8.3*	Energy Savings (MWh)	25.27	25.27	25.27	25.27	25.27	**126.35**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
Comp Audit - Heat Pump - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	56.66	56.66	56.66	56.66	56.66	**283.28**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	100	100	100	100	100	**500**
Comp Audit - CAC - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	29.64	29.64	29.64	29.64	29.64	**148.18**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	100	100	100	100	100	**500**
Comp Audit - HPWH	*2.3.1*	Energy Savings (MWh)	23.10	23.10	23.10	23.10	23.10	**115.50**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	100	100	100	100	100	**500**
MF - Tenant - DI - Res	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	23.34	23.34	23.34	23.34	23.34	**116.72**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	200	200	200	200	200	**1,000**
MF - Common - DI - Res	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	95.20	95.20	95.20	95.20	95.20	**476.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Projected Participation	8	8	8	8	8	**40**
MF - Tenant - Prescriptive - Res	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Prescriptive - Res	*2.4.8*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Tenant - Custom - Res	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Custom - Res	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Behavioral Ph5 Yr 1	*CSP & 2.7.3*	Energy Savings (MWh)	11,454.13	0.00	0.00	0.00	0.00	**11,454.13**
		Summer Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	**2.33**
		Winter Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	**2.33**
		Projected Participation	368,300	0	0	0	0	**368,300**
Behavioral Ph5 Yr 2	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	23,522.19	0.00	0.00	0.00	**23,522.19**
		Summer Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	**4.31**
		Winter Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	**4.31**
		Projected Participation	0	426,900	0	0	0	**426,900**
Behavioral Ph5 Yr 3	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	15,485.94	0.00	0.00	**15,485.94**
		Summer Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	**3.42**
		Winter Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	**3.42**
		Projected Participation	0	0	341,100	0	0	**341,100**
Behavioral Ph5 Yr 4	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	22,625.28	0.00	**22,625.28**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	**3.58**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	**3.58**
		Projected Participation	0	0	0	392,800	0	**392,800**
Behavioral Ph5 Yr 5	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	17,760.60	**17,760.60**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.92	**1.92**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.92	**1.92**
		Projected Participation	0	0	0	0	379,500	**379,500**
On-Line Audit	*CSP & 2.7.3*	Energy Savings (MWh)	360.00	360.00	360.00	360.00	360.00	**1,800.00**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Projected Participation	2,400	2,400	2,400	2,400	2,400	**12,000**
NC -Townhouse and duplex units	*2.7.1*	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	**923.03**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.19**
		Projected Participation	120	120	120	120	120	**600**
NC - Two-on-Two condominium units	*2.7.1*	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	**923.03**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.19**
		Projected Participation	120	120	120	120	120	**600**
NC - Single-family detached units	*2.7.1*	Energy Savings (MWh)	2,840.09	2,840.09	2,840.09	2,840.09	2,840.09	**14,200.43**
		Summer Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	**1.83**
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	**2.86**
		Projected Participation	1,200	1,200	1,200	1,200	1,200	**6,000**
NC - Multi Family Low Rise	*2.7.1*	Energy Savings (MWh)	397.61	397.61	397.61	397.61	397.61	**1,988.06**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.26**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Projected Participation	280	280	280	280	280	**1,400**
NC - Manufactured Housing	*2.7.1*	Energy Savings (MWh)	304.84	304.84	304.84	304.84	304.84	**1,524.18**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.20**
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.31**
		Projected Participation	184	184	184	184	184	**920**
NC - Multi Family High Rise	*2.7.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Behavioral DLS & DR	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	**35.79**
		Winter Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	**35.79**
		Projected Participation	600,000	600,000	600,000	600,000	600,000	**3,000,000**
Managed Charging	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	**3.34**
		Winter Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	**3.34**
		Projected Participation	2,250	2,500	3,000	3,500	4,000	**15,250**
Storage	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.03	1.16	1.29	1.41	1.54	**6.43**
		Winter Demand Reduction (MW)	2.06	2.31	2.57	2.83	3.09	**12.86**
		Projected Participation	400	450	500	550	600	**2,500**
Thermostat DR	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.69	1.75	1.93	2.17	2.41	**9.93**
		Winter Demand Reduction (MW)	2.91	3.02	3.33	3.74	4.16	**17.16**
		Projected Participation	7,000	7,250	8,000	9,000	10,000	**41,250**
Thermostat DLS-Summer	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.99	2.08	2.25	2.42	2.51	**11.24**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	11,500	12,000	13,000	14,000	14,500	**65,000**
Thermostat DLS-Winter	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	5.22	5.80	6.38	6.67	6.96	**31.03**
		Projected Participation	9,000	10,000	11,000	11,500	12,000	**53,500**
Front of Meter Measures - Res	*1.17*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Customer Engagement - LI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	837.95	837.95	837.95	837.95	837.95	**4,189.77**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.54**
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	**0.67**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**
LIURP Lookback - LI	*2.2.1 & 2.2.2*	Energy Savings (MWh)	359.57	359.57	359.57	359.57	359.57	**1,797.87**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.57**
		Projected Participation	100	100	100	100	100	**500**
WARM Plus	*Res Vol 2*	Energy Savings (MWh)	1,871.37	1,871.37	1,871.37	1,871.37	1,871.37	**9,356.86**
		Summer Demand Reduction (MW)	0.20	0.20	0.20	0.20	0.20	**1.00**
		Winter Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	**1.84**
		Projected Participation	1,500	1,500	1,500	1,500	1,500	**7,500**
WARM Extra Measures	*Res Vol 2*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.55**
		Winter Demand Reduction (MW)	0.22	0.22	0.22	0.22	0.22	**1.09**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Freezer Recycling - LI	*2.4.3*	Energy Savings (MWh)	302.90	302.90	302.90	302.90	302.90	**1,514.51**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Projected Participation	400	400	400	400	400	**2,000**
Refrigerator Recycling - LI	*2.4.3*	Energy Savings (MWh)	757.36	757.36	757.36	757.36	757.36	**3,786.81**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.56**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.42**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Room Air Conditioner Recycling - LI	*2.2.8*	Energy Savings (MWh)	395.80	395.80	395.80	395.80	395.80	**1,978.99**
		Summer Demand Reduction (MW)	1.08	1.08	1.08	1.08	1.08	**5.38**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,750	3,750	3,750	3,750	3,750	**18,750**
Dehumidifier Recycling - LI	*2.4.12*	Energy Savings (MWh)	1,842.38	1,842.38	1,842.38	1,842.38	1,842.38	**9,211.88**
		Summer Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	**3.56**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,750	3,750	3,750	3,750	3,750	**18,750**
LV Refrigerator Recycling - LI	*2.4.4*	Energy Savings (MWh)	11.77	11.77	11.77	11.77	11.77	**58.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	30	30	30	30	30	**150**
Cooler Recycling - LI	*2.4.6*	Energy Savings (MWh)	1.04	1.04	1.04	1.04	1.04	**5.20**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Clothes Washer - LI	*2.4.8*	Energy Savings (MWh)	335.23	335.23	335.23	335.23	335.23	**1,676.16**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.27**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.27**
		Projected Participation	3,000	3,000	3,000	3,000	3,000	**15,000**
Refrigerator - PY18 to PY20 - LI	*2.4.1*	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	**112.72**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	500	500	500	0	0	**1,500**
Refrigerator - PY21 & PY22 - LI	*2.4.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	**0.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Freezer - PY18 to PY20 - LI	*2.4.2*	Energy Savings (MWh)	10.15	10.15	10.15	0.00	0.00	**30.45**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	250	250	250	0	0	**750**
Freezer - PY21 & PY22 - LI	*2.4.2*	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	**0.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Clothes Dryer - PY18 & PY19 - LI	*2.4.9*	Energy Savings (MWh)	111.55	111.55	111.55	0.00	0.00	**334.64**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	**0.05**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	**0.05**
		Projected Participation	1,500	1,500	1,500	0	0	**4,500**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Clothes Dryer - PY20 to PY22 - LI	*2.4.9*	Energy Savings (MWh)	0.00	0.00	0.00	0.17	0.17	**0.33**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Air Purifier / Cleaner - LI	*2.4.14*	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	**1,287.05**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.21**
		Projected Participation	1,500	1,500	1,500	1,500	1,500	**7,500**
Room Air Conditioner - LI	*2.2.7*	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	**216.48**
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,300	3,300	3,300	3,300	3,300	**16,500**
Dehumidifier - LI	*2.4.11*	Energy Savings (MWh)	8.87	8.87	8.87	8.87	8.87	**44.36**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	60	60	60	60	60	**300**
Dishwasher - LI	*2.4.10*	Energy Savings (MWh)	49.17	49.17	49.17	49.17	49.17	**245.85**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Clothes Washer/Dryer Combo - LI	*2.4.8 & 2.4.9*	Energy Savings (MWh)	145.09	145.09	145.09	145.09	145.09	**725.47**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
LED Linear - LI	*2.1.1*	Energy Savings (MWh)	121.58	121.58	121.58	121.58	121.58	**607.90**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Projected Participation	6,000	6,000	6,000	6,000	6,000	**30,000**
LED Nightlights (Mrktplace) - LI	*2.1.3*	Energy Savings (MWh)	42.86	42.86	42.86	42.86	42.86	**214.29**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,000	3,000	3,000	3,000	3,000	**15,000**
Holiday Lights (Mrktplace) - LI	*2.1.4*	Energy Savings (MWh)	66.00	66.00	66.00	66.00	66.00	**330.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
Smart Strip Plug Outlet - LI	*2.5.1*	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	**1,559.26**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.20**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.25**
		Projected Participation	2,750	2,750	2,750	2,750	2,750	**13,750**
Residential Occupancy Sensor - LI	*2.1.2*	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	**101.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
LED Linear (Mrktplace) - LI	*2.1.1*	Energy Savings (MWh)	121.58	121.58	121.58	121.58	121.58	**607.90**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Projected Participation	6,000	6,000	6,000	6,000	6,000	**30,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Heat Pump - HEAR	*2.2.1 & 2.2.2*	Energy Savings (MWh)	2.83	2.83	2.83	2.83	2.83	**14.16**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Heat Pump Water Heater - PY18 to PY20 - HEAR	*2.3.1*	Energy Savings (MWh)	9.80	9.80	9.80	0.00	0.00	**29.40**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	0	0	**15**
Heat Pump Water Heater - PY21 & PY22 - HEAR	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.23	0.23	**0.46**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	1	1	**2**
Audit / Technical Scoping Studies	*0*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Behavioral Ph5 Yr 1 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	2,872.00	0.00	0.00	0.00	0.00	**2,872.00**
		Summer Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	**0.37**
		Winter Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	**0.37**
		Projected Participation	43,800	0	0	0	0	**43,800**
Behavioral Ph5 Yr 2 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	4,062.00	0.00	0.00	0.00	**4,062.00**
		Summer Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	**0.45**
		Winter Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	**0.45**
		Projected Participation	0	43,300	0	0	0	**43,300**
Behavioral Ph5 Yr 3 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	3,653.00	0.00	0.00	**3,653.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	**0.48**
		Winter Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	**0.48**
		Projected Participation	0	0	49,800	0	0	**49,800**
Behavioral Ph5 Yr 4 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	2,536.00	0.00	**2,536.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	**0.34**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	**0.34**
		Projected Participation	0	0	0	48,900	0	**48,900**
Behavioral Ph5 Yr 5 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	2,098.00	**2,098.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.10	**0.10**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.10	**0.10**
		Projected Participation	0	0	0	0	36,000	**36,000**
On-Line Audit - LI	*CSP & 2.7.3*	Energy Savings (MWh)	120.00	120.00	120.00	120.00	120.00	**600.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	800	800	800	800	800	**4,000**
NC -Townhouse and duplex units - LI	*2.7.1*	Energy Savings (MWh)	7.69	7.69	7.69	7.69	7.69	**38.46**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
NC - Two-on-Two condominium units - LI	*2.7.1*	Energy Savings (MWh)	4.62	4.62	4.62	4.62	4.62	**23.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**15**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
NC - Single-family detached units - LI	*2.7.1*	Energy Savings (MWh)	4.73	4.73	4.73	4.73	4.73	**23.67**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
NC - Multi Family Low Rise - LI	*2.7.1*	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	**71.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
NC - Manufactured Housing - LI	*2.7.1*	Energy Savings (MWh)	49.70	49.70	49.70	49.70	49.70	**248.51**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Projected Participation	30	30	30	30	30	**150**
NC - Multi Family High Rise - LI	*2.7.1*	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	**7.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - DI - Res - LI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	496.05	496.05	496.05	496.05	496.05	**2,480.27**
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.30**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.39**
		Projected Participation	4,250	4,250	4,250	4,250	4,250	**21,250**
MF - Common - DI - Res - LI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	1,309.00	1,309.00	1,309.00	1,309.00	1,309.00	**6,545.00**
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.88**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.91**
		Projected Participation	110	110	110	110	110	**550**
MF - Tenant - Prescriptive - Res - LI	*2.3.1*	Energy Savings (MWh)	25.41	25.41	25.41	25.41	25.41	**127.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	110	110	110	110	110	**550**
MF - Common - Prescriptive - Res - LI	*2.4.8*	Energy Savings (MWh)	12.29	12.29	12.29	12.29	12.29	**61.46**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	110	110	110	110	110	**550**
MF - Tenant - Custom - Res - LI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Custom - Res - LI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Tenant - DI - SCI - LI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	601.10	601.10	601.10	601.10	601.10	**3,005.50**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.36**
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.46**
		Projected Participation	5,150	5,150	5,150	5,150	5,150	**25,750**
MF - Common - DI - SCI - LI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	2,499.00	2,499.00	2,499.00	2,499.00	2,499.00	**12,495.00**
		Summer Demand Reduction (MW)	0.33	0.33	0.33	0.33	0.33	**1.64**
		Winter Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	**1.71**
		Projected Participation	210	210	210	210	210	**1,050**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
MF - Tenant - Prescriptive - SCI - LI	*2.3.1*	Energy Savings (MWh)	80.85	80.85	80.85	80.85	80.85	**404.25**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Projected Participation	350	350	350	350	350	**1,750**
MF - Common - Prescriptive - SCI - LI	*2.4.8*	Energy Savings (MWh)	39.11	39.11	39.11	39.11	39.11	**195.55**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	350	350	350	350	350	**1,750**
MF - Tenant - Custom - SCI - LI	*1.17 & 3.10*	Energy Savings (MWh)	200.00	200.00	200.00	200.00	200.00	**1,000.00**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	2	2	2	2	2	**10**
MF - Common - Custom - SCI - LI	*1.17 & 3.10*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - DI - SCI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	11.67	11.67	11.67	11.67	11.67	**58.36**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	100	100	100	100	100	**500**
MF - Common - DI - SCI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	23.80	23.80	23.80	23.80	23.80	**119.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	2	2	2	2	2	**10**
MF - Tenant - Prescriptive - SCI	*2.3.1*	Energy Savings (MWh)	0.23	0.23	0.23	0.23	0.23	**1.16**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Common - Prescriptive - SCI	*2.4.8*	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	**0.56**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - Custom - SCI	*1.17 & 3.10*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	1	1	1	1	1	**5**
MF - Common - Custom - SCI	*1.17 & 3.10*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	1	1	1	1	1	**5**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Air Conditioning - Level 1 <=5.4 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	203.41	203.41	203.41	203.41	203.41	**1,017.04**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.51**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	756	756	756	756	756	**3,780**
Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	1,155.34	1,155.34	1,155.34	1,155.34	1,155.34	**5,776.68**
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	**2.89**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	820	820	820	820	820	**4,100**
Air Conditioning - Level 1 >=20 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	1,317.80	1,317.80	1,317.80	1,317.80	1,317.80	**6,589.02**
		Summer Demand Reduction (MW)	0.66	0.66	0.66	0.66	0.66	**3.30**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	820	820	820	820	820	**4,100**
Heat Pump - Level 1 <=5.4 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	209.85	209.85	209.85	209.85	209.85	**1,049.27**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.23**
		Projected Participation	315	315	315	315	315	**1,575**
Heat Pump - Water & GeoT - SCI	*3.2.4*	Energy Savings (MWh)	48.00	48.00	48.00	48.00	48.00	**239.99**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	25	25	25	25	25	**125**
Ductless Mini-Split HP – SCI	*3.2.5 & 3.2.6*	Energy Savings (MWh)	111.65	111.65	111.65	111.65	111.65	**558.26**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	315	315	315	315	315	**1,575**
PTAC - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	104.69	104.69	104.69	104.69	104.69	**523.45**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.26**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1,260	1,260	1,260	1,260	1,260	**6,300**
PTHP - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	48.68	48.68	48.68	48.68	48.68	**243.39**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	315	315	315	315	315	**1,575**
Room Air Conditioner- SCI	*3.2.9*	Energy Savings (MWh)	1.50	1.50	1.50	1.50	1.50	**7.49**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	63	63	63	63	63	**315**
Smart Thermostat - SCI	*3.2.18*	Energy Savings (MWh)	7.14	7.14	7.14	7.14	7.14	**35.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	35	35	35	35	35	**175**
HVAC - Custom - SCI	*3.2*	Energy Savings (MWh)	700.00	700.00	700.00	700.00	700.00	**3,500.00**
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.38**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.19**
		Projected Participation	7	7	7	7	7	**35**
Circulating Pump (Mid Strm) - SCI	*3.3.5*	Energy Savings (MWh)	1.97	1.97	1.97	1.97	1.97	**9.86**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7	7	7	7	7	**35**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
HVAC - Maintenance - SCI	*3.2.7 & 3.2.8*	Energy Savings (MWh)	56.26	56.26	56.26	56.26	56.26	**281.31**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	190	190	190	190	190	**950**
Furnace Fan (Retrofit or New to ECM) - SCI	*3.3.3*	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	**7.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7	7	7	7	7	**35**
Lighting Control (Daylight & Occupancy) - SCI	*3.1.3*	Energy Savings (MWh)	423.89	423.89	423.89	423.89	423.89	**2,119.43**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.37**
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.30**
		Projected Participation	4,000	4,000	4,000	4,000	4,000	**20,000**
Lighting Control (Network) - SCI	*3.1.3*	Energy Savings (MWh)	1,854.50	1,854.50	1,854.50	1,854.50	1,854.50	**9,272.49**
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	**1.61**
		Winter Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	**1.31**
		Projected Participation	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	**7,500,000**
LED Linear - SCI	*3.1.1*	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	**34,422.67**
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	**5.97**
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	**4.86**
		Projected Participation	40,000	40,000	40,000	40,000	40,000	**200,000**
Exit Sign - SCI	*3.1.4*	Energy Savings (MWh)	0.21	0.21	0.21	0.21	0.21	**1.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
LED Fixture External - SCI	*3.1.1*	Energy Savings (MWh)	0.41	0.41	0.41	0.41	0.41	**2.07**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
LED Fixture Internal - SCI	*3.1.1*	Energy Savings (MWh)	7,614.44	7,614.44	7,614.44	7,614.44	7,614.44	**38,072.20**
		Summer Demand Reduction (MW)	1.32	1.32	1.32	1.32	1.32	**6.60**
		Winter Demand Reduction (MW)	1.07	1.07	1.07	1.07	1.07	**5.37**
		Projected Participation	13,000	13,000	13,000	13,000	13,000	**65,000**
LED Lamp Mogul Base - SCI	*3.1.1*	Energy Savings (MWh)	315.39	315.39	315.39	315.39	315.39	**1,576.95**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.27**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Projected Participation	800	800	800	800	800	**4,000**
Street & Area Lighting (Customer Owned) - SCI	*3.1.1*	Energy Savings (MWh)	1.26	1.26	1.26	1.26	1.26	**6.30**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
LED Reach in Refrig / Frzer Light - SCI	*3.1.5*	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	**253.34**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	200	200	200	200	200	**1,000**
Reach in Refrig / Frzer Occupancy Sensor - SCI	*3.5.15*	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	**76.32**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	200	200	200	200	200	**1,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Lighting - Other - SCI	*3.1*	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	**2,500.00**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.43**
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.35**
		Projected Participation	5	5	5	5	5	**25**
Lighting - Custom - SCI	*1.17 & 3.1*	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	**12,500.01**
		Summer Demand Reduction (MW)	0.43	0.43	0.43	0.43	0.43	**2.17**
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	**1.76**
		Projected Participation	5	5	5	5	5	**25**
Linear Lamp - MS - SCI	*3.1.6*	Energy Savings (MWh)	2,578.84	2,578.84	2,578.84	2,578.84	2,578.84	**12,894.19**
		Summer Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	**2.84**
		Winter Demand Reduction (MW)	0.38	0.38	0.38	0.38	0.38	**1.91**
		Projected Participation	125,000	125,000	125,000	125,000	125,000	**625,000**
High/Low Bay Lamp - MS - SCI	*3.1.6*	Energy Savings (MWh)	6,004.55	6,004.55	6,004.55	6,004.55	6,004.55	**30,022.76**
		Summer Demand Reduction (MW)	1.32	1.32	1.32	1.32	1.32	**6.60**
		Winter Demand Reduction (MW)	0.89	0.89	0.89	0.89	0.89	**4.44**
		Projected Participation	20,500	20,500	20,500	20,500	20,500	**102,500**
LED Fixture - MS - SCI	*3.1.6*	Energy Savings (MWh)	1,526.67	1,526.67	1,526.67	1,526.67	1,526.67	**7,633.36**
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	**1.68**
		Winter Demand Reduction (MW)	0.23	0.23	0.23	0.23	0.23	**1.13**
		Projected Participation	18,500	18,500	18,500	18,500	18,500	**92,500**
Lighting Controls - MS-SCI	*3.1.6*	Energy Savings (MWh)	1,878.04	1,878.04	1,878.04	1,878.04	1,878.04	**9,390.18**
		Summer Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	**2.06**
		Winter Demand Reduction (MW)	0.28	0.28	0.28	0.28	0.28	**1.39**
		Projected Participation	31,350	31,350	31,350	31,350	31,350	**156,750**
Ref/Frzr -Reach In Special Doors (low/No Anti Swt)- SCI	*3.5.11*	Energy Savings (MWh)	4.12	4.12	4.12	4.12	4.12	**20.60**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
ECM Evap Fan Motor - SCI	*3.5.2*	Energy Savings (MWh)	212.62	212.62	212.62	212.62	212.62	**1,063.11**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Projected Participation	150	150	150	150	150	**750**
Evap Fan Controls - SCI	*3.5.3*	Energy Savings (MWh)	61.32	61.32	61.32	61.32	61.32	**306.60**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	75	75	75	75	75	**375**
Refrigerator - Reach In - SCI	*3.5.1*	Energy Savings (MWh)	16.10	16.10	16.10	16.10	16.10	**80.48**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	30	30	30	30	30	**150**
Freezer - Reach In - SCI	*3.5.1*	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	**116.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Refrigerated Case Cover - SCI	*3.5.9, 3.5.14 & 3.5.15*	Energy Savings (MWh)	158.60	158.60	158.60	158.60	158.60	**793.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2,000	2,000	2,000	2,000	2,000	**10,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Anti Sweat Heater Controls - SCI	*3.5.5*	Energy Savings (MWh)	201.84	201.84	201.84	201.84	201.84	**1,009.22**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	300	300	300	300	300	**1,500**
Strip Curtain - SCI	*3.5.8*	Energy Savings (MWh)	1.48	1.48	1.48	1.48	1.48	**7.40**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	40	40	40	40	40	**200**
Ice Machine - SCI	*3.7.1*	Energy Savings (MWh)	8.55	8.55	8.55	8.55	8.55	**42.77**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	20	20	20	20	20	**100**
Beverage Vending Machine - Controls - SCI	*3.7.2*	Energy Savings (MWh)	18.75	18.75	18.75	18.75	18.75	**93.77**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Steam Cooker - SCI	*3.7.3*	Energy Savings (MWh)	52.76	52.76	52.76	52.76	52.76	**263.82**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	10	10	10	10	10	**50**
Fryer - SCI	*3.7.6*	Energy Savings (MWh)	11.87	11.87	11.87	11.87	11.87	**59.37**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Griddle - SCI	*3.7.9*	Energy Savings (MWh)	27.39	27.39	27.39	27.39	27.39	**136.97**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**
Hot Food Holding Cabinet - SCI	*3.7.7*	Energy Savings (MWh)	5.45	5.45	5.45	5.45	5.45	**27.27**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Combination Oven - SCI	*3.7.4*	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	**117.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Convection Oven - SCI	*3.7.5*	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	**63.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Dishwasher - SCI	*3.7.8*	Energy Savings (MWh)	37.65	37.65	37.65	37.65	37.65	**188.24**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**
Induction Cooktop - SCI	*3.7.10*	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Pre-Rinse Sprayer - SCI	*3.4.2*	Energy Savings (MWh)	46.02	46.02	46.02	46.02	46.02	**230.08**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	25	25	25	25	25	**125**
Freezer Recycling - SCI	*2.4.3*	Energy Savings (MWh)	11.36	11.36	11.36	11.36	11.36	**56.79**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	15	15	15	15	15	**75**
Refrigerator Recycling - SCI	*2.4.3*	Energy Savings (MWh)	378.68	378.68	378.68	378.68	378.68	**1,893.41**
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.28**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.21**
		Projected Participation	500	500	500	500	500	**2,500**
Room Air Conditioner Recycling - SCI	*2.2.8*	Energy Savings (MWh)	42.22	42.22	42.22	42.22	42.22	**211.09**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.56**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	400	400	400	400	400	**2,000**
Dehumidifiers Recycling - SCI	*2.4.12*	Energy Savings (MWh)	147.39	147.39	147.39	147.39	147.39	**736.95**
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.28**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	300	300	300	300	300	**1,500**
LV Refrigerator Recycling - SCI	*2.4.4*	Energy Savings (MWh)	5.88	5.88	5.88	5.88	5.88	**29.42**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	15	15	15	15	15	**75**
Cooler Recycling - SCI	*2.4.6*	Energy Savings (MWh)	1.56	1.56	1.56	1.56	1.56	**7.80**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	15	15	15	15	15	**75**
EV Charging Cord - Level 2 - SCI	*MA TRM V11*	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	**3.32**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	30	30	30	30	30	**150**
Clothes Washer - SCI	*2.4.8*	Energy Savings (MWh)	1.12	1.12	1.12	1.12	1.12	**5.59**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Clothes Dryer - SCI	*2.4.9*	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	**3.72**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Refrigerator - SCI	*2.4.1*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Water Heater - Heat Pump - SCI	*2.3.1*	Energy Savings (MWh)	1.16	1.16	1.16	1.16	1.16	**5.78**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Freezer - SCI	*2.4.2*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dehumidifier - SCI	*2.4.11*	Energy Savings (MWh)	2.96	2.96	2.96	2.96	2.96	**14.79**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
Uninterruptible Power Supply (UPS) - SCI	*3.11.4*	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	**71.01**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Agricultural Process Lighting	*3.1.7*	Energy Savings (MWh)	7.28	7.28	7.28	7.28	7.28	**36.42**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	200	200	200	200	200	**1,000**
Auto Milker Takeoff	*4.1.1*	Energy Savings (MWh)	19.38	19.38	19.38	19.38	19.38	**96.90**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**
Dairy Scroll Compressor	*4.1.2*	Energy Savings (MWh)	3.99	3.99	3.99	3.99	3.99	**19.93**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
HE Ventilation Fans	*4.1.3*	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	**3.28**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Heat Reclaimer	*4.1.4*	Energy Savings (MWh)	25.28	25.28	25.28	25.28	25.28	**126.38**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	5	5	5	5	5	**25**
High Volume Low Speed Fan	*4.1.5*	Energy Savings (MWh)	86.00	86.00	86.00	86.00	86.00	**430.01**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.23**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Livestock Waterer	*4.1.6*	Energy Savings (MWh)	10.04	10.04	10.04	10.04	10.04	**50.20**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Dairy Vac Pump VSD Control	*4.1.7*	Energy Savings (MWh)	50.38	50.38	50.38	50.38	50.38	**251.91**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	5	5	5	5	5	**25**
Low Pressure Irrigation	*4.1.8*	Energy Savings (MWh)	64.92	64.92	64.92	64.92	64.92	**324.62**
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.91**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Custom - Agricultural	*1.17*	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	**250.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	1	1	1	1	1	**3**
Engine Block Heater Timer	*3.11.2*	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	**1.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**3**
Street Lighting (Tariff / Utility Owned(EMU))	*3.1.1*	Energy Savings (MWh)	252.00	252.00	252.00	252.00	252.00	**1,260.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Street Lighting (Tariff / Customer Owned(MU))	*3.1.1*	Energy Savings (MWh)	252.00	252.00	252.00	252.00	252.00	**1,260.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Custom - SCI	*1.17*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.44**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.24**
		Projected Participation	10	10	10	10	10	**50**
Custom - Compressed Air - SCI	*1.17 & 3.10*	Energy Savings (MWh)	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	**10,000.00**
		Summer Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	**1.19**
		Winter Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	**1.19**
		Projected Participation	20	20	20	20	20	**100**
Custom - Refrigeration - SCI	*1.17 & 3.5*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.51**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.41**
		Projected Participation	10	10	10	10	10	**50**
Custom - Solar - SCI	*1.17 & 3.11.6*	Energy Savings (MWh)	2,302.25	2,302.25	2,302.25	2,302.25	2,302.25	**11,511.25**
		Summer Demand Reduction (MW)	0.61	0.61	0.61	0.61	0.61	**3.06**
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.44**
		Projected Participation	2,000	2,000	2,000	2,000	2,000	**10,000**
Custom - CHP - SCI	*1.17*	Energy Savings (MWh)	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	**25,000.00**
		Summer Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	**2.99**
		Winter Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	**2.99**
		Projected Participation	1	1	1	1	1	**3**
Custom - Bldg Improvements - SCI	*1.17 & Vol 2*	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	**250.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**3**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Custom - New Construction - SCI	*1.17 & Vol 2*	Energy Savings (MWh)	800.00	800.00	800.00	800.00	800.00	**4,000.00**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.49**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Projected Participation	8	8	8	8	8	**40**
Custom - Audit & Education - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Building Tune Up - SCI	*3.2.7,8,17,20&21, 3.4.3, 3.5.3,4,5,6,10,12&16, 3.6.2*	Energy Savings (MWh)	14,518.19	14,518.19	14,518.19	14,518.19	14,518.19	**72,590.94**
		Summer Demand Reduction (MW)	2.04	2.04	2.04	2.04	2.04	**10.19**
		Winter Demand Reduction (MW)	1.67	1.67	1.67	1.67	1.67	**8.34**
		Projected Participation	280	280	280	280	280	**1,400**
Virtual/Meter Data Commissioning - SCI	*1.17*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.43**
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.36**
		Projected Participation	100	100	100	100	100	**500**
Retrocommissioning - SCI	*1.17*	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	**250.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	5	5	5	5	5	**25**
Building Operations Training - SCI	*3.11.5*	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	**12,500.00**
		Summer Demand Reduction (MW)	0.36	0.36	0.36	0.36	0.36	**1.79**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.89**
		Projected Participation	50	50	50	50	50	**250**
Customer Concierge - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Energy Consultation - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Audits - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Managed Charging	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	**0.16**
		Winter Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	**0.16**
		Projected Participation	113	125	150	175	200	**763**
Storage	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	**0.32**
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	**0.64**
		Projected Participation	20	23	25	28	30	**126**
Thermostat DR	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.11	0.12	0.13	0.14	0.16	**0.66**
		Winter Demand Reduction (MW)	0.11	0.12	0.13	0.14	0.16	**0.66**
		Projected Participation	350	363	400	450	500	**2,063**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Thermostat DLS	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.20	0.21	0.23	0.24	0.25	**1.14**
		Winter Demand Reduction (MW)	0.20	0.21	0.23	0.24	0.25	**1.14**
		Projected Participation	575	600	650	700	725	**3,250**
Custom DLS & DR - SCI	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	**8.05**
		Winter Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	**8.05**
		Projected Participation	20	20	20	20	20	**100**
Front of Meter Measures - SCI	*1.17*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - DI - LCI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	**0.58**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Common - DI - LCI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	11.90	11.90	11.90	11.90	11.90	**59.50**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - Prescriptive - LCI	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Prescriptive - LCI	*2.4.8*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Tenant - Custom - LCI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Custom - LCI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
Air Conditioning - Level 1 <=5.4 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	2.69	2.69	2.69	2.69	2.69	**13.45**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	28.18	28.18	28.18	28.18	28.18	**140.89**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
Air Conditioning - Level 1 >=20 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	32.14	32.14	32.14	32.14	32.14	**160.71**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Heat Pump - Level 1 <=5.4 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	5.33	5.33	5.33	5.33	5.33	**26.65**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	8	8	8	8	8	**40**
Heat Pump - Water & GeoT - LCI	*3.2.4*	Energy Savings (MWh)	9.60	9.60	9.60	9.60	9.60	**48.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Ductless Mini-Split HP – LCI	*3.2.5 & 3.2.6*	Energy Savings (MWh)	1.77	1.77	1.77	1.77	1.77	**8.86**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
PTAC - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	0.17	0.17	0.17	0.17	0.17	**0.83**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
PTHP - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	0.31	0.31	0.31	0.31	0.31	**1.55**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Room Air Conditioner- LCI	*3.2.9*	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	**0.24**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Smart Thermostat - LCI	*3.2.18*	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	**1.02**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
HVAC - Custom - LCI	*3.2*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	1	1	1	1	1	**5**
Circulating Pump (Mid Strm) - LCI	*3.3.5*	Energy Savings (MWh)	0.28	0.28	0.28	0.28	0.28	**1.41**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
HVAC - Maintenance - LCI	*3.2.7 & 3.2.8*	Energy Savings (MWh)	0.59	0.59	0.59	0.59	0.59	**2.96**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Furnace Fan (Retrofit or New to ECM) - LCI	*3.3.3*	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	**1.01**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Lighting Controls (Daylight & Occupancy) - LCI	*3.1.3*	Energy Savings (MWh)	529.86	529.86	529.86	529.86	529.86	**2,649.28**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.46**
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.37**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Lighting Control (Network) - LCI	*3.1.3*	Energy Savings (MWh)	3,090.83	3,090.83	3,090.83	3,090.83	3,090.83	**15,454.16**
		Summer Demand Reduction (MW)	0.54	0.54	0.54	0.54	0.54	**2.68**
		Winter Demand Reduction (MW)	0.44	0.44	0.44	0.44	0.44	**2.18**
		Projected Participation	2,500,000	2,500,000	2,500,000	2,500,000	2,500,000	**12,500,000**
LED Linear - LCI	*3.1.1*	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	**34,422.67**
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	**5.97**
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	**4.86**
		Projected Participation	40,000	40,000	40,000	40,000	40,000	**200,000**
Exit Sign - LCI	*3.1.4*	Energy Savings (MWh)	25.23	25.23	25.23	25.23	25.23	**126.14**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	120	120	120	120	120	**600**
LED Fixture External - LCI	*3.1.1*	Energy Savings (MWh)	3,315.68	3,315.68	3,315.68	3,315.68	3,315.68	**16,578.40**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.54**
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	**2.86**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**
LED Fixture Internal - LCI	*3.1.1*	Energy Savings (MWh)	7,028.71	7,028.71	7,028.71	7,028.71	7,028.71	**35,143.57**
		Summer Demand Reduction (MW)	1.22	1.22	1.22	1.22	1.22	**6.09**
		Winter Demand Reduction (MW)	0.99	0.99	0.99	0.99	0.99	**4.96**
		Projected Participation	12,000	12,000	12,000	12,000	12,000	**60,000**
LED Lamp Mogul Base - LCI	*3.1.1*	Energy Savings (MWh)	197.12	197.12	197.12	197.12	197.12	**985.60**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.17**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	500	500	500	500	500	**2,500**
Street & Area Lighting (Customer Owned) - LCI	*3.1.1*	Energy Savings (MWh)	7.56	7.56	7.56	7.56	7.56	**37.80**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	30	30	30	30	30	**150**
LED Reach in Refrig / Frzer Light - LCI	*3.1.5*	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	**253.34**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	200	200	200	200	200	**1,000**
Reach in Refrig / Frzer Occupancy Sensor - LCI	*3.5.15*	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	**76.32**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	200	200	200	200	200	**1,000**
Lighting - Other - LCI	*3.1*	Energy Savings (MWh)	600.00	600.00	600.00	600.00	600.00	**3,000.00**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.52**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.42**
		Projected Participation	6	6	6	6	6	**30**
Lighting - Custom - LCI	*1.17 & 3.1*	Energy Savings (MWh)	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	**15,000.01**
		Summer Demand Reduction (MW)	0.52	0.52	0.52	0.52	0.52	**2.60**
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	**2.12**
		Projected Participation	6	6	6	6	6	**30**
Linear Lamp - MS - LCI	*3.1.6*	Energy Savings (MWh)	1,444.15	1,444.15	1,444.15	1,444.15	1,444.15	**7,220.75**
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	**1.59**
		Winter Demand Reduction (MW)	0.21	0.21	0.21	0.21	0.21	**1.07**
		Projected Participation	70,000	70,000	70,000	70,000	70,000	**350,000**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
High/Low Bay Lamp - MS - LCI	*3.1.6*	Energy Savings (MWh)	2,636.15	2,636.15	2,636.15	2,636.15	2,636.15	**13,180.73**
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	**2.90**
		Winter Demand Reduction (MW)	0.39	0.39	0.39	0.39	0.39	**1.95**
		Projected Participation	9,000	9,000	9,000	9,000	9,000	**45,000**
LED Fixture - MS - LCI	*3.1.6*	Energy Savings (MWh)	742.71	742.71	742.71	742.71	742.71	**3,713.53**
		Summer Demand Reduction (MW)	0.16	0.16	0.16	0.16	0.16	**0.82**
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.55**
		Projected Participation	9,000	9,000	9,000	9,000	9,000	**45,000**
Lighting Controls - MS-LCI	*3.1.6*	Energy Savings (MWh)	1,198.11	1,198.11	1,198.11	1,198.11	1,198.11	**5,990.54**
		Summer Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	**1.32**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.89**
		Projected Participation	20,000	20,000	20,000	20,000	20,000	**100,000**
Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	*3.5.11*	Energy Savings (MWh)	2.06	2.06	2.06	2.06	2.06	**10.30**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
ECM Evap Fan Motor - LCI	*3.5.2*	Energy Savings (MWh)	14.17	14.17	14.17	14.17	14.17	**70.87**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Evap Fan Controls - LCI	*3.5.3*	Energy Savings (MWh)	8.18	8.18	8.18	8.18	8.18	**40.88**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Refrigerator - Reach In - LCI	*3.5.1*	Energy Savings (MWh)	2.68	2.68	2.68	2.68	2.68	**13.41**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Freezer - Reach In - LCI	*3.5.1*	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	**116.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Refrigerated Case Cover - LCI	*3.5.9, 3.5.14 & 3.5.15*	Energy Savings (MWh)	3.96	3.96	3.96	3.96	3.96	**19.82**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Anti Sweat Heater Control - LCI	*3.5.5*	Energy Savings (MWh)	3.36	3.36	3.36	3.36	3.36	**16.82**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Strip Curtain - LCI	*3.5.8*	Energy Savings (MWh)	0.19	0.19	0.19	0.19	0.19	**0.93**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Ice Machine - LCI	*3.7.1*	Energy Savings (MWh)	2.14	2.14	2.14	2.14	2.14	**10.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Beverage Vending Machine - Controls - LCI	*3.7.2*	Energy Savings (MWh)	1.88	1.88	1.88	1.88	1.88	**9.38**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Steam Cooker - LCI	*3.7.3*	Energy Savings (MWh)	26.38	26.38	26.38	26.38	26.38	**131.91**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	5	5	5	5	5	**25**
Fryer - LCI	*3.7.6*	Energy Savings (MWh)	5.94	5.94	5.94	5.94	5.94	**29.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Griddle - LCI	*3.7.9*	Energy Savings (MWh)	13.70	13.70	13.70	13.70	13.70	**68.49**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Hot Food Holding Cabinet - LCI	*3.7.7*	Energy Savings (MWh)	2.73	2.73	2.73	2.73	2.73	**13.63**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Combination Oven - LCI	*3.7.4*	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	**117.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Convection Oven - LCI	*3.7.5*	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	**63.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Dishwasher - LCI	*3.7.8*	Energy Savings (MWh)	18.82	18.82	18.82	18.82	18.82	**94.12**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Induction Cooktop - LCI	*3.7.10*	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Pre-Rinse Sprayer - LCI	*3.4.2*	Energy Savings (MWh)	92.03	92.03	92.03	92.03	92.03	**460.16**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Projected Participation	50	50	50	50	50	**250**
Freezer Recycling - LCI	*2.4.3*	Energy Savings (MWh)	2.27	2.27	2.27	2.27	2.27	**11.36**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**15**
Refrigerator Recycling - LCI	*2.4.3*	Energy Savings (MWh)	104.14	104.14	104.14	104.14	104.14	**520.69**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	138	138	138	138	138	**688**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Room Air Conditioner Recycling - LCI	*2.2.8*	Energy Savings (MWh)	2.64	2.64	2.64	2.64	2.64	**13.19**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	25	25	25	25	25	**125**
Dehumidifiers Recycling - LCI	*2.4.12*	Energy Savings (MWh)	9.21	9.21	9.21	9.21	9.21	**46.06**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	19	19	19	19	19	**94**
LV Refrigerator Recycling - LCI	*2.4.4*	Energy Savings (MWh)	0.98	0.98	0.98	0.98	0.98	**4.90**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**13**
Cooler Recycling - LCI	*2.4.6*	Energy Savings (MWh)	0.26	0.26	0.26	0.26	0.26	**1.30**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**13**
EV Charging Cord - Level 2 - LCI	*MA TRM V11*	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Clothes Washer - LCI	*2.4.8*	Energy Savings (MWh)	0.56	0.56	0.56	0.56	0.56	**2.79**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Clothes Dryer - LCI	*2.4.9*	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	**1.86**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Refrigerator - LCI	*2.4.1*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Water Heater - Heat Pump - LCI	*2.3.1*	Energy Savings (MWh)	0.46	0.46	0.46	0.46	0.46	**2.31**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Freezer - LCI	*2.4.2*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dehumidifier - LCI	*2.4.11*	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	**3.70**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Uninterruptible Power Supply (UPS) - LCI	*3.11.4*	Energy Savings (MWh)	5.68	5.68	5.68	5.68	5.68	**28.40**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Custom - LCI	*1.17*	Energy Savings (MWh)	11,200.00	11,200.00	11,200.00	11,200.00	11,200.00	**56,000.00**
		Summer Demand Reduction (MW)	1.17	1.17	1.17	1.17	1.17	**5.83**
		Winter Demand Reduction (MW)	1.05	1.05	1.05	1.05	1.05	**5.27**
		Projected Participation	112	112	112	112	112	**560**
Custom - Compressed Air - LCI	*1.17 & 3.10*	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	**7,000.00**
		Summer Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	**0.86**
		Winter Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	**0.86**
		Projected Participation	14	14	14	14	14	**70**
Custom - Refrigeration - LCI	*1.17 & 3.5*	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	**7,000.00**
		Summer Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	**0.71**
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.57**
		Projected Participation	14	14	14	14	14	**70**
Custom - Solar - LCI	*1.17*	Energy Savings (MWh)	10,820.58	10,820.58	10,820.58	10,820.58	10,820.58	**54,102.88**
		Summer Demand Reduction (MW)	2.88	2.88	2.88	2.88	2.88	**14.39**
		Winter Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	**2.05**
		Projected Participation	9,400	9,400	9,400	9,400	9,400	**47,000**
Custom - CHP - LCI	*1.17 & 3.11.6*	Energy Savings (MWh)	15,000.00	15,000.00	15,000.00	15,000.00	15,000.00	**75,000.00**
		Summer Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	**8.97**
		Winter Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	**8.97**
		Projected Participation	2	2	2	2	2	**8**
Custom - Bldg Improvements - LCI	*1.17 & Vol 2*	Energy Savings (MWh)	6,000.00	6,000.00	6,000.00	6,000.00	6,000.00	**30,000.00**
		Summer Demand Reduction (MW)	0.90	0.90	0.90	0.90	0.90	**4.51**
		Winter Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	**3.54**
		Projected Participation	60	60	60	60	60	**300**
Custom - New Construction - LCI	*1.17 & Vol 2*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.12	0.12	0.12	0.12	0.12	**0.61**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	10	10	10	10	10	**50**
Custom - Audit & Education - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Virtual/Meter Data Commissioning - LCI	*1.17*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	10	10	10	10	10	**50**
Retrocommissioning - LCI	*1.17*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	1	1	1	1	1	**5**
Building Operations Training - LCI	*3.11.5*	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	**2,500.00**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.36**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Projected Participation	10	10	10	10	10	**50**
Customer Concierge - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Energy Consultation - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Audits - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Managed Charging	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	**0.07**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	**0.07**
		Projected Participation	45	50	60	70	80	**305**
Storage	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	**0.32**
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	**0.64**
		Projected Participation	20	23	25	28	30	**126**
Custom DLS & DR - LCI	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	**10.73**
		Winter Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	**10.73**
		Projected Participation	10	10	10	10	10	**50**
Front of Meter Measures - LCI	*1.17*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**

1 Each measure should receive its own row in the table.

2 Energy Savings and Demand Reduction should be aggregate (not per-unit) compliance values (not lifetime). Express MW impacts at the system-level (inclusive of line losses).

3 Projected participation should use the same basis as the units shown in Table 8.

4 If rows need to be added to accommodate more than 3 measures, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

5 The Measure Number reflects the Company's primary planning assumptions, other sections of the applicable PA TRM or other Evaluation guidance (e.g. Interim Measure Protocols) may be used to support the Company's program reporting and evaluation results.

Table 10: Budget by Program

Program Name: [1]	Residential Energy Solutions Program						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$25,129**	**$24,977**	**$24,418**	**$22,059**	**$22,346**	**$118,928**
Incentives ($000) [2]	Rebates	$10,471	$10,561	$10,703	$8,723	$8,886	$49,345
	Upstream/Midstream Buydown	$0	$0	$0	$0	$0	$0
	Kits	$0	$0	$0	$0	$0	$0
	Direct Install Materials & Labor	$58	$58	$58	$58	$58	$290
	Braided Funding Support Labor	$415	$380	$380	$291	$291	$1,758
	Incentive Total	**$10,944**	**$11,000**	**$11,141**	**$9,072**	**$9,235**	**$51,392**
Non-Incentives ($000)	Program Design	$403	$172	$168	$166	$166	$1,075
	Administrative	$1,326	$1,420	$1,211	$1,201	$1,294	$6,453
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$10,458	$10,471	$10,009	$9,796	$9,816	$50,551
	Marketing	$1,235	$1,250	$1,239	$1,234	$1,236	$6,194
	EM&V	$668	$664	$649	$589	$597	$3,167
	AEPS Registration Support	$0	$0	$0	$0	$0	$0
	Other (Describe)	$95	$0	$0	$0	$0	$95
	Non-Incentive Total	**$14,185**	**$13,978**	**$13,276**	**$12,986**	**$13,110**	**$67,536**
Percent Incentives[3]		44%	44%	46%	41%	41%	43%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: [1]	Low Income Energy Efficiency Program						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$11,128**	**$10,826**	**$10,840**	**$10,767**	**$10,684**	**$54,246**
Incentives ($000) [2]	Rebates	$875	$875	$875	$818	$818	$4,261
	Upstream/Midstream Buydown	$0	$0	$0	$0	$0	$0
	Kits	$200	$200	$200	$200	$200	$1,000
	Direct Install Materials & Labor	$5,524	$5,524	$5,524	$5,524	$5,524	$27,620
	Braided Funding Support Labor	$130	$124	$124	$128	$128	$634
	Incentive Total	**$6,729**	**$6,723**	**$6,723**	**$6,670**	**$6,670**	**$33,514**
Non-Incentives ($000)	Program Design	$113	$46	$47	$47	$46	$298
	Administrative	$370	$372	$336	$337	$352	$1,767
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$2,976	$2,784	$2,830	$2,810	$2,719	$14,119
	Marketing	$626	$624	$627	$627	$624	$3,127
	EM&V	$287	$278	$278	$277	$274	$1,394
	AEPS Registration Support	$0	$0	$0	$0	$0	$0
	Other (Describe)	$27	$0	$0	$0	$0	$27
	Non-Incentive Total	**$4,399**	**$4,103**	**$4,118**	**$4,098**	**$4,014**	**$20,732**
Percent Incentives[3]		60%	62%	62%	62%	62%	62%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: [1]	C&I Energy Solutions Program - Small						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$24,331**	**$23,467**	**$23,369**	**$23,407**	**$23,499**	**$118,074**
Incentives ($000) [2]	Rebates	$4,880	$4,884	$4,892	$4,900	$4,908	$24,464
	Upstream/Midstream Buydown	$959	$959	$959	$959	$959	$4,795
	Kits	$0	$0	$0	$0	$0	$0
	Direct Install Materials & Labor	$6,265	$6,265	$6,265	$6,265	$6,265	$31,327
	Braided Funding Support Labor	$336	$309	$309	$314	$314	$1,581
	Incentive Total	**$12,440**	**$12,418**	**$12,425**	**$12,438**	**$12,446**	**$62,167**
Non-Incentives ($000)	Program Design	$312	$125	$127	$128	$129	$822
	Administrative	$1,030	$1,036	$922	$933	$1,004	$4,925
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$8,219	$7,691	$7,698	$7,707	$7,713	$39,028
	Marketing	$928	$921	$925	$928	$929	$4,632
	EM&V	$1,247	$1,202	$1,197	$1,199	$1,204	$6,049
	AEPS Registration Support	$81	$74	$74	$74	$74	$378
	Other (Describe)	$73	$0	$0	$0	$0	$73
	Non-Incentive Total	**$11,891**	**$11,050**	**$10,944**	**$10,969**	**$11,053**	**$55,907**
Percent Incentives[3]		51%	53%	53%	53%	53%	53%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: [1]	C&I Energy Solutions Program - Large						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$20,336**	**$19,717**	**$19,636**	**$19,661**	**$19,722**	**$99,071**
Incentives ($000) [2]	Rebates	$10,548	$10,552	$10,555	$10,559	$10,562	$52,775
	Upstream/Midstream Buydown	$482	$482	$482	$482	$482	$2,408
	Kits	$0	$0	$0	$0	$0	$0
	Direct Install Materials & Labor	$4	$4	$4	$4	$4	$18
	Braided Funding Support Labor	$290	$279	$279	$288	$288	$1,424
	Incentive Total	**$11,324**	**$11,316**	**$11,319**	**$11,332**	**$11,335**	**$56,626**
Non-Incentives ($000)	Program Design	$234	$94	$96	$96	$97	$616
	Administrative	$774	$780	$694	$702	$755	$3,705
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$6,046	$5,664	$5,665	$5,666	$5,667	$28,706
	Marketing	$742	$737	$740	$742	$743	$3,705
	EM&V	$1,042	$1,010	$1,006	$1,007	$1,010	$5,076
	AEPS Registration Support	$119	$116	$116	$116	$116	$582
	Other (Describe)	$55	$0	$0	$0	$0	$55
	Non-Incentive Total	**$9,012**	**$8,401**	**$8,316**	**$8,329**	**$8,387**	**$42,445**
Percent Incentives [3]		56%	57%	58%	58%	57%	57%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 10: Budget by Program

Program Name: [1]	Total Portfolio						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$80,924**	**$78,988**	**$78,262**	**$75,894**	**$76,251**	**$390,320**
Incentives ($000) [2]	Rebates	$26,773	$26,872	$27,024	$25,000	$25,174	$130,844
	Upstream/Midstream Buydown	$1,441	$1,441	$1,441	$1,441	$1,441	$7,204
	Kits	$200	$200	$200	$200	$200	$1,000
	Direct Install Materials & Labor	$11,851	$11,851	$11,851	$11,851	$11,851	$59,256
	Braided Funding Support Labor	$1,171	$1,092	$1,092	$1,020	$1,020	$5,396
	Incentive Total	**$41,436**	**$41,456**	**$41,608**	**$39,513**	**$39,686**	**$203,699**
Non-Incentives ($000)	Program Design	$1,063	$438	$438	$438	$438	$2,813
	Administrative	$3,501	$3,609	$3,163	$3,172	$3,405	$16,850
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$27,700	$26,609	$26,202	$25,978	$25,915	$132,404
	Marketing	$3,532	$3,532	$3,532	$3,532	$3,532	$17,658
	EM&V	$3,243	$3,154	$3,131	$3,072	$3,086	$15,686
	AEPS Registration Support	$200	$190	$190	$190	$190	$960
	Other (Describe)	$250	$0	$0	$0	$0	$250
	Non-Incentive Total	**$39,488**	**$37,532**	**$36,654**	**$36,382**	**$36,564**	**$186,620**
Percent Incentives[3]		51%	52%	53%	52%	52%	52%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 11: Summary of EE&C Costs by Sector and Program

Sector	EE&C Program [1]	Cost Elements ($) [2]									Total Cost	Expected Acquisition Cost [3] ($/MWh)	Levelized Cost [4] ($/MWh)	Expected Acquisition Cost ($/MW)
		Incentives	*Program Design*	*Administrative*	*EDC Delivery Costs*	*CSP Delivery Fees*	*Marketing*	*EM&V*	*AEPS Registration Support*	*Other (Describe)*				
Residential Portfolio (incl. Low-Income)	*Residential Energy Solutions Program*	$51,392,196	$0	$0	$0	$50,551,043	$6,194,040	$3,167,406	$0	$0	$111,304,686	$381.20	$0.11	$2,136,622
	Low Income Energy Efficiency Program	$33,514,241	$0	$0	$0	$14,118,698	$3,127,209	$1,393,805	$0	$0	$52,153,953	$739.92	$0.14	$3,453,208
											$0			
											$0			
	Sector Total [5]	**$84,906,437**	**$0**	**$0**	**$0**	**$64,669,742**	**$9,321,249**	**$4,561,211**	**$0**	**$0**	**$163,458,639**	**$1,121**	**$0.25**	**$5,589,830**
Small C&I	*C&I Energy Solutions Program - Small*	$62,166,820	$0	$0	$0	$39,028,150	$4,631,768	$6,049,346	$377,812	$0	$112,253,896	$309.89	$0.08	$2,189,029
											$0			
											$0			
											$0			
	Sector Total	**$62,166,820**	**$0**	**$0**	**$0**	**$39,028,150**	**$4,631,768**	**$6,049,346**	**$377,812**	**$0**	**$112,253,896**	**$310**	**$0.08**	**$2,189,029**
Large C&I	*C&I Energy Solutions Program - Large*	$56,625,824	$0	$0	$0	$28,706,131	$3,704,512	$5,075,737	$582,283	$0	$94,694,487	$240.14	$0.07	$1,769,779
											$0			
											$0			
											$0			
	Sector Total	**$56,625,824**	**$0**	**$0**	**$0**	**$28,706,131**	**$3,704,512**	**$5,075,737**	**$582,283**	**$0**	**$94,694,487**	**$240**	**$0.07**	**$1,769,779**

1 List each EE&C program by name. Add rows as necessary, preserving formulas in totals rows.

2 List all cost elements for each program that can be directly identified as relating exclusively to the specific customer sector addressed in this table. Any cost elements that are applicable to multiple sectors, or are common across all sectors, are to be listed in Table 11 (relating to Common Costs). Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

3 The numerator in the acquisition cost calculation is the full EDC cost, free of any allocation. Acquisition costs are first-year.

4 The levelized cost of energy is the gross TRC costs divided by the discounted lifetime MWh savings

5 If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 12: Allocation of Common Costs to Applicable Customer Sector

Common Cost Element [1]	Total Cost ($)	Basis for Cost Allocation [2]	Sector Cost Allocation ($)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Program Design	$2,812,500	Ratio of each programs specific delivery and marketing costs	$1,373,716	$822,334	$616,449
Administrative	$16,850,000	Ratio of each programs specific delivery and marketing costs	$8,220,551	$4,924,560	$3,704,889
Other (Describe)	$250,000	Ratio of each programs specific delivery and marketing costs, including external legal	$121,486	$73,474	$55,040
Totals	$19,912,500		$9,715,753	$5,820,368	$4,376,379
SWE Cost [3]	$4,000,000				

1 List all identified cost elements that are determined to be applicable to multiple customer sectors, or are common across all sectors. Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

2 Provide a brief explanation of the methodology used to allocate each common cost element to the applicable customer sectors.

3 The Statewide Evaluator (SWE) costs are separate from the "2% rule" wherein EDCs have a budget ceiling that limits program spending to two percent of each EDC's 2006 annual revenue.

4 If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 13: Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs [1]	Total Common Costs [2]	Total of All Costs
Residential (Including Low-Income)	$163,458,639	$9,715,753	$173,174,392
Small C&I	$112,253,896	$5,820,368	$118,074,265
Large C&I	$94,694,487	$4,376,379	$99,070,866
Totals	$370,407,023	$19,912,500	$390,319,523

1 Cost figures are automatically carried over from the Sector Total rows of Table 11.

2 Cost figures are automatically carried over from the bottom row ("Totals") of Table 12. Does not include SWE cost.

Table 14: TRC Benefits Table (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year ($000)				TRC Benefits By Program Per Year ($000)				
Program	Program Year[2]	NTGR	Gross TRC[1]	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits[4]	Energy Benefits[5]	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Solutions Program	*PY18*	*1.0*	*1.07*	$9,927	$24,298.43	$14,185.18	$48,411	$17,801	$31,913	$2,468.00	-$325	$51,857
	PY19	*1.0*	*1.09*	$9,894	$26,630.17	$13,977.57	$50,502	$17,715	$34,916	$2,517.52	-$325	$54,823
	PY20	*1.0*	*1.04*	$9,884	$28,172.73	$13,276.37	$51,333	$17,679	$33,592	$2,580.37	-$325	$53,526
	PY21	*1.0*	*1.12*	$7,663	$22,475.46	$12,986.48	$43,125	$16,602	$29,457	$2,648.99	-$325	$48,383
	PY22	*1.0*	*1.09*	$7,663	$22,475.46	$13,110.20	$43,248	$16,337	$28,281	$2,726.36	-$325	$47,020
Residential Energy Solutions Program Total		***1.00***	***1.08***	$45,030	$124,052	$67,536	$236,618	$86,135	$158,158	$12,941	-$1,624	$255,609
Low Income Energy Efficiency Program	*PY18*	*1.0*	*1.09*	$6,621	$3,286.47	$4,399.41	$14,307	$3,342	$9,584	$2,676.48	$0	$15,602
	PY19	*1.0*	*1.14*	$6,617	$3,289.95	$4,103.23	$14,011	$3,291	$9,905	$2,729.91	$0	$15,926
	PY20	*1.0*	*1.16*	$6,617	$3,289.95	$4,117.61	$14,025	$3,396	$10,054	$2,784.52	$0	$16,234
	PY21	*1.0*	*1.18*	$6,576	$3,016.18	$4,097.57	$13,690	$3,402	$9,948	$2,840.36	$0	$16,190
	PY22	*1.0*	*1.21*	$6,576	$3,016.18	$4,014.34	$13,606	$3,426	$10,097	$2,897.45	$0	$16,420
Low Income Energy Efficiency Program Total		***1.00***	***1.15***	$33,007	$15,899	$20,732	$69,638	$16,855	$49,589	$13,929	$0	$80,373
C&I Energy Solutions Program - Small	*PY18*	*1.0*	*1.12*	$12,155	$49,412.03	$11,810.23	$73,377	$24,664	$59,555	($1,629.39)	-$81	$82,508
	PY19	*1.0*	*1.14*	$12,125	$50,020.27	$10,975.47	$73,120	$24,503	$60,736	($1,653.66)	-$81	$83,504
	PY20	*1.0*	*1.16*	$12,125	$50,405.88	$10,870.04	$73,401	$25,160	$61,927	($1,689.47)	-$81	$85,317
	PY21	*1.0*	*1.19*	$12,130	$50,401.01	$10,894.90	$73,426	$25,786	$63,172	($1,738.71)	-$81	$87,139
	PY22	*1.0*	*1.21*	$12,130	$50,401.01	$10,979.00	$73,510	$26,382	$64,423	($1,801.79)	-$81	$88,923
C&I Energy Solutions Program - Small Total		***1.00***	***1.17***	$60,663	$250,640	$55,530	$366,833	$126,496	$309,813	-$8,513	-$405	$427,391
C&I Energy Solutions Program - Large	*PY18*	*1.0*	*1.06*	$10,769	$53,918.02	$8,892.79	$73,580	$16,449	$66,046	($4,403.18)	-$381	$77,712
	PY19	*1.0*	*1.04*	$10,755	$56,650.42	$8,285.37	$75,691	$15,918	$67,388	($4,476.56)	-$381	$78,449
	PY20	*1.0*	*1.03*	$10,755	$58,462.82	$8,200.54	$77,419	$16,248	$68,742	($4,571.89)	-$381	$80,037
	PY21	*1.0*	*1.05*	$10,763	$58,454.57	$8,213.02	$77,431	$16,585	$70,153	($4,691.99)	-$381	$81,665
	PY22	*1.0*	*1.07*	$10,763	$58,454.57	$8,271.04	$77,489	$16,928	$71,546	($4,838.60)	-$381	$83,254
C&I Energy Solutions Program - Large Total		***1.00***	***1.05***	$53,806	$285,940	$41,863	$381,610	$82,128	$343,875	-$22,982	-$1,904	$401,116
Total[6]		***1.00***	***1.10***	**$192,507**	**$676,532**	**$185,660**	**$1,054,699**	**$311,613**	**$861,435**	**-$4,625**	**-$3,934**	**$1,164,489**

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 Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

3 Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

4 Capacity costs include generation, transmission, distribution, and capacity DRIPE.

5 Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPE components.

6 If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 14: TRC Benefits Table (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year ($000)				TRC Benefits By Program Per Year ($000)				
Program	Program Year[2]	NTGR	Net TRC[1]	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits[4]	Energy Benefits[5]	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Solutions Program	*PY18*	*0.72*	*0.85*	*$8,940*	*$15,901*	$14,185	$39,026	$9,756	$22,078	$1,469.39	-$300	$33,004
	PY19	*0.77*	*0.89*	*$8,910*	*$18,050*	$13,978	$40,938	$10,510	$24,868	$1,498.88	-$300	$36,578
	PY20	*0.74*	*0.83*	*$8,900*	*$19,474*	$13,276	$41,650	$10,059	$23,345	$1,536.25	-$300	$34,640
	PY21	*0.80*	*0.89*	*$6,677*	*$17,010*	$12,986	$36,674	$9,497	$21,733	$1,577.04	-$300	$32,507
	PY22	*0.78*	*0.83*	*$6,677*	*$17,010*	$13,110	$36,797	$8,843	$20,391	$1,623.02	-$300	$30,558
Residential Energy Solutions Program Total		***0.76***	***0.86***	$40,104	$87,446	$67,536	$195,086	$48,665	$112,415	$7,705	-$1,498	$167,286
Low Income Energy Efficiency Program	*PY18*	*0.81*	*0.94*	*$6,209*	*$2,625*	$4,399	$13,233	$2,518	$7,926	$1,975	$0	$12,419
	PY19	*0.82*	*0.98*	*$6,205*	*$2,629*	$4,103	$12,937	$2,484	$8,216	$2,014	$0	$12,714
	PY20	*0.82*	*1.00*	*$6,205*	*$2,629*	$4,118	$12,951	$2,562	$8,334	$2,055	$0	$12,950
	PY21	*0.81*	*1.01*	*$6,164*	*$2,483*	$4,098	$12,745	$2,565	$8,270	$2,096	$0	$12,931
	PY22	*0.80*	*1.03*	*$6,164*	*$2,483*	$4,014	$12,662	$2,568	$8,383	$2,138	$0	$13,089
Low Income Energy Efficiency Program Total		***0.81***	***0.99***	$30,947	$12,849	$20,732	$64,528	$12,697	$41,129	$10,277	$0	$64,103
C&I Energy Solutions Program - Small	*PY18*	*0.75*	*1.07*	*$12,113*	*$33,680*	$11,810	$57,603	$17,604	$44,691	($861.33)	-$50	$61,384
	PY19	*0.75*	*1.09*	*$12,084*	*$34,063*	$10,975	$57,122	$17,565	$45,564	($873.23)	-$50	$62,206
	PY20	*0.75*	*1.11*	*$12,084*	*$34,299*	$10,870	$57,252	$18,025	$46,445	($892.43)	-$50	$63,529
	PY21	*0.75*	*1.13*	*$12,088*	*$34,294*	$10,895	$57,277	$18,462	$47,365	($920.15)	-$50	$64,858
	PY22	*0.75*	*1.15*	*$12,088*	*$34,294*	$10,979	$57,361	$18,877	$48,296	($956.64)	-$50	$66,167
C&I Energy Solutions Program - Small Total		***0.81***	***1.11***	$60,457	$170,630	$55,530	$286,616	$90,534	$232,361	-$4,504	-$248	$318,144
C&I Energy Solutions Program - Large	*PY18*	*0.67*	*0.97*	*$10,759*	*$33,852*	$8,893	$53,504	$10,665	$44,225	($2,737)	-$233	$51,921
	PY19	*0.67*	*0.96*	*$10,747*	*$35,525*	$8,285	$54,557	$10,402	$45,117	($2,782)	-$233	$52,504
	PY20	*0.67*	*0.96*	*$10,747*	*$36,633*	$8,201	$55,580	$10,617	$46,017	($2,842)	-$233	$53,559
	PY21	*0.67*	*0.98*	*$10,755*	*$36,624*	$8,213	$55,592	$10,836	$46,954	($2,916)	-$233	$54,641
	PY22	*0.67*	*1.00*	*$10,755*	*$36,624*	$8,271	$55,650	$11,059	$47,883	($3,008)	-$233	$55,701
C&I Energy Solutions Program - Large Total		***0.67***	***0.98***	$53,762	$179,258	$41,863	$274,883	$53,578	$230,195	-$14,285	-$1,163	$268,326
Total [6]		***0.73***	***1.00***	**$185,271**	**$450,182**	**$185,660**	**$821,114**	**$205,474**	**$616,101**	**-$807**	**-$2,909**	**$817,859**

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 Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

3 Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

4 Capacity costs include generation, transmission, distribution, and capacity DRIPE.

5 Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPE components.

6 If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 15: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Sector	Total Discounted Lifetime Costs ($000)	Total Discounted Lifetime Benefits ($000) [3]	Present Value of Net[1] Benefits ($000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate EE (exclusive of Low-Income)[2]	$689,445	$802,029	$112,585	1.2
Low-Income	$106,490	$107,716	$1,226	1.0
Solar PV	$184,356	$147,860	-$36,496	0.8
CHP	$53,614	$84,519	$30,905	1.6
Demand Response	$20,794	$22,366	$1,571	1.1
Total Portfolio	$1,054,699	$1,164,489	$109,790	1.1

1 "Net" refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

2 The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

3 Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

Appendix C:
Company Supplemental Information

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		*PY18*		
Program	**Program Component**	**kWh**	**kW (Summer)**	**kW (Winter)**
Residential Energy Solutions Program	*Products*	22,434,262	5,973.74	2,713.80
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	11,814,130	2,358.56	2,353.31
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	12,353.16	17,839.69
	FTM-Res	-	-	-
	Subtotal	**55,428,522**	**24,167.49**	**26,457.37**
Low Income Energy Efficiency Program	*Weatherization*	4,068,902	428.04	834.86
	LI - Products	4,993,780	2,245.68	360.59
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	2,992,000	379.78	378.03
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	Subtotal	**13,992,433**	**3,306.20**	**1,860.04**
Residential Total		**69,420,955**	**27,473.70**	**28,317.41**
C&I Energy Solutions Program - Small[1]	*Multi Family - SCI*	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	1,997.97	2,048.40
	FTM-SCI	-	-	-
	Subtotal	**72,446,992**	**14,976**	**10,525**
Small Commercial & Industrial Total		**72,446,992**	**14,976.31**	**10,525.44**
C&I Energy Solutions Program - Large	*Multi Family - LCI*	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,206.33	2,256.77
	FTM-LCI	-	-	-
	Subtotal	**78,865,770**	**14,740.49**	**11,125.18**
Large Commercial & Industrial Total		**78,865,770**	**14,740.49**	**11,125.18**
Non-Residential Total		**151,312,763**	**29,716.79**	**21,650.61**
Total		**220,733,717**	**57,190.49**	**49,968.02**

[1] *Includes projected participation of Low Income households living in Multifamily housing.*

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY19		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	22,434,262	5,973.74	2,713.80
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	23,882,190	4,335.15	4,329.90
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	12,683.14	18,835.65
	FTM-Res	-	-	-
	Subtotal	**67,496,582**	**26,474.07**	**29,429.92**
Low Income Energy Efficiency Program	Weatherization	4,068,902	428.04	834.86
	LI - Products	4,993,780	2,245.68	360.59
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	4,182,000	459.67	457.92
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	Subtotal	**15,182,433**	**3,386.10**	**1,939.93**
Residential Total		**82,679,015**	**29,860.16**	**31,369.86**
C&I Energy Solutions Program - Small[1]	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,021.04	2,079.03
	FTM-SCI	-	-	-
	Subtotal	**72,446,992**	**14,999**	**10,556**
Small Commercial & Industrial Total		**72,446,992**	**14,999.38**	**10,556.07**
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,214.97	2,272.97
	FTM-LCI	-	-	-
	Subtotal	**78,865,770**	**14,749.13**	**11,141.38**
Large Commercial & Industrial Total		**78,865,770**	**14,749.13**	**11,141.38**
Non-Residential Total		**151,312,763**	**29,748.50**	**21,697.45**
Total		**233,991,777**	**59,608.67**	**53,067.31**

[1] *Includes projected participation of Low Income households living in Multifamily housing.*

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY20		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	22,413,755	5,970.72	2,710.77
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	15,845,940	3,444.26	3,439.01
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	13,274.70	20,094.28
	FTM-Res	-	-	-
	Subtotal	**59,439,824**	**26,171.71**	**29,794.63**
Low Income Energy Efficiency Program	Weatherization	4,068,902	428.04	834.86
	LI - Products	4,993,780	2,245.68	360.59
	LI - HVAC	12,633	1.54	2.45
	LI - Audits	-	-	-
	LI - Behavioral	3,773,000	485.94	484.19
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	Subtotal			**147**
	Residential Total	**74,213,257**	**29,584.08**	**31,760.83**
C&I Energy Solutions Program - Small[1]	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,060.85	2,123.88
	FTM-SCI	-	-	-
	Subtotal	**72,446,992**	**15,039**	**10,601**
	Small Commercial & Industrial Total	**72,446,992**	**15,039.18**	**10,600.92**
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,222.16	2,285.21
	FTM-LCI	-	-	-
	Subtotal	**78,865,770**	**14,756.32**	**11,153.61**
	Large Commercial & Industrial Total	**78,865,770**	**14,756.32**	**11,153.61**
	Non-Residential Total	**151,312,763**	**29,795.50**	**21,754.53**
	Total	**225,526,020**	**59,379.58**	**53,515.37**

[1] *Includes projected participation of Low Income households living in Multifamily housing.*

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		*PY21*		
Program	**Program Component**	**kWh**	**kW (Summer)**	**kW (Winter)**
Residential Energy Solutions Program	*Products*	13,075,221	4,888.71	913.84
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	22,985,280	3,608.43	3,603.18
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	13,926.45	21,166.85
	FTM-Res	-	-	-
	Subtotal	**57,240,631**	**25,905.62**	**29,234.44**
Low Income Energy Efficiency Program	*Weatherization*	4,068,902	428.04	834.86
	LI - Products	4,834,764	2,222.18	338.86
	LI - HVAC	3,064	0.43	0.61
	LI - Audits	-	-	-
	LI - Behavioral	2,656,000	346.94	345.19
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	Subtotal	**13,487,848**	**3,248.76**	**1,803.63**
	Residential Total	**70,728,478**	**29,154.38**	**31,038.06**
C&I Energy Solutions Program - Small[1]	*Multi Family - SCI*	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,107.36	2,177.96
	FTM-SCI	-	-	-
	Subtotal	**72,446,992**	**15,086**	**10,655**
	Small Commercial & Industrial Total	**72,446,992**	**15,085.70**	**10,655.00**
C&I Energy Solutions Program - Large	*Multi Family - LCI*	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,231.87	2,302.49
	FTM-LCI	-	-	-
	Subtotal	**78,865,770**	**14,766.03**	**11,170.89**
	Large Commercial & Industrial Total	**78,865,770**	**14,766.03**	**11,170.89**
	Non-Residential Total	**151,312,763**	**29,851.73**	**21,825.89**
	Total	**222,041,241**	**59,006.11**	**52,863.96**

[1] *Includes projected participation of Low Income households living in Multifamily housing.*

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		PY22		
Program	Program Component	kWh	kW (Summer)	kW (Winter)
Residential Energy Solutions Program	Products	13,075,221	4,888.71	913.84
	HVAC & Solar	16,445,153	2,906.70	2,549.76
	Comprehensive Audits	704,689	56.22	195.34
	Multi Family - Res	118,544	15.60	16.96
	Behavioral	18,120,600	1,948.14	1,942.88
	New Homes	3,911,744	503.52	788.51
	DLS & DR - Res	-	14,491.74	22,239.42
	FTM-Res	-	-	-
	Subtotal	**52,375,951**	**24,810.62**	**28,646.71**
Low Income Energy Efficiency Program	Weatherization	4,068,902	428.04	834.86
	LI - Products	4,834,764	2,222.18	338.86
	LI - HVAC	3,064	0.43	0.61
	LI - Audits	-	-	-
	LI - Behavioral	2,218,000	103.97	102.22
	LI - New Homes	82,362	10.60	16.60
	LI - Multifamily - Res	1,842,756	240.55	267.51
	Subtotal	**13,049,848**	**3,005.79**	**1,560.66**
Residential Total		**65,425,798**	**27,816.40**	**30,207.37**
C&I Energy Solutions Program - Small[1]	Multi Family - SCI	3,755,876	479.70	521.01
	Prescriptive - SCI	38,470,680	8,276.02	4,961.18
	Custom - SCI	12,152,250	1,737.79	1,072.00
	Energy Management - SCI	18,068,187	2,484.82	1,922.85
	DLS & DR - SCI	-	2,142.61	2,218.25
	FTM-SCI	-	-	-
	Subtotal	**72,446,992**	**15,121**	**10,695**
Small Commercial & Industrial Total		**72,446,992**	**15,120.95**	**10,695.29**
C&I Energy Solutions Program - Large	Multi Family - LCI	12,017	1.58	1.65
	Prescriptive - LCI	31,333,179	5,268.70	4,541.67
	Custom - LCI	46,820,575	7,175.16	4,275.01
	Energy Management - LCI	700,000	88.71	50.08
	DLS & DR - LCI	-	2,239.06	2,314.72
	FTM-LCI	-	-	-
	Subtotal	**78,865,770**	**14,773.22**	**11,183.12**
Large Commercial & Industrial Total		**78,865,770**	**14,773.22**	**11,183.12**
Non-Residential Total		**151,312,763**	**29,894.16**	**21,878.42**
Total		**216,738,561**	**57,710.57**	**52,085.79**

[1] *Includes projected participation of Low Income households living in Multifamily housing.*

Appendix C, FE PA Table 1: Program Savings by Program Year				
FE PA		*Total*		
Program	**Program Component**	**kWh**	**kW (Summer)**	**kW (Winter)**
Residential Energy Solutions Program	*Products*	93,432,722	27,695.60	9,966.04
	HVAC & Solar	82,225,765	14,533.49	12,748.79
	Comprehensive Audits	3,523,443	281.11	976.72
	Multi Family - Res	592,719	78.00	84.81
	Behavioral	92,648,140	15,694.55	15,668.28
	New Homes	19,558,720	2,517.58	3,942.56
	DLS & DR - Res	-	66,729.19	100,175.87
	FTM-Res	-	-	-
	Subtotal	**291,981,509**	**127,529.52**	**143,563.08**
Low Income Energy Efficiency Program	*Weatherization*	20,344,508	2,140.22	4,174.30
	LI - Products	24,650,869	11,181.42	1,759.50
	LI - HVAC	44,028	5.48	8.56
	LI - Audits	-	-	-
	LI - Behavioral	15,821,000	1,776.31	1,767.55
	LI - New Homes	411,812	53.01	83.01
	LI - Multifamily - Res	9,213,779	1,202.76	1,337.53
	Subtotal	**70,485,995**	**16,359.20**	**9,130.45**
Residential Total		**362,467,504**	**143,888.72**	**152,693.53**
***C&I Energy Solutions Program - Small*[1]**	*Multi Family - SCI*	18,779,378	2,398.52	2,605.05
	Prescriptive - SCI	192,353,398	41,380.11	24,805.90
	Custom - SCI	60,761,250	8,688.96	5,359.99
	Energy Management - SCI	90,340,935	12,424.10	9,614.25
	DLS & DR - SCI	-	10,329.82	10,647.53
	FTM-SCI	-	-	-
	Subtotal	**362,234,961**	**75,221.51**	**53,032.72**
Small Commercial & Industrial Total		**362,234,961**	**75,221.51**	**53,032.72**
C&I Energy Solutions Program - Large	*Multi Family - LCI*	60,084	7.90	8.25
	Prescriptive - LCI	156,665,893	26,343.49	22,708.34
	Custom - LCI	234,102,875	35,875.82	21,375.04
	Energy Management - LCI	3,500,000	443.56	250.39
	DLS & DR - LCI	-	11,114.41	11,432.16
	FTM-LCI	-	-	-
	Subtotal	**394,328,852**	**73,785.18**	**55,774.18**
Large Commercial & Industrial Total		**394,328,852**	**73,785.18**	**55,774.18**
Non-Residential Total		**756,563,813**	**149,006.69**	**108,806.90**
Total		**1,119,031,317**	**292,895.41**	**261,500.43**

[1] *Includes projected participation of Low Income households living in Multifamily housing.*

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	Products	Freezer Recycling	5	757	0.084	0.060	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator Recycling	6	757	0.103	0.077	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	3	106	0.262	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dehumidifier Recycling	4	491	0.173	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	5	392	0.053	0.040	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Cooler Recycling	5	104	0.014	0.011	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Washer	14	112	0.017	0.017	0.59	$36	$25	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	14	75	0.010	0.008	0.59	$0	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	14	8	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	11	41	0.006	0.004	0.59	$0	$10	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	11	10	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	14	74	0.010	0.010	0.59	$206	$25	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	14	33	0.004	0.005	0.59	$206	$5	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	9	172	0.019	0.025	0.59	$39	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Room Air Conditioner	9	13	0.022	0.000	0.59	$95	$15	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dehumidifier	12	148	0.028	0.000	0.59	$0	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	10	1,960	0.207	0.345	0.59	$1,685	$450	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	10	231	0.024	0.041	0.59	$1,685	$100	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	10	110	0.035	0.000	0.59	$218	$25	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dishwasher	10	49	0.008	0.013	0.59	$79	$10	$0.00	0.00	381	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	10	22	0.002	0.002	0.59	$143	$40	$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	PA IC DB
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncs	9	211	0.039	0.016	0.59	$104	$25	$0.00	6.87	0.00	1 Unit controlling 2.5 Ton CAC / ASHP	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Cooler	14	45	0.006	0.005	0.59	$282	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	14	145	0.021	0.021	0.59	$242	$48	$0.00	0.13	1,764	1 Unit	PA TRM	Co Assumption	Co Assumption
Residential Energy Solutions Program	Products	LED Linear	15	20	0.003	0.003	0.59	$14	$10	$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	8	14	0.000	0.000	0.59	$3	$3	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	10	13	0.000	0.000	0.59	$1	$1	$0.00	0.00	0.00	100 Light String	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	5	113	0.013	0.016	0.59	$41	$25	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	8	20	0.003	0.003	0.59	$25	$15	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	15	20	0.003	0.003	0.59	$14	$10	$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Agricultural Process Lighting	7	36	0.004	0.004	0.66	$21	$5	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Auto Milker Takeoff	10	1,938	0.329	0.329	0.66	$9,025	$414	$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	15	797	0.136	0.136	0.66	$557	$114	$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	HE Ventilation Fans	13	656	0.129	0.000	0.66	$226	$82	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Heat Reclaimer	15	5,055	0.859	0.910	0.66	$5,840	$727	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	15	8,600	4.300	0.000	0.66	$5,608	$1,398	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Livestock Waterer	10	1,004	0.000	0.400	0.66	$553	$150	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	15	10,076	1.411	1.411	0.66	$6,717	$1,360	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Low Pressure Irrigation	5	12,985	33.760	0.000	0.66	$13,745	$5,519	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Products	Custom - Agricultural	15	100,000	10.000	10.000	0.66	$40,520	$12,500	$0.00	0.00	0.00	1 Unit	Actuals	Co Assumption	Actuals

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	Products	Engine Block Heater Timer	15	738	0.000	0.000	0.66	$17	$15	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	15	567	0.074	0.102	0.54	$418	$300	$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	15	1,467	0.075	0.212	0.54	$1,044	$600	$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	15	296	0.135	0.000	0.54	$418	$150	$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	15	596	0.163	0.000	0.54	$1,044	$300	$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	15	1,023	0.078	0.180	0.54	$711	$400	$0.00	0.00	0.00	1- 1.5 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	PTAC	15	173	0.091	0.000	0.54	$522	$100	$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	PTHP	15	220	0.091	0.014	0.54	$522	$100	$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	15	1,516	0.447	0.521	0.54	$18,665	$4,000	$0.00	0.00	0.00	1- 3 Ton Unit	PA TRM	PA TRM	Co Assumption
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	5	195	0.045	0.043	0.54	$196	$50	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	9	318	0.045	0.029	0.54	$104	$50	$0.00	4.97	0.00	1 Unit controlling 2.5 Ton CAC / ASHP	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	3	127	0.051	0.000	0.54	$141	$50	$0.00	0.00	0.00	1 - Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	15	24	0.003	0.004	0.54	$52	$25	$0.00	0.00	0.00	1-20 CFM unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	9	399	0.048	0.735	0.54	$1,228	$300	$0.00	0.00	0.00	1 - Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	15	7,144	0.135	2.204	0.54	$2,088	$2,000	$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	15	3,945	0.078	1.394	0.54	$3,553	$1,000	$0.00	0.00	0.00	1- 1.5 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	15	3,596	0.091	1.035	0.54	$2,610	$1,000	$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	HVAC & Solar	Solar	15	1,263	0.299	0.040	0.92	$1,911	$150	-$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	5	1,425	0.055	0.408	0.92	$2,929	$1,750	$0.00	0.00	87	1 - Audit w DI & Wgtd Retrofits	PA TRM	Actuals	Actuals
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	15	1,263	0.299	0.040	0.92	$1,911	$150	-$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	15	567	0.074	0.102	0.54	$731	$450	$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	15	296	0.135	0.000	0.54	$731	$225	$0.00	0.00	0.00	1-2.75 Ton Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	10	231	0.024	0.041	0.59	$1,915	$450	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	13	117	0.013	0.017	1.00	$175	$150	$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	14	11,900	1.460	1.520	1.00	$21,518	$3,500	$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	10	231	0.024	0.041	0.59	$1,915	$100	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	14	112	0.017	0.017	0.59	$36	$50	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	1	31	0.006	0.006	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	2	55	0.009	0.009	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	1	45	0.009	0.009	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	2	58	0.008	0.008	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	1	47	0.005	0.005	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Residential Energy Solutions Program	Behavioral	On-Line Audit	1	150	0.010	0.008	1.00	$0	$0	$0.00	0.00	0.00	Per HH	Co Assumption	Actuals	Co Assumption
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	14	1,538	0.181	0.283	0.72	$2,803	$800	$0.00	0.00	0.00	NC Townhouse and Duplex	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	14	1,538	0.181	0.283	0.72	$2,803	$800	$0.00	0.00	0.00	NC Two on Two Cond Units	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	14	2,367	0.278	0.436	0.72	$2,803	$1,100	$0.00	0.00	0.00	NC Single Family Detached	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	14	1,420	0.167	0.262	0.72	$2,803	$625	$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	14	1,657	0.195	0.305	0.72	$2,803	$650	$0.00	0.00	0.00	NC Mfg Housing	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	14	1,420	0.167	0.262	0.72	$2,803	$625	$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	1	0	0.011	0.011	0.00	$0	$0	$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	1	0	0.200	0.200	0.00	$0	$155	$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Storage	1	0	2.350	4.700	0.00	$0	$810	$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	1	0	0.220	0.380	0.00	$0	$45	$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Summer	1	0	0.158	0.000	0.00	$0	$0	$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Winter	1	0	0.000	0.530	0.00	$0	$0	$0.00	0.00	0.00	Vendor	-	-	-
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	0	0	0.000	0.000	0.00	0	$0	$0.00	0.00	0.00	-	-	-	-
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	13	105	0.012	0.015	1.00	$173	$173	$0.00	0.00	227	1 Tenant Space	PA TRM	PA TRM	Co Assumption
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	15	3,596	0.091	1.035	0.54	$3,600	$3,600	$0.00	0.00	0.00	1-1.25 Ton Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	Weatherization	WARM Plus	13	1,248	0.122	0.224	1.00	$1,275	$1,275	$0.00	0.00	281	Per HH	PA TRM	Actuals	Co Assumption
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	13	1,000	0.100	0.200	1.00	$1,033	$1,033	$0.00	0.00	385	Per HH	PA TRM	Actuals	Co Assumption
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	5	757	0.084	0.060	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	6	757	0.103	0.077	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	3	106	0.262	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	4	491	0.173	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	5	392	0.053	0.040	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	5	104	0.014	0.011	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Washer - LI	14	112	0.017	0.017	0.59	$36	$28	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	14	75	0.010	0.008	0.59	$0	$22	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	14	8	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	11	41	0.006	0.004	0.59	$0	$12	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	11	10	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	14	74	0.010	0.010	0.59	$206	$27	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	14	33	0.004	0.005	0.59	$206	$5	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	9	172	0.019	0.025	0.59	$39	$32	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	9	13	0.022	0.000	0.59	$95	$17	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	12	148	0.028	0.000	0.59	$0	$34	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	10	49	0.008	0.013	0.59	$79	$12	$0.00	0.00	381	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	14	145	0.021	0.021	0.59	$242	$35	$0.00	0.13	1,764	1 Unit	PA TRM	Co Assumption	Co Assumption
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	15	20	0.003	0.003	0.59	$14	$12	$0.00	0.00	0.00	Per 4' Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mrktplace) - LI	8	14	0.000	0.000	0.59	$3	$3	$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mrktplace) - LI	10	13	0.000	0.000	0.59	$1	$3	$0.00	0.00	0.00	100 Light String	-	-	-
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	5	113	0.013	0.016	0.59	$41	$20	$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	8	20	0.003	0.003	0.59	$25	$12	$0.00	0.00	0.00	1 Unit	-	-	-
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mrktplace) - LI	15	20	0.003	0.003	0.59	$14	$10	$0.00	0.00	0.00	Per 4' Unit	-	-	-
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	15	567	0.074	0.102	0.54	$1,148	$450	$0.00	0.00	0.00	1- 2.75 ton unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	10	1,960	0.207	0.345	0.59	$1,685	$450	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	10	231	0.024	0.041	0.59	$1,685	$450	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	0	0	0.000	0.000	0.00	$0	$1,000	$0.00	0.00	0.00	-	-	-	-
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	1	66	0.008	0.008	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	1	94	0.010	0.010	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	1	73	0.009	0.009	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	1	52	0.006	0.006	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	1	58	0.002	0.002	1.00	$0	$0	$0.00	0.00	0.00	Per HH	PA TRM	CSP	PA IC DB
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	1	150	0.010	0.008	1.00	$0	$0	$0.00	0.00	0.00	Per HH	Co Assumption	Actuals	Co Assumption
Low Income Energy Efficiency Program	LI - New Homes	NC -Townhouse and duplex units - LI	14	1,538	0.181	0.283	0.72	$2,803	$800	$0.00	0.00	0.00	NC Townhouse and Duplex	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	14	1,538	0.181	0.283	0.72	$2,803	$800	$0.00	0.00	0.00	NC Two on Two Cond Units	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	14	2,367	0.278	0.436	0.72	$2,803	$1,100	$0.00	0.00	0.00	NC Single Family Detached	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise - LI	14	1,420	0.167	0.262	0.72	$2,803	$625	$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	14	1,657	0.195	0.305	0.72	$2,803	$650	$0.00	0.00	0.00	NC Mfg Housing	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	14	1,420	0.167	0.262	0.72	$2,803	$625	$0.00	0.00	0.00	NC MultiFamily Low Rise	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - DI - Res - LI	13	117	0.013	0.017	1.00	$175	$150	$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - DI - Res - LI	14	11,900	1.460	1.520	1.00	$21,518	$3,500	$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Prescriptive - Res - LI	10	231	0.024	0.041	0.59	$1,915	$100	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Prescriptive - Res - LI	14	112	0.017	0.017	0.59	$36	$50	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Custom - Res - LI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Custom - Res - LI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	13	117	0.013	0.017	1.00	$175	$150	$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	14	11,900	1.460	1.520	1.00	$21,518	$3,500	$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	10	231	0.024	0.041	0.59	$1,915	$100	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	14	112	0.017	0.017	0.59	$36	$50	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	13	117	0.013	0.017	1.00	$175	$150	$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	14	11,900	1.460	1.520	1.00	$21,518	$3,500	$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	10	231	0.024	0.041	0.59	$1,915	$100	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	14	112	0.017	0.017	0.59	$36	$50	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 <=5.4 Tn - SCI	15	269	0.125	0.000	0.66	$2,088	$67	$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	15	1,409	0.657	0.000	0.66	$1,860	$352	$0.00	0.00	0.00	1- 11 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >=20 Tn - SCI	15	1,607	0.749	0.000	0.66	$709	$402	$0.00	0.00	0.00	1- 20 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	15	666	0.132	0.136	0.66	$556	$167	$0.00	0.00	0.00	1 - 5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	15	1,920	0.263	0.481	0.66	$31,108	$480	$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP – SCI	15	354	0.054	0.085	0.66	$711	$89	$0.00	0.00	0.00	1-1.5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	15	83	0.039	0.000	0.66	$169	$21	$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	15	155	0.039	0.025	0.66	$140	$39	$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner- SCI	9	24	0.040	0.000	0.66	$95	$6	$0.00	0.00	0.00	1-1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	11	204	0.017	0.000	0.66	$76	$51	$0.00	6.87	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom - SCI	15	100,000	10.000	5.000	0.66	$40,520	$25,000	$0.00	0.00	0.00	1 Project	PA TRM	Co Assumption	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	15	282	0.000	0.005	0.66	$66	$70	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	3	296	0.105	0.001	0.66	$438	$74	$0.00	0.00	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	5	202	0.026	0.014	0.66	$395	$51	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	8	106	0.017	0.014	0.66	$53	$8	$0.00	-0.10	0.00	1 unit controller	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	8	1	0.000	0.000	0.66	$1	$0	$0.00	0.00	0.00	Per sq-ft of building lighting controlled	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	14	172	0.028	0.023	0.66	$207	$14	$0.00	-0.15	0.00	1- 4 lamp trougher	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	15	210	0.024	0.024	0.66	$69	$17	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	14	414	0.013	0.067	0.66	$412	$33	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	14	586	0.095	0.077	0.66	$466	$47	$0.00	-0.53	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	14	394	0.064	0.052	0.66	$430	$32	$0.00	-0.35	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	14	252	0.000	0.030	0.66	$197	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzer Light - SCI	8	253	0.036	0.033	0.66	$59	$20	$0.00	-0.23	0.00	1 Door	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzer Occupancy Sensor - SCI	8	76	0.011	0.010	0.66	$53	$6	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	14	100,000	16.150	13.147	0.66	$39,800	$8,000	$0.00	-90.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	14	500,000	80.752	65.736	0.66	$198,999	$40,000	$0.00	-450.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	14	21	0.004	0.003	0.66	$31	$2	$0.00	-0.02	0.00	1- Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	14	293	0.060	0.040	0.66	$244	$23	$0.00	-0.26	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	14	83	0.017	0.011	0.66	$122	$7	$0.00	-0.07	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	8	60	0.012	0.008	0.66	$53	$5	$0.00	-0.05	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt)- SCI	12	206	0.024	0.024	0.66	$504	$19	$0.00	0.00	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	15	1,417	0.162	0.162	0.66	$353	$128	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	15	818	0.077	0.077	0.66	$767	$74	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	12	537	0.061	0.061	0.66	$683	$48	$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	12	2,332	0.266	0.266	0.66	$453	$210	$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	9	79	0.000	0.000	0.66	$79	$7	$0.00	0.00	0.00	Per LF of Case	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls - SCI	12	673	0.023	0.018	0.66	$1,119	$61	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	4	37	0.007	0.007	0.66	$10	$3	$0.00	0.00	0.00	Per SF	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	10	428	0.080	0.051	0.66	$381	$38	$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	5	375	0.000	0.000	0.66	$234	$34	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	12	5,276	0.983	0.629	0.66	$2,538	$475	$0.00	0.00	0.00	1- unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	12	1,187	0.221	0.142	0.66	$1,903	$107	$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	12	2,739	0.510	0.327	0.66	$1,289	$247	$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	12	545	0.101	0.065	0.66	$550	$49	$0.00	0.00	0.00	1-15 CU. FT. unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	12	4,682	0.872	0.558	0.66	$1,899	$421	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	12	2,554	0.476	0.304	0.66	$1,118	$230	$0.00	0.00	0.00	1-full size unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	10	3,765	0.701	0.449	0.66	$1,540	$339	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	10	23	0.004	0.003	0.66	$574	$2	$0.00	0.00	0.00	1-Two well unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	8	1,841	0.476	0.260	0.66	$113	$166	$0.00	0.00	14,016	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	5	757	0.084	0.060	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	6	757	0.103	0.077	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	3	106	0.262	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	4	491	0.173	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	5	392	0.053	0.040	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	5	104	0.014	0.011	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	10	22	0.002	0.002	0.59	$143	$40	$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	Co Assumption
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer - SCI	14	112	0.017	0.017	0.59	$36	$26	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	14	74	0.010	0.010	0.59	$206	$25	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	14	8	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	10	231	0.024	0.041	0.59	$1,685	$450	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	11	10	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	12	148	0.028	0.000	0.59	$0	$32	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	7	2,840	0.324	0.324	0.66	$47	$350	$0.00	0.00	0.00	1 - 5kVA Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	7	36	0.004	0.004	0.66	$21	$5	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	10	1,938	0.329	0.329	0.66	$9,025	$414	$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	15	797	0.136	0.136	0.66	$557	$114	$0.00	0.00	0.00	Per Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	13	656	0.129	0.000	0.66	$226	$82	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	15	5,055	0.859	0.910	0.66	$5,840	$727	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	15	8,600	4.300	0.000	0.66	$5,608	$1,398	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	10	1,004	0.000	0.400	0.66	$553	$150	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	15	10,076	1.411	1.411	0.66	$6,717	$1,360	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	5	12,985	33.760	0.000	0.66	$13,745	$5,519	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	15	100,000	10.000	10.000	0.66	$40,520	$12,500	$0.00	0.00	0.00	1 Unit	Actuals	Co Assumption	Actuals
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	15	738	0.000	0.000	0.66	$17	$15	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Utility Owned(EMU))	15	252	0.000	0.030	0.66	$197	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Customer Owned(MU))	15	252	0.000	0.030	0.66	$197	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	15	100,000	8.168	4.387	0.61	$40,520	$9,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	15	100,000	11.126	11.126	0.61	$46,285	$9,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	15	100,000	9.457	7.566	0.61	$40,520	$9,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	15	1,151	0.285	0.041	0.61	$1,928	$150	-$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	Actuals	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	15	10,000,000	1114.156	1114.156	0.61	$4,529,326	$900,000	$0.00	-52,507.22	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	15	100,000	3.884	0.777	1.00	$149,388	$20,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	15	100,000	11.411	2.282	1.00	$29,997	$20,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1	0	0.000	0.000	1.00	$1,225	$1,250	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Tune Up - SCI	13	51,851	6.780	5.555	0.98	$37,783	$16,592	$0.00	0.00	0.00	1 Project	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Virtual/Meter Data Commissioning - SCI	2	10,000	0.800	0.667	0.98	$1,173	$1,000	$0.00	0.00	0.00	1 Project	Co Assumption	Co Assumption	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Retrocommissioning - SCI	3	10,000	0.800	0.667	0.98	$5,864	$1,000	$0.00	0.00	0.00	1 Project	Co Assumption	Actuals	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Operations Training - SCI	13	50,000	6.667	3.333	0.98	$6,000	$5,000	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Small	Energy Management - SCI	Customer Concierge - SCI	1	0	0.000	0.000	1.00	$3,500	$1,000	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Energy Consultation - SCI	1	0	0.000	0.000	1.00	$1,225	$1,000	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	Energy Management - SCI	Audits - SCI	1	0	0.000	0.000	1.00	$1,225	$1,000	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	1	0	0.200	0.200	0.00	$0	$155	$0.00	0.00	0.00	Company Assumption	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	1	0	2.350	4.700	0.00	$0	$810	$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	1	0	0.300	0.300	0.00	$0	$45	$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	1	0	0.326	0.326	0.00	$0	$0	$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	1	0	75.000	75.000	0.00	$0	$15,000	$0.00	0.00	0.00	Vendor	-	-	-
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	0	0	0.000	0.000	0.00	0	$0	$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	13	117	0.013	0.017	1.00	$175	$150	$0.00	0.00	453	1 Tenant Space	PA TRM	PA TRM	Actuals
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	14	11,900	1.460	1.520	1.00	$21,518	$3,500	$0.00	0.00	0.00	1 Common Space	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	10	231	0.024	0.041	0.59	$1,915	$100	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	14	112	0.017	0.017	0.59	$36	$50	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	15	100,000	11.126	11.126	0.61	$46,285	$7,500	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 <=5.4 Tn - LCI	15	269	0.125	0.000	0.66	$2,088	$67	$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	15	1,409	0.657	0.000	0.66	$1,860	$352	$0.00	0.00	0.00	1- 11 ton unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >=20 Tn - LCI	15	1,607	0.749	0.000	0.66	$709	$402	$0.00	0.00	0.00	1- 20 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	15	666	0.132	0.136	0.66	$556	$167	$0.00	0.00	0.00	1 - 5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	15	1,920	0.263	0.481	0.66	$31,108	$480	$0.00	0.00	0.00	1-5 ton unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP – LCI	15	354	0.054	0.085	0.66	$711	$89	$0.00	0.00	0.00	1-1.5 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	15	83	0.039	0.000	0.66	$169	$21	$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	15	155	0.039	0.025	0.66	$140	$39	$0.00	0.00	0.00	1 - 1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner- LCI	9	24	0.040	0.000	0.66	$95	$6	$0.00	0.00	0.00	1-1 ton unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	11	204	0.017	0.000	0.66	$76	$51	$0.00	6.87	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom - LCI	15	100,000	10.000	5.000	0.66	$40,520	$25,000	$0.00	0.00	0.00	1 Project	PA TRM	Co Assumption	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	15	282	0.000	0.005	0.66	$66	$70	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	3	296	0.105	0.001	0.66	$438	$74	$0.00	0.00	0.00	1-5 Ton Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	5	202	0.026	0.014	0.66	$395	$51	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	8	106	0.017	0.014	0.66	$53	$8	$0.00	-0.10	0.00	1 unit controller	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	8	1	0.000	0.000	0.66	$1	$0	$0.00	0.00	0.00	Per sq-ft of building lighting controlled	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	14	172	0.028	0.023	0.66	$207	$14	$0.00	-0.15	0.00	1- 4 lamp trougher	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	15	210	0.024	0.024	0.66	$69	$17	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	14	414	0.013	0.067	0.66	$412	$33	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	14	586	0.095	0.077	0.66	$466	$47	$0.00	-0.53	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	14	394	0.064	0.052	0.66	$430	$32	$0.00	-0.35	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	14	252	0.000	0.030	0.66	$197	$20	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzer Light - LCI	8	253	0.036	0.033	0.66	$59	$20	$0.00	-0.23	0.00	1 Door	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzer Occupancy Sensor - LCI	8	76	0.011	0.010	0.66	$53	$6	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	14	100,000	16.150	13.147	0.66	$39,800	$8,000	$0.00	-90.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	14	500,000	80.752	65.736	0.66	$198,999	$40,000	$0.00	-450.00	0.00	1 Project	PA TRM	Co Assumption	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	14	21	0.004	0.003	0.66	$31	$2	$0.00	-0.02	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	14	293	0.060	0.040	0.66	$244	$23	$0.00	-0.26	0.00	1- Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	14	83	0.017	0.011	0.66	$122	$7	$0.00	-0.07	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS-LCI	8	60	0.012	0.008	0.66	$53	$5	$0.00	-0.05	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	12	206	0.024	0.024	0.66	$504	$19	$0.00	0.00	0.00	1- Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	15	1,417	0.162	0.162	0.66	$353	$128	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	15	818	0.077	0.077	0.66	$767	$74	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	12	537	0.061	0.061	0.66	$683	$48	$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	12	2,332	0.266	0.266	0.66	$453	$210	$0.00	0.00	0.00	1-100CF Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	9	79	0.000	0.000	0.66	$79	$7	$0.00	0.00	0.00	Per LF of Case	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	12	673	0.023	0.018	0.66	$1,119	$61	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	4	37	0.007	0.007	0.66	$10	$3	$0.00	0.00	0.00	Per SF	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	10	428	0.080	0.051	0.66	$381	$38	$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	5	375	0.000	0.000	0.66	$234	$34	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	12	5,276	0.983	0.629	0.66	$2,538	$475	$0.00	0.00	0.00	1- unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	12	1,187	0.221	0.142	0.66	$1,903	$107	$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	12	2,739	0.510	0.327	0.66	$1,289	$247	$0.00	0.00	0.00	1-Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	12	545	0.101	0.065	0.66	$550	$49	$0.00	0.00	0.00	1-15 CU. FT. unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	12	4,682	0.872	0.558	0.66	$1,899	$421	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	12	2,554	0.476	0.304	0.66	$1,118	$230	$0.00	0.00	0.00	1-full size unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	10	3,765	0.701	0.449	0.66	$1,540	$339	$0.00	0.00	0.00	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	10	23	0.004	0.003	0.66	$574	$2	$0.00	0.00	0.00	1-Two well unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	8	1,841	0.476	0.260	0.66	$113	$166	$0.00	0.00	14,016	1-unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	5	757	0.084	0.060	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	6	757	0.103	0.077	0.46	$60	$60	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	3	106	0.262	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	4	491	0.173	0.000	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	5	392	0.053	0.040	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	5	104	0.014	0.011	0.46	$30	$30	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB

Appendix C, FE PA Table 2: Measure Assumptions

FE PA

Program	Program Component	Measure	Measure Life	Verified kWh	Verified kW (Summer)	Verified kW (Winter)	NTG	Incremental Cost	Modeled Rebate	O&M Benefit ($/Unit/Yr)	Gas Savings (MMBTu/Yr)	Water Savings (Gal/Yr)	Savings Assumption	Source of Measure Life	Savings Source	Incremental Cost Source
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	10	22	0.002	0.002	0.59	$143	$40	$0.00	0.00	0.00	1 Unit	MA TRM	MA TRM	Co Assumption
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer - LCI	14	112	0.017	0.017	0.59	$36	$26	$0.00	0.13	1,764	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	14	74	0.010	0.010	0.59	$206	$25	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	14	8	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	10	231	0.024	0.041	0.59	$1,685	$450	$0.00	0.00	0.00	1-50 gal unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	11	10	0.001	0.001	0.59	$0	$2	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	12	148	0.028	0.000	0.59	$0	$32	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	7	2,840	0.324	0.324	0.66	$47	$350	$0.00	0.00	0.00	1 - 5kVA Unit	PA TRM	PA TRM	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	15	100,000	9.709	8.766	0.61	$47,090	$11,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	15	100,000	11.416	11.416	0.61	$91,960	$11,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	15	100,000	9.457	7.566	0.61	$40,520	$11,000	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	15	1,151	0.285	0.041	0.61	$1,928	$127	-$40.51	0.00	0.00	1 kW DC Installed Capacity	PA TRM	Actuals	PA IC DB
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	15	10,000,000	1114.156	1114.156	0.61	$4,529,326	$1,100,000	$0.00	-52,507.22	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	15	100,000	14.000	11.000	1.00	$149,388	$49,960	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	15	100,000	11.411	2.282	1.00	$29,997	$49,960	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1	0	0.000	0.000	1.00	$1,225	$1,250	$0.00	0.00	0.00	1 Project	PA TRM	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Virtual/Meter Data Commissioning - LCI	2	10,000	0.800	0.667	0.98	$1,173	$1,000	$0.00	0.00	0.00	1 Project	Co Assumption	Co Assumption	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Retrocommissioning - LCI	3	100,000	8.000	6.667	0.61	$58,637	$10,000	$0.00	0.00	0.00	1 Project	Co Assumption	Actuals	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Building Operations Training - LCI	13	50,000	6.667	3.333	0.98	$6,000	$5,000	$0.00	0.00	0.00	1 Unit	PA TRM	PA TRM	Co Assumption
C&I Energy Solutions Program - Large	Energy Management - LCI	Customer Concierge - LCI	1	0	0.000	0.000	1.00	$3,500	$3,500	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Energy Management - LCI	Energy Consultation - LCI	1	0	0.000	0.000	1.00	$1,750	$3,500	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	Energy Management - LCI	Audits - LCI	1	0	0.000	0.000	1.00	$1,750	$3,500	$0.00	0.00	0.00	1 Project	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	1	0	0.200	0.200	0.00	$0	$155	$0.00	0.00	0.00	Company Assumption	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	1	0	2.350	4.700	0.00	$0	$810	$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	1	0	200.000	200.000	0.00	$0	$40,000	$0.00	0.00	0.00	-	-	-	-
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	0	0	0.000	0.000	0.00	0	$0	$0.00	0.00	0.00	-	-	-	-

VERIFICATION

I, Edward C. Miller, Manager, Compliance and Development in the Energy Efficiency Department at FirstEnergy Corp, hereby state that the facts set forth in the above filing dated November 26, 2025 are true and correct to the best of my knowledge, information and belief and that I expect to be able to provide the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: November 26, 2025

Edward C. Miller

Legacy EDC / Rate District	2024 Sales	Share of Sales
FE: Met-Ed	13,962,426,826	27.49%
FE: Penelec	13,333,291,458	26.25%
FE: Penn Power	4,450,409,839	8.76%
FE: West Penn Power	19,051,528,060	37.50%
FirstEnergy	50,797,656,183	100.00%

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arr

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$86.54	$57.56	$90.71	$79.05	$73.38
19	2028	$96.66	$65.86	$103.99	$91.64	$82.91
20	2029	$103.96	$74.01	$112.68	$99.54	$89.76
21	2030	$101.51	$73.47	$113.02	$99.23	$90.95
22	2031	$72.04	$42.91	$79.19	$67.41	$58.40
23	2032	$72.12	$43.01	$81.83	$69.27	$59.12
24	2033	$74.58	$44.75	$86.23	$72.36	$61.59
25	2034	$77.54	$46.83	$91.69	$76.16	$64.87
26	2035	$80.40	$48.85	$96.82	$79.74	$68.14
27	2036	$83.05	$50.73	$101.47	$82.99	$70.95
28	2037	$84.68	$51.90	$104.76	$85.32	$72.73
29	2038	$84.06	$51.53	$103.06	$84.20	$72.00
30	2039	$83.64	$51.29	$101.81	$83.39	$71.49
31	2040	$84.07	$51.64	$102.59	$83.98	$71.95
32	2041	$85.40	$52.61	$105.52	$86.05	$73.45
33	2042	$86.87	$53.68	$108.77	$88.34	$75.10
34	2043	$88.38	$54.78	$112.11	$90.70	$76.80
35	2044	$89.41	$55.55	$114.30	$92.27	$77.95
36	2045	$90.20	$56.16	$115.92	$93.45	$78.83
37	2046	$92.05	$57.49	$120.04	$96.34	$80.91

PY Selection	PY19

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$88.68	$57.87	$96.00	$83.66	$74.93
20	2029	$98.13	$68.18	$106.85	$93.71	$83.93
21	2030	$104.38	$76.34	$115.89	$102.09	$93.82
22	2031	$102.21	$73.07	$109.35	$97.58	$88.56
23	2032	$72.12	$43.01	$81.83	$69.27	$59.12
24	2033	$74.58	$44.75	$86.23	$72.36	$61.59

25	**2034**	$77.54	$46.83	$91.69	$76.16	$64.87
26	**2035**	$80.40	$48.85	$96.82	$79.74	$68.14
27	**2036**	$83.05	$50.73	$101.47	$82.99	$70.95
28	**2037**	$84.68	$51.90	$104.76	$85.32	$72.73
29	**2038**	$84.06	$51.53	$103.06	$84.20	$72.00
30	**2039**	$83.64	$51.29	$101.81	$83.39	$71.49
31	**2040**	$84.07	$51.64	$102.59	$83.98	$71.95
32	**2041**	$85.40	$52.61	$105.52	$86.05	$73.45
33	**2042**	$86.87	$53.68	$108.77	$88.34	$75.10
34	**2043**	$88.38	$54.78	$112.11	$90.70	$76.80
35	**2044**	$89.41	$55.55	$114.30	$92.27	$77.95
36	**2045**	$90.20	$56.16	$115.92	$93.45	$78.83
37	**2046**	$92.05	$57.49	$120.04	$96.34	$80.91

PY Selection	PY20

		FirstEnergy Zone Summer ($/MWh)		**FirstEnergy Zone Winter ($/MWh)**		**FirstEnergy DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$89.67	$59.72	$98.39	$85.25	$75.47
21	**2030**	$98.25	$70.21	$109.76	$95.97	$87.69
22	**2031**	$105.23	$76.09	$112.37	$100.60	$91.58
23	**2032**	$103.96	$74.85	$113.67	$101.12	$90.96
24	**2033**	$74.58	$44.75	$86.23	$72.36	$61.59
25	**2034**	$77.54	$46.83	$91.69	$76.16	$64.87
26	**2035**	$80.40	$48.85	$96.82	$79.74	$68.14
27	**2036**	$83.05	$50.73	$101.47	$82.99	$70.95
28	**2037**	$84.68	$51.90	$104.76	$85.32	$72.73
29	**2038**	$84.06	$51.53	$103.06	$84.20	$72.00
30	**2039**	$83.64	$51.29	$101.81	$83.39	$71.49
31	**2040**	$84.07	$51.64	$102.59	$83.98	$71.95
32	**2041**	$85.40	$52.61	$105.52	$86.05	$73.45
33	**2042**	$86.87	$53.68	$108.77	$88.34	$75.10
34	**2043**	$88.38	$54.78	$112.11	$90.70	$76.80
35	**2044**	$89.41	$55.55	$114.30	$92.27	$77.95
36	**2045**	$90.20	$56.16	$115.92	$93.45	$78.83
37	**2046**	$92.05	$57.49	$120.04	$96.34	$80.91

PY Selection	PY21

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$89.37	$61.33	$100.88	$87.08	$78.81
22	2031	$98.78	$69.65	$105.93	$94.15	$85.14
23	2032	$107.15	$78.04	$116.86	$104.30	$94.15
24	2033	$107.40	$77.57	$119.05	$105.18	$94.41
25	2034	$77.54	$46.83	$91.69	$76.16	$64.87
26	2035	$80.40	$48.85	$96.82	$79.74	$68.14
27	2036	$83.05	$50.73	$101.47	$82.99	$70.95
28	2037	$84.68	$51.90	$104.76	$85.32	$72.73
29	2038	$84.06	$51.53	$103.06	$84.20	$72.00
30	2039	$83.64	$51.29	$101.81	$83.39	$71.49
31	2040	$84.07	$51.64	$102.59	$83.98	$71.95
32	2041	$85.40	$52.61	$105.52	$86.05	$73.45
33	2042	$86.87	$53.68	$108.77	$88.34	$75.10
34	2043	$88.38	$54.78	$112.11	$90.70	$76.80
35	2044	$89.41	$55.55	$114.30	$92.27	$77.95
36	2045	$90.20	$56.16	$115.92	$93.45	$78.83
37	2046	$92.05	$57.49	$120.04	$96.34	$80.91

PY Selection	PY22

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00

22	**2031**	$89.45	$60.32	$96.60	$84.82	$75.80
23	**2032**	$100.35	$71.24	$110.06	$97.50	$87.35
24	**2033**	$110.68	$80.85	$122.34	$108.46	$97.70
25	**2034**	$111.37	$80.66	$125.52	$109.99	$98.70
26	**2035**	$80.40	$48.85	$96.82	$79.74	$68.14
27	**2036**	$83.05	$50.73	$101.47	$82.99	$70.95
28	**2037**	$84.68	$51.90	$104.76	$85.32	$72.73
29	**2038**	$84.06	$51.53	$103.06	$84.20	$72.00
30	**2039**	$83.64	$51.29	$101.81	$83.39	$71.49
31	**2040**	$84.07	$51.64	$102.59	$83.98	$71.95
32	**2041**	$85.40	$52.61	$105.52	$86.05	$73.45
33	**2042**	$86.87	$53.68	$108.77	$88.34	$75.10
34	**2043**	$88.38	$54.78	$112.11	$90.70	$76.80
35	**2044**	$89.41	$55.55	$114.30	$92.27	$77.95
36	**2045**	$90.20	$56.16	$115.92	$93.45	$78.83
37	**2046**	$92.05	$57.49	$120.04	$96.34	$80.91

earages study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

Zone Shoulder (Wh)	FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter	
$61.20	$86.46	$86.46	$37.86	$7.18	$43.46	$6.68	$3.71
$70.71	$54.51	$54.51	$38.64	$7.33	$47.87	$7.29	$3.64
$76.55	$55.62	$55.62	$39.44	$7.48	$52.21	$8.21	$3.52
$76.41	$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37
$46.16	$29.35	$29.35	$41.09	$7.79	$60.55	$9.93	$3.33
$46.70	$29.95	$29.95	$41.95	$7.95	$61.80	$10.14	$3.40
$48.45	$30.58	$30.58	$42.81	$8.12	$63.08	$10.35	$3.65
$50.76	$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98
$53.06	$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28
$55.04	$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56
$56.32	$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73
$55.87	$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64
$55.57	$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56
$55.94	$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59
$57.03	$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74
$58.23	$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90
$59.46	$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07
$60.31	$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17
$60.97	$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25
$62.46	$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46

Zone Shoulder (Wh)	FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.72	$54.51	$54.51	$38.64	$7.33	$47.87	$7.29	$3.64
$70.71	$55.62	$55.62	$39.44	$7.48	$52.21	$8.21	$3.52
$79.28	$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37
$76.32	$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33
$46.70	$29.95	$29.95	$41.95	$7.95	$61.80	$10.14	$3.40
$48.45	$30.58	$30.58	$42.81	$8.12	$63.08	$10.35	$3.65

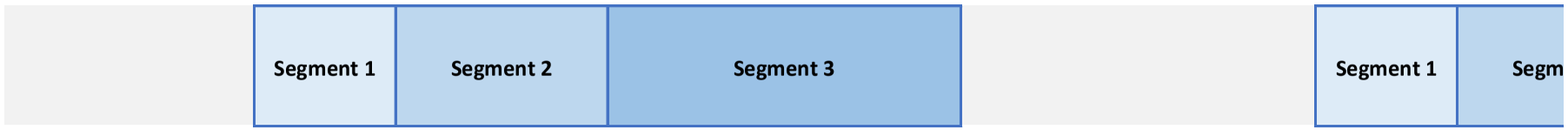
$50.76	$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98
$53.06	$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28
$55.04	$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56
$56.32	$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73
$55.87	$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64
$55.57	$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56
$55.94	$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59
$57.03	$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74
$58.23	$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90
$59.46	$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07
$60.31	$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17
$60.97	$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25
$62.46	$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46

Zone Shoulder Wh)	**FirstEnergy Generation Capacity ($/kW/year)**		**FirstEnergy Transmission Capacity ($/kW/year)**		**FirstEnergy Distribution Capacity ($/kW/year)**		**Avoided Natural Gas Fuel Costs ($/MMBTU)**
Shoulder Off-Peak	**Summer**	**Winter**	**Summer**	**Winter**	**Summer**	**Winter**	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.26	$55.62	$55.62	$39.44	$7.48	$52.21	$8.21	$3.52
$73.15	$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37
$79.34	$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33
$78.54	$59.09	$59.09	$41.95	$7.95	$61.80	$10.14	$3.40
$48.45	$30.58	$30.58	$42.81	$8.12	$63.08	$10.35	$3.65
$50.76	$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98
$53.06	$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28
$55.04	$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56
$56.32	$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73
$55.87	$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64
$55.57	$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56
$55.94	$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59
$57.03	$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74
$58.23	$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90
$59.46	$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07
$60.31	$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17
$60.97	$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25
$62.46	$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46

Zone Shoulder MWh)	FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.27	$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37
$72.90	$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33
$81.73	$59.09	$59.09	$41.95	$7.95	$61.80	$10.14	$3.40
$81.27	$60.29	$60.29	$42.81	$8.12	$63.08	$10.35	$3.65
$50.76	$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98
$53.06	$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28
$55.04	$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56
$56.32	$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73
$55.87	$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64
$55.57	$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56
$55.94	$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59
$57.03	$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74
$58.23	$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90
$59.46	$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07
$60.31	$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17
$60.97	$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25
$62.46	$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46

Zone Shoulder MWh)	FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

$63.56	$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33
$74.93	$59.09	$59.09	$41.95	$7.95	$61.80	$10.14	$3.40
$84.56	$60.29	$60.29	$42.81	$8.12	$63.08	$10.35	$3.65
$84.59	$61.52	$61.52	$43.70	$8.29	$64.39	$10.56	$3.98
$53.06	$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28
$55.04	$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56
$56.32	$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73
$55.87	$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64
$55.57	$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56
$55.94	$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59
$57.03	$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74
$58.23	$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90
$59.46	$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07
$60.31	$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17
$60.97	$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25
$62.46	$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46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PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arrearages stud

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC Zone Shoulder ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
18	2027	$104.64	$75.66	$108.81	$97.15	$91.48	$79.30
19	2028	$115.13	$84.32	$122.45	$110.10	$101.37	$89.17
20	2029	$122.80	$92.84	$131.51	$118.37	$108.59	$95.38
21	2030	$120.72	$92.68	$132.23	$118.44	$110.16	$95.62
22	2031	$91.64	$62.50	$98.78	$87.00	$77.99	$65.75
23	2032	$92.10	$62.99	$101.81	$89.26	$79.10	$66.68
24	2033	$94.96	$65.13	$106.62	$92.74	$81.97	$68.83
25	2034	$98.33	$67.63	$112.48	$96.95	$85.66	$71.55
26	2035	$101.61	$70.06	$118.03	$100.95	$89.35	$74.27
27	2036	$104.68	$72.36	$123.10	$104.63	$92.58	$76.67
28	2037	$106.74	$73.97	$126.83	$107.38	$94.79	$78.38
29	2038	$106.57	$74.04	$125.57	$106.70	$94.50	$78.37
30	2039	$106.59	$74.25	$124.77	$106.35	$94.44	$78.52
31	2040	$107.48	$75.06	$126.01	$107.40	$95.36	$79.36
32	2041	$109.28	$76.50	$129.40	$109.93	$97.33	$80.91
33	2042	$111.23	$78.04	$133.13	$112.70	$99.46	$82.59
34	2043	$113.23	$79.63	$136.96	$115.55	$101.65	$84.30
35	2044	$114.76	$80.90	$139.65	$117.62	$103.30	$85.65
36	2045	$116.06	$82.01	$141.77	$119.30	$104.68	$86.82
37	2046	$118.42	$83.86	$146.40	$122.71	$107.28	$88.83

PY Selection	PY19

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC Zone Shoulder ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$107.14	$76.34	$114.47	$102.12	$93.39	$81.18
20	2029	$116.96	$87.01	$125.68	$112.54	$102.76	$89.55

21	**2030**	$123.59	$95.55	$135.10	$121.30	$113.03	$98.48
22	**2031**	$121.80	$92.67	$128.95	$117.17	$108.15	$95.91
23	**2032**	$92.10	$62.99	$101.81	$89.26	$79.10	$66.68
24	**2033**	$94.96	$65.13	$106.62	$92.74	$81.97	$68.83
25	**2034**	$98.33	$67.63	$112.48	$96.95	$85.66	$71.55
26	**2035**	$101.61	$70.06	$118.03	$100.95	$89.35	$74.27
27	**2036**	$104.68	$72.36	$123.10	$104.63	$92.58	$76.67
28	**2037**	$106.74	$73.97	$126.83	$107.38	$94.79	$78.38
29	**2038**	$106.57	$74.04	$125.57	$106.70	$94.50	$78.37
30	**2039**	$106.59	$74.25	$124.77	$106.35	$94.44	$78.52
31	**2040**	$107.48	$75.06	$126.01	$107.40	$95.36	$79.36
32	**2041**	$109.28	$76.50	$129.40	$109.93	$97.33	$80.91
33	**2042**	$111.23	$78.04	$133.13	$112.70	$99.46	$82.59
34	**2043**	$113.23	$79.63	$136.96	$115.55	$101.65	$84.30
35	**2044**	$114.76	$80.90	$139.65	$117.62	$103.30	$85.65
36	**2045**	$116.06	$82.01	$141.77	$119.30	$104.68	$86.82
37	**2046**	$118.42	$83.86	$146.40	$122.71	$107.28	$88.83

PY Selection	PY20

		FirstEnergy Zone Summer ($/MWh)		**FirstEnergy Zone Winter ($/MWh)**		**FirstEnergy DLC Zone Shoulder ($/MWh)**	
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**	**Shoulder Off-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$108.51	$78.55	$117.22	$104.09	$94.30	$81.09
21	**2030**	$117.46	$89.42	$128.97	$115.18	$106.90	$92.36
22	**2031**	$124.82	$95.69	$131.97	$120.19	$111.17	$98.93
23	**2032**	$123.95	$94.84	$133.65	$121.10	$110.94	$98.53
24	**2033**	$94.96	$65.13	$106.62	$92.74	$81.97	$68.83
25	**2034**	$98.33	$67.63	$112.48	$96.95	$85.66	$71.55
26	**2035**	$101.61	$70.06	$118.03	$100.95	$89.35	$74.27
27	**2036**	$104.68	$72.36	$123.10	$104.63	$92.58	$76.67
28	**2037**	$106.74	$73.97	$126.83	$107.38	$94.79	$78.38
29	**2038**	$106.57	$74.04	$125.57	$106.70	$94.50	$78.37
30	**2039**	$106.59	$74.25	$124.77	$106.35	$94.44	$78.52
31	**2040**	$107.48	$75.06	$126.01	$107.40	$95.36	$79.36
32	**2041**	$109.28	$76.50	$129.40	$109.93	$97.33	$80.91

33	**2042**	$111.23	$78.04	$133.13	$112.70	$99.46	$82.59
34	**2043**	$113.23	$79.63	$136.96	$115.55	$101.65	$84.30
35	**2044**	$114.76	$80.90	$139.65	$117.62	$103.30	$85.65
36	**2045**	$116.06	$82.01	$141.77	$119.30	$104.68	$86.82
37	**2046**	$118.42	$83.86	$146.40	$122.71	$107.28	$88.83

PY Selection	PY21

		FirstEnergy Zone Summer ($/MWh)		**FirstEnergy Zone Winter ($/MWh)**		**FirstEnergy DLC Zone Shoulder ($/MWh)**	
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**	**Shoulder Off-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
21	**2030**	$108.58	$80.54	$120.09	$106.29	$98.02	$83.48
22	**2031**	$118.38	$89.24	$125.52	$113.74	$104.73	$92.49
23	**2032**	$127.14	$98.02	$136.84	$124.29	$114.13	$101.71
24	**2033**	$127.78	$97.95	$139.44	$125.56	$114.79	$101.65
25	**2034**	$98.33	$67.63	$112.48	$96.95	$85.66	$71.55
26	**2035**	$101.61	$70.06	$118.03	$100.95	$89.35	$74.27
27	**2036**	$104.68	$72.36	$123.10	$104.63	$92.58	$76.67
28	**2037**	$106.74	$73.97	$126.83	$107.38	$94.79	$78.38
29	**2038**	$106.57	$74.04	$125.57	$106.70	$94.50	$78.37
30	**2039**	$106.59	$74.25	$124.77	$106.35	$94.44	$78.52
31	**2040**	$107.48	$75.06	$126.01	$107.40	$95.36	$79.36
32	**2041**	$109.28	$76.50	$129.40	$109.93	$97.33	$80.91
33	**2042**	$111.23	$78.04	$133.13	$112.70	$99.46	$82.59
34	**2043**	$113.23	$79.63	$136.96	$115.55	$101.65	$84.30
35	**2044**	$114.76	$80.90	$139.65	$117.62	$103.30	$85.65
36	**2045**	$116.06	$82.01	$141.77	$119.30	$104.68	$86.82
37	**2046**	$118.42	$83.86	$146.40	$122.71	$107.28	$88.83

PY Selection	PY22

		FirstEnergy Zone Summer ($/MWh)		FirstEnergy Zone Winter ($/MWh)		FirstEnergy DLC Zone Shoulder ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$109.04	$79.91	$116.19	$104.41	$95.40	$83.16
23	2032	$120.34	$91.22	$130.04	$117.49	$107.33	$94.92
24	2033	$131.07	$101.24	$142.72	$128.85	$118.08	$104.94
25	2034	$132.16	$101.46	$146.31	$130.78	$119.49	$105.38
26	2035	$101.61	$70.06	$118.03	$100.95	$89.35	$74.27
27	2036	$104.68	$72.36	$123.10	$104.63	$92.58	$76.67
28	2037	$106.74	$73.97	$126.83	$107.38	$94.79	$78.38
29	2038	$106.57	$74.04	$125.57	$106.70	$94.50	$78.37
30	2039	$106.59	$74.25	$124.77	$106.35	$94.44	$78.52
31	2040	$107.48	$75.06	$126.01	$107.40	$95.36	$79.36
32	2041	$109.28	$76.50	$129.40	$109.93	$97.33	$80.91
33	2042	$111.23	$78.04	$133.13	$112.70	$99.46	$82.59
34	2043	$113.23	$79.63	$136.96	$115.55	$101.65	$84.30
35	2044	$114.76	$80.90	$139.65	$117.62	$103.30	$85.65
36	2045	$116.06	$82.01	$141.77	$119.30	$104.68	$86.82
37	2046	$118.42	$83.86	$146.40	$122.71	$107.28	$88.83

ly. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter	Summer	Winter	Summer	Winter		
$86.46	$86.46	$37.86	$7.18	$43.46	$6.68	$3.71	Segment 1
$54.51	$54.51	$38.64	$7.33	$47.87	$7.29	$3.64	
$55.62	$55.62	$39.44	$7.48	$52.21	$8.21	$3.52	
$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37	
$29.35	$29.35	$41.09	$7.79	$60.55	$9.93	$3.33	Segment 2
$29.95	$29.95	$41.95	$7.95	$61.80	$10.14	$3.40	
$30.58	$30.58	$42.81	$8.12	$63.08	$10.35	$3.65	
$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98	
$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28	
$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56	
$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73	Segment 3
$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64	
$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56	
$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59	
$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74	
$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90	
$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07	
$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17	
$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25	
$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46	

FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter	Summer	Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	Segment
$54.51	$54.51	$38.64	$7.33	$47.87	$7.29	$3.64	
$55.62	$55.62	$39.44	$7.48	$52.21	$8.21	$3.52	

$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37	1
$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33	Segment 2
$29.95	$29.95	$41.95	$7.95	$61.80	$10.14	$3.40	
$30.58	$30.58	$42.81	$8.12	$63.08	$10.35	$3.65	
$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98	
$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28	
$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56	
$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73	Segment 3
$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64	
$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56	
$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59	
$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74	
$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90	
$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07	
$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17	
$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25	
$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46	

FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter	Summer	Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	
$55.62	$55.62	$39.44	$7.48	$52.21	$8.21	$3.52	
$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37	
$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33	Segment 2
$59.09	$59.09	$41.95	$7.95	$61.80	$10.14	$3.40	
$30.58	$30.58	$42.81	$8.12	$63.08	$10.35	$3.65	
$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98	
$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28	
$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56	
$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73	Segm
$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64	
$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56	
$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59	
$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74	

$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90	ent 3
$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07	
$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17	
$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25	
$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46	

FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter	Summer	Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	
$56.75	$56.75	$40.26	$7.63	$56.37	$8.88	$3.37	
$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33	Segment 2
$59.09	$59.09	$41.95	$7.95	$61.80	$10.14	$3.40	
$60.29	$60.29	$42.81	$8.12	$63.08	$10.35	$3.65	
$31.21	$31.21	$43.70	$8.29	$64.39	$10.56	$3.98	
$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28	
$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56	
$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73	Segment 3
$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64	
$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56	
$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59	
$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74	
$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90	
$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07	
$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17	
$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25	
$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46	

FirstEnergy Generation Capacity ($/kW/year)		FirstEnergy Transmission Capacity ($/kW/year)		FirstEnergy Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter	Summer	Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	
$57.91	$57.91	$41.09	$7.79	$60.55	$9.93	$3.33	Segment 2
$59.09	$59.09	$41.95	$7.95	$61.80	$10.14	$3.40	
$60.29	$60.29	$42.81	$8.12	$63.08	$10.35	$3.65	
$61.52	$61.52	$43.70	$8.29	$64.39	$10.56	$3.98	
$31.85	$31.85	$44.61	$8.46	$65.72	$10.78	$4.28	
$32.51	$32.51	$45.53	$8.63	$67.09	$11.00	$4.56	
$33.19	$33.19	$46.47	$8.81	$68.48	$11.23	$4.73	Segment 3
$33.88	$33.88	$47.44	$8.99	$69.89	$11.46	$4.64	
$34.58	$34.58	$48.42	$9.18	$71.34	$11.70	$4.56	
$35.29	$35.29	$49.42	$9.37	$72.82	$11.94	$4.59	
$36.03	$36.03	$50.45	$9.56	$74.33	$12.19	$4.74	
$36.77	$36.77	$51.49	$9.76	$75.87	$12.44	$4.90	
$37.53	$37.53	$52.56	$9.96	$77.44	$12.70	$5.07	
$38.31	$38.31	$53.65	$10.17	$79.04	$12.97	$5.17	
$39.10	$39.10	$54.76	$10.38	$80.68	$13.23	$5.25	
$39.91	$39.91	$55.89	$10.60	$82.35	$13.51	$5.46	

Values

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arr

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$86.16	$57.30	$90.31	$78.70	$73.06
19	2028	$95.95	$65.28	$103.25	$90.95	$82.26
20	2029	$102.63	$72.81	$111.31	$98.23	$88.49
21	2030	$99.79	$71.88	$111.25	$97.52	$89.28
22	2031	$71.87	$42.83	$79.13	$67.32	$58.29
23	2032	$72.11	$43.04	$81.96	$69.31	$59.16
24	2033	$74.75	$44.91	$86.53	$72.51	$61.80
25	2034	$77.90	$47.12	$92.16	$76.44	$65.24
26	2035	$80.95	$49.27	$97.49	$80.15	$68.69
27	2036	$83.79	$51.28	$102.37	$83.57	$71.67
28	2037	$85.58	$52.57	$105.97	$86.10	$73.62
29	2038	$84.94	$52.17	$104.32	$85.01	$72.88
30	2039	$84.50	$51.92	$103.11	$84.24	$72.37
31	2040	$84.93	$52.28	$103.88	$84.82	$72.83
32	2041	$86.30	$53.28	$106.72	$86.83	$74.34
33	2042	$87.81	$54.37	$109.88	$89.06	$76.01
34	2043	$89.37	$55.50	$113.14	$91.36	$77.73
35	2044	$90.42	$56.29	$115.27	$92.89	$78.89
36	2045	$91.24	$56.91	$116.85	$94.04	$79.77
37	2046	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY19

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$88.11	$57.44	$95.41	$83.11	$74.42
20	2029	$97.00	$67.18	$105.68	$92.60	$82.86
21	2030	$102.51	$74.60	$113.97	$100.24	$92.00
22	2031	$100.03	$70.99	$107.29	$95.48	$86.45

23	**2032**	$72.11	$43.04	$81.96	$69.31	$59.16
24	**2033**	$74.75	$44.91	$86.53	$72.51	$61.80
25	**2034**	$77.90	$47.12	$92.16	$76.44	$65.24
26	**2035**	$80.95	$49.27	$97.49	$80.15	$68.69
27	**2036**	$83.79	$51.28	$102.37	$83.57	$71.67
28	**2037**	$85.58	$52.57	$105.97	$86.10	$73.62
29	**2038**	$84.94	$52.17	$104.32	$85.01	$72.88
30	**2039**	$84.50	$51.92	$103.11	$84.24	$72.37
31	**2040**	$84.93	$52.28	$103.88	$84.82	$72.83
32	**2041**	$86.30	$53.28	$106.72	$86.83	$74.34
33	**2042**	$87.81	$54.37	$109.88	$89.06	$76.01
34	**2043**	$89.37	$55.50	$113.14	$91.36	$77.73
35	**2044**	$90.42	$56.29	$115.27	$92.89	$78.89
36	**2045**	$91.24	$56.91	$116.85	$94.04	$79.77
37	**2046**	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY20

		Met-Ed Zone Summer ($/MWh)		**Met-Ed Zone Winter ($/MWh)**		**Met-Ed DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$88.83	$59.01	$97.51	$84.43	$74.69
21	**2030**	$96.69	$68.78	$108.15	$94.42	$86.18
22	**2031**	$102.85	$73.81	$110.11	$98.30	$89.27
23	**2032**	$101.28	$72.21	$111.13	$98.48	$88.33
24	**2033**	$74.75	$44.91	$86.53	$72.51	$61.80
25	**2034**	$77.90	$47.12	$92.16	$76.44	$65.24
26	**2035**	$80.95	$49.27	$97.49	$80.15	$68.69
27	**2036**	$83.79	$51.28	$102.37	$83.57	$71.67
28	**2037**	$85.58	$52.57	$105.97	$86.10	$73.62
29	**2038**	$84.94	$52.17	$104.32	$85.01	$72.88
30	**2039**	$84.50	$51.92	$103.11	$84.24	$72.37
31	**2040**	$84.93	$52.28	$103.88	$84.82	$72.83
32	**2041**	$86.30	$53.28	$106.72	$86.83	$74.34
33	**2042**	$87.81	$54.37	$109.88	$89.06	$76.01
34	**2043**	$89.37	$55.50	$113.14	$91.36	$77.73
35	**2044**	$90.42	$56.29	$115.27	$92.89	$78.89
36	**2045**	$91.24	$56.91	$116.85	$94.04	$79.77
37	**2046**	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY21

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$88.25	$60.34	$99.71	$85.98	$77.74
22	2031	$96.83	$67.79	$104.09	$92.28	$83.25
23	2032	$104.20	$75.13	$114.05	$101.40	$91.25
24	2033	$104.23	$74.39	$116.01	$101.99	$91.28
25	2034	$77.90	$47.12	$92.16	$76.44	$65.24
26	2035	$80.95	$49.27	$97.49	$80.15	$68.69
27	2036	$83.79	$51.28	$102.37	$83.57	$71.67
28	2037	$85.58	$52.57	$105.97	$86.10	$73.62
29	2038	$84.94	$52.17	$104.32	$85.01	$72.88
30	2039	$84.50	$51.92	$103.11	$84.24	$72.37
31	2040	$84.93	$52.28	$103.88	$84.82	$72.83
32	2041	$86.30	$53.28	$106.72	$86.83	$74.34
33	2042	$87.81	$54.37	$109.88	$89.06	$76.01
34	2043	$89.37	$55.50	$113.14	$91.36	$77.73
35	2044	$90.42	$56.29	$115.27	$92.89	$78.89
36	2045	$91.24	$56.91	$116.85	$94.04	$79.77
37	2046	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY22

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00

22	**2031**	$88.12	$59.08	$95.38	$83.57	$74.54
23	**2032**	$97.97	$68.90	$107.82	$95.17	$85.02
24	**2033**	$107.18	$77.34	$118.96	$104.94	$94.23
25	**2034**	$107.62	$76.84	$121.88	$106.16	$94.96
26	**2035**	$80.95	$49.27	$97.49	$80.15	$68.69
27	**2036**	$83.79	$51.28	$102.37	$83.57	$71.67
28	**2037**	$85.58	$52.57	$105.97	$86.10	$73.62
29	**2038**	$84.94	$52.17	$104.32	$85.01	$72.88
30	**2039**	$84.50	$51.92	$103.11	$84.24	$72.37
31	**2040**	$84.93	$52.28	$103.88	$84.82	$72.83
32	**2041**	$86.30	$53.28	$106.72	$86.83	$74.34
33	**2042**	$87.81	$54.37	$109.88	$89.06	$76.01
34	**2043**	$89.37	$55.50	$113.14	$91.36	$77.73
35	**2044**	$90.42	$56.29	$115.27	$92.89	$78.89
36	**2045**	$91.24	$56.91	$116.85	$94.04	$79.77
37	**2046**	$93.13	$58.27	$120.86	$96.86	$81.87

from Results of ACC Model

earages study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$60.93	$99.25	$99.25	$58.92	$0.00	$52.46	$6.70
$70.11	$68.94	$68.94	$60.14	$0.00	$55.82	$7.21
$75.34	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$74.80	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$46.07	$30.81	$30.81	$63.95	$0.00	$65.41	$9.68
$46.72	$31.45	$31.45	$65.28	$0.00	$66.77	$9.88
$48.58	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.27	$68.94	$68.94	$60.14	$0.00	$55.82	$7.21
$69.71	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$77.52	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$74.23	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68

$46.72	$31.45	$31.45	$65.28	$0.00	$66.77	$9.88
$48.58	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$61.54	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$71.70	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$77.05	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$75.89	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$48.58	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.26	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$71.03	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$78.81	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$78.06	$76.22	$76.22	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

$62.32	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$72.58	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$81.01	$76.22	$76.22	$66.63	$0.00	$68.15	$10.09
$80.72	$77.77	$77.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

PY Selection	PY18

SWE Note: This data excludes av

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Met-Ed Zone Summer ($/MWh) Summer On-Peak	Met-Ed Zone Summer ($/MWh) Summer Off-Peak	Met-Ed Zone W Winter On-Peak
$3.60	Segment 1	18	2027	$23.68	$15.75	$24.82
$3.52		19	2028	$26.37	$17.94	$28.38
$3.41		20	2029	$28.21	$20.01	$30.60
$3.26		21	2030	$27.43	$19.76	$30.58
$3.23	Segment 2	22	2031	$19.75	$11.77	$21.75
$3.32		23	2032	$19.82	$11.83	$22.53
$3.59		24	2033	$20.55	$12.34	$23.78
$3.92		25	2034	$21.41	$12.95	$25.33
$4.25		26	2035	$22.25	$13.54	$26.80
$4.54		27	2036	$23.03	$14.09	$28.14
$4.73	Segment 3	28	2037	$23.52	$14.45	$29.13
$4.64		29	2038	$23.35	$14.34	$28.67
$4.56		30	2039	$23.22	$14.27	$28.34
$4.59		31	2040	$23.34	$14.37	$28.55
$4.74		32	2041	$23.72	$14.64	$29.33
$4.90		33	2042	$24.14	$14.95	$30.20
$5.07		34	2043	$24.56	$15.26	$31.10
$5.17		35	2044	$24.85	$15.47	$31.68
$5.25		36	2045	$25.08	$15.64	$32.12
$5.46		37	2046	$25.60	$16.02	$33.22

PY Selection	PY19

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Met-Ed Zone Summer ($/MWh) Summer On-Peak	Met-Ed Zone Summer ($/MWh) Summer Off-Peak	Met-Ed Zone W Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$3.52		19	2028	$24.22	$15.79	$26.22
$3.41		20	2029	$26.66	$18.47	$29.05
$3.26		21	2030	$28.18	$20.50	$31.33
$3.23		22	2031	$27.49	$19.51	$29.49

$3.32	Segment 2		23	2032	$19.82	$11.83	$22.53
$3.59			24	2033	$20.55	$12.34	$23.78
$3.92			25	2034	$21.41	$12.95	$25.33
$4.25			26	2035	$22.25	$13.54	$26.80
$4.54			27	2036	$23.03	$14.09	$28.14
$4.73	Segment 3		28	2037	$23.52	$14.45	$29.13
$4.64			29	2038	$23.35	$14.34	$28.67
$4.56			30	2039	$23.22	$14.27	$28.34
$4.59			31	2040	$23.34	$14.37	$28.55
$4.74			32	2041	$23.72	$14.64	$29.33
$4.90			33	2042	$24.14	$14.95	$30.20
$5.07			34	2043	$24.56	$15.26	$31.10
$5.17			35	2044	$24.85	$15.47	$31.68
$5.25			36	2045	$25.08	$15.64	$32.12
$5.46			37	2046	$25.60	$16.02	$33.22

PY Selection	PY20

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Met-Ed Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	Met-Ed Zone W Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00	$0.00
$3.41		20	2029	$24.42	$16.22	$26.80
$3.26		21	2030	$26.58	$18.90	$29.73
$3.23	Segment 2	22	2031	$28.27	$20.29	$30.26
$3.32		23	2032	$27.84	$19.85	$30.54
$3.59		24	2033	$20.55	$12.34	$23.78
$3.92		25	2034	$21.41	$12.95	$25.33
$4.25		26	2035	$22.25	$13.54	$26.80
$4.54		27	2036	$23.03	$14.09	$28.14
$4.73	Segment 3	28	2037	$23.52	$14.45	$29.13
$4.64		29	2038	$23.35	$14.34	$28.67
$4.56		30	2039	$23.22	$14.27	$28.34
$4.59		31	2040	$23.34	$14.37	$28.55
$4.74		32	2041	$23.72	$14.64	$29.33
$4.90		33	2042	$24.14	$14.95	$30.20
$5.07		34	2043	$24.56	$15.26	$31.10
$5.17		35	2044	$24.85	$15.47	$31.68
$5.25		36	2045	$25.08	$15.64	$32.12
$5.46		37	2046	$25.60	$16.02	$33.22

PY Selection	PY21

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Met-Ed Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	Met-Ed Zone W Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00	$0.00
$3.26		21	2030	$24.26	$16.58	$27.41
$3.23	Segment 2	22	2031	$26.62	$18.63	$28.61
$3.32		23	2032	$28.64	$20.65	$31.35
$3.59		24	2033	$28.65	$20.45	$31.89
$3.92		25	2034	$21.41	$12.95	$25.33
$4.25		26	2035	$22.25	$13.54	$26.80
$4.54		27	2036	$23.03	$14.09	$28.14
$4.73	Segment 3	28	2037	$23.52	$14.45	$29.13
$4.64		29	2038	$23.35	$14.34	$28.67
$4.56		30	2039	$23.22	$14.27	$28.34
$4.59		31	2040	$23.34	$14.37	$28.55
$4.74		32	2041	$23.72	$14.64	$29.33
$4.90		33	2042	$24.14	$14.95	$30.20
$5.07		34	2043	$24.56	$15.26	$31.10
$5.17		35	2044	$24.85	$15.47	$31.68
$5.25		36	2045	$25.08	$15.64	$32.12
$5.46		37	2046	$25.60	$16.02	$33.22

PY Selection	PY22

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Met-Ed Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	Met-Ed Zone W Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00	$0.00
$0.00		21	2030	$0.00	$0.00	$0.00

$3.23	Segment 2		22	2031	$24.22	$16.24	$26.22
$3.32			23	2032	$26.93	$18.94	$29.63
$3.59			24	2033	$29.46	$21.26	$32.70
$3.92			25	2034	$29.58	$21.12	$33.50
$4.25			26	2035	$22.25	$13.54	$26.80
$4.54			27	2036	$23.03	$14.09	$28.14
$4.73	Segment 3		28	2037	$23.52	$14.45	$29.13
$4.64			29	2038	$23.35	$14.34	$28.67
$4.56			30	2039	$23.22	$14.27	$28.34
$4.59			31	2040	$23.34	$14.37	$28.55
$4.74			32	2041	$23.72	$14.64	$29.33
$4.90			33	2042	$24.14	$14.95	$30.20
$5.07			34	2043	$24.56	$15.26	$31.10
$5.17			35	2044	$24.85	$15.47	$31.68
$5.25			36	2045	$25.08	$15.64	$32.12
$5.46			37	2046	$25.60	$16.02	$33.22

CALCULATIONS

voided energy costs from the Arrearages study. Please refer to the 'LI Output' tab for avoided costs to be used for

Winter ($/MWh)	Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$21.63	$20.08	$16.75	$27.28	$27.28	$16.19	$0.00
$25.00	$22.61	$19.27	$18.95	$18.95	$16.53	$0.00
$27.00	$24.32	$20.71	$19.33	$19.33	$16.87	$0.00
$26.80	$24.54	$20.56	$19.73	$19.73	$17.22	$0.00
$18.50	$16.02	$12.66	$8.47	$8.47	$17.58	$0.00
$19.05	$16.26	$12.84	$8.65	$8.65	$17.94	$0.00
$19.93	$16.99	$13.35	$8.82	$8.82	$18.31	$0.00
$21.01	$17.93	$14.02	$9.01	$9.01	$18.69	$0.00
$22.03	$18.88	$14.68	$9.19	$9.19	$19.08	$0.00
$22.97	$19.70	$15.26	$9.38	$9.38	$19.48	$0.00
$23.67	$20.24	$15.64	$9.58	$9.58	$19.88	$0.00
$23.37	$20.03	$15.52	$9.78	$9.78	$20.29	$0.00
$23.15	$19.89	$15.44	$9.98	$9.98	$20.71	$0.00
$23.31	$20.02	$15.54	$10.19	$10.19	$21.14	$0.00
$23.87	$20.43	$15.84	$10.40	$10.40	$21.58	$0.00
$24.48	$20.89	$16.17	$10.61	$10.61	$22.03	$0.00
$25.11	$21.36	$16.51	$10.83	$10.83	$22.48	$0.00
$25.53	$21.68	$16.75	$11.06	$11.06	$22.95	$0.00
$25.85	$21.93	$16.93	$11.29	$11.29	$23.42	$0.00
$26.62	$22.50	$17.35	$11.52	$11.52	$23.91	$0.00

Winter ($/MWh)	Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$22.84	$20.46	$17.12	$18.95	$18.95	$16.53	$0.00
$25.45	$22.78	$19.16	$19.33	$19.33	$16.87	$0.00
$27.55	$25.29	$21.31	$19.73	$19.73	$17.22	$0.00
$26.24	$23.76	$20.40	$20.13	$20.13	$17.58	$0.00

$19.05	$16.26	$12.84	$8.65	$8.65	$17.94	$0.00
$19.93	$16.99	$13.35	$8.82	$8.82	$18.31	$0.00
$21.01	$17.93	$14.02	$9.01	$9.01	$18.69	$0.00
$22.03	$18.88	$14.68	$9.19	$9.19	$19.08	$0.00
$22.97	$19.70	$15.26	$9.38	$9.38	$19.48	$0.00
$23.67	$20.24	$15.64	$9.58	$9.58	$19.88	$0.00
$23.37	$20.03	$15.52	$9.78	$9.78	$20.29	$0.00
$23.15	$19.89	$15.44	$9.98	$9.98	$20.71	$0.00
$23.31	$20.02	$15.54	$10.19	$10.19	$21.14	$0.00
$23.87	$20.43	$15.84	$10.40	$10.40	$21.58	$0.00
$24.48	$20.89	$16.17	$10.61	$10.61	$22.03	$0.00
$25.11	$21.36	$16.51	$10.83	$10.83	$22.48	$0.00
$25.53	$21.68	$16.75	$11.06	$11.06	$22.95	$0.00
$25.85	$21.93	$16.93	$11.29	$11.29	$23.42	$0.00
$26.62	$22.50	$17.35	$11.52	$11.52	$23.91	$0.00

'inter ($/MWh)	Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$23.21	$20.53	$16.91	$19.33	$19.33	$16.87	$0.00
$25.95	$23.69	$19.71	$19.73	$19.73	$17.22	$0.00
$27.02	$24.54	$21.18	$20.13	$20.13	$17.58	$0.00
$27.07	$24.28	$20.86	$20.53	$20.53	$17.94	$0.00
$19.93	$16.99	$13.35	$8.82	$8.82	$18.31	$0.00
$21.01	$17.93	$14.02	$9.01	$9.01	$18.69	$0.00
$22.03	$18.88	$14.68	$9.19	$9.19	$19.08	$0.00
$22.97	$19.70	$15.26	$9.38	$9.38	$19.48	$0.00
$23.67	$20.24	$15.64	$9.58	$9.58	$19.88	$0.00
$23.37	$20.03	$15.52	$9.78	$9.78	$20.29	$0.00
$23.15	$19.89	$15.44	$9.98	$9.98	$20.71	$0.00
$23.31	$20.02	$15.54	$10.19	$10.19	$21.14	$0.00
$23.87	$20.43	$15.84	$10.40	$10.40	$21.58	$0.00
$24.48	$20.89	$16.17	$10.61	$10.61	$22.03	$0.00
$25.11	$21.36	$16.51	$10.83	$10.83	$22.48	$0.00
$25.53	$21.68	$16.75	$11.06	$11.06	$22.95	$0.00
$25.85	$21.93	$16.93	$11.29	$11.29	$23.42	$0.00
$26.62	$22.50	$17.35	$11.52	$11.52	$23.91	$0.00

Winter ($/MWh)	Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$23.63	$21.37	$17.39	$19.73	$19.73	$17.22	$0.00
$25.36	$22.88	$19.52	$20.13	$20.13	$17.58	$0.00
$27.87	$25.08	$21.66	$20.53	$20.53	$17.94	$0.00
$28.03	$25.09	$21.46	$20.95	$20.95	$18.31	$0.00
$21.01	$17.93	$14.02	$9.01	$9.01	$18.69	$0.00
$22.03	$18.88	$14.68	$9.19	$9.19	$19.08	$0.00
$22.97	$19.70	$15.26	$9.38	$9.38	$19.48	$0.00
$23.67	$20.24	$15.64	$9.58	$9.58	$19.88	$0.00
$23.37	$20.03	$15.52	$9.78	$9.78	$20.29	$0.00
$23.15	$19.89	$15.44	$9.98	$9.98	$20.71	$0.00
$23.31	$20.02	$15.54	$10.19	$10.19	$21.14	$0.00
$23.87	$20.43	$15.84	$10.40	$10.40	$21.58	$0.00
$24.48	$20.89	$16.17	$10.61	$10.61	$22.03	$0.00
$25.11	$21.36	$16.51	$10.83	$10.83	$22.48	$0.00
$25.53	$21.68	$16.75	$11.06	$11.06	$22.95	$0.00
$25.85	$21.93	$16.93	$11.29	$11.29	$23.42	$0.00
$26.62	$22.50	$17.35	$11.52	$11.52	$23.91	$0.00

Winter ($/MWh)	Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

$22.97	$20.49	$17.13	$20.13	$20.13	$17.58	$0.00
$26.16	$23.37	$19.95	$20.53	$20.53	$17.94	$0.00
$28.84	$25.90	$22.27	$20.95	$20.95	$18.31	$0.00
$29.18	$26.10	$22.19	$21.38	$21.38	$18.69	$0.00
$22.03	$18.88	$14.68	$9.19	$9.19	$19.08	$0.00
$22.97	$19.70	$15.26	$9.38	$9.38	$19.48	$0.00
$23.67	$20.24	$15.64	$9.58	$9.58	$19.88	$0.00
$23.37	$20.03	$15.52	$9.78	$9.78	$20.29	$0.00
$23.15	$19.89	$15.44	$9.98	$9.98	$20.71	$0.00
$23.31	$20.02	$15.54	$10.19	$10.19	$21.14	$0.00
$23.87	$20.43	$15.84	$10.40	$10.40	$21.58	$0.00
$24.48	$20.89	$16.17	$10.61	$10.61	$22.03	$0.00
$25.11	$21.36	$16.51	$10.83	$10.83	$22.48	$0.00
$25.53	$21.68	$16.75	$11.06	$11.06	$22.95	$0.00
$25.85	$21.93	$16.93	$11.29	$11.29	$23.42	$0.00
$26.62	$22.50	$17.35	$11.52	$11.52	$23.91	$0.00

Low Income programs only.

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$14.42	$1.84	$0.99	Segment 1
$15.34	$1.98	$0.97	
$16.20	$2.24	$0.94	
$17.09	$2.38	$0.90	
$17.98	$2.66	$0.89	Segment 2
$18.35	$2.72	$0.91	
$18.73	$2.77	$0.99	
$19.12	$2.83	$1.08	
$19.52	$2.89	$1.17	
$19.92	$2.95	$1.25	
$20.33	$3.01	$1.30	Segment 3
$20.75	$3.07	$1.27	
$21.18	$3.14	$1.25	
$21.62	$3.20	$1.26	
$22.07	$3.27	$1.30	
$22.53	$3.34	$1.35	
$22.99	$3.40	$1.39	
$23.47	$3.47	$1.42	
$23.96	$3.55	$1.44	
$24.45	$3.62	$1.50	

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$15.34	$1.98	$0.97	
$16.20	$2.24	$0.94	
$17.09	$2.38	$0.90	
$17.98	$2.66	$0.89	

$18.35	$2.72	$0.91	Segment 2
$18.73	$2.77	$0.99	
$19.12	$2.83	$1.08	
$19.52	$2.89	$1.17	
$19.92	$2.95	$1.25	
$20.33	$3.01	$1.30	Segment 3
$20.75	$3.07	$1.27	
$21.18	$3.14	$1.25	
$21.62	$3.20	$1.26	
$22.07	$3.27	$1.30	
$22.53	$3.34	$1.35	
$22.99	$3.40	$1.39	
$23.47	$3.47	$1.42	
$23.96	$3.55	$1.44	
$24.45	$3.62	$1.50	

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	
$16.20	$2.24	$0.94	
$17.09	$2.38	$0.90	
$17.98	$2.66	$0.89	Segment 2
$18.35	$2.72	$0.91	
$18.73	$2.77	$0.99	
$19.12	$2.83	$1.08	
$19.52	$2.89	$1.17	
$19.92	$2.95	$1.25	
$20.33	$3.01	$1.30	Segment 3
$20.75	$3.07	$1.27	
$21.18	$3.14	$1.25	
$21.62	$3.20	$1.26	
$22.07	$3.27	$1.30	
$22.53	$3.34	$1.35	
$22.99	$3.40	$1.39	
$23.47	$3.47	$1.42	
$23.96	$3.55	$1.44	
$24.45	$3.62	$1.50	

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	
$17.09	$2.38	$0.90	
$17.98	$2.66	$0.89	Segment 2
$18.35	$2.72	$0.91	
$18.73	$2.77	$0.99	
$19.12	$2.83	$1.08	
$19.52	$2.89	$1.17	
$19.92	$2.95	$1.25	
$20.33	$3.01	$1.30	Segment 3
$20.75	$3.07	$1.27	
$21.18	$3.14	$1.25	
$21.62	$3.20	$1.26	
$22.07	$3.27	$1.30	
$22.53	$3.34	$1.35	
$22.99	$3.40	$1.39	
$23.47	$3.47	$1.42	
$23.96	$3.55	$1.44	
$24.45	$3.62	$1.50	

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	

$17.98	$2.66	$0.89	Segment 2
$18.35	$2.72	$0.91	
$18.73	$2.77	$0.99	
$19.12	$2.83	$1.08	
$19.52	$2.89	$1.17	
$19.92	$2.95	$1.25	
$20.33	$3.01	$1.30	Segment 3
$20.75	$3.07	$1.27	
$21.18	$3.14	$1.25	
$21.62	$3.20	$1.26	
$22.07	$3.27	$1.30	
$22.53	$3.34	$1.35	
$22.99	$3.40	$1.39	
$23.47	$3.47	$1.42	
$23.96	$3.55	$1.44	
$24.45	$3.62	$1.50	

Values

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arrear

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$85.24	$57.20	$89.27	$77.99	$72.51
19	2028	$96.15	$66.35	$103.24	$91.29	$82.85
20	2029	$104.20	$75.22	$112.64	$99.93	$90.46
21	2030	$101.87	$74.75	$113.01	$99.66	$91.66
22	2031	$69.79	$41.65	$76.61	$65.30	$56.57
23	2032	$69.81	$41.71	$79.18	$67.11	$57.23
24	2033	$72.19	$43.40	$83.52	$70.15	$59.65
25	2034	$75.08	$45.44	$88.92	$73.91	$62.86
26	2035	$77.87	$47.41	$93.96	$77.44	$66.07
27	2036	$80.46	$49.24	$98.52	$80.63	$68.81
28	2037	$82.02	$50.37	$101.71	$82.87	$70.52
29	2038	$81.41	$50.00	$99.98	$81.74	$69.79
30	2039	$80.99	$49.77	$98.72	$80.92	$69.29
31	2040	$81.42	$50.11	$99.51	$81.52	$69.75
32	2041	$82.74	$51.08	$102.46	$83.60	$71.24
33	2042	$84.19	$52.14	$105.74	$85.92	$72.89
34	2043	$85.69	$53.22	$109.12	$88.30	$74.59
35	2044	$86.71	$53.99	$111.33	$89.89	$75.74
36	2045	$87.50	$54.59	$112.96	$91.07	$76.61
37	2046	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY19

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$87.58	$57.78	$94.67	$82.72	$74.28
20	2029	$97.90	$68.92	$106.34	$93.63	$84.16
21	2030	$104.99	$77.87	$116.13	$102.78	$94.78
22	2031	$102.76	$74.62	$109.58	$98.27	$89.54
23	2032	$69.81	$41.71	$79.18	$67.11	$57.23
24	2033	$72.19	$43.40	$83.52	$70.15	$59.65

25	**2034**	$75.08	$45.44	$88.92	$73.91	$62.86
26	**2035**	$77.87	$47.41	$93.96	$77.44	$66.07
27	**2036**	$80.46	$49.24	$98.52	$80.63	$68.81
28	**2037**	$82.02	$50.37	$101.71	$82.87	$70.52
29	**2038**	$81.41	$50.00	$99.98	$81.74	$69.79
30	**2039**	$80.99	$49.77	$98.72	$80.92	$69.29
31	**2040**	$81.42	$50.11	$99.51	$81.52	$69.75
32	**2041**	$82.74	$51.08	$102.46	$83.60	$71.24
33	**2042**	$84.19	$52.14	$105.74	$85.92	$72.89
34	**2043**	$85.69	$53.22	$109.12	$88.30	$74.59
35	**2044**	$86.71	$53.99	$111.33	$89.89	$75.74
36	**2045**	$87.50	$54.59	$112.96	$91.07	$76.61
37	**2046**	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY20

		Penelec Zone Summer ($/MWh)		**Penelec Zone Winter ($/MWh)**		**Penelec DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$88.76	$59.78	$97.20	$84.49	$75.02
21	**2030**	$98.33	$71.21	$109.47	$96.12	$88.12
22	**2031**	$106.06	$77.92	$112.88	$101.57	$92.84
23	**2032**	$104.80	$76.70	$114.17	$102.10	$92.22
24	**2033**	$72.19	$43.40	$83.52	$70.15	$59.65
25	**2034**	$75.08	$45.44	$88.92	$73.91	$62.86
26	**2035**	$77.87	$47.41	$93.96	$77.44	$66.07
27	**2036**	$80.46	$49.24	$98.52	$80.63	$68.81
28	**2037**	$82.02	$50.37	$101.71	$82.87	$70.52
29	**2038**	$81.41	$50.00	$99.98	$81.74	$69.79
30	**2039**	$80.99	$49.77	$98.72	$80.92	$69.29
31	**2040**	$81.42	$50.11	$99.51	$81.52	$69.75
32	**2041**	$82.74	$51.08	$102.46	$83.60	$71.24
33	**2042**	$84.19	$52.14	$105.74	$85.92	$72.89
34	**2043**	$85.69	$53.22	$109.12	$88.30	$74.59
35	**2044**	$86.71	$53.99	$111.33	$89.89	$75.74
36	**2045**	$87.50	$54.59	$112.96	$91.07	$76.61
37	**2046**	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY21

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$88.67	$61.55	$99.81	$86.46	$78.46
22	2031	$99.02	$70.88	$105.84	$94.53	$85.80
23	2032	$108.30	$80.20	$117.67	$105.60	$95.72
24	2033	$108.44	$79.65	$119.77	$106.40	$95.90
25	2034	$75.08	$45.44	$88.92	$73.91	$62.86
26	2035	$77.87	$47.41	$93.96	$77.44	$66.07
27	2036	$80.46	$49.24	$98.52	$80.63	$68.81
28	2037	$82.02	$50.37	$101.71	$82.87	$70.52
29	2038	$81.41	$50.00	$99.98	$81.74	$69.79
30	2039	$80.99	$49.77	$98.72	$80.92	$69.29
31	2040	$81.42	$50.11	$99.51	$81.52	$69.75
32	2041	$82.74	$51.08	$102.46	$83.60	$71.24
33	2042	$84.19	$52.14	$105.74	$85.92	$72.89
34	2043	$85.69	$53.22	$109.12	$88.30	$74.59
35	2044	$86.71	$53.99	$111.33	$89.89	$75.74
36	2045	$87.50	$54.59	$112.96	$91.07	$76.61
37	2046	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY22

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$88.82	$60.68	$95.64	$84.33	$75.60
23	2032	$100.83	$72.73	$110.20	$98.13	$88.25
24	2033	$112.07	$83.28	$123.40	$110.03	$99.53

25	**2034**	$112.66	$83.02	$126.50	$111.49	$100.44
26	**2035**	$77.87	$47.41	$93.96	$77.44	$66.07
27	**2036**	$80.46	$49.24	$98.52	$80.63	$68.81
28	**2037**	$82.02	$50.37	$101.71	$82.87	$70.52
29	**2038**	$81.41	$50.00	$99.98	$81.74	$69.79
30	**2039**	$80.99	$49.77	$98.72	$80.92	$69.29
31	**2040**	$81.42	$50.11	$99.51	$81.52	$69.75
32	**2041**	$82.74	$51.08	$102.46	$83.60	$71.24
33	**2042**	$84.19	$52.14	$105.74	$85.92	$72.89
34	**2043**	$85.69	$53.22	$109.12	$88.30	$74.59
35	**2044**	$86.71	$53.99	$111.33	$89.89	$75.74
36	**2045**	$87.50	$54.59	$112.96	$91.07	$76.61
37	**2046**	$89.32	$55.91	$117.12	$94.00	$78.68

s from Results of ACC Model

ages study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$60.72	$99.25	$99.25	$44.19	$14.73	$37.18	$5.79
$71.04	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$77.68	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$77.59	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$44.78	$30.81	$30.81	$47.97	$15.99	$57.97	$7.24
$45.29	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39
$46.99	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.47	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$71.38	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$80.71	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$77.75	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$45.29	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39
$46.99	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54

$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.24	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$74.05	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$81.05	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$80.28	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$46.99	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.39	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$74.01	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$83.78	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$83.24	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.81	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$76.31	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$86.87	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54

$86.83	$77.77	$77.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

PY Selection	PY18	SWE Note: This d

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$3.75	Segment 1	18	2027	$22.37	$15.01
$3.68		19	2028	$25.24	$17.42
$3.56		20	2029	$27.35	$19.74
$3.42		21	2030	$26.74	$19.62
$3.37	Segment 2	22	2031	$18.32	$10.93
$3.43		23	2032	$18.32	$10.95
$3.68		24	2033	$18.95	$11.39
$4.00		25	2034	$19.71	$11.93
$4.30		26	2035	$20.44	$12.44
$4.57		27	2036	$21.12	$12.92
$4.73	Segment 3	28	2037	$21.53	$13.22
$4.64		29	2038	$21.37	$13.12
$4.56		30	2039	$21.26	$13.06
$4.59		31	2040	$21.37	$13.15
$4.74		32	2041	$21.72	$13.41
$4.90		33	2042	$22.10	$13.68
$5.07		34	2043	$22.49	$13.97
$5.17		35	2044	$22.76	$14.17
$5.25		36	2045	$22.97	$14.33
$5.46		37	2046	$23.45	$14.67

PY Selection	PY19

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$3.68		19	2028	$22.99	$15.17
$3.56		20	2029	$25.70	$18.09
$3.42		21	2030	$27.56	$20.44
$3.37	Segm	22	2031	$26.97	$19.59
$3.43		23	2032	$18.32	$10.95
$3.68		24	2033	$18.95	$11.39

$4.00	ent 2		25	2034	$19.71	$11.93
$4.30			26	2035	$20.44	$12.44
$4.57			27	2036	$21.12	$12.92
$4.73	Segment 3		28	2037	$21.53	$13.22
$4.64			29	2038	$21.37	$13.12
$4.56			30	2039	$21.26	$13.06
$4.59			31	2040	$21.37	$13.15
$4.74			32	2041	$21.72	$13.41
$4.90			33	2042	$22.10	$13.68
$5.07			34	2043	$22.49	$13.97
$5.17			35	2044	$22.76	$14.17
$5.25			36	2045	$22.97	$14.33
$5.46			37	2046	$23.45	$14.67

PY Selection	PY20

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$3.56		20	2029	$23.30	$15.69
$3.42		21	2030	$25.81	$18.69
$3.37	Segment 2	22	2031	$27.84	$20.45
$3.43		23	2032	$27.51	$20.13
$3.68		24	2033	$18.95	$11.39
$4.00		25	2034	$19.71	$11.93
$4.30		26	2035	$20.44	$12.44
$4.57		27	2036	$21.12	$12.92
$4.73	Segment 3	28	2037	$21.53	$13.22
$4.64		29	2038	$21.37	$13.12
$4.56		30	2039	$21.26	$13.06
$4.59		31	2040	$21.37	$13.15
$4.74		32	2041	$21.72	$13.41
$4.90		33	2042	$22.10	$13.68
$5.07		34	2043	$22.49	$13.97
$5.17		35	2044	$22.76	$14.17
$5.25		36	2045	$22.97	$14.33
$5.46		37	2046	$23.45	$14.67

PY Selection	PY21

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00
$3.42		21	2030	$23.27	$16.16
$3.37	Segment 2	22	2031	$25.99	$18.61
$3.43		23	2032	$28.43	$21.05
$3.68		24	2033	$28.46	$20.91
$4.00		25	2034	$19.71	$11.93
$4.30		26	2035	$20.44	$12.44
$4.57		27	2036	$21.12	$12.92
$4.73	Segment 3	28	2037	$21.53	$13.22
$4.64		29	2038	$21.37	$13.12
$4.56		30	2039	$21.26	$13.06
$4.59		31	2040	$21.37	$13.15
$4.74		32	2041	$21.72	$13.41
$4.90		33	2042	$22.10	$13.68
$5.07		34	2043	$22.49	$13.97
$5.17		35	2044	$22.76	$14.17
$5.25		36	2045	$22.97	$14.33
$5.46		37	2046	$23.45	$14.67

PY Selection	PY22

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00
$0.00		21	2030	$0.00	$0.00
$3.37	Segm	22	2031	$23.31	$15.93
$3.43		23	2032	$26.47	$19.09
$3.68		24	2033	$29.42	$21.86

$4.00	ent 2		25	2034	$29.57	$21.79
$4.30			26	2035	$20.44	$12.44
$4.57			27	2036	$21.12	$12.92
$4.73	Segment 3		28	2037	$21.53	$13.22
$4.64			29	2038	$21.37	$13.12
$4.56			30	2039	$21.26	$13.06
$4.59			31	2040	$21.37	$13.15
$4.74			32	2041	$21.72	$13.41
$4.90			33	2042	$22.10	$13.68
$5.07			34	2043	$22.49	$13.97
$5.17			35	2044	$22.76	$14.17
$5.25			36	2045	$22.97	$14.33
$5.46			37	2046	$23.45	$14.67

CALCULATIONS

lata excludes avoided energy costs from the Arrearages study. Please refer to the 'LI Output' tab for avoided costs to b

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$23.43	$20.47	$19.03	$15.94	$26.05	$26.05	$11.60
$27.10	$23.96	$21.75	$18.65	$18.09	$18.09	$11.84
$29.57	$26.23	$23.74	$20.39	$18.46	$18.46	$12.08
$29.66	$26.16	$24.06	$20.37	$18.84	$18.84	$12.33
$20.11	$17.14	$14.85	$11.75	$8.09	$8.09	$12.59
$20.78	$17.61	$15.02	$11.89	$8.26	$8.26	$12.85
$21.92	$18.41	$15.66	$12.33	$8.43	$8.43	$13.12
$23.34	$19.40	$16.50	$12.93	$8.60	$8.60	$13.39
$24.66	$20.33	$17.34	$13.52	$8.78	$8.78	$13.67
$25.86	$21.16	$18.06	$14.03	$8.96	$8.96	$13.95
$26.70	$21.75	$18.51	$14.35	$9.15	$9.15	$14.24
$26.24	$21.45	$18.32	$14.24	$9.34	$9.34	$14.53
$25.91	$21.24	$18.19	$14.16	$9.53	$9.53	$14.83
$26.12	$21.40	$18.31	$14.26	$9.73	$9.73	$15.14
$26.89	$21.94	$18.70	$14.54	$9.93	$9.93	$15.46
$27.75	$22.55	$19.13	$14.85	$10.13	$10.13	$15.78
$28.64	$23.18	$19.58	$15.17	$10.34	$10.34	$16.10
$29.22	$23.59	$19.88	$15.40	$10.56	$10.56	$16.44
$29.65	$23.90	$20.11	$15.57	$10.78	$10.78	$16.78
$30.74	$24.67	$20.65	$15.96	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$24.85	$21.71	$19.50	$16.40	$18.09	$18.09	$11.84
$27.91	$24.58	$22.09	$18.74	$18.46	$18.46	$12.08
$30.48	$26.98	$24.88	$21.19	$18.84	$18.84	$12.33
$28.76	$25.79	$23.50	$20.41	$19.22	$19.22	$12.59
$20.78	$17.61	$15.02	$11.89	$8.26	$8.26	$12.85
$21.92	$18.41	$15.66	$12.33	$8.43	$8.43	$13.12

$23.34	$19.40	$16.50	$12.93	$8.60	$8.60	$13.39
$24.66	$20.33	$17.34	$13.52	$8.78	$8.78	$13.67
$25.86	$21.16	$18.06	$14.03	$8.96	$8.96	$13.95
$26.70	$21.75	$18.51	$14.35	$9.15	$9.15	$14.24
$26.24	$21.45	$18.32	$14.24	$9.34	$9.34	$14.53
$25.91	$21.24	$18.19	$14.16	$9.53	$9.53	$14.83
$26.12	$21.40	$18.31	$14.26	$9.73	$9.73	$15.14
$26.89	$21.94	$18.70	$14.54	$9.93	$9.93	$15.46
$27.75	$22.55	$19.13	$14.85	$10.13	$10.13	$15.78
$28.64	$23.18	$19.58	$15.17	$10.34	$10.34	$16.10
$29.22	$23.59	$19.88	$15.40	$10.56	$10.56	$16.44
$29.65	$23.90	$20.11	$15.57	$10.78	$10.78	$16.78
$30.74	$24.67	$20.65	$15.96	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$25.51	$22.18	$19.69	$16.34	$18.46	$18.46	$12.08
$28.73	$25.23	$23.13	$19.44	$18.84	$18.84	$12.33
$29.63	$26.66	$24.37	$21.27	$19.22	$19.22	$12.59
$29.97	$26.80	$24.21	$21.07	$19.61	$19.61	$12.85
$21.92	$18.41	$15.66	$12.33	$8.43	$8.43	$13.12
$23.34	$19.40	$16.50	$12.93	$8.60	$8.60	$13.39
$24.66	$20.33	$17.34	$13.52	$8.78	$8.78	$13.67
$25.86	$21.16	$18.06	$14.03	$8.96	$8.96	$13.95
$26.70	$21.75	$18.51	$14.35	$9.15	$9.15	$14.24
$26.24	$21.45	$18.32	$14.24	$9.34	$9.34	$14.53
$25.91	$21.24	$18.19	$14.16	$9.53	$9.53	$14.83
$26.12	$21.40	$18.31	$14.26	$9.73	$9.73	$15.14
$26.89	$21.94	$18.70	$14.54	$9.93	$9.93	$15.46
$27.75	$22.55	$19.13	$14.85	$10.13	$10.13	$15.78
$28.64	$23.18	$19.58	$15.17	$10.34	$10.34	$16.10
$29.22	$23.59	$19.88	$15.40	$10.56	$10.56	$16.44
$29.65	$23.90	$20.11	$15.57	$10.78	$10.78	$16.78
$30.74	$24.67	$20.65	$15.96	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$26.20	$22.69	$20.59	$16.90	$18.84	$18.84	$12.33
$27.78	$24.81	$22.52	$19.43	$19.22	$19.22	$12.59
$30.88	$27.72	$25.13	$21.99	$19.61	$19.61	$12.85
$31.44	$27.93	$25.17	$21.85	$20.01	$20.01	$13.12
$23.34	$19.40	$16.50	$12.93	$8.60	$8.60	$13.39
$24.66	$20.33	$17.34	$13.52	$8.78	$8.78	$13.67
$25.86	$21.16	$18.06	$14.03	$8.96	$8.96	$13.95
$26.70	$21.75	$18.51	$14.35	$9.15	$9.15	$14.24
$26.24	$21.45	$18.32	$14.24	$9.34	$9.34	$14.53
$25.91	$21.24	$18.19	$14.16	$9.53	$9.53	$14.83
$26.12	$21.40	$18.31	$14.26	$9.73	$9.73	$15.14
$26.89	$21.94	$18.70	$14.54	$9.93	$9.93	$15.46
$27.75	$22.55	$19.13	$14.85	$10.13	$10.13	$15.78
$28.64	$23.18	$19.58	$15.17	$10.34	$10.34	$16.10
$29.22	$23.59	$19.88	$15.40	$10.56	$10.56	$16.44
$29.65	$23.90	$20.11	$15.57	$10.78	$10.78	$16.78
$30.74	$24.67	$20.65	$15.96	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$25.10	$22.13	$19.84	$16.75	$19.22	$19.22	$12.59
$28.92	$25.76	$23.16	$20.03	$19.61	$19.61	$12.85
$32.39	$28.88	$26.12	$22.80	$20.01	$20.01	$13.12

$33.20	$29.26	$26.36	$22.79	$20.41	$20.41	$13.39
$24.66	$20.33	$17.34	$13.52	$8.78	$8.78	$13.67
$25.86	$21.16	$18.06	$14.03	$8.96	$8.96	$13.95
$26.70	$21.75	$18.51	$14.35	$9.15	$9.15	$14.24
$26.24	$21.45	$18.32	$14.24	$9.34	$9.34	$14.53
$25.91	$21.24	$18.19	$14.16	$9.53	$9.53	$14.83
$26.12	$21.40	$18.31	$14.26	$9.73	$9.73	$15.14
$26.89	$21.94	$18.70	$14.54	$9.93	$9.93	$15.46
$27.75	$22.55	$19.13	$14.85	$10.13	$10.13	$15.78
$28.64	$23.18	$19.58	$15.17	$10.34	$10.34	$16.10
$29.22	$23.59	$19.88	$15.40	$10.56	$10.56	$16.44
$29.65	$23.90	$20.11	$15.57	$10.78	$10.78	$16.78
$30.74	$24.67	$20.65	$15.96	$11.00	$11.00	$17.12

e used for Low Income programs only.

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$3.87	$9.76	$1.52	$0.99	Segment 1
$3.95	$11.19	$1.57	$0.97	
$4.03	$12.59	$1.64	$0.94	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment 2
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$3.95	$11.19	$1.57	$0.97	
$4.03	$12.59	$1.64	$0.94	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segm
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	

$4.46	$16.18	$2.02	$1.05	ent 2
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$4.03	$12.59	$1.64	$0.94	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment 2
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment 2
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$4.20	$15.22	$1.90	$0.88	Segm
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	

$4.46	$16.18	$2.02	$1.05	ent 2
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

PY Selection	PY18

SWE Note: This data excludes avoided energy costs fror

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$86.93	$58.11	$91.07	$79.48
19	2028	$97.78	$67.16	$105.06	$92.78
20	2029	$105.75	$75.97	$114.41	$101.35
21	2030	$103.40	$75.53	$114.84	$101.13
22	2031	$71.59	$42.65	$78.64	$66.96
23	2032	$71.61	$42.71	$81.20	$68.77
24	2033	$73.99	$44.40	$85.54	$71.82
25	2034	$76.88	$46.44	$90.94	$75.58
26	2035	$79.67	$48.41	$95.99	$79.10
27	2036	$82.25	$50.24	$100.55	$82.29
28	2037	$83.82	$51.37	$103.73	$84.54
29	2038	$83.21	$51.00	$102.01	$83.40
30	2039	$82.79	$50.76	$100.74	$82.59
31	2040	$83.22	$51.11	$101.53	$83.18
32	2041	$84.53	$52.07	$104.48	$85.27
33	2042	$85.99	$53.13	$107.76	$87.59
34	2043	$87.49	$54.22	$111.14	$89.97
35	2044	$88.51	$54.98	$113.35	$91.55
36	2045	$89.29	$55.58	$114.99	$92.74
37	2046	$91.12	$56.90	$119.14	$95.66

PY Selection	PY19

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$89.27	$58.65	$96.55	$84.27
20	2029	$99.49	$69.71	$108.15	$95.09
21	2030	$106.50	$78.63	$117.94	$104.23
22	2031	$104.36	$75.42	$111.41	$99.73
23	2032	$71.61	$42.71	$81.20	$68.77
24	2033	$73.99	$44.40	$85.54	$71.82

25	**2034**	$76.88	$46.44	$90.94	$75.58
26	**2035**	$79.67	$48.41	$95.99	$79.10
27	**2036**	$82.25	$50.24	$100.55	$82.29
28	**2037**	$83.82	$51.37	$103.73	$84.54
29	**2038**	$83.21	$51.00	$102.01	$83.40
30	**2039**	$82.79	$50.76	$100.74	$82.59
31	**2040**	$83.22	$51.11	$101.53	$83.18
32	**2041**	$84.53	$52.07	$104.48	$85.27
33	**2042**	$85.99	$53.13	$107.76	$87.59
34	**2043**	$87.49	$54.22	$111.14	$89.97
35	**2044**	$88.51	$54.98	$113.35	$91.55
36	**2045**	$89.29	$55.58	$114.99	$92.74
37	**2046**	$91.12	$56.90	$119.14	$95.66

PY Selection	PY20

		Penn Power Zone Summer ($/MWh)		**Penn Power Zone Winter ($/MWh)**	
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00
20	**2029**	$90.42	$60.64	$99.08	$86.02
21	**2030**	$99.88	$72.01	$111.32	$97.61
22	**2031**	$107.64	$78.70	$114.69	$103.01
23	**2032**	$106.44	$77.54	$116.03	$103.60
24	**2033**	$73.99	$44.40	$85.54	$71.82
25	**2034**	$76.88	$46.44	$90.94	$75.58
26	**2035**	$79.67	$48.41	$95.99	$79.10
27	**2036**	$82.25	$50.24	$100.55	$82.29
28	**2037**	$83.82	$51.37	$103.73	$84.54
29	**2038**	$83.21	$51.00	$102.01	$83.40
30	**2039**	$82.79	$50.76	$100.74	$82.59
31	**2040**	$83.22	$51.11	$101.53	$83.18
32	**2041**	$84.53	$52.07	$104.48	$85.27
33	**2042**	$85.99	$53.13	$107.76	$87.59
34	**2043**	$87.49	$54.22	$111.14	$89.97
35	**2044**	$88.51	$54.98	$113.35	$91.55
36	**2045**	$89.29	$55.58	$114.99	$92.74
37	**2046**	$91.12	$56.90	$119.14	$95.66

PY Selection	PY21

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00
21	2030	$90.29	$62.42	$101.73	$88.02
22	2031	$100.64	$71.70	$107.69	$96.01
23	2032	$109.92	$81.02	$119.51	$107.08
24	2033	$110.13	$80.54	$121.68	$107.96
25	2034	$76.88	$46.44	$90.94	$75.58
26	2035	$79.67	$48.41	$95.99	$79.10
27	2036	$82.25	$50.24	$100.55	$82.29
28	2037	$83.82	$51.37	$103.73	$84.54
29	2038	$83.21	$51.00	$102.01	$83.40
30	2039	$82.79	$50.76	$100.74	$82.59
31	2040	$83.22	$51.11	$101.53	$83.18
32	2041	$84.53	$52.07	$104.48	$85.27
33	2042	$85.99	$53.13	$107.76	$87.59
34	2043	$87.49	$54.22	$111.14	$89.97
35	2044	$88.51	$54.98	$113.35	$91.55
36	2045	$89.29	$55.58	$114.99	$92.74
37	2046	$91.12	$56.90	$119.14	$95.66

PY Selection	PY22

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00
22	2031	$90.50	$61.56	$97.55	$85.87

23	**2032**	$102.49	$73.59	$112.08	$99.65
24	**2033**	$113.74	$84.15	$125.29	$111.57
25	**2034**	$114.38	$83.94	$128.44	$113.08
26	**2035**	$79.67	$48.41	$95.99	$79.10
27	**2036**	$82.25	$50.24	$100.55	$82.29
28	**2037**	$83.82	$51.37	$103.73	$84.54
29	**2038**	$83.21	$51.00	$102.01	$83.40
30	**2039**	$82.79	$50.76	$100.74	$82.59
31	**2040**	$83.22	$51.11	$101.53	$83.18
32	**2041**	$84.53	$52.07	$104.48	$85.27
33	**2042**	$85.99	$53.13	$107.76	$87.59
34	**2043**	$87.49	$54.22	$111.14	$89.97
35	**2044**	$88.51	$54.98	$113.35	$91.55
36	**2045**	$89.29	$55.58	$114.99	$92.74
37	**2046**	$91.12	$56.90	$119.14	$95.66

Values from Results of ACC Model

n the Arrearages study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income program

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$73.84	$61.74	$67.40	$67.40	$77.10	$0.00
$84.11	$71.98	$33.46	$33.46	$78.69	$0.00
$91.63	$78.50	$34.15	$34.15	$80.32	$0.00
$92.90	$78.45	$34.85	$34.85	$81.99	$0.00
$58.02	$45.87	$27.64	$27.64	$83.69	$0.00
$58.68	$46.38	$28.21	$28.21	$85.42	$0.00
$61.09	$48.09	$28.80	$28.80	$87.19	$0.00
$64.31	$50.35	$29.40	$29.40	$88.99	$0.00
$67.52	$52.61	$30.00	$30.00	$90.84	$0.00
$70.26	$54.54	$30.63	$30.63	$92.72	$0.00
$71.97	$55.77	$31.26	$31.26	$94.64	$0.00
$71.24	$55.33	$31.91	$31.91	$96.60	$0.00
$70.73	$55.03	$32.57	$32.57	$98.60	$0.00
$71.20	$55.40	$33.24	$33.24	$100.64	$0.00
$72.69	$56.49	$33.93	$33.93	$102.73	$0.00
$74.34	$57.68	$34.64	$34.64	$104.86	$0.00
$76.03	$58.90	$35.35	$35.35	$107.03	$0.00
$77.18	$59.75	$36.09	$36.09	$109.25	$0.00
$78.06	$60.42	$36.83	$36.83	$111.51	$0.00
$80.13	$61.90	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$75.60	$63.47	$33.46	$33.46	$78.69	$0.00
$85.37	$72.24	$34.15	$34.15	$80.32	$0.00
$96.00	$81.55	$34.85	$34.85	$81.99	$0.00
$90.79	$78.64	$35.57	$35.57	$83.69	$0.00
$58.68	$46.38	$28.21	$28.21	$85.42	$0.00
$61.09	$48.09	$28.80	$28.80	$87.19	$0.00

$64.31	$50.35	$29.40	$29.40	$88.99	$0.00
$67.52	$52.61	$30.00	$30.00	$90.84	$0.00
$70.26	$54.54	$30.63	$30.63	$92.72	$0.00
$71.97	$55.77	$31.26	$31.26	$94.64	$0.00
$71.24	$55.33	$31.91	$31.91	$96.60	$0.00
$70.73	$55.03	$32.57	$32.57	$98.60	$0.00
$71.20	$55.40	$33.24	$33.24	$100.64	$0.00
$72.69	$56.49	$33.93	$33.93	$102.73	$0.00
$74.34	$57.68	$34.64	$34.64	$104.86	$0.00
$76.03	$58.90	$35.35	$35.35	$107.03	$0.00
$77.18	$59.75	$36.09	$36.09	$109.25	$0.00
$78.06	$60.42	$36.83	$36.83	$111.51	$0.00
$80.13	$61.90	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	**Shoulder Off-Peak**	**Summer**	**Winter**	**Summer**	**Winter**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$76.30	$63.17	$34.15	$34.15	$80.32	$0.00
$89.38	$74.93	$34.85	$34.85	$81.99	$0.00
$94.07	$81.92	$35.57	$35.57	$83.69	$0.00
$93.51	$81.21	$36.30	$36.30	$85.42	$0.00
$61.09	$48.09	$28.80	$28.80	$87.19	$0.00
$64.31	$50.35	$29.40	$29.40	$88.99	$0.00
$67.52	$52.61	$30.00	$30.00	$90.84	$0.00
$70.26	$54.54	$30.63	$30.63	$92.72	$0.00
$71.97	$55.77	$31.26	$31.26	$94.64	$0.00
$71.24	$55.33	$31.91	$31.91	$96.60	$0.00
$70.73	$55.03	$32.57	$32.57	$98.60	$0.00
$71.20	$55.40	$33.24	$33.24	$100.64	$0.00
$72.69	$56.49	$33.93	$33.93	$102.73	$0.00
$74.34	$57.68	$34.64	$34.64	$104.86	$0.00
$76.03	$58.90	$35.35	$35.35	$107.03	$0.00
$77.18	$59.75	$36.09	$36.09	$109.25	$0.00
$78.06	$60.42	$36.83	$36.83	$111.51	$0.00
$80.13	$61.90	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$79.79	$65.34	$34.85	$34.85	$81.99	$0.00
$87.07	$74.92	$35.57	$35.57	$83.69	$0.00
$96.99	$84.69	$36.30	$36.30	$85.42	$0.00
$97.23	$84.23	$37.04	$37.04	$87.19	$0.00
$64.31	$50.35	$29.40	$29.40	$88.99	$0.00
$67.52	$52.61	$30.00	$30.00	$90.84	$0.00
$70.26	$54.54	$30.63	$30.63	$92.72	$0.00
$71.97	$55.77	$31.26	$31.26	$94.64	$0.00
$71.24	$55.33	$31.91	$31.91	$96.60	$0.00
$70.73	$55.03	$32.57	$32.57	$98.60	$0.00
$71.20	$55.40	$33.24	$33.24	$100.64	$0.00
$72.69	$56.49	$33.93	$33.93	$102.73	$0.00
$74.34	$57.68	$34.64	$34.64	$104.86	$0.00
$76.03	$58.90	$35.35	$35.35	$107.03	$0.00
$77.18	$59.75	$36.09	$36.09	$109.25	$0.00
$78.06	$60.42	$36.83	$36.83	$111.51	$0.00
$80.13	$61.90	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$76.93	$64.78	$35.57	$35.57	$83.69	$0.00

$89.56	$77.26	$36.30	$36.30	$85.42	$0.00
$100.84	$87.84	$37.04	$37.04	$87.19	$0.00
$101.81	$87.85	$37.81	$37.81	$88.99	$0.00
$67.52	$52.61	$30.00	$30.00	$90.84	$0.00
$70.26	$54.54	$30.63	$30.63	$92.72	$0.00
$71.97	$55.77	$31.26	$31.26	$94.64	$0.00
$71.24	$55.33	$31.91	$31.91	$96.60	$0.00
$70.73	$55.03	$32.57	$32.57	$98.60	$0.00
$71.20	$55.40	$33.24	$33.24	$100.64	$0.00
$72.69	$56.49	$33.93	$33.93	$102.73	$0.00
$74.34	$57.68	$34.64	$34.64	$104.86	$0.00
$76.03	$58.90	$35.35	$35.35	$107.03	$0.00
$77.18	$59.75	$36.09	$36.09	$109.25	$0.00
$78.06	$60.42	$36.83	$36.83	$111.51	$0.00
$80.13	$61.90	$37.60	$37.60	$113.82	$0.00

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PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$43.52	$16.27	$3.75	Segment 1	18
$45.52	$16.76	$3.68		19
$45.17	$19.33	$3.56		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment 2	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$45.52	$16.76	$3.68		19
$45.17	$19.33	$3.56		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segm	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24

$48.90	$24.14	$4.00	ent 2	25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$0.00	$0.00	$0.00		19
$45.17	$19.33	$3.56		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment 2	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$0.00	$0.00	$0.00		19
$0.00	$0.00	$0.00		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment 2	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$0.00	$0.00	$0.00		19
$0.00	$0.00	$0.00		20
$0.00	$0.00	$0.00		21
$45.98	$22.70	$3.37		22

$46.93	$23.17	$3.43	Segment 2		23
$47.91	$23.65	$3.68			24
$48.90	$24.14	$4.00			25
$49.91	$24.64	$4.30			26
$50.94	$25.15	$4.57			27
$52.00	$25.67	$4.73	Segment 3		28
$53.08	$26.20	$4.64			29
$54.18	$26.74	$4.56			30
$55.30	$27.30	$4.59			31
$56.44	$27.86	$4.74			32
$57.61	$28.44	$4.90			33
$58.81	$29.03	$5.07			34
$60.03	$29.63	$5.17			35
$61.27	$30.25	$5.25			36
$62.54	$30.87	$5.46			37

PY18

SWE Note: This data excludes avoided energy costs from the Arrearages st

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$7.62	$5.09	$7.98	$6.96	$6.47
2028	$8.57	$5.88	$9.20	$8.13	$7.37
2029	$9.26	$6.66	$10.02	$8.88	$8.03
2030	$9.06	$6.62	$10.06	$8.86	$8.14
2031	$6.27	$3.74	$6.89	$5.87	$5.08
2032	$6.27	$3.74	$7.11	$6.03	$5.14
2033	$6.48	$3.89	$7.49	$6.29	$5.35
2034	$6.74	$4.07	$7.97	$6.62	$5.63
2035	$6.98	$4.24	$8.41	$6.93	$5.92
2036	$7.21	$4.40	$8.81	$7.21	$6.16
2037	$7.34	$4.50	$9.09	$7.41	$6.31
2038	$7.29	$4.47	$8.94	$7.31	$6.24
2039	$7.25	$4.45	$8.83	$7.24	$6.20
2040	$7.29	$4.48	$8.89	$7.29	$6.24
2041	$7.41	$4.56	$9.15	$7.47	$6.37
2042	$7.53	$4.66	$9.44	$7.67	$6.51
2043	$7.66	$4.75	$9.74	$7.88	$6.66
2044	$7.75	$4.82	$9.93	$8.02	$6.76
2045	$7.82	$4.87	$10.07	$8.12	$6.84
2046	$7.98	$4.99	$10.44	$8.38	$7.02

PY19

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$7.82	$5.14	$8.46	$7.38	$6.62
2029	$8.72	$6.11	$9.48	$8.33	$7.48
2030	$9.33	$6.89	$10.33	$9.13	$8.41
2031	$9.14	$6.61	$9.76	$8.74	$7.95
2032	$6.27	$3.74	$7.11	$6.03	$5.14
2033	$6.48	$3.89	$7.49	$6.29	$5.35

2034	$6.74	$4.07	$7.97	$6.62	$5.63
2035	$6.98	$4.24	$8.41	$6.93	$5.92
2036	$7.21	$4.40	$8.81	$7.21	$6.16
2037	$7.34	$4.50	$9.09	$7.41	$6.31
2038	$7.29	$4.47	$8.94	$7.31	$6.24
2039	$7.25	$4.45	$8.83	$7.24	$6.20
2040	$7.29	$4.48	$8.89	$7.29	$6.24
2041	$7.41	$4.56	$9.15	$7.47	$6.37
2042	$7.53	$4.66	$9.44	$7.67	$6.51
2043	$7.66	$4.75	$9.74	$7.88	$6.66
2044	$7.75	$4.82	$9.93	$8.02	$6.76
2045	$7.82	$4.87	$10.07	$8.12	$6.84
2046	$7.98	$4.99	$10.44	$8.38	$7.02

PY20

	Penn Power Zone Summer ($/MWh)		**Penn Power Zone Winter ($/MWh)**		**Penn Power DLC ($/M**
Year	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$0.00	$0.00	$0.00	$0.00	$0.00
2029	$7.92	$5.31	$8.68	$7.54	$6.68
2030	$8.75	$6.31	$9.75	$8.55	$7.83
2031	$9.43	$6.90	$10.05	$9.03	$8.24
2032	$9.32	$6.79	$10.17	$9.08	$8.19
2033	$6.48	$3.89	$7.49	$6.29	$5.35
2034	$6.74	$4.07	$7.97	$6.62	$5.63
2035	$6.98	$4.24	$8.41	$6.93	$5.92
2036	$7.21	$4.40	$8.81	$7.21	$6.16
2037	$7.34	$4.50	$9.09	$7.41	$6.31
2038	$7.29	$4.47	$8.94	$7.31	$6.24
2039	$7.25	$4.45	$8.83	$7.24	$6.20
2040	$7.29	$4.48	$8.89	$7.29	$6.24
2041	$7.41	$4.56	$9.15	$7.47	$6.37
2042	$7.53	$4.66	$9.44	$7.67	$6.51
2043	$7.66	$4.75	$9.74	$7.88	$6.66
2044	$7.75	$4.82	$9.93	$8.02	$6.76
2045	$7.82	$4.87	$10.07	$8.12	$6.84
2046	$7.98	$4.99	$10.44	$8.38	$7.02

PY21

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$0.00	$0.00	$0.00	$0.00	$0.00
2029	$0.00	$0.00	$0.00	$0.00	$0.00
2030	$7.91	$5.47	$8.91	$7.71	$6.99
2031	$8.82	$6.28	$9.43	$8.41	$7.63
2032	$9.63	$7.10	$10.47	$9.38	$8.50
2033	$9.65	$7.06	$10.66	$9.46	$8.52
2034	$6.74	$4.07	$7.97	$6.62	$5.63
2035	$6.98	$4.24	$8.41	$6.93	$5.92
2036	$7.21	$4.40	$8.81	$7.21	$6.16
2037	$7.34	$4.50	$9.09	$7.41	$6.31
2038	$7.29	$4.47	$8.94	$7.31	$6.24
2039	$7.25	$4.45	$8.83	$7.24	$6.20
2040	$7.29	$4.48	$8.89	$7.29	$6.24
2041	$7.41	$4.56	$9.15	$7.47	$6.37
2042	$7.53	$4.66	$9.44	$7.67	$6.51
2043	$7.66	$4.75	$9.74	$7.88	$6.66
2044	$7.75	$4.82	$9.93	$8.02	$6.76
2045	$7.82	$4.87	$10.07	$8.12	$6.84
2046	$7.98	$4.99	$10.44	$8.38	$7.02

PY22

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$0.00	$0.00	$0.00	$0.00	$0.00
2029	$0.00	$0.00	$0.00	$0.00	$0.00
2030	$0.00	$0.00	$0.00	$0.00	$0.00
2031	$7.93	$5.39	$8.55	$7.52	$6.74

2032	$8.98	$6.45	$9.82	$8.73	$7.85
2033	$9.96	$7.37	$10.98	$9.77	$8.83
2034	$10.02	$7.35	$11.25	$9.91	$8.92
2035	$6.98	$4.24	$8.41	$6.93	$5.92
2036	$7.21	$4.40	$8.81	$7.21	$6.16
2037	$7.34	$4.50	$9.09	$7.41	$6.31
2038	$7.29	$4.47	$8.94	$7.31	$6.24
2039	$7.25	$4.45	$8.83	$7.24	$6.20
2040	$7.29	$4.48	$8.89	$7.29	$6.24
2041	$7.41	$4.56	$9.15	$7.47	$6.37
2042	$7.53	$4.66	$9.44	$7.67	$6.51
2043	$7.66	$4.75	$9.74	$7.88	$6.66
2044	$7.75	$4.82	$9.93	$8.02	$6.76
2045	$7.82	$4.87	$10.07	$8.12	$6.84
2046	$7.98	$4.99	$10.44	$8.38	$7.02

CALCULATIONS

tudy. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distr ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$5.41	$5.90	$5.90	$6.75	$0.00	$3.81
$6.31	$2.93	$2.93	$6.89	$0.00	$3.99
$6.88	$2.99	$2.99	$7.04	$0.00	$3.96
$6.87	$3.05	$3.05	$7.18	$0.00	$4.01
$4.02	$2.42	$2.42	$7.33	$0.00	$4.03
$4.06	$2.47	$2.47	$7.48	$0.00	$4.11
$4.21	$2.52	$2.52	$7.64	$0.00	$4.20
$4.41	$2.58	$2.58	$7.80	$0.00	$4.28
$4.61	$2.63	$2.63	$7.96	$0.00	$4.37
$4.78	$2.68	$2.68	$8.12	$0.00	$4.46
$4.89	$2.74	$2.74	$8.29	$0.00	$4.56
$4.85	$2.80	$2.80	$8.46	$0.00	$4.65
$4.82	$2.85	$2.85	$8.64	$0.00	$4.75
$4.85	$2.91	$2.91	$8.82	$0.00	$4.84
$4.95	$2.97	$2.97	$9.00	$0.00	$4.95
$5.05	$3.03	$3.03	$9.19	$0.00	$5.05
$5.16	$3.10	$3.10	$9.38	$0.00	$5.15
$5.23	$3.16	$3.16	$9.57	$0.00	$5.26
$5.29	$3.23	$3.23	$9.77	$0.00	$5.37
$5.42	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distr ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$5.56	$2.93	$2.93	$6.89	$0.00	$3.99
$6.33	$2.99	$2.99	$7.04	$0.00	$3.96
$7.14	$3.05	$3.05	$7.18	$0.00	$4.01
$6.89	$3.12	$3.12	$7.33	$0.00	$4.03
$4.06	$2.47	$2.47	$7.48	$0.00	$4.11
$4.21	$2.52	$2.52	$7.64	$0.00	$4.20

$4.41	$2.58	$2.58	$7.80	$0.00	$4.28
$4.61	$2.63	$2.63	$7.96	$0.00	$4.37
$4.78	$2.68	$2.68	$8.12	$0.00	$4.46
$4.89	$2.74	$2.74	$8.29	$0.00	$4.56
$4.85	$2.80	$2.80	$8.46	$0.00	$4.65
$4.82	$2.85	$2.85	$8.64	$0.00	$4.75
$4.85	$2.91	$2.91	$8.82	$0.00	$4.84
$4.95	$2.97	$2.97	$9.00	$0.00	$4.95
$5.05	$3.03	$3.03	$9.19	$0.00	$5.05
$5.16	$3.10	$3.10	$9.38	$0.00	$5.15
$5.23	$3.16	$3.16	$9.57	$0.00	$5.26
$5.29	$3.23	$3.23	$9.77	$0.00	$5.37
$5.42	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	**Penn Power Generation Capacity ($/kW/year)**		**Penn Power Transmission Capacity ($/kW/year)**		**Penn Power Distr ($/kW**
Shoulder Off-Peak	**Summer**	**Winter**	**Summer**	**Winter**	**Summer**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$5.53	$2.99	$2.99	$7.04	$0.00	$3.96
$6.56	$3.05	$3.05	$7.18	$0.00	$4.01
$7.18	$3.12	$3.12	$7.33	$0.00	$4.03
$7.11	$3.18	$3.18	$7.48	$0.00	$4.11
$4.21	$2.52	$2.52	$7.64	$0.00	$4.20
$4.41	$2.58	$2.58	$7.80	$0.00	$4.28
$4.61	$2.63	$2.63	$7.96	$0.00	$4.37
$4.78	$2.68	$2.68	$8.12	$0.00	$4.46
$4.89	$2.74	$2.74	$8.29	$0.00	$4.56
$4.85	$2.80	$2.80	$8.46	$0.00	$4.65
$4.82	$2.85	$2.85	$8.64	$0.00	$4.75
$4.85	$2.91	$2.91	$8.82	$0.00	$4.84
$4.95	$2.97	$2.97	$9.00	$0.00	$4.95
$5.05	$3.03	$3.03	$9.19	$0.00	$5.05
$5.16	$3.10	$3.10	$9.38	$0.00	$5.15
$5.23	$3.16	$3.16	$9.57	$0.00	$5.26
$5.29	$3.23	$3.23	$9.77	$0.00	$5.37
$5.42	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distr ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$5.72	$3.05	$3.05	$7.18	$0.00	$4.01
$6.56	$3.12	$3.12	$7.33	$0.00	$4.03
$7.42	$3.18	$3.18	$7.48	$0.00	$4.11
$7.38	$3.25	$3.25	$7.64	$0.00	$4.20
$4.41	$2.58	$2.58	$7.80	$0.00	$4.28
$4.61	$2.63	$2.63	$7.96	$0.00	$4.37
$4.78	$2.68	$2.68	$8.12	$0.00	$4.46
$4.89	$2.74	$2.74	$8.29	$0.00	$4.56
$4.85	$2.80	$2.80	$8.46	$0.00	$4.65
$4.82	$2.85	$2.85	$8.64	$0.00	$4.75
$4.85	$2.91	$2.91	$8.82	$0.00	$4.84
$4.95	$2.97	$2.97	$9.00	$0.00	$4.95
$5.05	$3.03	$3.03	$9.19	$0.00	$5.05
$5.16	$3.10	$3.10	$9.38	$0.00	$5.15
$5.23	$3.16	$3.16	$9.57	$0.00	$5.26
$5.29	$3.23	$3.23	$9.77	$0.00	$5.37
$5.42	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distr ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$5.68	$3.12	$3.12	$7.33	$0.00	$4.03

$6.77	$3.18	$3.18	$7.48	$0.00	$4.11
$7.70	$3.25	$3.25	$7.64	$0.00	$4.20
$7.70	$3.31	$3.31	$7.80	$0.00	$4.28
$4.61	$2.63	$2.63	$7.96	$0.00	$4.37
$4.78	$2.68	$2.68	$8.12	$0.00	$4.46
$4.89	$2.74	$2.74	$8.29	$0.00	$4.56
$4.85	$2.80	$2.80	$8.46	$0.00	$4.65
$4.82	$2.85	$2.85	$8.64	$0.00	$4.75
$4.85	$2.91	$2.91	$8.82	$0.00	$4.84
$4.95	$2.97	$2.97	$9.00	$0.00	$4.95
$5.05	$3.03	$3.03	$9.19	$0.00	$5.05
$5.16	$3.10	$3.10	$9.38	$0.00	$5.15
$5.23	$3.16	$3.16	$9.57	$0.00	$5.26
$5.29	$3.23	$3.23	$9.77	$0.00	$5.37
$5.42	$3.29	$3.29	$9.97	$0.00	$5.48

ribution Capacity /year) Winter	Avoided Natural Gas Fuel Costs ($/MMBTU)	
$1.43	$0.33	Segment 1
$1.47	$0.32	
$1.69	$0.31	
$1.80	$0.30	
$1.99	$0.30	Segment 2
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year) Winter	Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	$0.00	Segment 1
$1.47	$0.32	
$1.69	$0.31	
$1.80	$0.30	
$1.99	$0.30	Segm
$2.03	$0.30	
$2.07	$0.32	

$2.11	$0.35	ent 2
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year)	Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter		
$0.00	$0.00	Segment 1
$0.00	$0.00	
$1.69	$0.31	
$1.80	$0.30	
$1.99	$0.30	Segment 2
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year)	Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter		
$0.00	$0.00	Segment 1
$0.00	$0.00	
$0.00	$0.00	
$1.80	$0.30	
$1.99	$0.30	Segment 2
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year)	Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter		
$0.00	$0.00	Segment 1
$0.00	$0.00	
$0.00	$0.00	
$0.00	$0.00	
$1.99	$0.30	

$2.03	$0.30	Segment 2
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

Values

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arre

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$87.65	$57.86	$91.93	$79.95	$74.12
19	2028	$97.28	$65.63	$104.81	$92.12	$83.15
20	2029	$104.35	$73.57	$113.31	$99.81	$89.76
21	2030	$102.08	$73.27	$113.91	$99.73	$91.23
22	2031	$73.85	$43.91	$81.17	$69.06	$59.84
23	2032	$73.87	$43.96	$83.73	$70.87	$60.50
24	2033	$76.25	$45.65	$88.08	$73.91	$62.91
25	2034	$79.14	$47.69	$93.47	$77.68	$66.13
26	2035	$81.93	$49.66	$98.52	$81.20	$69.34
27	2036	$84.52	$51.49	$103.08	$84.39	$72.08
28	2037	$86.08	$52.62	$106.26	$86.64	$73.79
29	2038	$85.47	$52.25	$104.54	$85.50	$73.06
30	2039	$85.05	$52.02	$103.28	$84.69	$72.55
31	2040	$85.48	$52.37	$104.06	$85.28	$73.02
32	2041	$86.80	$53.33	$107.02	$87.37	$74.51
33	2042	$88.25	$54.39	$110.30	$89.69	$76.16
34	2043	$89.75	$55.48	$113.67	$92.07	$77.85
35	2044	$90.77	$56.24	$115.89	$93.65	$79.00
36	2045	$91.56	$56.84	$117.52	$94.84	$79.88
37	2046	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY19

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$89.72	$58.07	$97.25	$84.56	$75.59
20	2029	$98.80	$68.02	$107.76	$94.26	$84.21
21	2030	$104.82	$76.01	$116.65	$102.47	$93.97
22	2031	$102.91	$72.97	$110.23	$98.12	$88.90
23	2032	$73.87	$43.96	$83.73	$70.87	$60.50
24	2033	$76.25	$45.65	$88.08	$73.91	$62.91

25	**2034**	$79.14	$47.69	$93.47	$77.68	$66.13
26	**2035**	$81.93	$49.66	$98.52	$81.20	$69.34
27	**2036**	$84.52	$51.49	$103.08	$84.39	$72.08
28	**2037**	$86.08	$52.62	$106.26	$86.64	$73.79
29	**2038**	$85.47	$52.25	$104.54	$85.50	$73.06
30	**2039**	$85.05	$52.02	$103.28	$84.69	$72.55
31	**2040**	$85.48	$52.37	$104.06	$85.28	$73.02
32	**2041**	$86.80	$53.33	$107.02	$87.37	$74.51
33	**2042**	$88.25	$54.39	$110.30	$89.69	$76.16
34	**2043**	$89.75	$55.48	$113.67	$92.07	$77.85
35	**2044**	$90.77	$56.24	$115.89	$93.65	$79.00
36	**2045**	$91.56	$56.84	$117.52	$94.84	$79.88
37	**2046**	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY20

		West Penn Zone Summer ($/MWh)		**West Penn Zone Winter ($/MWh)**		**West Penn DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$90.75	$59.97	$99.71	$86.21	$76.16
21	**2030**	$98.96	$70.15	$110.79	$96.61	$88.11
22	**2031**	$105.82	$75.88	$113.14	$101.03	$91.81
23	**2032**	$104.77	$74.86	$114.63	$101.77	$91.40
24	**2033**	$76.25	$45.65	$88.08	$73.91	$62.91
25	**2034**	$79.14	$47.69	$93.47	$77.68	$66.13
26	**2035**	$81.93	$49.66	$98.52	$81.20	$69.34
27	**2036**	$84.52	$51.49	$103.08	$84.39	$72.08
28	**2037**	$86.08	$52.62	$106.26	$86.64	$73.79
29	**2038**	$85.47	$52.25	$104.54	$85.50	$73.06
30	**2039**	$85.05	$52.02	$103.28	$84.69	$72.55
31	**2040**	$85.48	$52.37	$104.06	$85.28	$73.02
32	**2041**	$86.80	$53.33	$107.02	$87.37	$74.51
33	**2042**	$88.25	$54.39	$110.30	$89.69	$76.16
34	**2043**	$89.75	$55.48	$113.67	$92.07	$77.85
35	**2044**	$90.77	$56.24	$115.89	$93.65	$79.00
36	**2045**	$91.56	$56.84	$117.52	$94.84	$79.88
37	**2046**	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY21

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$90.46	$61.65	$102.29	$88.11	$79.61
22	2031	$99.61	$69.67	$106.93	$94.82	$85.60
23	2032	$107.87	$77.96	$117.73	$104.87	$94.50
24	2033	$108.34	$77.74	$120.17	$106.00	$95.00
25	2034	$79.14	$47.69	$93.47	$77.68	$66.13
26	2035	$81.93	$49.66	$98.52	$81.20	$69.34
27	2036	$84.52	$51.49	$103.08	$84.39	$72.08
28	2037	$86.08	$52.62	$106.26	$86.64	$73.79
29	2038	$85.47	$52.25	$104.54	$85.50	$73.06
30	2039	$85.05	$52.02	$103.28	$84.69	$72.55
31	2040	$85.48	$52.37	$104.06	$85.28	$73.02
32	2041	$86.80	$53.33	$107.02	$87.37	$74.51
33	2042	$88.25	$54.39	$110.30	$89.69	$76.16
34	2043	$89.75	$55.48	$113.67	$92.07	$77.85
35	2044	$90.77	$56.24	$115.89	$93.65	$79.00
36	2045	$91.56	$56.84	$117.52	$94.84	$79.88
37	2046	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY22

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$90.62	$60.68	$97.94	$85.83	$76.61
23	2032	$101.27	$71.36	$111.13	$98.27	$87.90

24	**2033**	$111.56	$80.96	$123.39	$109.22	$98.22
25	**2034**	$112.50	$81.05	$126.83	$111.04	$99.49
26	**2035**	$81.93	$49.66	$98.52	$81.20	$69.34
27	**2036**	$84.52	$51.49	$103.08	$84.39	$72.08
28	**2037**	$86.08	$52.62	$106.26	$86.64	$73.79
29	**2038**	$85.47	$52.25	$104.54	$85.50	$73.06
30	**2039**	$85.05	$52.02	$103.28	$84.69	$72.55
31	**2040**	$85.48	$52.37	$104.06	$85.28	$73.02
32	**2041**	$86.80	$53.33	$107.02	$87.37	$74.51
33	**2042**	$88.25	$54.39	$110.30	$89.69	$76.16
34	**2043**	$89.75	$55.48	$113.67	$92.07	$77.85
35	**2044**	$90.77	$56.24	$115.89	$93.65	$79.00
36	**2045**	$91.56	$56.84	$117.52	$94.84	$79.88
37	**2046**	$93.38	$58.16	$121.68	$97.76	$81.95

from Results of ACC Model

arages study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$61.61	$72.59	$72.59	$8.83	$8.83	$41.25	$5.05
$70.61	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$76.18	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$76.29	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$47.25	$27.64	$27.64	$9.58	$9.58	$62.19	$9.02
$47.75	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21
$49.46	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.05	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$70.63	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$79.03	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$76.31	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$47.75	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21
$49.46	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40

$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder kWh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.58	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$73.17	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$79.22	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$78.65	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$49.46	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.67	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$73.01	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$81.75	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$81.55	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.02	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$75.15	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21

$84.77	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$85.08	$43.78	$43.78	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

PY Selection	PY18

SWE Note: This

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	West Penn Zone Summer ($/MWh) Summer Off-Peak
$3.75	Segment 1	18	2027	$32.87	$21.70
$3.68		19	2028	$36.49	$24.62
$3.56		20	2029	$39.14	$27.59
$3.42		21	2030	$38.28	$27.48
$3.37	Segment 2	22	2031	$27.70	$16.47
$3.43		23	2032	$27.70	$16.49
$3.68		24	2033	$28.60	$17.12
$4.00		25	2034	$29.68	$17.89
$4.30		26	2035	$30.73	$18.63
$4.57		27	2036	$31.70	$19.31
$4.73	Segment 3	28	2037	$32.28	$19.74
$4.64		29	2038	$32.06	$19.60
$4.56		30	2039	$31.90	$19.51
$4.59		31	2040	$32.06	$19.64
$4.74		32	2041	$32.55	$20.00
$4.90		33	2042	$33.10	$20.40
$5.07		34	2043	$33.66	$20.81
$5.17		35	2044	$34.04	$21.09
$5.25		36	2045	$34.34	$21.32
$5.46		37	2046	$35.02	$21.81

PY Selection	PY19

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	West Penn Zone Summer ($/MWh) Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$3.68		19	2028	$33.65	$21.78
$3.56		20	2029	$37.06	$25.51
$3.42		21	2030	$39.31	$28.51
$3.37	Segm	22	2031	$38.60	$27.37
$3.43		23	2032	$27.70	$16.49
$3.68		24	2033	$28.60	$17.12

$4.00	ent 2	25	2034	$29.68	$17.89
$4.30		26	2035	$30.73	$18.63
$4.57		27	2036	$31.70	$19.31
$4.73	Segment 3	28	2037	$32.28	$19.74
$4.64		29	2038	$32.06	$19.60
$4.56		30	2039	$31.90	$19.51
$4.59		31	2040	$32.06	$19.64
$4.74		32	2041	$32.55	$20.00
$4.90		33	2042	$33.10	$20.40
$5.07		34	2043	$33.66	$20.81
$5.17		35	2044	$34.04	$21.09
$5.25		36	2045	$34.34	$21.32
$5.46		37	2046	$35.02	$21.81

PY Selection	PY20

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$3.56		20	2029	$34.04	$22.49
$3.42		21	2030	$37.11	$26.31
$3.37	Segment 2	22	2031	$39.69	$28.46
$3.43		23	2032	$39.29	$28.08
$3.68		24	2033	$28.60	$17.12
$4.00		25	2034	$29.68	$17.89
$4.30		26	2035	$30.73	$18.63
$4.57		27	2036	$31.70	$19.31
$4.73	Segment 3	28	2037	$32.28	$19.74
$4.64		29	2038	$32.06	$19.60
$4.56		30	2039	$31.90	$19.51
$4.59		31	2040	$32.06	$19.64
$4.74		32	2041	$32.55	$20.00
$4.90		33	2042	$33.10	$20.40
$5.07		34	2043	$33.66	$20.81
$5.17		35	2044	$34.04	$21.09
$5.25		36	2045	$34.34	$21.32
$5.46		37	2046	$35.02	$21.81

PY Selection	PY21

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	West Penn Zone Summer ($/MWh) Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00
$3.42		21	2030	$33.93	$23.12
$3.37	Segment 2	22	2031	$37.36	$26.13
$3.43		23	2032	$40.46	$29.24
$3.68		24	2033	$40.63	$29.16
$4.00		25	2034	$29.68	$17.89
$4.30		26	2035	$30.73	$18.63
$4.57		27	2036	$31.70	$19.31
$4.73	Segment 3	28	2037	$32.28	$19.74
$4.64		29	2038	$32.06	$19.60
$4.56		30	2039	$31.90	$19.51
$4.59		31	2040	$32.06	$19.64
$4.74		32	2041	$32.55	$20.00
$4.90		33	2042	$33.10	$20.40
$5.07		34	2043	$33.66	$20.81
$5.17		35	2044	$34.04	$21.09
$5.25		36	2045	$34.34	$21.32
$5.46		37	2046	$35.02	$21.81

PY Selection	PY22

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	West Penn Zone Summer ($/MWh) Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00
$0.00		21	2030	$0.00	$0.00
$3.37	Se	22	2031	$33.99	$22.76
$3.43		23	2032	$37.98	$26.77

$3.68	egment 2		24	2033	$41.84	$30.37
$4.00			25	2034	$42.19	$30.40
$4.30			26	2035	$30.73	$18.63
$4.57			27	2036	$31.70	$19.31
$4.73	Segment 3		28	2037	$32.28	$19.74
$4.64			29	2038	$32.06	$19.60
$4.56			30	2039	$31.90	$19.51
$4.59			31	2040	$32.06	$19.64
$4.74			32	2041	$32.55	$20.00
$4.90			33	2042	$33.10	$20.40
$5.07			34	2043	$33.66	$20.81
$5.17			35	2044	$34.04	$21.09
$5.25			36	2045	$34.34	$21.32
$5.46			37	2046	$35.02	$21.81

CALCULATIONS

data excludes avoided energy costs from the Arrearages study. Please refer to the 'LI Output' tab for avoided costs

West Penn Zone Winter ($/MWh)		West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn T Capa ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$34.48	$29.99	$27.80	$23.11	$27.23	$27.23	$3.31
$39.31	$34.55	$31.19	$26.48	$14.54	$14.54	$3.38
$42.50	$37.43	$33.66	$28.57	$14.84	$14.84	$3.45
$42.72	$37.40	$34.22	$28.61	$15.14	$15.14	$3.52
$30.44	$25.90	$22.44	$17.72	$10.37	$10.37	$3.59
$31.40	$26.58	$22.69	$17.91	$10.58	$10.58	$3.67
$33.03	$27.72	$23.60	$18.55	$10.80	$10.80	$3.74
$35.06	$29.13	$24.80	$19.40	$11.02	$11.02	$3.82
$36.95	$30.45	$26.00	$20.25	$11.25	$11.25	$3.90
$38.66	$31.65	$27.03	$20.97	$11.49	$11.49	$3.98
$39.85	$32.49	$27.67	$21.43	$11.72	$11.72	$4.06
$39.21	$32.07	$27.40	$21.27	$11.97	$11.97	$4.15
$38.73	$31.76	$27.21	$21.15	$12.22	$12.22	$4.23
$39.03	$31.98	$27.39	$21.29	$12.47	$12.47	$4.32
$40.14	$32.77	$27.94	$21.70	$12.73	$12.73	$4.41
$41.37	$33.64	$28.56	$22.15	$12.99	$12.99	$4.50
$42.63	$34.53	$29.20	$22.61	$13.26	$13.26	$4.60
$43.46	$35.12	$29.63	$22.93	$13.53	$13.53	$4.69
$44.08	$35.57	$29.96	$23.17	$13.81	$13.81	$4.79
$45.64	$36.67	$30.73	$23.73	$14.10	$14.10	$4.89

West Penn Zone Winter ($/MWh)		West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn T Capa ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$36.47	$31.72	$28.35	$23.65	$14.54	$14.54	$3.38
$40.42	$35.35	$31.58	$26.49	$14.84	$14.84	$3.45
$43.75	$38.43	$35.24	$29.64	$15.14	$15.14	$3.52
$41.34	$36.80	$33.34	$28.62	$15.45	$15.45	$3.59
$31.40	$26.58	$22.69	$17.91	$10.58	$10.58	$3.67
$33.03	$27.72	$23.60	$18.55	$10.80	$10.80	$3.74

$35.06	$29.13	$24.80	$19.40	$11.02	$11.02	$3.82
$36.95	$30.45	$26.00	$20.25	$11.25	$11.25	$3.90
$38.66	$31.65	$27.03	$20.97	$11.49	$11.49	$3.98
$39.85	$32.49	$27.67	$21.43	$11.72	$11.72	$4.06
$39.21	$32.07	$27.40	$21.27	$11.97	$11.97	$4.15
$38.73	$31.76	$27.21	$21.15	$12.22	$12.22	$4.23
$39.03	$31.98	$27.39	$21.29	$12.47	$12.47	$4.32
$40.14	$32.77	$27.94	$21.70	$12.73	$12.73	$4.41
$41.37	$33.64	$28.56	$22.15	$12.99	$12.99	$4.50
$42.63	$34.53	$29.20	$22.61	$13.26	$13.26	$4.60
$43.46	$35.12	$29.63	$22.93	$13.53	$13.53	$4.69
$44.08	$35.57	$29.96	$23.17	$13.81	$13.81	$4.79
$45.64	$36.67	$30.73	$23.73	$14.10	$14.10	$4.89

West Penn Zone Winter ($/MWh)		West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn T Capa ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$37.40	$32.33	$28.56	$23.47	$14.84	$14.84	$3.45
$41.55	$36.23	$33.05	$27.44	$15.14	$15.14	$3.52
$42.43	$37.89	$34.43	$29.71	$15.45	$15.45	$3.59
$42.99	$38.17	$34.28	$29.50	$15.77	$15.77	$3.67
$33.03	$27.72	$23.60	$18.55	$10.80	$10.80	$3.74
$35.06	$29.13	$24.80	$19.40	$11.02	$11.02	$3.82
$36.95	$30.45	$26.00	$20.25	$11.25	$11.25	$3.90
$38.66	$31.65	$27.03	$20.97	$11.49	$11.49	$3.98
$39.85	$32.49	$27.67	$21.43	$11.72	$11.72	$4.06
$39.21	$32.07	$27.40	$21.27	$11.97	$11.97	$4.15
$38.73	$31.76	$27.21	$21.15	$12.22	$12.22	$4.23
$39.03	$31.98	$27.39	$21.29	$12.47	$12.47	$4.32
$40.14	$32.77	$27.94	$21.70	$12.73	$12.73	$4.41
$41.37	$33.64	$28.56	$22.15	$12.99	$12.99	$4.50
$42.63	$34.53	$29.20	$22.61	$13.26	$13.26	$4.60
$43.46	$35.12	$29.63	$22.93	$13.53	$13.53	$4.69
$44.08	$35.57	$29.96	$23.17	$13.81	$13.81	$4.79
$45.64	$36.67	$30.73	$23.73	$14.10	$14.10	$4.89

West Penn Zone Winter ($/MWh)		West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn T Capa ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$38.36	$33.05	$29.86	$24.25	$15.14	$15.14	$3.52
$40.10	$35.56	$32.10	$27.38	$15.45	$15.45	$3.59
$44.16	$39.33	$35.44	$30.66	$15.77	$15.77	$3.67
$45.07	$39.76	$35.63	$30.59	$16.09	$16.09	$3.74
$35.06	$29.13	$24.80	$19.40	$11.02	$11.02	$3.82
$36.95	$30.45	$26.00	$20.25	$11.25	$11.25	$3.90
$38.66	$31.65	$27.03	$20.97	$11.49	$11.49	$3.98
$39.85	$32.49	$27.67	$21.43	$11.72	$11.72	$4.06
$39.21	$32.07	$27.40	$21.27	$11.97	$11.97	$4.15
$38.73	$31.76	$27.21	$21.15	$12.22	$12.22	$4.23
$39.03	$31.98	$27.39	$21.29	$12.47	$12.47	$4.32
$40.14	$32.77	$27.94	$21.70	$12.73	$12.73	$4.41
$41.37	$33.64	$28.56	$22.15	$12.99	$12.99	$4.50
$42.63	$34.53	$29.20	$22.61	$13.26	$13.26	$4.60
$43.46	$35.12	$29.63	$22.93	$13.53	$13.53	$4.69
$44.08	$35.57	$29.96	$23.17	$13.81	$13.81	$4.79
$45.64	$36.67	$30.73	$23.73	$14.10	$14.10	$4.89

West Penn Zone Winter ($/MWh)		West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn T Capa ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$36.73	$32.19	$28.73	$24.01	$15.45	$15.45	$3.59
$41.68	$36.86	$32.97	$28.19	$15.77	$15.77	$3.67

$46.28	$40.96	$36.84	$31.79	$16.09	$16.09	$3.74
$47.57	$41.64	$37.31	$31.91	$16.42	$16.42	$3.82
$36.95	$30.45	$26.00	$20.25	$11.25	$11.25	$3.90
$38.66	$31.65	$27.03	$20.97	$11.49	$11.49	$3.98
$39.85	$32.49	$27.67	$21.43	$11.72	$11.72	$4.06
$39.21	$32.07	$27.40	$21.27	$11.97	$11.97	$4.15
$38.73	$31.76	$27.21	$21.15	$12.22	$12.22	$4.23
$39.03	$31.98	$27.39	$21.29	$12.47	$12.47	$4.32
$40.14	$32.77	$27.94	$21.70	$12.73	$12.73	$4.41
$41.37	$33.64	$28.56	$22.15	$12.99	$12.99	$4.50
$42.63	$34.53	$29.20	$22.61	$13.26	$13.26	$4.60
$43.46	$35.12	$29.63	$22.93	$13.53	$13.53	$4.69
$44.08	$35.57	$29.96	$23.17	$13.81	$13.81	$4.79
$45.64	$36.67	$30.73	$23.73	$14.10	$14.10	$4.89

to be used for Low Income programs only.

Transmission acity /year)	West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$3.31	$15.47	$1.89	$1.41	Segment 1
$3.38	$17.35	$2.27	$1.38	
$3.45	$19.46	$2.63	$1.34	
$3.52	$21.35	$2.97	$1.28	
$3.59	$23.33	$3.38	$1.26	Segment 2
$3.67	$23.81	$3.45	$1.29	
$3.74	$24.30	$3.52	$1.38	
$3.82	$24.81	$3.60	$1.50	
$3.90	$25.32	$3.67	$1.61	
$3.98	$25.84	$3.75	$1.71	
$4.06	$26.38	$3.83	$1.78	Segment 3
$4.15	$26.93	$3.90	$1.74	
$4.23	$27.48	$3.99	$1.71	
$4.32	$28.05	$4.07	$1.72	
$4.41	$28.63	$4.15	$1.78	
$4.50	$29.23	$4.24	$1.84	
$4.60	$29.83	$4.33	$1.90	
$4.69	$30.45	$4.42	$1.94	
$4.79	$31.08	$4.51	$1.97	
$4.89	$31.73	$4.60	$2.05	

Transmission acity /year)	West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$3.38	$17.35	$2.27	$1.38	
$3.45	$19.46	$2.63	$1.34	
$3.52	$21.35	$2.97	$1.28	
$3.59	$23.33	$3.38	$1.26	Segm
$3.67	$23.81	$3.45	$1.29	
$3.74	$24.30	$3.52	$1.38	

$3.82	$24.81	$3.60	$1.50	ent 2
$3.90	$25.32	$3.67	$1.61	
$3.98	$25.84	$3.75	$1.71	
$4.06	$26.38	$3.83	$1.78	Segment 3
$4.15	$26.93	$3.90	$1.74	
$4.23	$27.48	$3.99	$1.71	
$4.32	$28.05	$4.07	$1.72	
$4.41	$28.63	$4.15	$1.78	
$4.50	$29.23	$4.24	$1.84	
$4.60	$29.83	$4.33	$1.90	
$4.69	$30.45	$4.42	$1.94	
$4.79	$31.08	$4.51	$1.97	
$4.89	$31.73	$4.60	$2.05	

Transmission acity /year)	West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$3.45	$19.46	$2.63	$1.34	
$3.52	$21.35	$2.97	$1.28	
$3.59	$23.33	$3.38	$1.26	Segment 2
$3.67	$23.81	$3.45	$1.29	
$3.74	$24.30	$3.52	$1.38	
$3.82	$24.81	$3.60	$1.50	
$3.90	$25.32	$3.67	$1.61	
$3.98	$25.84	$3.75	$1.71	
$4.06	$26.38	$3.83	$1.78	Segment 3
$4.15	$26.93	$3.90	$1.74	
$4.23	$27.48	$3.99	$1.71	
$4.32	$28.05	$4.07	$1.72	
$4.41	$28.63	$4.15	$1.78	
$4.50	$29.23	$4.24	$1.84	
$4.60	$29.83	$4.33	$1.90	
$4.69	$30.45	$4.42	$1.94	
$4.79	$31.08	$4.51	$1.97	
$4.89	$31.73	$4.60	$2.05	

Transmission acity /year)	West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$3.52	$21.35	$2.97	$1.28	
$3.59	$23.33	$3.38	$1.26	Segment 2
$3.67	$23.81	$3.45	$1.29	
$3.74	$24.30	$3.52	$1.38	
$3.82	$24.81	$3.60	$1.50	
$3.90	$25.32	$3.67	$1.61	
$3.98	$25.84	$3.75	$1.71	
$4.06	$26.38	$3.83	$1.78	Segment 3
$4.15	$26.93	$3.90	$1.74	
$4.23	$27.48	$3.99	$1.71	
$4.32	$28.05	$4.07	$1.72	
$4.41	$28.63	$4.15	$1.78	
$4.50	$29.23	$4.24	$1.84	
$4.60	$29.83	$4.33	$1.90	
$4.69	$30.45	$4.42	$1.94	
$4.79	$31.08	$4.51	$1.97	
$4.89	$31.73	$4.60	$2.05	

Transmission acity /year)	West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$3.59	$23.33	$3.38	$1.26	Se
$3.67	$23.81	$3.45	$1.29	

$3.74	$24.30	$3.52	$1.38	egment 2
$3.82	$24.81	$3.60	$1.50	
$3.90	$25.32	$3.67	$1.61	
$3.98	$25.84	$3.75	$1.71	
$4.06	$26.38	$3.83	$1.78	Segment 3
$4.15	$26.93	$3.90	$1.74	
$4.23	$27.48	$3.99	$1.71	
$4.32	$28.05	$4.07	$1.72	
$4.41	$28.63	$4.15	$1.78	
$4.50	$29.23	$4.24	$1.84	
$4.60	$29.83	$4.33	$1.90	
$4.69	$30.45	$4.42	$1.94	
$4.79	$31.08	$4.51	$1.97	
$4.89	$31.73	$4.60	$2.05	

PY Selection	PY18

SWE Note: This data includes avoided energy costs fr

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$104.26	$75.40	$108.41	$96.80
19	2028	$114.42	$83.75	$121.71	$109.42
20	2029	$121.47	$91.64	$130.15	$117.06
21	2030	$119.00	$91.08	$130.46	$116.72
22	2031	$91.46	$62.42	$98.72	$86.91
23	2032	$92.09	$63.02	$101.94	$89.30
24	2033	$95.13	$65.29	$106.91	$92.89
25	2034	$98.69	$67.91	$112.95	$97.23
26	2035	$102.16	$70.48	$118.69	$101.36
27	2036	$105.42	$72.91	$124.00	$105.20
28	2037	$107.65	$74.63	$128.03	$108.16
29	2038	$107.44	$74.68	$126.83	$107.52
30	2039	$107.45	$74.88	$126.07	$107.19
31	2040	$108.35	$75.69	$127.29	$108.23
32	2041	$110.18	$77.16	$130.60	$110.71
33	2042	$112.17	$78.73	$134.24	$113.42
34	2043	$114.21	$80.35	$137.99	$116.21
35	2044	$115.77	$81.63	$140.62	$118.24
36	2045	$117.09	$82.76	$142.70	$119.89
37	2046	$119.50	$84.64	$147.23	$123.23

PY Selection	PY19

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$106.58	$75.91	$113.87	$101.58
20	2029	$115.84	$86.01	$124.52	$111.43
21	2030	$121.72	$93.80	$133.18	$119.44
22	2031	$119.62	$90.58	$126.88	$115.07
23	2032	$92.09	$63.02	$101.94	$89.30
24	2033	$95.13	$65.29	$106.91	$92.89

25	**2034**	$98.69	$67.91	$112.95	$97.23
26	**2035**	$102.16	$70.48	$118.69	$101.36
27	**2036**	$105.42	$72.91	$124.00	$105.20
28	**2037**	$107.65	$74.63	$128.03	$108.16
29	**2038**	$107.44	$74.68	$126.83	$107.52
30	**2039**	$107.45	$74.88	$126.07	$107.19
31	**2040**	$108.35	$75.69	$127.29	$108.23
32	**2041**	$110.18	$77.16	$130.60	$110.71
33	**2042**	$112.17	$78.73	$134.24	$113.42
34	**2043**	$114.21	$80.35	$137.99	$116.21
35	**2044**	$115.77	$81.63	$140.62	$118.24
36	**2045**	$117.09	$82.76	$142.70	$119.89
37	**2046**	$119.50	$84.64	$147.23	$123.23

PY Selection	PY20

		Met-Ed Zone Summer ($/MWh)		**Met-Ed Zone Winter ($/MWh)**	
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00
20	**2029**	$107.67	$77.84	$116.35	$103.26
21	**2030**	$115.90	$87.98	$127.36	$113.62
22	**2031**	$122.44	$93.40	$129.70	$117.89
23	**2032**	$121.26	$92.19	$131.11	$118.47
24	**2033**	$95.13	$65.29	$106.91	$92.89
25	**2034**	$98.69	$67.91	$112.95	$97.23
26	**2035**	$102.16	$70.48	$118.69	$101.36
27	**2036**	$105.42	$72.91	$124.00	$105.20
28	**2037**	$107.65	$74.63	$128.03	$108.16
29	**2038**	$107.44	$74.68	$126.83	$107.52
30	**2039**	$107.45	$74.88	$126.07	$107.19
31	**2040**	$108.35	$75.69	$127.29	$108.23
32	**2041**	$110.18	$77.16	$130.60	$110.71
33	**2042**	$112.17	$78.73	$134.24	$113.42
34	**2043**	$114.21	$80.35	$137.99	$116.21
35	**2044**	$115.77	$81.63	$140.62	$118.24
36	**2045**	$117.09	$82.76	$142.70	$119.89
37	**2046**	$119.50	$84.64	$147.23	$123.23

PY Selection	PY21

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00
21	2030	$107.46	$79.54	$118.92	$105.18
22	2031	$116.42	$87.38	$123.68	$111.87
23	2032	$124.18	$95.11	$134.03	$121.39
24	2033	$124.61	$94.77	$136.39	$122.37
25	2034	$98.69	$67.91	$112.95	$97.23
26	2035	$102.16	$70.48	$118.69	$101.36
27	2036	$105.42	$72.91	$124.00	$105.20
28	2037	$107.65	$74.63	$128.03	$108.16
29	2038	$107.44	$74.68	$126.83	$107.52
30	2039	$107.45	$74.88	$126.07	$107.19
31	2040	$108.35	$75.69	$127.29	$108.23
32	2041	$110.18	$77.16	$130.60	$110.71
33	2042	$112.17	$78.73	$134.24	$113.42
34	2043	$114.21	$80.35	$137.99	$116.21
35	2044	$115.77	$81.63	$140.62	$118.24
36	2045	$117.09	$82.76	$142.70	$119.89
37	2046	$119.50	$84.64	$147.23	$123.23

PY Selection	PY22

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00
22	2031	$107.71	$78.67	$114.97	$103.16
23	2032	$117.95	$88.88	$127.80	$115.16

24	**2033**	$127.56	$97.72	$139.34	$125.32
25	**2034**	$128.41	$97.63	$142.67	$126.95
26	**2035**	$102.16	$70.48	$118.69	$101.36
27	**2036**	$105.42	$72.91	$124.00	$105.20
28	**2037**	$107.65	$74.63	$128.03	$108.16
29	**2038**	$107.44	$74.68	$126.83	$107.52
30	**2039**	$107.45	$74.88	$126.07	$107.19
31	**2040**	$108.35	$75.69	$127.29	$108.23
32	**2041**	$110.18	$77.16	$130.60	$110.71
33	**2042**	$112.17	$78.73	$134.24	$113.42
34	**2043**	$114.21	$80.35	$137.99	$116.21
35	**2044**	$115.77	$81.63	$140.62	$118.24
36	**2045**	$117.09	$82.76	$142.70	$119.89
37	**2046**	$119.50	$84.64	$147.23	$123.23

Values from Results of ACC Model

om the Arrearages Study and should only be applied for low income programs

Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$91.16	$79.03	$99.25	$99.25	$58.92	$0.00
$100.72	$88.57	$68.94	$68.94	$60.14	$0.00
$107.33	$94.17	$70.34	$70.34	$61.38	$0.00
$108.49	$94.01	$71.76	$71.76	$62.66	$0.00
$77.88	$65.66	$30.81	$30.81	$63.95	$0.00
$79.15	$66.70	$31.45	$31.45	$65.28	$0.00
$82.18	$68.96	$32.10	$32.10	$66.63	$0.00
$86.03	$71.79	$32.77	$32.77	$68.01	$0.00
$89.90	$74.63	$33.45	$33.45	$69.42	$0.00
$93.30	$77.16	$34.14	$34.14	$70.86	$0.00
$95.69	$78.98	$34.85	$34.85	$72.33	$0.00
$95.39	$78.97	$35.57	$35.57	$73.82	$0.00
$95.32	$79.12	$36.31	$36.31	$75.35	$0.00
$96.25	$79.95	$37.06	$37.06	$76.92	$0.00
$98.22	$81.51	$37.83	$37.83	$78.51	$0.00
$100.37	$83.20	$38.61	$38.61	$80.13	$0.00
$102.57	$84.92	$39.41	$39.41	$81.79	$0.00
$104.23	$86.28	$40.23	$40.23	$83.49	$0.00
$105.62	$87.45	$41.06	$41.06	$85.22	$0.00
$108.23	$89.47	$41.91	$41.91	$86.98	$0.00

Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$92.88	$80.73	$68.94	$68.94	$60.14	$0.00
$101.70	$88.54	$70.34	$70.34	$61.38	$0.00
$111.21	$96.73	$71.76	$71.76	$62.66	$0.00
$106.04	$93.82	$73.22	$73.22	$63.95	$0.00
$79.15	$66.70	$31.45	$31.45	$65.28	$0.00
$82.18	$68.96	$32.10	$32.10	$66.63	$0.00

$86.03	$71.79	$32.77	$32.77	$68.01	$0.00
$89.90	$74.63	$33.45	$33.45	$69.42	$0.00
$93.30	$77.16	$34.14	$34.14	$70.86	$0.00
$95.69	$78.98	$34.85	$34.85	$72.33	$0.00
$95.39	$78.97	$35.57	$35.57	$73.82	$0.00
$95.32	$79.12	$36.31	$36.31	$75.35	$0.00
$96.25	$79.95	$37.06	$37.06	$76.92	$0.00
$98.22	$81.51	$37.83	$37.83	$78.51	$0.00
$100.37	$83.20	$38.61	$38.61	$80.13	$0.00
$102.57	$84.92	$39.41	$39.41	$81.79	$0.00
$104.23	$86.28	$40.23	$40.23	$83.49	$0.00
$105.62	$87.45	$41.06	$41.06	$85.22	$0.00
$108.23	$89.47	$41.91	$41.91	$86.98	$0.00

Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Shoulder On-Peak	**Shoulder Off-Peak**	**Summer**	**Winter**	**Summer**	**Winter**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$93.53	$80.37	$70.34	$70.34	$61.38	$0.00
$105.39	$90.91	$71.76	$71.76	$62.66	$0.00
$108.86	$96.64	$73.22	$73.22	$63.95	$0.00
$108.32	$95.87	$74.71	$74.71	$65.28	$0.00
$82.18	$68.96	$32.10	$32.10	$66.63	$0.00
$86.03	$71.79	$32.77	$32.77	$68.01	$0.00
$89.90	$74.63	$33.45	$33.45	$69.42	$0.00
$93.30	$77.16	$34.14	$34.14	$70.86	$0.00
$95.69	$78.98	$34.85	$34.85	$72.33	$0.00
$95.39	$78.97	$35.57	$35.57	$73.82	$0.00
$95.32	$79.12	$36.31	$36.31	$75.35	$0.00
$96.25	$79.95	$37.06	$37.06	$76.92	$0.00
$98.22	$81.51	$37.83	$37.83	$78.51	$0.00
$100.37	$83.20	$38.61	$38.61	$80.13	$0.00
$102.57	$84.92	$39.41	$39.41	$81.79	$0.00
$104.23	$86.28	$40.23	$40.23	$83.49	$0.00
$105.62	$87.45	$41.06	$41.06	$85.22	$0.00
$108.23	$89.47	$41.91	$41.91	$86.98	$0.00

Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$96.95	$82.47	$71.76	$71.76	$62.66	$0.00
$102.84	$90.62	$73.22	$73.22	$63.95	$0.00
$111.24	$98.79	$74.71	$74.71	$65.28	$0.00
$111.66	$98.44	$76.22	$76.22	$66.63	$0.00
$86.03	$71.79	$32.77	$32.77	$68.01	$0.00
$89.90	$74.63	$33.45	$33.45	$69.42	$0.00
$93.30	$77.16	$34.14	$34.14	$70.86	$0.00
$95.69	$78.98	$34.85	$34.85	$72.33	$0.00
$95.39	$78.97	$35.57	$35.57	$73.82	$0.00
$95.32	$79.12	$36.31	$36.31	$75.35	$0.00
$96.25	$79.95	$37.06	$37.06	$76.92	$0.00
$98.22	$81.51	$37.83	$37.83	$78.51	$0.00
$100.37	$83.20	$38.61	$38.61	$80.13	$0.00
$102.57	$84.92	$39.41	$39.41	$81.79	$0.00
$104.23	$86.28	$40.23	$40.23	$83.49	$0.00
$105.62	$87.45	$41.06	$41.06	$85.22	$0.00
$108.23	$89.47	$41.91	$41.91	$86.98	$0.00

Met-Ed DLC Zone Shoulder ($/MWh)		Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$94.13	$81.91	$73.22	$73.22	$63.95	$0.00
$105.01	$92.56	$74.71	$74.71	$65.28	$0.00

$114.61	$101.39	$76.22	$76.22	$66.63	$0.00
$115.75	$101.51	$77.77	$77.77	$68.01	$0.00
$89.90	$74.63	$33.45	$33.45	$69.42	$0.00
$93.30	$77.16	$34.14	$34.14	$70.86	$0.00
$95.69	$78.98	$34.85	$34.85	$72.33	$0.00
$95.39	$78.97	$35.57	$35.57	$73.82	$0.00
$95.32	$79.12	$36.31	$36.31	$75.35	$0.00
$96.25	$79.95	$37.06	$37.06	$76.92	$0.00
$98.22	$81.51	$37.83	$37.83	$78.51	$0.00
$100.37	$83.20	$38.61	$38.61	$80.13	$0.00
$102.57	$84.92	$39.41	$39.41	$81.79	$0.00
$104.23	$86.28	$40.23	$40.23	$83.49	$0.00
$105.62	$87.45	$41.06	$41.06	$85.22	$0.00
$108.23	$89.47	$41.91	$41.91	$86.98	$0.00

PY Selection	PY18

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$52.46	$6.70	$3.60	Segment 1
$55.82	$7.21	$3.52	
$58.95	$8.16	$3.41	
$62.16	$8.64	$3.26	
$65.41	$9.68	$3.23	Segment 2
$66.77	$9.88	$3.32	
$68.15	$10.09	$3.59	
$69.56	$10.30	$3.92	
$71.00	$10.51	$4.25	
$72.47	$10.73	$4.54	
$73.97	$10.95	$4.73	Segment 3
$75.51	$11.18	$4.64	
$77.07	$11.41	$4.56	
$78.67	$11.65	$4.59	
$80.30	$11.89	$4.74	
$81.96	$12.13	$4.90	
$83.66	$12.39	$5.07	
$85.39	$12.64	$5.17	
$87.16	$12.90	$5.25	
$88.97	$13.17	$5.46	

PA ACT 129 Program Year	Year
18	2027
19	2028
20	2029
21	2030
22	2031
23	2032
24	2033
25	2034
26	2035
27	2036
28	2037
29	2038
30	2039
31	2040
32	2041
33	2042
34	2043
35	2044
36	2045
37	2046

PY Selection	PY19

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$55.82	$7.21	$3.52	
$58.95	$8.16	$3.41	
$62.16	$8.64	$3.26	
$65.41	$9.68	$3.23	Segm
$66.77	$9.88	$3.32	
$68.15	$10.09	$3.59	

PA ACT 129 Program Year	Year
18	2027
19	2028
20	2029
21	2030
22	2031
23	2032
24	2033

$69.56	$10.30	$3.92	ent 2
$71.00	$10.51	$4.25	
$72.47	$10.73	$4.54	
$73.97	$10.95	$4.73	Segment 3
$75.51	$11.18	$4.64	
$77.07	$11.41	$4.56	
$78.67	$11.65	$4.59	
$80.30	$11.89	$4.74	
$81.96	$12.13	$4.90	
$83.66	$12.39	$5.07	
$85.39	$12.64	$5.17	
$87.16	$12.90	$5.25	
$88.97	$13.17	$5.46	

PA ACT 129 Program Year	Year
25	2034
26	2035
27	2036
28	2037
29	2038
30	2039
31	2040
32	2041
33	2042
34	2043
35	2044
36	2045
37	2046

PY Selection	PY20

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	
$58.95	$8.16	$3.41	
$62.16	$8.64	$3.26	
$65.41	$9.68	$3.23	Segment 2
$66.77	$9.88	$3.32	
$68.15	$10.09	$3.59	
$69.56	$10.30	$3.92	
$71.00	$10.51	$4.25	
$72.47	$10.73	$4.54	
$73.97	$10.95	$4.73	Segment 3
$75.51	$11.18	$4.64	
$77.07	$11.41	$4.56	
$78.67	$11.65	$4.59	
$80.30	$11.89	$4.74	
$81.96	$12.13	$4.90	
$83.66	$12.39	$5.07	
$85.39	$12.64	$5.17	
$87.16	$12.90	$5.25	
$88.97	$13.17	$5.46	

PA ACT 129 Program Year	Year
18	2027
19	2028
20	2029
21	2030
22	2031
23	2032
24	2033
25	2034
26	2035
27	2036
28	2037
29	2038
30	2039
31	2040
32	2041
33	2042
34	2043
35	2044
36	2045
37	2046

PY Selection	PY21

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year
Summer	Winter				
$0.00	$0.00	$0.00	Segment 1	18	2027
$0.00	$0.00	$0.00		19	2028
$0.00	$0.00	$0.00		20	2029
$62.16	$8.64	$3.26		21	2030
$65.41	$9.68	$3.23	Segment 2	22	2031
$66.77	$9.88	$3.32		23	2032
$68.15	$10.09	$3.59		24	2033
$69.56	$10.30	$3.92		25	2034
$71.00	$10.51	$4.25		26	2035
$72.47	$10.73	$4.54		27	2036
$73.97	$10.95	$4.73	Segment 3	28	2037
$75.51	$11.18	$4.64		29	2038
$77.07	$11.41	$4.56		30	2039
$78.67	$11.65	$4.59		31	2040
$80.30	$11.89	$4.74		32	2041
$81.96	$12.13	$4.90		33	2042
$83.66	$12.39	$5.07		34	2043
$85.39	$12.64	$5.17		35	2044
$87.16	$12.90	$5.25		36	2045
$88.97	$13.17	$5.46		37	2046

PY Selection	PY22

Met-Ed Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year
Summer	Winter				
$0.00	$0.00	$0.00	Segment 1	18	2027
$0.00	$0.00	$0.00		19	2028
$0.00	$0.00	$0.00		20	2029
$0.00	$0.00	$0.00		21	2030
$65.41	$9.68	$3.23	Se	22	2031
$66.77	$9.88	$3.32		23	2032

$68.15	$10.09	$3.59	egment 2		24	2033
$69.56	$10.30	$3.92			25	2034
$71.00	$10.51	$4.25			26	2035
$72.47	$10.73	$4.54			27	2036
$73.97	$10.95	$4.73	Segment 3		28	2037
$75.51	$11.18	$4.64			29	2038
$77.07	$11.41	$4.56			30	2039
$78.67	$11.65	$4.59			31	2040
$80.30	$11.89	$4.74			32	2041
$81.96	$12.13	$4.90			33	2042
$83.66	$12.39	$5.07			34	2043
$85.39	$12.64	$5.17			35	2044
$87.16	$12.90	$5.25			36	2045
$88.97	$13.17	$5.46			37	2046

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SWE Note: This data includes avoided energy costs from the Arrearages Study and shoul

Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Zone Shoulder ($/MWh)	
Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
$28.66	$20.73	$29.80	$26.61	$25.06	$21.72
$31.45	$23.02	$33.45	$30.07	$27.69	$24.35
$33.39	$25.19	$35.77	$32.18	$29.50	$25.88
$32.71	$25.04	$35.86	$32.08	$29.82	$25.84
$25.14	$17.16	$27.13	$23.89	$21.41	$18.05
$25.31	$17.32	$28.02	$24.54	$21.75	$18.33
$26.15	$17.95	$29.39	$25.53	$22.59	$18.95
$27.13	$18.67	$31.05	$26.72	$23.65	$19.73
$28.08	$19.37	$32.62	$27.86	$24.71	$20.51
$28.98	$20.04	$34.08	$28.92	$25.65	$21.21
$29.59	$20.51	$35.19	$29.73	$26.30	$21.71
$29.53	$20.53	$34.86	$29.55	$26.22	$21.71
$29.53	$20.58	$34.65	$29.46	$26.20	$21.75
$29.78	$20.80	$34.99	$29.75	$26.46	$21.98
$30.29	$21.21	$35.90	$30.43	$27.00	$22.41
$30.83	$21.64	$36.90	$31.18	$27.59	$22.87
$31.39	$22.09	$37.93	$31.94	$28.19	$23.34
$31.82	$22.44	$38.65	$32.50	$28.65	$23.71
$32.18	$22.75	$39.22	$32.95	$29.03	$24.04
$32.85	$23.27	$40.47	$33.87	$29.75	$24.59

Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Zone Shoulder ($/MWh)	
Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$29.29	$20.86	$31.30	$27.92	$25.53	$22.19
$31.84	$23.64	$34.22	$30.63	$27.95	$24.34
$33.46	$25.78	$36.61	$32.83	$30.57	$26.59
$32.88	$24.90	$34.87	$31.63	$29.15	$25.79
$25.31	$17.32	$28.02	$24.54	$21.75	$18.33
$26.15	$17.95	$29.39	$25.53	$22.59	$18.95

$27.13	$18.67	$31.05	$26.72	$23.65	$19.73
$28.08	$19.37	$32.62	$27.86	$24.71	$20.51
$28.98	$20.04	$34.08	$28.92	$25.65	$21.21
$29.59	$20.51	$35.19	$29.73	$26.30	$21.71
$29.53	$20.53	$34.86	$29.55	$26.22	$21.71
$29.53	$20.58	$34.65	$29.46	$26.20	$21.75
$29.78	$20.80	$34.99	$29.75	$26.46	$21.98
$30.29	$21.21	$35.90	$30.43	$27.00	$22.41
$30.83	$21.64	$36.90	$31.18	$27.59	$22.87
$31.39	$22.09	$37.93	$31.94	$28.19	$23.34
$31.82	$22.44	$38.65	$32.50	$28.65	$23.71
$32.18	$22.75	$39.22	$32.95	$29.03	$24.04
$32.85	$23.27	$40.47	$33.87	$29.75	$24.59

Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Zone Shoulder ($/MWh)	
Summer On-Peak	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**	**Shoulder Off-Peak**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$29.59	$21.40	$31.98	$28.38	$25.71	$22.09
$31.86	$24.18	$35.01	$31.23	$28.97	$24.99
$33.65	$25.67	$35.65	$32.40	$29.92	$26.56
$33.33	$25.34	$36.04	$32.56	$29.77	$26.35
$26.15	$17.95	$29.39	$25.53	$22.59	$18.95
$27.13	$18.67	$31.05	$26.72	$23.65	$19.73
$28.08	$19.37	$32.62	$27.86	$24.71	$20.51
$28.98	$20.04	$34.08	$28.92	$25.65	$21.21
$29.59	$20.51	$35.19	$29.73	$26.30	$21.71
$29.53	$20.53	$34.86	$29.55	$26.22	$21.71
$29.53	$20.58	$34.65	$29.46	$26.20	$21.75
$29.78	$20.80	$34.99	$29.75	$26.46	$21.98
$30.29	$21.21	$35.90	$30.43	$27.00	$22.41
$30.83	$21.64	$36.90	$31.18	$27.59	$22.87
$31.39	$22.09	$37.93	$31.94	$28.19	$23.34
$31.82	$22.44	$38.65	$32.50	$28.65	$23.71
$32.18	$22.75	$39.22	$32.95	$29.03	$24.04
$32.85	$23.27	$40.47	$33.87	$29.75	$24.59

Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Zone Shoulder ($/MWh)	
Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$29.54	$21.86	$32.69	$28.91	$26.65	$22.67
$32.00	$24.02	$33.99	$30.75	$28.27	$24.91
$34.13	$26.14	$36.84	$33.36	$30.57	$27.15
$34.25	$26.05	$37.49	$33.64	$30.69	$27.06
$27.13	$18.67	$31.05	$26.72	$23.65	$19.73
$28.08	$19.37	$32.62	$27.86	$24.71	$20.51
$28.98	$20.04	$34.08	$28.92	$25.65	$21.21
$29.59	$20.51	$35.19	$29.73	$26.30	$21.71
$29.53	$20.53	$34.86	$29.55	$26.22	$21.71
$29.53	$20.58	$34.65	$29.46	$26.20	$21.75
$29.78	$20.80	$34.99	$29.75	$26.46	$21.98
$30.29	$21.21	$35.90	$30.43	$27.00	$22.41
$30.83	$21.64	$36.90	$31.18	$27.59	$22.87
$31.39	$22.09	$37.93	$31.94	$28.19	$23.34
$31.82	$22.44	$38.65	$32.50	$28.65	$23.71
$32.18	$22.75	$39.22	$32.95	$29.03	$24.04
$32.85	$23.27	$40.47	$33.87	$29.75	$24.59

Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Zone Shoulder ($/MWh)	
Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$29.61	$21.62	$31.60	$28.36	$25.87	$22.51
$32.42	$24.43	$35.13	$31.65	$28.86	$25.44

$35.06	$26.86	$38.30	$34.45	$31.50	$27.87
$35.30	$26.84	$39.21	$34.89	$31.82	$27.90
$28.08	$19.37	$32.62	$27.86	$24.71	$20.51
$28.98	$20.04	$34.08	$28.92	$25.65	$21.21
$29.59	$20.51	$35.19	$29.73	$26.30	$21.71
$29.53	$20.53	$34.86	$29.55	$26.22	$21.71
$29.53	$20.58	$34.65	$29.46	$26.20	$21.75
$29.78	$20.80	$34.99	$29.75	$26.46	$21.98
$30.29	$21.21	$35.90	$30.43	$27.00	$22.41
$30.83	$21.64	$36.90	$31.18	$27.59	$22.87
$31.39	$22.09	$37.93	$31.94	$28.19	$23.34
$31.82	$22.44	$38.65	$32.50	$28.65	$23.71
$32.18	$22.75	$39.22	$32.95	$29.03	$24.04
$32.85	$23.27	$40.47	$33.87	$29.75	$24.59

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d only be applied for low income programs

Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Summer	Winter	Summer	Winter	Summer	Winter
$27.28	$27.28	$16.19	$0.00	$14.42	$1.84
$18.95	$18.95	$16.53	$0.00	$15.34	$1.98
$19.33	$19.33	$16.87	$0.00	$16.20	$2.24
$19.73	$19.73	$17.22	$0.00	$17.09	$2.38
$8.47	$8.47	$17.58	$0.00	$17.98	$2.66
$8.65	$8.65	$17.94	$0.00	$18.35	$2.72
$8.82	$8.82	$18.31	$0.00	$18.73	$2.77
$9.01	$9.01	$18.69	$0.00	$19.12	$2.83
$9.19	$9.19	$19.08	$0.00	$19.52	$2.89
$9.38	$9.38	$19.48	$0.00	$19.92	$2.95
$9.58	$9.58	$19.88	$0.00	$20.33	$3.01
$9.78	$9.78	$20.29	$0.00	$20.75	$3.07
$9.98	$9.98	$20.71	$0.00	$21.18	$3.14
$10.19	$10.19	$21.14	$0.00	$21.62	$3.20
$10.40	$10.40	$21.58	$0.00	$22.07	$3.27
$10.61	$10.61	$22.03	$0.00	$22.53	$3.34
$10.83	$10.83	$22.48	$0.00	$22.99	$3.40
$11.06	$11.06	$22.95	$0.00	$23.47	$3.47
$11.29	$11.29	$23.42	$0.00	$23.96	$3.55
$11.52	$11.52	$23.91	$0.00	$24.45	$3.62

Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$18.95	$18.95	$16.53	$0.00	$15.34	$1.98
$19.33	$19.33	$16.87	$0.00	$16.20	$2.24
$19.73	$19.73	$17.22	$0.00	$17.09	$2.38
$20.13	$20.13	$17.58	$0.00	$17.98	$2.66
$8.65	$8.65	$17.94	$0.00	$18.35	$2.72
$8.82	$8.82	$18.31	$0.00	$18.73	$2.77

$9.01	$9.01	$18.69	$0.00	$19.12	$2.83
$9.19	$9.19	$19.08	$0.00	$19.52	$2.89
$9.38	$9.38	$19.48	$0.00	$19.92	$2.95
$9.58	$9.58	$19.88	$0.00	$20.33	$3.01
$9.78	$9.78	$20.29	$0.00	$20.75	$3.07
$9.98	$9.98	$20.71	$0.00	$21.18	$3.14
$10.19	$10.19	$21.14	$0.00	$21.62	$3.20
$10.40	$10.40	$21.58	$0.00	$22.07	$3.27
$10.61	$10.61	$22.03	$0.00	$22.53	$3.34
$10.83	$10.83	$22.48	$0.00	$22.99	$3.40
$11.06	$11.06	$22.95	$0.00	$23.47	$3.47
$11.29	$11.29	$23.42	$0.00	$23.96	$3.55
$11.52	$11.52	$23.91	$0.00	$24.45	$3.62

Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Summer	**Winter**	**Summer**	**Winter**	**Summer**	**Winter**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$19.33	$19.33	$16.87	$0.00	$16.20	$2.24
$19.73	$19.73	$17.22	$0.00	$17.09	$2.38
$20.13	$20.13	$17.58	$0.00	$17.98	$2.66
$20.53	$20.53	$17.94	$0.00	$18.35	$2.72
$8.82	$8.82	$18.31	$0.00	$18.73	$2.77
$9.01	$9.01	$18.69	$0.00	$19.12	$2.83
$9.19	$9.19	$19.08	$0.00	$19.52	$2.89
$9.38	$9.38	$19.48	$0.00	$19.92	$2.95
$9.58	$9.58	$19.88	$0.00	$20.33	$3.01
$9.78	$9.78	$20.29	$0.00	$20.75	$3.07
$9.98	$9.98	$20.71	$0.00	$21.18	$3.14
$10.19	$10.19	$21.14	$0.00	$21.62	$3.20
$10.40	$10.40	$21.58	$0.00	$22.07	$3.27
$10.61	$10.61	$22.03	$0.00	$22.53	$3.34
$10.83	$10.83	$22.48	$0.00	$22.99	$3.40
$11.06	$11.06	$22.95	$0.00	$23.47	$3.47
$11.29	$11.29	$23.42	$0.00	$23.96	$3.55
$11.52	$11.52	$23.91	$0.00	$24.45	$3.62

Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$19.73	$19.73	$17.22	$0.00	$17.09	$2.38
$20.13	$20.13	$17.58	$0.00	$17.98	$2.66
$20.53	$20.53	$17.94	$0.00	$18.35	$2.72
$20.95	$20.95	$18.31	$0.00	$18.73	$2.77
$9.01	$9.01	$18.69	$0.00	$19.12	$2.83
$9.19	$9.19	$19.08	$0.00	$19.52	$2.89
$9.38	$9.38	$19.48	$0.00	$19.92	$2.95
$9.58	$9.58	$19.88	$0.00	$20.33	$3.01
$9.78	$9.78	$20.29	$0.00	$20.75	$3.07
$9.98	$9.98	$20.71	$0.00	$21.18	$3.14
$10.19	$10.19	$21.14	$0.00	$21.62	$3.20
$10.40	$10.40	$21.58	$0.00	$22.07	$3.27
$10.61	$10.61	$22.03	$0.00	$22.53	$3.34
$10.83	$10.83	$22.48	$0.00	$22.99	$3.40
$11.06	$11.06	$22.95	$0.00	$23.47	$3.47
$11.29	$11.29	$23.42	$0.00	$23.96	$3.55
$11.52	$11.52	$23.91	$0.00	$24.45	$3.62

Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$20.13	$20.13	$17.58	$0.00	$17.98	$2.66
$20.53	$20.53	$17.94	$0.00	$18.35	$2.72

$20.95	$20.95	$18.31	$0.00	$18.73	$2.77
$21.38	$21.38	$18.69	$0.00	$19.12	$2.83
$9.19	$9.19	$19.08	$0.00	$19.52	$2.89
$9.38	$9.38	$19.48	$0.00	$19.92	$2.95
$9.58	$9.58	$19.88	$0.00	$20.33	$3.01
$9.78	$9.78	$20.29	$0.00	$20.75	$3.07
$9.98	$9.98	$20.71	$0.00	$21.18	$3.14
$10.19	$10.19	$21.14	$0.00	$21.62	$3.20
$10.40	$10.40	$21.58	$0.00	$22.07	$3.27
$10.61	$10.61	$22.03	$0.00	$22.53	$3.34
$10.83	$10.83	$22.48	$0.00	$22.99	$3.40
$11.06	$11.06	$22.95	$0.00	$23.47	$3.47
$11.29	$11.29	$23.42	$0.00	$23.96	$3.55
$11.52	$11.52	$23.91	$0.00	$24.45	$3.62

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.99	Segment 1
$0.97	
$0.94	
$0.90	
$0.89	Segment 2
$0.91	
$0.99	
$1.08	
$1.17	
$1.25	
$1.30	Segment 3
$1.27	
$1.25	
$1.26	
$1.30	
$1.35	
$1.39	
$1.42	
$1.44	
$1.50	

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.97	
$0.94	
$0.90	
$0.89	Segm
$0.91	
$0.99	

$1.08	ent 2
$1.17	
$1.25	
$1.30	Segment 3
$1.27	
$1.25	
$1.26	
$1.30	
$1.35	
$1.39	
$1.42	
$1.44	
$1.50	

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.94	
$0.90	
$0.89	Segment 2
$0.91	
$0.99	
$1.08	
$1.17	
$1.25	
$1.30	Segment 3
$1.27	
$1.25	
$1.26	
$1.30	
$1.35	
$1.39	
$1.42	
$1.44	
$1.50	

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.90	
$0.89	Segment 2
$0.91	
$0.99	
$1.08	
$1.17	
$1.25	
$1.30	Segment 3
$1.27	
$1.25	
$1.26	
$1.30	
$1.35	
$1.39	
$1.42	
$1.44	
$1.50	

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$0.89	Se
$0.91	

$0.99	egment 2
$1.08	
$1.17	
$1.25	
$1.30	Segment 3
$1.27	
$1.25	
$1.26	
$1.30	
$1.35	
$1.39	
$1.42	
$1.44	
$1.50	

Values

PY Selection	PY18

SWE Note: This data includes avoided energy costs from the Area

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$103.34	$75.30	$107.37	$96.09	$90.61
19	2028	$114.61	$84.81	$121.70	$109.75	$101.31
20	2029	$123.03	$94.05	$131.47	$118.76	$109.29
21	2030	$121.08	$93.96	$132.22	$118.87	$110.87
22	2031	$89.39	$61.25	$96.21	$84.89	$76.16
23	2032	$89.79	$61.70	$99.16	$87.09	$77.22
24	2033	$92.58	$63.78	$103.91	$90.53	$80.03
25	2034	$95.87	$66.23	$109.71	$94.70	$83.65
26	2035	$99.08	$68.62	$115.17	$98.65	$87.28
27	2036	$102.09	$70.87	$120.16	$102.26	$90.44
28	2037	$104.09	$72.43	$123.77	$104.94	$92.59
29	2038	$103.92	$72.51	$122.49	$104.24	$92.30
30	2039	$103.95	$72.72	$121.68	$103.88	$92.24
31	2040	$104.83	$73.53	$122.92	$104.93	$93.17
32	2041	$106.62	$74.96	$126.34	$107.49	$95.13
33	2042	$108.55	$76.50	$130.10	$110.28	$97.25
34	2043	$110.54	$78.07	$133.96	$113.15	$99.44
35	2044	$112.06	$79.33	$136.68	$115.23	$101.08
36	2045	$113.35	$80.44	$138.82	$116.92	$102.46
37	2046	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY19

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$106.04	$76.24	$113.13	$101.18	$92.74
20	2029	$116.73	$87.75	$125.17	$112.46	$102.99
21	2030	$124.20	$97.08	$135.34	$121.99	$113.99
22	2031	$122.36	$94.22	$129.18	$117.86	$109.13
23	2032	$89.79	$61.70	$99.16	$87.09	$77.22
24	2033	$92.58	$63.78	$103.91	$90.53	$80.03
25	2034	$95.87	$66.23	$109.71	$94.70	$83.65

26	**2035**	$99.08	$68.62	$115.17	$98.65	$87.28
27	**2036**	$102.09	$70.87	$120.16	$102.26	$90.44
28	**2037**	$104.09	$72.43	$123.77	$104.94	$92.59
29	**2038**	$103.92	$72.51	$122.49	$104.24	$92.30
30	**2039**	$103.95	$72.72	$121.68	$103.88	$92.24
31	**2040**	$104.83	$73.53	$122.92	$104.93	$93.17
32	**2041**	$106.62	$74.96	$126.34	$107.49	$95.13
33	**2042**	$108.55	$76.50	$130.10	$110.28	$97.25
34	**2043**	$110.54	$78.07	$133.96	$113.15	$99.44
35	**2044**	$112.06	$79.33	$136.68	$115.23	$101.08
36	**2045**	$113.35	$80.44	$138.82	$116.92	$102.46
37	**2046**	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY20

		Penelec Zone Summer ($/MWh)		**Penelec Zone Winter ($/MWh)**		**Penelec DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$107.59	$78.61	$116.03	$103.32	$93.85
21	**2030**	$117.54	$90.42	$128.68	$115.33	$107.33
22	**2031**	$125.66	$97.52	$132.48	$121.16	$112.43
23	**2032**	$124.78	$96.69	$134.15	$122.08	$112.21
24	**2033**	$92.58	$63.78	$103.91	$90.53	$80.03
25	**2034**	$95.87	$66.23	$109.71	$94.70	$83.65
26	**2035**	$99.08	$68.62	$115.17	$98.65	$87.28
27	**2036**	$102.09	$70.87	$120.16	$102.26	$90.44
28	**2037**	$104.09	$72.43	$123.77	$104.94	$92.59
29	**2038**	$103.92	$72.51	$122.49	$104.24	$92.30
30	**2039**	$103.95	$72.72	$121.68	$103.88	$92.24
31	**2040**	$104.83	$73.53	$122.92	$104.93	$93.17
32	**2041**	$106.62	$74.96	$126.34	$107.49	$95.13
33	**2042**	$108.55	$76.50	$130.10	$110.28	$97.25
34	**2043**	$110.54	$78.07	$133.96	$113.15	$99.44
35	**2044**	$112.06	$79.33	$136.68	$115.23	$101.08
36	**2045**	$113.35	$80.44	$138.82	$116.92	$102.46
37	**2046**	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY21

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$107.88	$80.76	$119.02	$105.67	$97.67
22	2031	$118.62	$90.48	$125.44	$114.12	$105.39
23	2032	$128.28	$100.19	$137.65	$125.58	$115.71
24	2033	$128.83	$100.03	$140.16	$126.78	$116.28
25	2034	$95.87	$66.23	$109.71	$94.70	$83.65
26	2035	$99.08	$68.62	$115.17	$98.65	$87.28
27	2036	$102.09	$70.87	$120.16	$102.26	$90.44
28	2037	$104.09	$72.43	$123.77	$104.94	$92.59
29	2038	$103.92	$72.51	$122.49	$104.24	$92.30
30	2039	$103.95	$72.72	$121.68	$103.88	$92.24
31	2040	$104.83	$73.53	$122.92	$104.93	$93.17
32	2041	$106.62	$74.96	$126.34	$107.49	$95.13
33	2042	$108.55	$76.50	$130.10	$110.28	$97.25
34	2043	$110.54	$78.07	$133.96	$113.15	$99.44
35	2044	$112.06	$79.33	$136.68	$115.23	$101.08
36	2045	$113.35	$80.44	$138.82	$116.92	$102.46
37	2046	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY22

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$108.42	$80.28	$115.24	$103.92	$95.19
23	2032	$120.81	$92.72	$130.18	$118.11	$108.24
24	2033	$132.46	$103.66	$143.79	$130.41	$119.91
25	2034	$133.45	$103.81	$147.29	$132.28	$121.23

26	**2035**	$99.08	$68.62	$115.17	$98.65	$87.28
27	**2036**	$102.09	$70.87	$120.16	$102.26	$90.44
28	**2037**	$104.09	$72.43	$123.77	$104.94	$92.59
29	**2038**	$103.92	$72.51	$122.49	$104.24	$92.30
30	**2039**	$103.95	$72.72	$121.68	$103.88	$92.24
31	**2040**	$104.83	$73.53	$122.92	$104.93	$93.17
32	**2041**	$106.62	$74.96	$126.34	$107.49	$95.13
33	**2042**	$108.55	$76.50	$130.10	$110.28	$97.25
34	**2043**	$110.54	$78.07	$133.96	$113.15	$99.44
35	**2044**	$112.06	$79.33	$136.68	$115.23	$101.08
36	**2045**	$113.35	$80.44	$138.82	$116.92	$102.46
37	**2046**	$115.69	$82.27	$143.49	$120.37	$105.05

s from Results of ACC Model

rages Study and should only be applied for low income programs

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$78.82	$99.25	$99.25	$44.19	$14.73	$37.18	$5.79
$89.50	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$96.51	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$96.80	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$64.37	$30.81	$30.81	$47.97	$15.99	$57.97	$7.24
$65.27	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39
$67.38	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$80.93	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$90.21	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$99.92	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$97.34	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$65.27	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39
$67.38	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69

$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.07	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$93.26	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$100.64	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$100.26	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$67.38	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.60	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$93.60	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$103.76	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$103.63	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.40	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$96.29	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$107.26	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$107.63	$77.77	$77.77	$51.01	$17.00	$61.65	$7.69

$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

PY Selection	PY18

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Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$3.75	Segment 1	18	2027	$27.12	$19.76
$3.68		19	2028	$30.08	$22.26
$3.56		20	2029	$32.29	$24.69
$3.42		21	2030	$31.78	$24.66
$3.37	Segment 2	22	2031	$23.46	$16.08
$3.43		23	2032	$23.57	$16.19
$3.68		24	2033	$24.30	$16.74
$4.00		25	2034	$25.16	$17.38
$4.30		26	2035	$26.01	$18.01
$4.57		27	2036	$26.80	$18.60
$4.73	Segment 3	28	2037	$27.32	$19.01
$4.64		29	2038	$27.28	$19.03
$4.56		30	2039	$27.28	$19.09
$4.59		31	2040	$27.52	$19.30
$4.74		32	2041	$27.99	$19.68
$4.90		33	2042	$28.49	$20.08
$5.07		34	2043	$29.01	$20.49
$5.17		35	2044	$29.41	$20.82
$5.25		36	2045	$29.75	$21.11
$5.46		37	2046	$30.37	$21.59

PY Selection	PY19

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$3.68		19	2028	$27.83	$20.01
$3.56		20	2029	$30.64	$23.03
$3.42		21	2030	$32.60	$25.48
$3.37	Segment	22	2031	$32.12	$24.73
$3.43		23	2032	$23.57	$16.19
$3.68		24	2033	$24.30	$16.74
$4.00		25	2034	$25.16	$17.38

$4.30	2	26	2035	$26.01	$18.01
$4.57		27	2036	$26.80	$18.60
$4.73	Segment 3	28	2037	$27.32	$19.01
$4.64		29	2038	$27.28	$19.03
$4.56		30	2039	$27.28	$19.09
$4.59		31	2040	$27.52	$19.30
$4.74		32	2041	$27.99	$19.68
$4.90		33	2042	$28.49	$20.08
$5.07		34	2043	$29.01	$20.49
$5.17		35	2044	$29.41	$20.82
$5.25		36	2045	$29.75	$21.11
$5.46		37	2046	$30.37	$21.59

PY Selection	PY20

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$3.56		20	2029	$28.24	$20.63
$3.42		21	2030	$30.85	$23.73
$3.37	Segment 2	22	2031	$32.98	$25.60
$3.43		23	2032	$32.75	$25.38
$3.68		24	2033	$24.30	$16.74
$4.00		25	2034	$25.16	$17.38
$4.30		26	2035	$26.01	$18.01
$4.57		27	2036	$26.80	$18.60
$4.73	Segment 3	28	2037	$27.32	$19.01
$4.64		29	2038	$27.28	$19.03
$4.56		30	2039	$27.28	$19.09
$4.59		31	2040	$27.52	$19.30
$4.74		32	2041	$27.99	$19.68
$4.90		33	2042	$28.49	$20.08
$5.07		34	2043	$29.01	$20.49
$5.17		35	2044	$29.41	$20.82
$5.25		36	2045	$29.75	$21.11
$5.46		37	2046	$30.37	$21.59

PY Selection	PY21

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00
$3.42		21	2030	$28.32	$21.20
$3.37	Segment 2	22	2031	$31.13	$23.75
$3.43		23	2032	$33.67	$26.30
$3.68		24	2033	$33.81	$26.26
$4.00		25	2034	$25.16	$17.38
$4.30		26	2035	$26.01	$18.01
$4.57		27	2036	$26.80	$18.60
$4.73	Segment 3	28	2037	$27.32	$19.01
$4.64		29	2038	$27.28	$19.03
$4.56		30	2039	$27.28	$19.09
$4.59		31	2040	$27.52	$19.30
$4.74		32	2041	$27.99	$19.68
$4.90		33	2042	$28.49	$20.08
$5.07		34	2043	$29.01	$20.49
$5.17		35	2044	$29.41	$20.82
$5.25		36	2045	$29.75	$21.11
$5.46		37	2046	$30.37	$21.59

PY Selection	PY22

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	Penelec Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00
$0.00		21	2030	$0.00	$0.00
$3.37	Segment	22	2031	$28.46	$21.07
$3.43		23	2032	$31.71	$24.34
$3.68		24	2033	$34.77	$27.21
$4.00		25	2034	$35.03	$27.25

$4.30	2		26	2035	$26.01	$18.01
$4.57			27	2036	$26.80	$18.60
$4.73	Segment 3		28	2037	$27.32	$19.01
$4.64			29	2038	$27.28	$19.03
$4.56			30	2039	$27.28	$19.09
$4.59			31	2040	$27.52	$19.30
$4.74			32	2041	$27.99	$19.68
$4.90			33	2042	$28.49	$20.08
$5.07			34	2043	$29.01	$20.49
$5.17			35	2044	$29.41	$20.82
$5.25			36	2045	$29.75	$21.11
$5.46			37	2046	$30.37	$21.59

CALCULATIONS

data includes avoided energy costs from the Arrearages Study and should only be applied for low income programs

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$28.18	$25.22	$23.78	$20.69	$26.05	$26.05	$11.60
$31.94	$28.81	$26.59	$23.49	$18.09	$18.09	$11.84
$34.51	$31.17	$28.69	$25.33	$18.46	$18.46	$12.08
$34.70	$31.20	$29.10	$25.41	$18.84	$18.84	$12.33
$25.25	$22.28	$19.99	$16.90	$8.09	$8.09	$12.59
$26.03	$22.86	$20.27	$17.13	$8.26	$8.26	$12.85
$27.27	$23.76	$21.01	$17.69	$8.43	$8.43	$13.12
$28.80	$24.86	$21.96	$18.39	$8.60	$8.60	$13.39
$30.23	$25.89	$22.91	$19.09	$8.78	$8.78	$13.67
$31.54	$26.84	$23.74	$19.71	$8.96	$8.96	$13.95
$32.49	$27.54	$24.30	$20.14	$9.15	$9.15	$14.24
$32.15	$27.36	$24.23	$20.14	$9.34	$9.34	$14.53
$31.94	$27.27	$24.21	$20.18	$9.53	$9.53	$14.83
$32.26	$27.54	$24.45	$20.40	$9.73	$9.73	$15.14
$33.16	$28.21	$24.97	$20.81	$9.93	$9.93	$15.46
$34.15	$28.95	$25.53	$21.25	$10.13	$10.13	$15.78
$35.16	$29.70	$26.10	$21.70	$10.34	$10.34	$16.10
$35.87	$30.25	$26.53	$22.05	$10.56	$10.56	$16.44
$36.44	$30.69	$26.89	$22.36	$10.78	$10.78	$16.78
$37.66	$31.59	$27.57	$22.88	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$29.69	$26.56	$24.34	$21.24	$18.09	$18.09	$11.84
$32.85	$29.52	$27.03	$23.68	$18.46	$18.46	$12.08
$35.52	$32.02	$29.92	$26.23	$18.84	$18.84	$12.33
$33.91	$30.94	$28.64	$25.55	$19.22	$19.22	$12.59
$26.03	$22.86	$20.27	$17.13	$8.26	$8.26	$12.85
$27.27	$23.76	$21.01	$17.69	$8.43	$8.43	$13.12
$28.80	$24.86	$21.96	$18.39	$8.60	$8.60	$13.39

$30.23	$25.89	$22.91	$19.09	$8.78	$8.78	$13.67
$31.54	$26.84	$23.74	$19.71	$8.96	$8.96	$13.95
$32.49	$27.54	$24.30	$20.14	$9.15	$9.15	$14.24
$32.15	$27.36	$24.23	$20.14	$9.34	$9.34	$14.53
$31.94	$27.27	$24.21	$20.18	$9.53	$9.53	$14.83
$32.26	$27.54	$24.45	$20.40	$9.73	$9.73	$15.14
$33.16	$28.21	$24.97	$20.81	$9.93	$9.93	$15.46
$34.15	$28.95	$25.53	$21.25	$10.13	$10.13	$15.78
$35.16	$29.70	$26.10	$21.70	$10.34	$10.34	$16.10
$35.87	$30.25	$26.53	$22.05	$10.56	$10.56	$16.44
$36.44	$30.69	$26.89	$22.36	$10.78	$10.78	$16.78
$37.66	$31.59	$27.57	$22.88	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$30.46	$27.12	$24.63	$21.28	$18.46	$18.46	$12.08
$33.78	$30.27	$28.17	$24.48	$18.84	$18.84	$12.33
$34.77	$31.80	$29.51	$26.42	$19.22	$19.22	$12.59
$35.21	$32.04	$29.45	$26.32	$19.61	$19.61	$12.85
$27.27	$23.76	$21.01	$17.69	$8.43	$8.43	$13.12
$28.80	$24.86	$21.96	$18.39	$8.60	$8.60	$13.39
$30.23	$25.89	$22.91	$19.09	$8.78	$8.78	$13.67
$31.54	$26.84	$23.74	$19.71	$8.96	$8.96	$13.95
$32.49	$27.54	$24.30	$20.14	$9.15	$9.15	$14.24
$32.15	$27.36	$24.23	$20.14	$9.34	$9.34	$14.53
$31.94	$27.27	$24.21	$20.18	$9.53	$9.53	$14.83
$32.26	$27.54	$24.45	$20.40	$9.73	$9.73	$15.14
$33.16	$28.21	$24.97	$20.81	$9.93	$9.93	$15.46
$34.15	$28.95	$25.53	$21.25	$10.13	$10.13	$15.78
$35.16	$29.70	$26.10	$21.70	$10.34	$10.34	$16.10
$35.87	$30.25	$26.53	$22.05	$10.56	$10.56	$16.44
$36.44	$30.69	$26.89	$22.36	$10.78	$10.78	$16.78
$37.66	$31.59	$27.57	$22.88	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$31.24	$27.74	$25.64	$21.94	$18.84	$18.84	$12.33
$32.92	$29.95	$27.66	$24.57	$19.22	$19.22	$12.59
$36.13	$32.96	$30.37	$27.23	$19.61	$19.61	$12.85
$36.79	$33.28	$30.52	$27.20	$20.01	$20.01	$13.12
$28.80	$24.86	$21.96	$18.39	$8.60	$8.60	$13.39
$30.23	$25.89	$22.91	$19.09	$8.78	$8.78	$13.67
$31.54	$26.84	$23.74	$19.71	$8.96	$8.96	$13.95
$32.49	$27.54	$24.30	$20.14	$9.15	$9.15	$14.24
$32.15	$27.36	$24.23	$20.14	$9.34	$9.34	$14.53
$31.94	$27.27	$24.21	$20.18	$9.53	$9.53	$14.83
$32.26	$27.54	$24.45	$20.40	$9.73	$9.73	$15.14
$33.16	$28.21	$24.97	$20.81	$9.93	$9.93	$15.46
$34.15	$28.95	$25.53	$21.25	$10.13	$10.13	$15.78
$35.16	$29.70	$26.10	$21.70	$10.34	$10.34	$16.10
$35.87	$30.25	$26.53	$22.05	$10.56	$10.56	$16.44
$36.44	$30.69	$26.89	$22.36	$10.78	$10.78	$16.78
$37.66	$31.59	$27.57	$22.88	$11.00	$11.00	$17.12

Penelec Zone Winter ($/MWh)		Penelec DLC Zone Shoulder ($/MWh)		Penelec Generation Capacity ($/kW/year)		Penelec Transm ($/kW
Winter On-Peak	Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$30.25	$27.28	$24.99	$21.89	$19.22	$19.22	$12.59
$34.17	$31.00	$28.41	$25.27	$19.61	$19.61	$12.85
$37.74	$34.23	$31.47	$28.15	$20.01	$20.01	$13.12
$38.66	$34.72	$31.82	$28.25	$20.41	$20.41	$13.39

$30.23	$25.89	$22.91	$19.09	$8.78	$8.78	$13.67
$31.54	$26.84	$23.74	$19.71	$8.96	$8.96	$13.95
$32.49	$27.54	$24.30	$20.14	$9.15	$9.15	$14.24
$32.15	$27.36	$24.23	$20.14	$9.34	$9.34	$14.53
$31.94	$27.27	$24.21	$20.18	$9.53	$9.53	$14.83
$32.26	$27.54	$24.45	$20.40	$9.73	$9.73	$15.14
$33.16	$28.21	$24.97	$20.81	$9.93	$9.93	$15.46
$34.15	$28.95	$25.53	$21.25	$10.13	$10.13	$15.78
$35.16	$29.70	$26.10	$21.70	$10.34	$10.34	$16.10
$35.87	$30.25	$26.53	$22.05	$10.56	$10.56	$16.44
$36.44	$30.69	$26.89	$22.36	$10.78	$10.78	$16.78
$37.66	$31.59	$27.57	$22.88	$11.00	$11.00	$17.12

ission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$3.87	$9.76	$1.52	$0.99	Segment 1
$3.95	$11.19	$1.57	$0.97	
$4.03	$12.59	$1.64	$0.94	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment 2
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$3.95	$11.19	$1.57	$0.97	
$4.03	$12.59	$1.64	$0.94	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	

$4.56	$16.52	$2.06	$1.13	2
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$4.03	$12.59	$1.64	$0.94	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment 2
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$4.11	$13.92	$1.73	$0.90	
$4.20	$15.22	$1.90	$0.88	Segment 2
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	
$4.56	$16.52	$2.06	$1.13	
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

ıission Capacity /year)	Penelec Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter	Summer	Winter		
$0.00	$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	$0.00	
$4.20	$15.22	$1.90	$0.88	Segment
$4.28	$15.53	$1.94	$0.90	
$4.37	$15.85	$1.98	$0.97	
$4.46	$16.18	$2.02	$1.05	

$4.56	$16.52	$2.06	$1.13	2
$4.65	$16.86	$2.10	$1.20	
$4.75	$17.21	$2.15	$1.24	Segment 3
$4.84	$17.56	$2.19	$1.22	
$4.94	$17.93	$2.24	$1.20	
$5.05	$18.30	$2.28	$1.21	
$5.15	$18.68	$2.33	$1.24	
$5.26	$19.06	$2.38	$1.29	
$5.37	$19.46	$2.43	$1.33	
$5.48	$19.86	$2.48	$1.36	
$5.59	$20.27	$2.53	$1.38	
$5.71	$20.69	$2.58	$1.43	

PY Selection	PY18

SWE Note: This data includes avoided energy costs from t

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$105.03	$76.21	$109.17	$97.58
19	2028	$116.24	$85.62	$123.52	$111.25
20	2029	$124.58	$94.80	$133.25	$120.19
21	2030	$122.60	$94.74	$134.05	$120.33
22	2031	$91.18	$62.24	$98.23	$86.56
23	2032	$91.59	$62.69	$101.18	$88.76
24	2033	$94.37	$64.78	$105.93	$92.20
25	2034	$97.67	$67.23	$111.73	$96.37
26	2035	$100.88	$69.61	$117.19	$100.31
27	2036	$103.89	$71.87	$122.18	$103.93
28	2037	$105.88	$73.43	$125.79	$106.60
29	2038	$105.71	$73.50	$124.51	$105.91
30	2039	$105.75	$73.72	$123.70	$105.54
31	2040	$106.63	$74.53	$124.94	$106.60
32	2041	$108.42	$75.96	$128.36	$109.15
33	2042	$110.35	$77.49	$132.12	$111.95
34	2043	$112.33	$79.07	$135.99	$114.82
35	2044	$113.85	$80.33	$138.70	$116.90
36	2045	$115.14	$81.44	$140.84	$118.59
37	2046	$117.49	$83.27	$145.51	$122.03

PY Selection	PY19

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$107.73	$77.11	$115.01	$102.74
20	2029	$118.32	$88.54	$126.99	$113.93
21	2030	$125.70	$97.84	$137.15	$123.43
22	2031	$123.95	$95.01	$131.00	$119.33
23	2032	$91.59	$62.69	$101.18	$88.76
24	2033	$94.37	$64.78	$105.93	$92.20
25	2034	$97.67	$67.23	$111.73	$96.37

26	**2035**	$100.88	$69.61	$117.19	$100.31
27	**2036**	$103.89	$71.87	$122.18	$103.93
28	**2037**	$105.88	$73.43	$125.79	$106.60
29	**2038**	$105.71	$73.50	$124.51	$105.91
30	**2039**	$105.75	$73.72	$123.70	$105.54
31	**2040**	$106.63	$74.53	$124.94	$106.60
32	**2041**	$108.42	$75.96	$128.36	$109.15
33	**2042**	$110.35	$77.49	$132.12	$111.95
34	**2043**	$112.33	$79.07	$135.99	$114.82
35	**2044**	$113.85	$80.33	$138.70	$116.90
36	**2045**	$115.14	$81.44	$140.84	$118.59
37	**2046**	$117.49	$83.27	$145.51	$122.03

PY Selection	PY20

		Penn Power Zone Summer ($/MWh)		**Penn Power Zone Winter ($/MWh)**	
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00
20	**2029**	$109.25	$79.47	$117.92	$104.86
21	**2030**	$119.08	$91.22	$130.53	$116.81
22	**2031**	$127.23	$98.29	$134.28	$122.61
23	**2032**	$126.42	$97.52	$136.01	$123.59
24	**2033**	$94.37	$64.78	$105.93	$92.20
25	**2034**	$97.67	$67.23	$111.73	$96.37
26	**2035**	$100.88	$69.61	$117.19	$100.31
27	**2036**	$103.89	$71.87	$122.18	$103.93
28	**2037**	$105.88	$73.43	$125.79	$106.60
29	**2038**	$105.71	$73.50	$124.51	$105.91
30	**2039**	$105.75	$73.72	$123.70	$105.54
31	**2040**	$106.63	$74.53	$124.94	$106.60
32	**2041**	$108.42	$75.96	$128.36	$109.15
33	**2042**	$110.35	$77.49	$132.12	$111.95
34	**2043**	$112.33	$79.07	$135.99	$114.82
35	**2044**	$113.85	$80.33	$138.70	$116.90
36	**2045**	$115.14	$81.44	$140.84	$118.59
37	**2046**	$117.49	$83.27	$145.51	$122.03

PY Selection	PY21

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00
21	2030	$109.49	$81.63	$120.94	$107.22
22	2031	$120.23	$91.29	$127.28	$115.61
23	2032	$129.90	$101.00	$139.49	$127.07
24	2033	$130.51	$100.92	$142.07	$128.34
25	2034	$97.67	$67.23	$111.73	$96.37
26	2035	$100.88	$69.61	$117.19	$100.31
27	2036	$103.89	$71.87	$122.18	$103.93
28	2037	$105.88	$73.43	$125.79	$106.60
29	2038	$105.71	$73.50	$124.51	$105.91
30	2039	$105.75	$73.72	$123.70	$105.54
31	2040	$106.63	$74.53	$124.94	$106.60
32	2041	$108.42	$75.96	$128.36	$109.15
33	2042	$110.35	$77.49	$132.12	$111.95
34	2043	$112.33	$79.07	$135.99	$114.82
35	2044	$113.85	$80.33	$138.70	$116.90
36	2045	$115.14	$81.44	$140.84	$118.59
37	2046	$117.49	$83.27	$145.51	$122.03

PY Selection	PY22

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)	
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
18	2027	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00
22	2031	$110.09	$81.15	$117.14	$105.47
23	2032	$122.47	$93.57	$132.06	$119.64
24	2033	$134.12	$104.53	$145.68	$131.95

25	**2034**	$135.17	$104.73	$149.23	$133.87
26	**2035**	$100.88	$69.61	$117.19	$100.31
27	**2036**	$103.89	$71.87	$122.18	$103.93
28	**2037**	$105.88	$73.43	$125.79	$106.60
29	**2038**	$105.71	$73.50	$124.51	$105.91
30	**2039**	$105.75	$73.72	$123.70	$105.54
31	**2040**	$106.63	$74.53	$124.94	$106.60
32	**2041**	$108.42	$75.96	$128.36	$109.15
33	**2042**	$110.35	$77.49	$132.12	$111.95
34	**2043**	$112.33	$79.07	$135.99	$114.82
35	**2044**	$113.85	$80.33	$138.70	$116.90
36	**2045**	$115.14	$81.44	$140.84	$118.59
37	**2046**	$117.49	$83.27	$145.51	$122.03

Values from Results of ACC Model

he Arrearages Study and should only be applied for low income programs

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$91.94	$79.84	$67.40	$67.40	$77.10	$0.00
$102.57	$90.44	$33.46	$33.46	$78.69	$0.00
$110.46	$97.33	$34.15	$34.15	$80.32	$0.00
$112.11	$97.65	$34.85	$34.85	$81.99	$0.00
$77.61	$65.47	$27.64	$27.64	$83.69	$0.00
$78.66	$66.36	$28.21	$28.21	$85.42	$0.00
$81.48	$68.47	$28.80	$28.80	$87.19	$0.00
$85.10	$71.14	$29.40	$29.40	$88.99	$0.00
$88.72	$73.81	$30.00	$30.00	$90.84	$0.00
$91.89	$76.18	$30.63	$30.63	$92.72	$0.00
$94.03	$77.84	$31.26	$31.26	$94.64	$0.00
$93.75	$77.83	$31.91	$31.91	$96.60	$0.00
$93.69	$77.98	$32.57	$32.57	$98.60	$0.00
$94.61	$78.82	$33.24	$33.24	$100.64	$0.00
$96.57	$80.37	$33.93	$33.93	$102.73	$0.00
$98.70	$82.04	$34.64	$34.64	$104.86	$0.00
$100.88	$83.75	$35.35	$35.35	$107.03	$0.00
$102.53	$85.10	$36.09	$36.09	$109.25	$0.00
$103.91	$86.27	$36.83	$36.83	$111.51	$0.00
$106.50	$88.27	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$94.06	$81.93	$33.46	$33.46	$78.69	$0.00
$104.20	$91.07	$34.15	$34.15	$80.32	$0.00
$115.21	$100.75	$34.85	$34.85	$81.99	$0.00
$110.38	$98.24	$35.57	$35.57	$83.69	$0.00
$78.66	$66.36	$28.21	$28.21	$85.42	$0.00
$81.48	$68.47	$28.80	$28.80	$87.19	$0.00
$85.10	$71.14	$29.40	$29.40	$88.99	$0.00

$88.72	$73.81	$30.00	$30.00	$90.84	$0.00
$91.89	$76.18	$30.63	$30.63	$92.72	$0.00
$94.03	$77.84	$31.26	$31.26	$94.64	$0.00
$93.75	$77.83	$31.91	$31.91	$96.60	$0.00
$93.69	$77.98	$32.57	$32.57	$98.60	$0.00
$94.61	$78.82	$33.24	$33.24	$100.64	$0.00
$96.57	$80.37	$33.93	$33.93	$102.73	$0.00
$98.70	$82.04	$34.64	$34.64	$104.86	$0.00
$100.88	$83.75	$35.35	$35.35	$107.03	$0.00
$102.53	$85.10	$36.09	$36.09	$109.25	$0.00
$103.91	$86.27	$36.83	$36.83	$111.51	$0.00
$106.50	$88.27	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	**Shoulder Off-Peak**	**Summer**	**Winter**	**Summer**	**Winter**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$95.13	$82.00	$34.15	$34.15	$80.32	$0.00
$108.59	$94.13	$34.85	$34.85	$81.99	$0.00
$113.66	$101.52	$35.57	$35.57	$83.69	$0.00
$113.49	$101.19	$36.30	$36.30	$85.42	$0.00
$81.48	$68.47	$28.80	$28.80	$87.19	$0.00
$85.10	$71.14	$29.40	$29.40	$88.99	$0.00
$88.72	$73.81	$30.00	$30.00	$90.84	$0.00
$91.89	$76.18	$30.63	$30.63	$92.72	$0.00
$94.03	$77.84	$31.26	$31.26	$94.64	$0.00
$93.75	$77.83	$31.91	$31.91	$96.60	$0.00
$93.69	$77.98	$32.57	$32.57	$98.60	$0.00
$94.61	$78.82	$33.24	$33.24	$100.64	$0.00
$96.57	$80.37	$33.93	$33.93	$102.73	$0.00
$98.70	$82.04	$34.64	$34.64	$104.86	$0.00
$100.88	$83.75	$35.35	$35.35	$107.03	$0.00
$102.53	$85.10	$36.09	$36.09	$109.25	$0.00
$103.91	$86.27	$36.83	$36.83	$111.51	$0.00
$106.50	$88.27	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$99.00	$84.54	$34.85	$34.85	$81.99	$0.00
$106.66	$94.52	$35.57	$35.57	$83.69	$0.00
$116.97	$104.67	$36.30	$36.30	$85.42	$0.00
$117.62	$104.61	$37.04	$37.04	$87.19	$0.00
$85.10	$71.14	$29.40	$29.40	$88.99	$0.00
$88.72	$73.81	$30.00	$30.00	$90.84	$0.00
$91.89	$76.18	$30.63	$30.63	$92.72	$0.00
$94.03	$77.84	$31.26	$31.26	$94.64	$0.00
$93.75	$77.83	$31.91	$31.91	$96.60	$0.00
$93.69	$77.98	$32.57	$32.57	$98.60	$0.00
$94.61	$78.82	$33.24	$33.24	$100.64	$0.00
$96.57	$80.37	$33.93	$33.93	$102.73	$0.00
$98.70	$82.04	$34.64	$34.64	$104.86	$0.00
$100.88	$83.75	$35.35	$35.35	$107.03	$0.00
$102.53	$85.10	$36.09	$36.09	$109.25	$0.00
$103.91	$86.27	$36.83	$36.83	$111.51	$0.00
$106.50	$88.27	$37.60	$37.60	$113.82	$0.00

Penn Power DLC Zone Shoulder ($/MWh)		Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)	
Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$96.52	$84.38	$35.57	$35.57	$83.69	$0.00
$109.54	$97.24	$36.30	$36.30	$85.42	$0.00
$121.23	$108.22	$37.04	$37.04	$87.19	$0.00

$122.60	$108.64	$37.81	$37.81	$88.99	$0.00
$88.72	$73.81	$30.00	$30.00	$90.84	$0.00
$91.89	$76.18	$30.63	$30.63	$92.72	$0.00
$94.03	$77.84	$31.26	$31.26	$94.64	$0.00
$93.75	$77.83	$31.91	$31.91	$96.60	$0.00
$93.69	$77.98	$32.57	$32.57	$98.60	$0.00
$94.61	$78.82	$33.24	$33.24	$100.64	$0.00
$96.57	$80.37	$33.93	$33.93	$102.73	$0.00
$98.70	$82.04	$34.64	$34.64	$104.86	$0.00
$100.88	$83.75	$35.35	$35.35	$107.03	$0.00
$102.53	$85.10	$36.09	$36.09	$109.25	$0.00
$103.91	$86.27	$36.83	$36.83	$111.51	$0.00
$106.50	$88.27	$37.60	$37.60	$113.82	$0.00

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$43.52	$16.27	$3.75	Segment 1	18
$45.52	$16.76	$3.68		19
$45.17	$19.33	$3.56		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment 2	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$45.52	$16.76	$3.68		19
$45.17	$19.33	$3.56		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25

$49.91	$24.64	$4.30	2	26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$0.00	$0.00	$0.00		19
$45.17	$19.33	$3.56		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment 2	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$0.00	$0.00	$0.00		19
$0.00	$0.00	$0.00		20
$45.79	$20.57	$3.42		21
$45.98	$22.70	$3.37	Segment 2	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24
$48.90	$24.14	$4.00		25
$49.91	$24.64	$4.30		26
$50.94	$25.15	$4.57		27
$52.00	$25.67	$4.73	Segment 3	28
$53.08	$26.20	$4.64		29
$54.18	$26.74	$4.56		30
$55.30	$27.30	$4.59		31
$56.44	$27.86	$4.74		32
$57.61	$28.44	$4.90		33
$58.81	$29.03	$5.07		34
$60.03	$29.63	$5.17		35
$61.27	$30.25	$5.25		36
$62.54	$30.87	$5.46		37

PY Selection

Penn Power Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year
Summer	Winter			
$0.00	$0.00	$0.00	Segment 1	18
$0.00	$0.00	$0.00		19
$0.00	$0.00	$0.00		20
$0.00	$0.00	$0.00		21
$45.98	$22.70	$3.37	Segm	22
$46.93	$23.17	$3.43		23
$47.91	$23.65	$3.68		24

$48.90	$24.14	$4.00	ent 2		25
$49.91	$24.64	$4.30			26
$50.94	$25.15	$4.57			27
$52.00	$25.67	$4.73	Segment 3		28
$53.08	$26.20	$4.64			29
$54.18	$26.74	$4.56			30
$55.30	$27.30	$4.59			31
$56.44	$27.86	$4.74			32
$57.61	$28.44	$4.90			33
$58.81	$29.03	$5.07			34
$60.03	$29.63	$5.17			35
$61.27	$30.25	$5.25			36
$62.54	$30.87	$5.46			37

PY18

SWE Note: This data includes avoided energy costs from the Arrearages Stud

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$9.20	$6.68	$9.56	$8.55	$8.06
2028	$10.18	$7.50	$10.82	$9.75	$8.99
2029	$10.91	$8.31	$11.67	$10.53	$9.68
2030	$10.74	$8.30	$11.74	$10.54	$9.82
2031	$7.99	$5.45	$8.61	$7.58	$6.80
2032	$8.02	$5.49	$8.86	$7.78	$6.89
2033	$8.27	$5.68	$9.28	$8.08	$7.14
2034	$8.56	$5.89	$9.79	$8.44	$7.46
2035	$8.84	$6.10	$10.27	$8.79	$7.77
2036	$9.10	$6.30	$10.70	$9.10	$8.05
2037	$9.28	$6.43	$11.02	$9.34	$8.24
2038	$9.26	$6.44	$10.91	$9.28	$8.21
2039	$9.26	$6.46	$10.84	$9.25	$8.21
2040	$9.34	$6.53	$10.95	$9.34	$8.29
2041	$9.50	$6.65	$11.25	$9.56	$8.46
2042	$9.67	$6.79	$11.58	$9.81	$8.65
2043	$9.84	$6.93	$11.91	$10.06	$8.84
2044	$9.97	$7.04	$12.15	$10.24	$8.98
2045	$10.09	$7.13	$12.34	$10.39	$9.10
2046	$10.29	$7.30	$12.75	$10.69	$9.33

PY19

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$9.44	$6.76	$10.08	$9.00	$8.24
2029	$10.37	$7.76	$11.13	$9.98	$9.13
2030	$11.01	$8.57	$12.02	$10.81	$10.09
2031	$10.86	$8.32	$11.48	$10.45	$9.67
2032	$8.02	$5.49	$8.86	$7.78	$6.89
2033	$8.27	$5.68	$9.28	$8.08	$7.14
2034	$8.56	$5.89	$9.79	$8.44	$7.46

2035	$8.84	$6.10	$10.27	$8.79	$7.77
2036	$9.10	$6.30	$10.70	$9.10	$8.05
2037	$9.28	$6.43	$11.02	$9.34	$8.24
2038	$9.26	$6.44	$10.91	$9.28	$8.21
2039	$9.26	$6.46	$10.84	$9.25	$8.21
2040	$9.34	$6.53	$10.95	$9.34	$8.29
2041	$9.50	$6.65	$11.25	$9.56	$8.46
2042	$9.67	$6.79	$11.58	$9.81	$8.65
2043	$9.84	$6.93	$11.91	$10.06	$8.84
2044	$9.97	$7.04	$12.15	$10.24	$8.98
2045	$10.09	$7.13	$12.34	$10.39	$9.10
2046	$10.29	$7.30	$12.75	$10.69	$9.33

PY20

	Penn Power Zone Summer ($/MWh)		**Penn Power Zone Winter ($/MWh)**		**Penn Power DLC ($/M**
Year	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$0.00	$0.00	$0.00	$0.00	$0.00
2029	$9.57	$6.96	$10.33	$9.19	$8.33
2030	$10.43	$7.99	$11.44	$10.23	$9.51
2031	$11.15	$8.61	$11.76	$10.74	$9.96
2032	$11.08	$8.54	$11.92	$10.83	$9.94
2033	$8.27	$5.68	$9.28	$8.08	$7.14
2034	$8.56	$5.89	$9.79	$8.44	$7.46
2035	$8.84	$6.10	$10.27	$8.79	$7.77
2036	$9.10	$6.30	$10.70	$9.10	$8.05
2037	$9.28	$6.43	$11.02	$9.34	$8.24
2038	$9.26	$6.44	$10.91	$9.28	$8.21
2039	$9.26	$6.46	$10.84	$9.25	$8.21
2040	$9.34	$6.53	$10.95	$9.34	$8.29
2041	$9.50	$6.65	$11.25	$9.56	$8.46
2042	$9.67	$6.79	$11.58	$9.81	$8.65
2043	$9.84	$6.93	$11.91	$10.06	$8.84
2044	$9.97	$7.04	$12.15	$10.24	$8.98
2045	$10.09	$7.13	$12.34	$10.39	$9.10
2046	$10.29	$7.30	$12.75	$10.69	$9.33

PY21

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$0.00	$0.00	$0.00	$0.00	$0.00
2029	$0.00	$0.00	$0.00	$0.00	$0.00
2030	$9.59	$7.15	$10.60	$9.39	$8.67
2031	$10.53	$8.00	$11.15	$10.13	$9.34
2032	$11.38	$8.85	$12.22	$11.13	$10.25
2033	$11.43	$8.84	$12.45	$11.24	$10.30
2034	$8.56	$5.89	$9.79	$8.44	$7.46
2035	$8.84	$6.10	$10.27	$8.79	$7.77
2036	$9.10	$6.30	$10.70	$9.10	$8.05
2037	$9.28	$6.43	$11.02	$9.34	$8.24
2038	$9.26	$6.44	$10.91	$9.28	$8.21
2039	$9.26	$6.46	$10.84	$9.25	$8.21
2040	$9.34	$6.53	$10.95	$9.34	$8.29
2041	$9.50	$6.65	$11.25	$9.56	$8.46
2042	$9.67	$6.79	$11.58	$9.81	$8.65
2043	$9.84	$6.93	$11.91	$10.06	$8.84
2044	$9.97	$7.04	$12.15	$10.24	$8.98
2045	$10.09	$7.13	$12.34	$10.39	$9.10
2046	$10.29	$7.30	$12.75	$10.69	$9.33

PY22

	Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
2027	$0.00	$0.00	$0.00	$0.00	$0.00
2028	$0.00	$0.00	$0.00	$0.00	$0.00
2029	$0.00	$0.00	$0.00	$0.00	$0.00
2030	$0.00	$0.00	$0.00	$0.00	$0.00
2031	$9.65	$7.11	$10.26	$9.24	$8.46
2032	$10.73	$8.20	$11.57	$10.48	$9.60
2033	$11.75	$9.16	$12.76	$11.56	$10.62

2034	$11.84	$9.18	$13.07	$11.73	$10.74
2035	$8.84	$6.10	$10.27	$8.79	$7.77
2036	$9.10	$6.30	$10.70	$9.10	$8.05
2037	$9.28	$6.43	$11.02	$9.34	$8.24
2038	$9.26	$6.44	$10.91	$9.28	$8.21
2039	$9.26	$6.46	$10.84	$9.25	$8.21
2040	$9.34	$6.53	$10.95	$9.34	$8.29
2041	$9.50	$6.65	$11.25	$9.56	$8.46
2042	$9.67	$6.79	$11.58	$9.81	$8.65
2043	$9.84	$6.93	$11.91	$10.06	$8.84
2044	$9.97	$7.04	$12.15	$10.24	$8.98
2045	$10.09	$7.13	$12.34	$10.39	$9.10
2046	$10.29	$7.30	$12.75	$10.69	$9.33

CALCULATIONS

y and should only be applied for low income programs

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distr ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$6.99	$5.90	$5.90	$6.75	$0.00	$3.81
$7.92	$2.93	$2.93	$6.89	$0.00	$3.99
$8.53	$2.99	$2.99	$7.04	$0.00	$3.96
$8.56	$3.05	$3.05	$7.18	$0.00	$4.01
$5.74	$2.42	$2.42	$7.33	$0.00	$4.03
$5.81	$2.47	$2.47	$7.48	$0.00	$4.11
$6.00	$2.52	$2.52	$7.64	$0.00	$4.20
$6.23	$2.58	$2.58	$7.80	$0.00	$4.28
$6.47	$2.63	$2.63	$7.96	$0.00	$4.37
$6.67	$2.68	$2.68	$8.12	$0.00	$4.46
$6.82	$2.74	$2.74	$8.29	$0.00	$4.56
$6.82	$2.80	$2.80	$8.46	$0.00	$4.65
$6.83	$2.85	$2.85	$8.64	$0.00	$4.75
$6.91	$2.91	$2.91	$8.82	$0.00	$4.84
$7.04	$2.97	$2.97	$9.00	$0.00	$4.95
$7.19	$3.03	$3.03	$9.19	$0.00	$5.05
$7.34	$3.10	$3.10	$9.38	$0.00	$5.15
$7.46	$3.16	$3.16	$9.57	$0.00	$5.26
$7.56	$3.23	$3.23	$9.77	$0.00	$5.37
$7.73	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distr ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$7.18	$2.93	$2.93	$6.89	$0.00	$3.99
$7.98	$2.99	$2.99	$7.04	$0.00	$3.96
$8.83	$3.05	$3.05	$7.18	$0.00	$4.01
$8.61	$3.12	$3.12	$7.33	$0.00	$4.03
$5.81	$2.47	$2.47	$7.48	$0.00	$4.11
$6.00	$2.52	$2.52	$7.64	$0.00	$4.20
$6.23	$2.58	$2.58	$7.80	$0.00	$4.28

$6.47	$2.63	$2.63	$7.96	$0.00	$4.37
$6.67	$2.68	$2.68	$8.12	$0.00	$4.46
$6.82	$2.74	$2.74	$8.29	$0.00	$4.56
$6.82	$2.80	$2.80	$8.46	$0.00	$4.65
$6.83	$2.85	$2.85	$8.64	$0.00	$4.75
$6.91	$2.91	$2.91	$8.82	$0.00	$4.84
$7.04	$2.97	$2.97	$9.00	$0.00	$4.95
$7.19	$3.03	$3.03	$9.19	$0.00	$5.05
$7.34	$3.10	$3.10	$9.38	$0.00	$5.15
$7.46	$3.16	$3.16	$9.57	$0.00	$5.26
$7.56	$3.23	$3.23	$9.77	$0.00	$5.37
$7.73	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	**Penn Power Generation Capacity ($/kW/year)**		**Penn Power Transmission Capacity ($/kW/year)**		**Penn Power Distr ($/kW**
Shoulder Off-Peak	**Summer**	**Winter**	**Summer**	**Winter**	**Summer**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$7.18	$2.99	$2.99	$7.04	$0.00	$3.96
$8.25	$3.05	$3.05	$7.18	$0.00	$4.01
$8.89	$3.12	$3.12	$7.33	$0.00	$4.03
$8.87	$3.18	$3.18	$7.48	$0.00	$4.11
$6.00	$2.52	$2.52	$7.64	$0.00	$4.20
$6.23	$2.58	$2.58	$7.80	$0.00	$4.28
$6.47	$2.63	$2.63	$7.96	$0.00	$4.37
$6.67	$2.68	$2.68	$8.12	$0.00	$4.46
$6.82	$2.74	$2.74	$8.29	$0.00	$4.56
$6.82	$2.80	$2.80	$8.46	$0.00	$4.65
$6.83	$2.85	$2.85	$8.64	$0.00	$4.75
$6.91	$2.91	$2.91	$8.82	$0.00	$4.84
$7.04	$2.97	$2.97	$9.00	$0.00	$4.95
$7.19	$3.03	$3.03	$9.19	$0.00	$5.05
$7.34	$3.10	$3.10	$9.38	$0.00	$5.15
$7.46	$3.16	$3.16	$9.57	$0.00	$5.26
$7.56	$3.23	$3.23	$9.77	$0.00	$5.37
$7.73	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distı ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$7.41	$3.05	$3.05	$7.18	$0.00	$4.01
$8.28	$3.12	$3.12	$7.33	$0.00	$4.03
$9.17	$3.18	$3.18	$7.48	$0.00	$4.11
$9.16	$3.25	$3.25	$7.64	$0.00	$4.20
$6.23	$2.58	$2.58	$7.80	$0.00	$4.28
$6.47	$2.63	$2.63	$7.96	$0.00	$4.37
$6.67	$2.68	$2.68	$8.12	$0.00	$4.46
$6.82	$2.74	$2.74	$8.29	$0.00	$4.56
$6.82	$2.80	$2.80	$8.46	$0.00	$4.65
$6.83	$2.85	$2.85	$8.64	$0.00	$4.75
$6.91	$2.91	$2.91	$8.82	$0.00	$4.84
$7.04	$2.97	$2.97	$9.00	$0.00	$4.95
$7.19	$3.03	$3.03	$9.19	$0.00	$5.05
$7.34	$3.10	$3.10	$9.38	$0.00	$5.15
$7.46	$3.16	$3.16	$9.57	$0.00	$5.26
$7.56	$3.23	$3.23	$9.77	$0.00	$5.37
$7.73	$3.29	$3.29	$9.97	$0.00	$5.48

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distı ($/kW
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$7.39	$3.12	$3.12	$7.33	$0.00	$4.03
$8.52	$3.18	$3.18	$7.48	$0.00	$4.11
$9.48	$3.25	$3.25	$7.64	$0.00	$4.20

$9.52	$3.31	$3.31	$7.80	$0.00	$4.28
$6.47	$2.63	$2.63	$7.96	$0.00	$4.37
$6.67	$2.68	$2.68	$8.12	$0.00	$4.46
$6.82	$2.74	$2.74	$8.29	$0.00	$4.56
$6.82	$2.80	$2.80	$8.46	$0.00	$4.65
$6.83	$2.85	$2.85	$8.64	$0.00	$4.75
$6.91	$2.91	$2.91	$8.82	$0.00	$4.84
$7.04	$2.97	$2.97	$9.00	$0.00	$4.95
$7.19	$3.03	$3.03	$9.19	$0.00	$5.05
$7.34	$3.10	$3.10	$9.38	$0.00	$5.15
$7.46	$3.16	$3.16	$9.57	$0.00	$5.26
$7.56	$3.23	$3.23	$9.77	$0.00	$5.37
$7.73	$3.29	$3.29	$9.97	$0.00	$5.48

ribution Capacity /year) Winter	Avoided Natural Gas Fuel Costs ($/MMBTU)	
$1.43	$0.33	Segment 1
$1.47	$0.32	
$1.69	$0.31	
$1.80	$0.30	
$1.99	$0.30	Segment 2
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year) Winter	Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	$0.00	Segment 1
$1.47	$0.32	
$1.69	$0.31	
$1.80	$0.30	
$1.99	$0.30	Segment
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	

$2.16	$0.38	2
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year)	Avoided Natural Gas Fuel Costs ($/MMBTU)	
Winter		
$0.00	$0.00	Segment 1
$0.00	$0.00	
$1.69	$0.31	
$1.80	$0.30	
$1.99	$0.30	Segment 2
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year) Winter	Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	$0.00	Segment 1
$0.00	$0.00	
$0.00	$0.00	
$1.80	$0.30	
$1.99	$0.30	Segment 2
$2.03	$0.30	
$2.07	$0.32	
$2.11	$0.35	
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

ribution Capacity /year) Winter	Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	$0.00	Segment 1
$0.00	$0.00	
$0.00	$0.00	
$0.00	$0.00	
$1.99	$0.30	Segm
$2.03	$0.30	
$2.07	$0.32	

$2.11	$0.35	ent 2
$2.16	$0.38	
$2.20	$0.40	
$2.25	$0.41	Segment 3
$2.30	$0.41	
$2.34	$0.40	
$2.39	$0.40	
$2.44	$0.42	
$2.49	$0.43	
$2.54	$0.44	
$2.60	$0.45	
$2.65	$0.46	
$2.70	$0.48	

Values

PY Selection	PY18

SWE Note: This data includes avoided energy costs from the A

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$105.75	$75.96	$110.03	$98.05	$92.22
19	2028	$115.75	$84.09	$123.27	$110.59	$101.62
20	2029	$123.19	$92.40	$132.14	$118.64	$108.59
21	2030	$121.29	$92.48	$133.12	$118.94	$110.44
22	2031	$93.45	$63.50	$100.76	$88.65	$79.43
23	2032	$93.85	$63.95	$103.72	$90.86	$80.49
24	2033	$96.64	$66.04	$108.46	$94.30	$83.30
25	2034	$99.93	$68.48	$114.26	$98.47	$86.92
26	2035	$103.14	$70.87	$119.73	$102.41	$90.54
27	2036	$106.15	$73.12	$124.71	$106.02	$93.71
28	2037	$108.14	$74.68	$128.33	$108.70	$95.85
29	2038	$107.98	$74.76	$127.04	$108.01	$95.57
30	2039	$108.01	$74.97	$126.23	$107.64	$95.51
31	2040	$108.89	$75.78	$127.48	$108.70	$96.43
32	2041	$110.68	$77.21	$130.90	$111.25	$98.39
33	2042	$112.61	$78.75	$134.66	$114.05	$100.52
34	2043	$114.60	$80.33	$138.52	$116.92	$102.70
35	2044	$116.12	$81.58	$141.23	$119.00	$104.35
36	2045	$117.41	$82.69	$143.37	$120.69	$105.73
37	2046	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY19

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$108.19	$76.53	$115.71	$103.03	$94.06
20	2029	$117.64	$86.85	$126.59	$113.09	$103.04
21	2030	$124.03	$95.22	$135.86	$121.68	$113.18
22	2031	$122.51	$92.56	$129.82	$117.71	$108.49

23	**2032**	$93.85	$63.95	$103.72	$90.86	$80.49
24	**2033**	$96.64	$66.04	$108.46	$94.30	$83.30
25	**2034**	$99.93	$68.48	$114.26	$98.47	$86.92
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73
37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY20

		West Penn Zone Summer ($/MWh)		**West Penn Zone Winter ($/MWh)**		**West Penn DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$109.59	$78.80	$118.54	$105.04	$94.99
21	**2030**	$118.17	$89.36	$130.00	$115.82	$107.32
22	**2031**	$125.42	$95.47	$132.73	$120.62	$111.40
23	**2032**	$124.75	$94.85	$134.62	$121.76	$111.39
24	**2033**	$96.64	$66.04	$108.46	$94.30	$83.30
25	**2034**	$99.93	$68.48	$114.26	$98.47	$86.92
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73

37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY21

		West Penn Zone Summer ($/MWh)		**West Penn Zone Winter ($/MWh)**		**West Penn DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$0.00	$0.00	$0.00	$0.00	$0.00
21	**2030**	$109.67	$80.86	$121.50	$107.32	$98.82
22	**2031**	$119.21	$89.26	$126.52	$114.41	$105.19
23	**2032**	$127.85	$97.95	$137.72	$124.86	$114.49
24	**2033**	$128.73	$98.13	$140.55	$126.39	$115.39
25	**2034**	$99.93	$68.48	$114.26	$98.47	$86.92
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73
37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY22

		West Penn Zone Summer ($/MWh)		**West Penn Zone Winter ($/MWh)**		**West Penn DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00

20	**2029**	$0.00	$0.00	$0.00	$0.00	$0.00
21	**2030**	$0.00	$0.00	$0.00	$0.00	$0.00
22	**2031**	$110.22	$80.27	$117.53	$105.42	$96.20
23	**2032**	$121.25	$91.35	$131.12	$118.26	$107.89
24	**2033**	$131.95	$101.35	$143.77	$129.61	$118.61
25	**2034**	$133.29	$101.84	$147.62	$131.83	$120.28
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73
37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

from Results of ACC Model

rrearages Study and should only be applied for low income programs

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$79.71	$72.59	$72.59	$8.83	$8.83	$41.25	$5.05
$89.08	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$95.01	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$95.50	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$66.84	$27.64	$27.64	$9.58	$9.58	$62.19	$9.02
$67.74	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21
$69.84	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.52	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$89.46	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$98.24	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$95.90	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02

$67.74	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21
$69.84	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder (Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.41	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$92.38	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$98.81	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$98.64	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$69.84	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02

$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.88	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$92.60	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$101.74	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$101.93	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.61	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$95.14	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$105.15	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$105.87	$43.78	$43.78	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

PY Selection	PY18	SWE Note: This data includes a

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	West Penn Z ($/M Winter On-Peak
$3.75	Segment 1	18	2027	$39.66	$28.49	$41.27
$3.68		19	2028	$43.41	$31.54	$46.23
$3.56		20	2029	$46.20	$34.66	$49.56
$3.42		21	2030	$45.49	$34.68	$49.92
$3.37	Segment 2	22	2031	$35.05	$23.82	$37.79
$3.43		23	2032	$35.20	$23.98	$38.90
$3.68		24	2033	$36.24	$24.77	$40.68
$4.00		25	2034	$37.48	$25.68	$42.85
$4.30		26	2035	$38.68	$26.58	$44.90
$4.57		27	2036	$39.81	$27.42	$46.77
$4.73	Segment 3	28	2037	$40.56	$28.01	$48.13
$4.64		29	2038	$40.50	$28.04	$47.65
$4.56		30	2039	$40.51	$28.12	$47.34
$4.59		31	2040	$40.84	$28.42	$47.81
$4.74		32	2041	$41.51	$28.96	$49.09
$4.90		33	2042	$42.24	$29.53	$50.50
$5.07		34	2043	$42.98	$30.13	$51.95
$5.17		35	2044	$43.55	$30.60	$52.97
$5.25		36	2045	$44.03	$31.01	$53.77
$5.46		37	2046	$44.91	$31.70	$55.52

PY Selection	PY19

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	West Penn Z ($/M Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$3.68		19	2028	$40.58	$28.70	$43.40
$3.56		20	2029	$44.12	$32.57	$47.48
$3.42		21	2030	$46.52	$35.71	$50.95
$3.37		22	2031	$45.95	$34.71	$48.69

$3.43	Segment 2		23	2032	$35.20	$23.98	$38.90
$3.68			24	2033	$36.24	$24.77	$40.68
$4.00			25	2034	$37.48	$25.68	$42.85
$4.30			26	2035	$38.68	$26.58	$44.90
$4.57			27	2036	$39.81	$27.42	$46.77
$4.73	Segment 3		28	2037	$40.56	$28.01	$48.13
$4.64			29	2038	$40.50	$28.04	$47.65
$4.56			30	2039	$40.51	$28.12	$47.34
$4.59			31	2040	$40.84	$28.42	$47.81
$4.74			32	2041	$41.51	$28.96	$49.09
$4.90			33	2042	$42.24	$29.53	$50.50
$5.07			34	2043	$42.98	$30.13	$51.95
$5.17			35	2044	$43.55	$30.60	$52.97
$5.25			36	2045	$44.03	$31.01	$53.77
$5.46			37	2046	$44.91	$31.70	$55.52

PY Selection	PY20

Avoided Natural Gas Fuel Costs ($/MMBTU)			West Penn Zone Summer ($/MWh)		West Penn Z ($/M
		PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00	$0.00
$3.56		20	2029	$41.10	$29.56	$44.46
$3.42		21	2030	$44.32	$33.51	$48.75
$3.37	Segment 2	22	2031	$47.04	$35.81	$49.78
$3.43		23	2032	$46.79	$35.57	$50.49
$3.68		24	2033	$36.24	$24.77	$40.68
$4.00		25	2034	$37.48	$25.68	$42.85
$4.30		26	2035	$38.68	$26.58	$44.90
$4.57		27	2036	$39.81	$27.42	$46.77
$4.73	Segment 3	28	2037	$40.56	$28.01	$48.13
$4.64		29	2038	$40.50	$28.04	$47.65
$4.56		30	2039	$40.51	$28.12	$47.34
$4.59		31	2040	$40.84	$28.42	$47.81
$4.74		32	2041	$41.51	$28.96	$49.09
$4.90		33	2042	$42.24	$29.53	$50.50
$5.07		34	2043	$42.98	$30.13	$51.95
$5.17		35	2044	$43.55	$30.60	$52.97
$5.25		36	2045	$44.03	$31.01	$53.77

$5.46		37	2046	$44.91	$31.70	$55.52

PY Selection	PY21

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	West Penn Z ($/M Winter On-Peak
$0.00	Segment 1	18	2027	$0.00	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00	$0.00
$0.00		20	2029	$0.00	$0.00	$0.00
$3.42		21	2030	$41.13	$30.33	$45.57
$3.37	Segment 2	22	2031	$44.71	$33.48	$47.45
$3.43		23	2032	$47.95	$36.74	$51.65
$3.68		24	2033	$48.28	$36.80	$52.71
$4.00		25	2034	$37.48	$25.68	$42.85
$4.30		26	2035	$38.68	$26.58	$44.90
$4.57		27	2036	$39.81	$27.42	$46.77
$4.73	Segment 3	28	2037	$40.56	$28.01	$48.13
$4.64		29	2038	$40.50	$28.04	$47.65
$4.56		30	2039	$40.51	$28.12	$47.34
$4.59		31	2040	$40.84	$28.42	$47.81
$4.74		32	2041	$41.51	$28.96	$49.09
$4.90		33	2042	$42.24	$29.53	$50.50
$5.07		34	2043	$42.98	$30.13	$51.95
$5.17		35	2044	$43.55	$30.60	$52.97
$5.25		36	2045	$44.03	$31.01	$53.77
$5.46		37	2046	$44.91	$31.70	$55.52

PY Selection	PY22

Avoided Natural Gas Fuel Costs ($/MMBTU)		PA ACT 129 Program Year	Year	West Penn Zone Summer ($/MWh) Summer On-Peak	Summer Off-Peak	West Penn Z ($/M Winter On-Peak
$0.00	Segm	18	2027	$0.00	$0.00	$0.00
$0.00		19	2028	$0.00	$0.00	$0.00

$0.00	ent 1		20	2029	$0.00	$0.00	$0.00
$0.00			21	2030	$0.00	$0.00	$0.00
$3.37	Segment 2		22	2031	$41.34	$30.11	$44.08
$3.43			23	2032	$45.48	$34.26	$49.17
$3.68			24	2033	$49.49	$38.01	$53.92
$4.00			25	2034	$49.99	$38.20	$55.37
$4.30			26	2035	$38.68	$26.58	$44.90
$4.57			27	2036	$39.81	$27.42	$46.77
$4.73	Segment 3		28	2037	$40.56	$28.01	$48.13
$4.64			29	2038	$40.50	$28.04	$47.65
$4.56			30	2039	$40.51	$28.12	$47.34
$4.59			31	2040	$40.84	$28.42	$47.81
$4.74			32	2041	$41.51	$28.96	$49.09
$4.90			33	2042	$42.24	$29.53	$50.50
$5.07			34	2043	$42.98	$30.13	$51.95
$5.17			35	2044	$43.55	$30.60	$52.97
$5.25			36	2045	$44.03	$31.01	$53.77
$5.46			37	2046	$44.91	$31.70	$55.52

CALCULATIONS

voided energy costs from the Arrearages Study and should only be applied for low income programs

Zone Winter (MWh)	West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$36.77	$34.59	$29.89	$27.23	$27.23	$3.31	$3.31
$41.47	$38.11	$33.41	$14.54	$14.54	$3.38	$3.38
$44.50	$40.73	$35.63	$14.84	$14.84	$3.45	$3.45
$44.61	$41.42	$35.82	$15.14	$15.14	$3.52	$3.52
$33.25	$29.79	$25.07	$10.37	$10.37	$3.59	$3.59
$34.08	$30.19	$25.40	$10.58	$10.58	$3.67	$3.67
$35.37	$31.24	$26.20	$10.80	$10.80	$3.74	$3.74
$36.93	$32.60	$27.20	$11.02	$11.02	$3.82	$3.82
$38.41	$33.96	$28.20	$11.25	$11.25	$3.90	$3.90
$39.76	$35.15	$29.09	$11.49	$11.49	$3.98	$3.98
$40.77	$35.95	$29.71	$11.72	$11.72	$4.06	$4.06
$40.51	$35.84	$29.71	$11.97	$11.97	$4.15	$4.15
$40.37	$35.82	$29.76	$12.22	$12.22	$4.23	$4.23
$40.77	$36.17	$30.08	$12.47	$12.47	$4.32	$4.32
$41.72	$36.90	$30.66	$12.73	$12.73	$4.41	$4.41
$42.77	$37.70	$31.28	$12.99	$12.99	$4.50	$4.50
$43.85	$38.52	$31.93	$13.26	$13.26	$4.60	$4.60
$44.63	$39.13	$32.43	$13.53	$13.53	$4.69	$4.69
$45.26	$39.65	$32.87	$13.81	$13.81	$4.79	$4.79
$46.55	$40.62	$33.62	$14.10	$14.10	$4.89	$4.89

Zone Winter (MWh)	West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$38.64	$35.28	$30.57	$14.54	$14.54	$3.38	$3.38
$42.42	$38.65	$33.55	$14.84	$14.84	$3.45	$3.45
$45.64	$42.45	$36.84	$15.14	$15.14	$3.52	$3.52
$44.15	$40.69	$35.97	$15.45	$15.45	$3.59	$3.59

$34.08	$30.19	$25.40	$10.58	$10.58	$3.67	$3.67
$35.37	$31.24	$26.20	$10.80	$10.80	$3.74	$3.74
$36.93	$32.60	$27.20	$11.02	$11.02	$3.82	$3.82
$38.41	$33.96	$28.20	$11.25	$11.25	$3.90	$3.90
$39.76	$35.15	$29.09	$11.49	$11.49	$3.98	$3.98
$40.77	$35.95	$29.71	$11.72	$11.72	$4.06	$4.06
$40.51	$35.84	$29.71	$11.97	$11.97	$4.15	$4.15
$40.37	$35.82	$29.76	$12.22	$12.22	$4.23	$4.23
$40.77	$36.17	$30.08	$12.47	$12.47	$4.32	$4.32
$41.72	$36.90	$30.66	$12.73	$12.73	$4.41	$4.41
$42.77	$37.70	$31.28	$12.99	$12.99	$4.50	$4.50
$43.85	$38.52	$31.93	$13.26	$13.26	$4.60	$4.60
$44.63	$39.13	$32.43	$13.53	$13.53	$4.69	$4.69
$45.26	$39.65	$32.87	$13.81	$13.81	$4.79	$4.79
$46.55	$40.62	$33.62	$14.10	$14.10	$4.89	$4.89

Zone Winter (MWh)	West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$39.40	$35.63	$30.53	$14.84	$14.84	$3.45	$3.45
$43.44	$40.25	$34.65	$15.14	$15.14	$3.52	$3.52
$45.24	$41.78	$37.06	$15.45	$15.45	$3.59	$3.59
$45.66	$41.77	$36.99	$15.77	$15.77	$3.67	$3.67
$35.37	$31.24	$26.20	$10.80	$10.80	$3.74	$3.74
$36.93	$32.60	$27.20	$11.02	$11.02	$3.82	$3.82
$38.41	$33.96	$28.20	$11.25	$11.25	$3.90	$3.90
$39.76	$35.15	$29.09	$11.49	$11.49	$3.98	$3.98
$40.77	$35.95	$29.71	$11.72	$11.72	$4.06	$4.06
$40.51	$35.84	$29.71	$11.97	$11.97	$4.15	$4.15
$40.37	$35.82	$29.76	$12.22	$12.22	$4.23	$4.23
$40.77	$36.17	$30.08	$12.47	$12.47	$4.32	$4.32
$41.72	$36.90	$30.66	$12.73	$12.73	$4.41	$4.41
$42.77	$37.70	$31.28	$12.99	$12.99	$4.50	$4.50
$43.85	$38.52	$31.93	$13.26	$13.26	$4.60	$4.60
$44.63	$39.13	$32.43	$13.53	$13.53	$4.69	$4.69
$45.26	$39.65	$32.87	$13.81	$13.81	$4.79	$4.79

$46.55	$40.62	$33.62	$14.10	$14.10	$4.89	$4.89

Zone Winter (MWh)	West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$40.25	$37.06	$31.46	$15.14	$15.14	$3.52	$3.52
$42.91	$39.45	$34.73	$15.45	$15.45	$3.59	$3.59
$46.83	$42.94	$38.16	$15.77	$15.77	$3.67	$3.67
$47.40	$43.28	$38.23	$16.09	$16.09	$3.74	$3.74
$36.93	$32.60	$27.20	$11.02	$11.02	$3.82	$3.82
$38.41	$33.96	$28.20	$11.25	$11.25	$3.90	$3.90
$39.76	$35.15	$29.09	$11.49	$11.49	$3.98	$3.98
$40.77	$35.95	$29.71	$11.72	$11.72	$4.06	$4.06
$40.51	$35.84	$29.71	$11.97	$11.97	$4.15	$4.15
$40.37	$35.82	$29.76	$12.22	$12.22	$4.23	$4.23
$40.77	$36.17	$30.08	$12.47	$12.47	$4.32	$4.32
$41.72	$36.90	$30.66	$12.73	$12.73	$4.41	$4.41
$42.77	$37.70	$31.28	$12.99	$12.99	$4.50	$4.50
$43.85	$38.52	$31.93	$13.26	$13.26	$4.60	$4.60
$44.63	$39.13	$32.43	$13.53	$13.53	$4.69	$4.69
$45.26	$39.65	$32.87	$13.81	$13.81	$4.79	$4.79
$46.55	$40.62	$33.62	$14.10	$14.10	$4.89	$4.89

Zone Winter (MWh)	West Penn DLC Zone Shoulder ($/MWh)		West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)	
Winter Off-Peak	Shoulder On-Peak	Shoulder Off-Peak	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00

$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$39.54	$36.08	$31.36	$15.45	$15.45	$3.59	$3.59
$44.35	$40.46	$35.68	$15.77	$15.77	$3.67	$3.67
$48.61	$44.48	$39.44	$16.09	$16.09	$3.74	$3.74
$49.44	$45.11	$39.71	$16.42	$16.42	$3.82	$3.82
$38.41	$33.96	$28.20	$11.25	$11.25	$3.90	$3.90
$39.76	$35.15	$29.09	$11.49	$11.49	$3.98	$3.98
$40.77	$35.95	$29.71	$11.72	$11.72	$4.06	$4.06
$40.51	$35.84	$29.71	$11.97	$11.97	$4.15	$4.15
$40.37	$35.82	$29.76	$12.22	$12.22	$4.23	$4.23
$40.77	$36.17	$30.08	$12.47	$12.47	$4.32	$4.32
$41.72	$36.90	$30.66	$12.73	$12.73	$4.41	$4.41
$42.77	$37.70	$31.28	$12.99	$12.99	$4.50	$4.50
$43.85	$38.52	$31.93	$13.26	$13.26	$4.60	$4.60
$44.63	$39.13	$32.43	$13.53	$13.53	$4.69	$4.69
$45.26	$39.65	$32.87	$13.81	$13.81	$4.79	$4.79
$46.55	$40.62	$33.62	$14.10	$14.10	$4.89	$4.89

West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$15.47	$1.89	$1.41	Segment 1
$17.35	$2.27	$1.38	
$19.46	$2.63	$1.34	
$21.35	$2.97	$1.28	
$23.33	$3.38	$1.26	Segment 2
$23.81	$3.45	$1.29	
$24.30	$3.52	$1.38	
$24.81	$3.60	$1.50	
$25.32	$3.67	$1.61	
$25.84	$3.75	$1.71	
$26.38	$3.83	$1.78	Segment 3
$26.93	$3.90	$1.74	
$27.48	$3.99	$1.71	
$28.05	$4.07	$1.72	
$28.63	$4.15	$1.78	
$29.23	$4.24	$1.84	
$29.83	$4.33	$1.90	
$30.45	$4.42	$1.94	
$31.08	$4.51	$1.97	
$31.73	$4.60	$2.05	

West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$17.35	$2.27	$1.38	
$19.46	$2.63	$1.34	
$21.35	$2.97	$1.28	
$23.33	$3.38	$1.26	

$23.81	$3.45	$1.29	Segment 2
$24.30	$3.52	$1.38	
$24.81	$3.60	$1.50	
$25.32	$3.67	$1.61	
$25.84	$3.75	$1.71	
$26.38	$3.83	$1.78	Segment 3
$26.93	$3.90	$1.74	
$27.48	$3.99	$1.71	
$28.05	$4.07	$1.72	
$28.63	$4.15	$1.78	
$29.23	$4.24	$1.84	
$29.83	$4.33	$1.90	
$30.45	$4.42	$1.94	
$31.08	$4.51	$1.97	
$31.73	$4.60	$2.05	

West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	
$19.46	$2.63	$1.34	
$21.35	$2.97	$1.28	
$23.33	$3.38	$1.26	Segment 2
$23.81	$3.45	$1.29	
$24.30	$3.52	$1.38	
$24.81	$3.60	$1.50	
$25.32	$3.67	$1.61	
$25.84	$3.75	$1.71	
$26.38	$3.83	$1.78	Segment 3
$26.93	$3.90	$1.74	
$27.48	$3.99	$1.71	
$28.05	$4.07	$1.72	
$28.63	$4.15	$1.78	
$29.23	$4.24	$1.84	
$29.83	$4.33	$1.90	
$30.45	$4.42	$1.94	
$31.08	$4.51	$1.97	

$31.73	$4.60	$2.05	

West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segment 1
$0.00	$0.00	$0.00	
$0.00	$0.00	$0.00	
$21.35	$2.97	$1.28	
$23.33	$3.38	$1.26	Segment 2
$23.81	$3.45	$1.29	
$24.30	$3.52	$1.38	
$24.81	$3.60	$1.50	
$25.32	$3.67	$1.61	
$25.84	$3.75	$1.71	
$26.38	$3.83	$1.78	Segment 3
$26.93	$3.90	$1.74	
$27.48	$3.99	$1.71	
$28.05	$4.07	$1.72	
$28.63	$4.15	$1.78	
$29.23	$4.24	$1.84	
$29.83	$4.33	$1.90	
$30.45	$4.42	$1.94	
$31.08	$4.51	$1.97	
$31.73	$4.60	$2.05	

West Penn Distribution Capacity ($/kW/year)		Avoided Natural Gas Fuel Costs ($/MMBTU)	
Summer	Winter		
$0.00	$0.00	$0.00	Segm
$0.00	$0.00	$0.00	

$0.00	$0.00	$0.00	ent 1
$0.00	$0.00	$0.00	
$23.33	$3.38	$1.26	Segment 2
$23.81	$3.45	$1.29	
$24.30	$3.52	$1.38	
$24.81	$3.60	$1.50	
$25.32	$3.67	$1.61	
$25.84	$3.75	$1.71	
$26.38	$3.83	$1.78	Segment 3
$26.93	$3.90	$1.74	
$27.48	$3.99	$1.71	
$28.05	$4.07	$1.72	
$28.63	$4.15	$1.78	
$29.23	$4.24	$1.84	
$29.83	$4.33	$1.90	
$30.45	$4.42	$1.94	
$31.08	$4.51	$1.97	
$31.73	$4.60	$2.05	

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator
This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references. For Phase V, the start year shall be set to Program Year 18 (6/1/2026/5/31/2027). The user shall gather publicly available data sets as inputs. This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

Data Needed	TRC Test Order Section
EDC Name	
Start Year	
Inflation Rate	A.7 Page 8
Plant Heat Rates	B.2.b.v Page 18
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18
PJM Base Residual Auction Results	B.7 Page 21
Transmission and Distribution Capacity Costs	B.8 Page 22
AEPS Avoided Costs	B.9 Page 24
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25
Benefits Incurreced Through Reduced Arrearages Activity	B.12 Page 29

Monetary Issues:	All output dollars are nominal

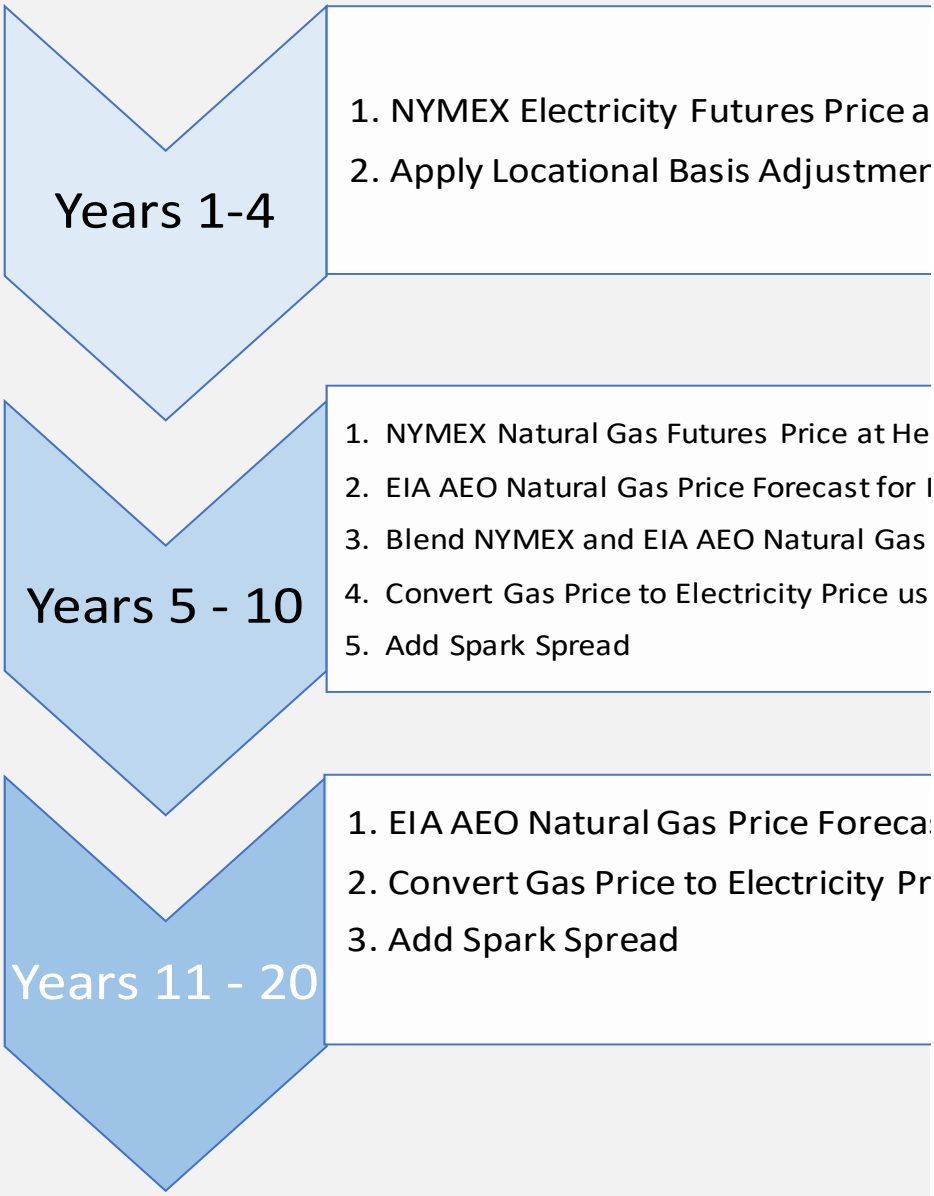
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

1. Included latest PJM Capacity Auction Results (2026/2027) per 2026 TRC Order, at page 38 ""EDC inclusion of the upco
of generation capacity calculation wil be an important mechanism to capture any market shifts."
Note that on Generation Capacity Tab, annual labels on Row 14 required correction.
3. Updated BLS data for CPI and PPI to add 2024 data.
2. Updated data with ICE August 21 values for PJM Western Hub, HH NG, Transco, and Tetco
4. Per SWE August 29, 2025 Guidance Memo:

* Correction Steps 1 and 2. Fixed calendarization issue, per steps outlined in the SWE memo. Please note that EIA Natu
* Additional issue 1: Not Applicable
* Additional Issue 2: Used 2025 PJM SOM Report for 2024 values, Tables 11-5 and 11-7 (See also SWE follow up email t
* Additional Issue 3: Switched from using NYMEX to ICE data (see 2. above)

5. EIA AEO data was updated to 2025 report for Mid Atlantic Region, Table 3, line 39, Natural Gas $/mmbtu in real dolla

Summary of Avoided Energy C



Input Tab
General Inputs
General Inputs
General Inputs
General Inputs
Elec Futures
Elec Futures
NG Futures
NG Futures
Adjustments
BLS Input
Generation Capacity
T&D Capacity
AEPS
DRIPE
Arrearages

ming auction results [2026/2027] within the PH V avoided cost

ıral Gas information had to be extended to 2046.

o Ed Miller from Patrick Burns dated: Sept 17, 2025.)

rs

ost Methodology

t PJM West Hub

nt from PJM West Hub to Operating Company Zone

nry Hub with Locational Adjustment

Mid-Atlantic Region

Price Forecast over 6 Year Period

ing On-Peak and Off-Peak Plant Heat Rates

st for Mid-Atlantic Region

ice using On-Peak and Off-Peak Plant Heat Rates

General			Act 129 PY
Company Name	Met-Ed		
Start Year (Program)	18	2027	18
Discount Rate	5%	TRC Test Order A.4 page 10	19
Inflation Rate	2%	TRC Test Order B.4 page 18	20
Plant Specifications			21
	Heat Rate (Btu/kWh)		22
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24
EDC Natural Gas Futures Source			25
Electric Distribution Companies	**EDC Abbreviation**	**NYMEX NG Futures Source**	26
Duquesne Light Co	DLC	Tetco M-3	27
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28
PECO Energy Co	PECO	Transco 6 (Non-NY)	29
Pennsylvania Electric Co	Penelec	Tetco M-3	30
Pennsylvania Power Co	Penn Power	Tetco M-3	31
PPL Utilities	PPL	Transco 6 (Non-NY)	32
West Penn Power Co	West Penn	Tetco M-3	33
Seasonal Definitions			34
Jan	Winter		35
Feb	Winter		36
Mar	Shoulder		37
Apr	Shoulder		38
May	Summer		39
Jun	Summer		40
Jul	Summer		41
Aug	Summer		42
Sep	Summer		43
Oct	Shoulder		44
Nov	Shoulder		45
Dec	Winter		46
			47

Calendar		
PY Start	**PY End**	**Avoided Energy YR**
2026	2027	2027
2027	2028	2028
2028	2029	2029
2029	2030	2030
2030	2031	2031
2031	2032	2032
2032	2033	2033
2033	2034	2034
2034	2035	2035
2035	2036	2036
2036	2037	2037
2037	2038	2038
2038	2039	2039
2039	2040	2040
2040	2041	2041
2041	2042	2042
2042	2043	2043
2043	2044	2044
2044	2045	2045
2045	2046	2046
2046	2047	2047
2047	2048	2048
2048	2049	2049
2049	2050	2050
2050	2051	2051
2051	2052	2052
2052	2053	2053
2053	2054	2054
2054	2055	2055
2055	2056	2056

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arrearag

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$86.16	$57.30	$90.31	$78.70	$73.06
19	2028	$95.95	$65.28	$103.25	$90.95	$82.26
20	2029	$102.63	$72.81	$111.31	$98.23	$88.49
21	2030	$99.79	$71.88	$111.25	$97.52	$89.28
22	2031	$71.87	$42.83	$79.13	$67.32	$58.29
23	2032	$72.11	$43.04	$81.96	$69.31	$59.16
24	2033	$74.75	$44.91	$86.53	$72.51	$61.80
25	2034	$77.90	$47.12	$92.16	$76.44	$65.24
26	2035	$80.95	$49.27	$97.49	$80.15	$68.69
27	2036	$83.79	$51.28	$102.37	$83.57	$71.67
28	2037	$85.58	$52.57	$105.97	$86.10	$73.62
29	2038	$84.94	$52.17	$104.32	$85.01	$72.88
30	2039	$84.50	$51.92	$103.11	$84.24	$72.37
31	2040	$84.93	$52.28	$103.88	$84.82	$72.83
32	2041	$86.30	$53.28	$106.72	$86.83	$74.34
33	2042	$87.81	$54.37	$109.88	$89.06	$76.01
34	2043	$89.37	$55.50	$113.14	$91.36	$77.73
35	2044	$90.42	$56.29	$115.27	$92.89	$78.89
36	2045	$91.24	$56.91	$116.85	$94.04	$79.77
37	2046	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY19

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$88.11	$57.44	$95.41	$83.11	$74.42
20	2029	$97.00	$67.18	$105.68	$92.60	$82.86
21	2030	$102.51	$74.60	$113.97	$100.24	$92.00
22	2031	$100.03	$70.99	$107.29	$95.48	$86.45
23	2032	$72.11	$43.04	$81.96	$69.31	$59.16

24	**2033**	$74.75	$44.91	$86.53	$72.51	$61.80
25	**2034**	$77.90	$47.12	$92.16	$76.44	$65.24
26	**2035**	$80.95	$49.27	$97.49	$80.15	$68.69
27	**2036**	$83.79	$51.28	$102.37	$83.57	$71.67
28	**2037**	$85.58	$52.57	$105.97	$86.10	$73.62
29	**2038**	$84.94	$52.17	$104.32	$85.01	$72.88
30	**2039**	$84.50	$51.92	$103.11	$84.24	$72.37
31	**2040**	$84.93	$52.28	$103.88	$84.82	$72.83
32	**2041**	$86.30	$53.28	$106.72	$86.83	$74.34
33	**2042**	$87.81	$54.37	$109.88	$89.06	$76.01
34	**2043**	$89.37	$55.50	$113.14	$91.36	$77.73
35	**2044**	$90.42	$56.29	$115.27	$92.89	$78.89
36	**2045**	$91.24	$56.91	$116.85	$94.04	$79.77
37	**2046**	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY20

		Met-Ed Zone Summer ($/MWh)		**Met-Ed Zone Winter ($/MWh)**		**Met-Ed DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$88.83	$59.01	$97.51	$84.43	$74.69
21	**2030**	$96.69	$68.78	$108.15	$94.42	$86.18
22	**2031**	$102.85	$73.81	$110.11	$98.30	$89.27
23	**2032**	$101.28	$72.21	$111.13	$98.48	$88.33
24	**2033**	$74.75	$44.91	$86.53	$72.51	$61.80
25	**2034**	$77.90	$47.12	$92.16	$76.44	$65.24
26	**2035**	$80.95	$49.27	$97.49	$80.15	$68.69
27	**2036**	$83.79	$51.28	$102.37	$83.57	$71.67
28	**2037**	$85.58	$52.57	$105.97	$86.10	$73.62
29	**2038**	$84.94	$52.17	$104.32	$85.01	$72.88
30	**2039**	$84.50	$51.92	$103.11	$84.24	$72.37
31	**2040**	$84.93	$52.28	$103.88	$84.82	$72.83
32	**2041**	$86.30	$53.28	$106.72	$86.83	$74.34
33	**2042**	$87.81	$54.37	$109.88	$89.06	$76.01
34	**2043**	$89.37	$55.50	$113.14	$91.36	$77.73
35	**2044**	$90.42	$56.29	$115.27	$92.89	$78.89
36	**2045**	$91.24	$56.91	$116.85	$94.04	$79.77
37	**2046**	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY21

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$88.25	$60.34	$99.71	$85.98	$77.74
22	2031	$96.83	$67.79	$104.09	$92.28	$83.25
23	2032	$104.20	$75.13	$114.05	$101.40	$91.25
24	2033	$104.23	$74.39	$116.01	$101.99	$91.28
25	2034	$77.90	$47.12	$92.16	$76.44	$65.24
26	2035	$80.95	$49.27	$97.49	$80.15	$68.69
27	2036	$83.79	$51.28	$102.37	$83.57	$71.67
28	2037	$85.58	$52.57	$105.97	$86.10	$73.62
29	2038	$84.94	$52.17	$104.32	$85.01	$72.88
30	2039	$84.50	$51.92	$103.11	$84.24	$72.37
31	2040	$84.93	$52.28	$103.88	$84.82	$72.83
32	2041	$86.30	$53.28	$106.72	$86.83	$74.34
33	2042	$87.81	$54.37	$109.88	$89.06	$76.01
34	2043	$89.37	$55.50	$113.14	$91.36	$77.73
35	2044	$90.42	$56.29	$115.27	$92.89	$78.89
36	2045	$91.24	$56.91	$116.85	$94.04	$79.77
37	2046	$93.13	$58.27	$120.86	$96.86	$81.87

PY Selection	PY22

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$88.12	$59.08	$95.38	$83.57	$74.54

23	**2032**	$97.97	$68.90	$107.82	$95.17	$85.02
24	**2033**	$107.18	$77.34	$118.96	$104.94	$94.23
25	**2034**	$107.62	$76.84	$121.88	$106.16	$94.96
26	**2035**	$80.95	$49.27	$97.49	$80.15	$68.69
27	**2036**	$83.79	$51.28	$102.37	$83.57	$71.67
28	**2037**	$85.58	$52.57	$105.97	$86.10	$73.62
29	**2038**	$84.94	$52.17	$104.32	$85.01	$72.88
30	**2039**	$84.50	$51.92	$103.11	$84.24	$72.37
31	**2040**	$84.93	$52.28	$103.88	$84.82	$72.83
32	**2041**	$86.30	$53.28	$106.72	$86.83	$74.34
33	**2042**	$87.81	$54.37	$109.88	$89.06	$76.01
34	**2043**	$89.37	$55.50	$113.14	$91.36	$77.73
35	**2044**	$90.42	$56.29	$115.27	$92.89	$78.89
36	**2045**	$91.24	$56.91	$116.85	$94.04	$79.77
37	**2046**	$93.13	$58.27	$120.86	$96.86	$81.87

es study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$60.93	$99.25	$99.25	$58.92	$0.00	$52.46	$6.70
$70.11	$68.94	$68.94	$60.14	$0.00	$55.82	$7.21
$75.34	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$74.80	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$46.07	$30.81	$30.81	$63.95	$0.00	$65.41	$9.68
$46.72	$31.45	$31.45	$65.28	$0.00	$66.77	$9.88
$48.58	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.27	$68.94	$68.94	$60.14	$0.00	$55.82	$7.21
$69.71	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$77.52	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$74.23	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$46.72	$31.45	$31.45	$65.28	$0.00	$66.77	$9.88

$48.58	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

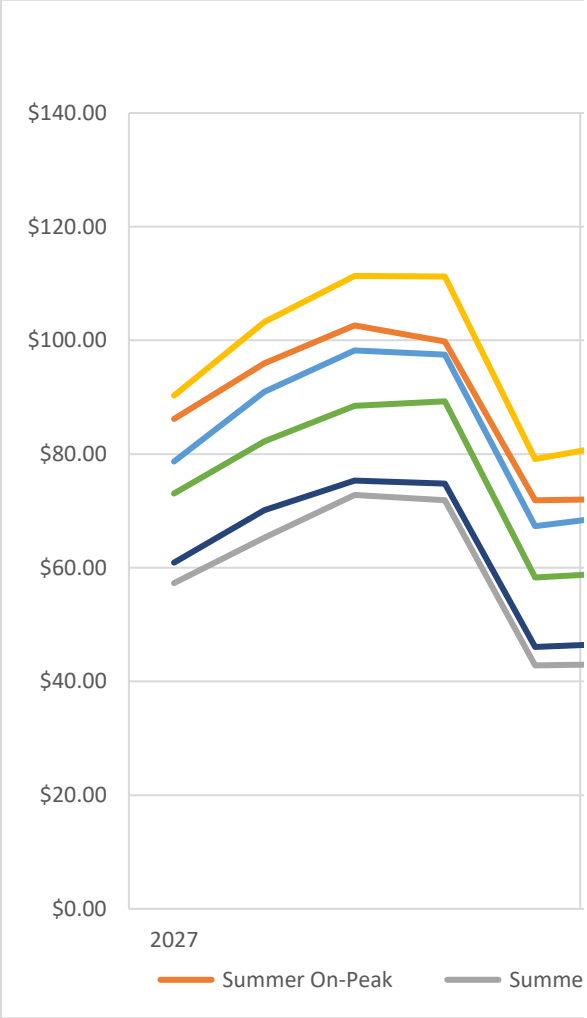
one Shoulder /Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$61.54	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$71.70	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$77.05	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$75.89	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$48.58	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.26	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$71.03	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$78.81	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$78.06	$76.22	$76.22	$66.63	$0.00	$68.15	$10.09
$51.00	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

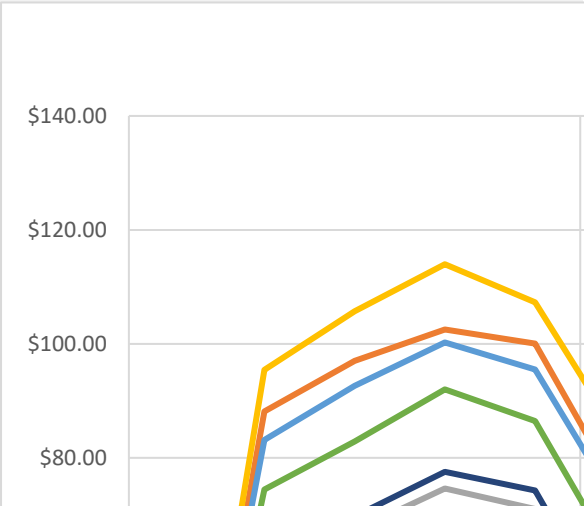
one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.32	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68

$72.58	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$81.01	$76.22	$76.22	$66.63	$0.00	$68.15	$10.09
$80.72	$77.77	$77.77	$68.01	$0.00	$69.56	$10.30
$53.42	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$55.52	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$56.92	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$56.46	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$56.16	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$56.54	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$57.63	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$58.84	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$60.08	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$60.93	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$61.60	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$63.11	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.60	Segment 1
$3.52	
$3.41	
$3.26	
$3.23	Segment 2
$3.32	
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

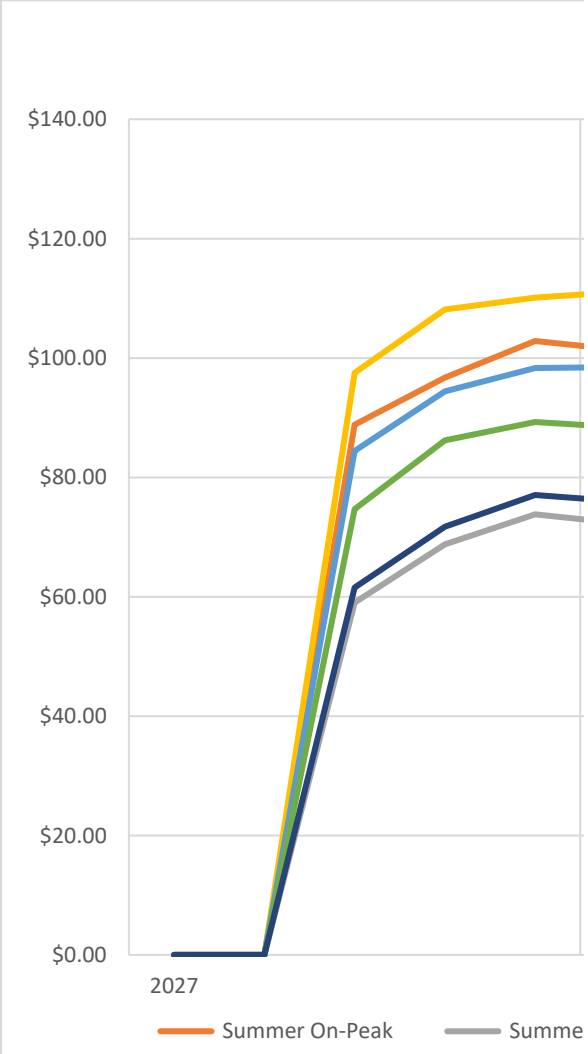


Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$3.52	
$3.41	
$3.26	
$3.23	
$3.32	

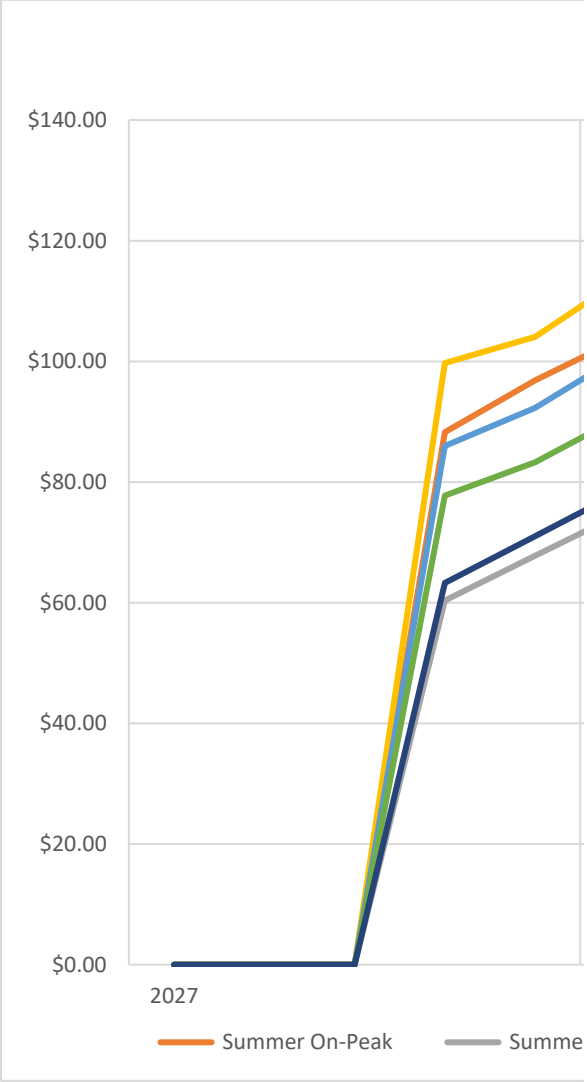


$3.59	Segment 2
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

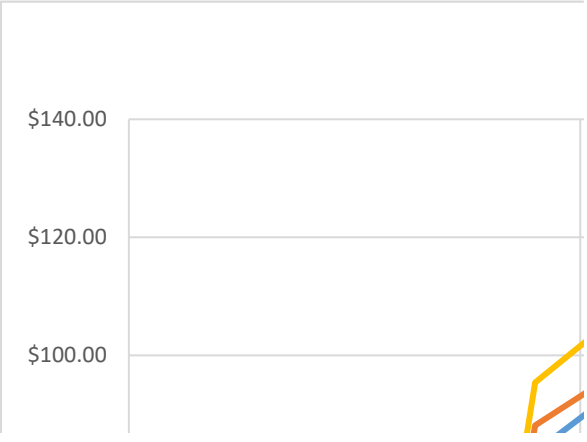
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.41	
$3.26	
$3.23	Segment 2
$3.32	
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.26	
$3.23	Segment 2
$3.32	
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.23	



$3.32	Segment 2
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
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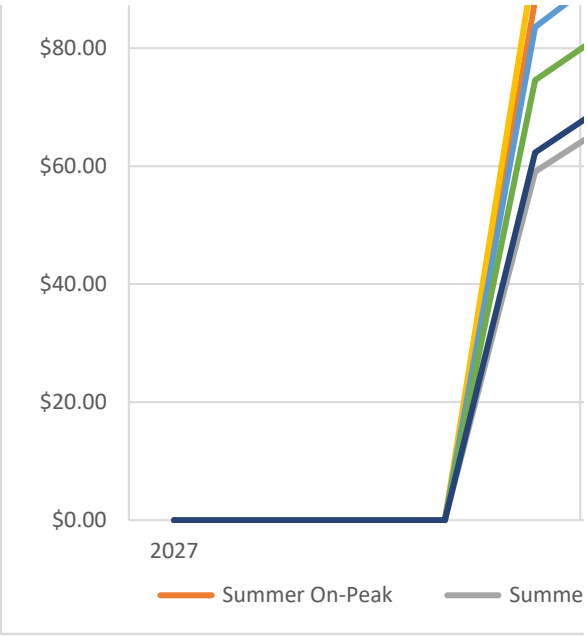
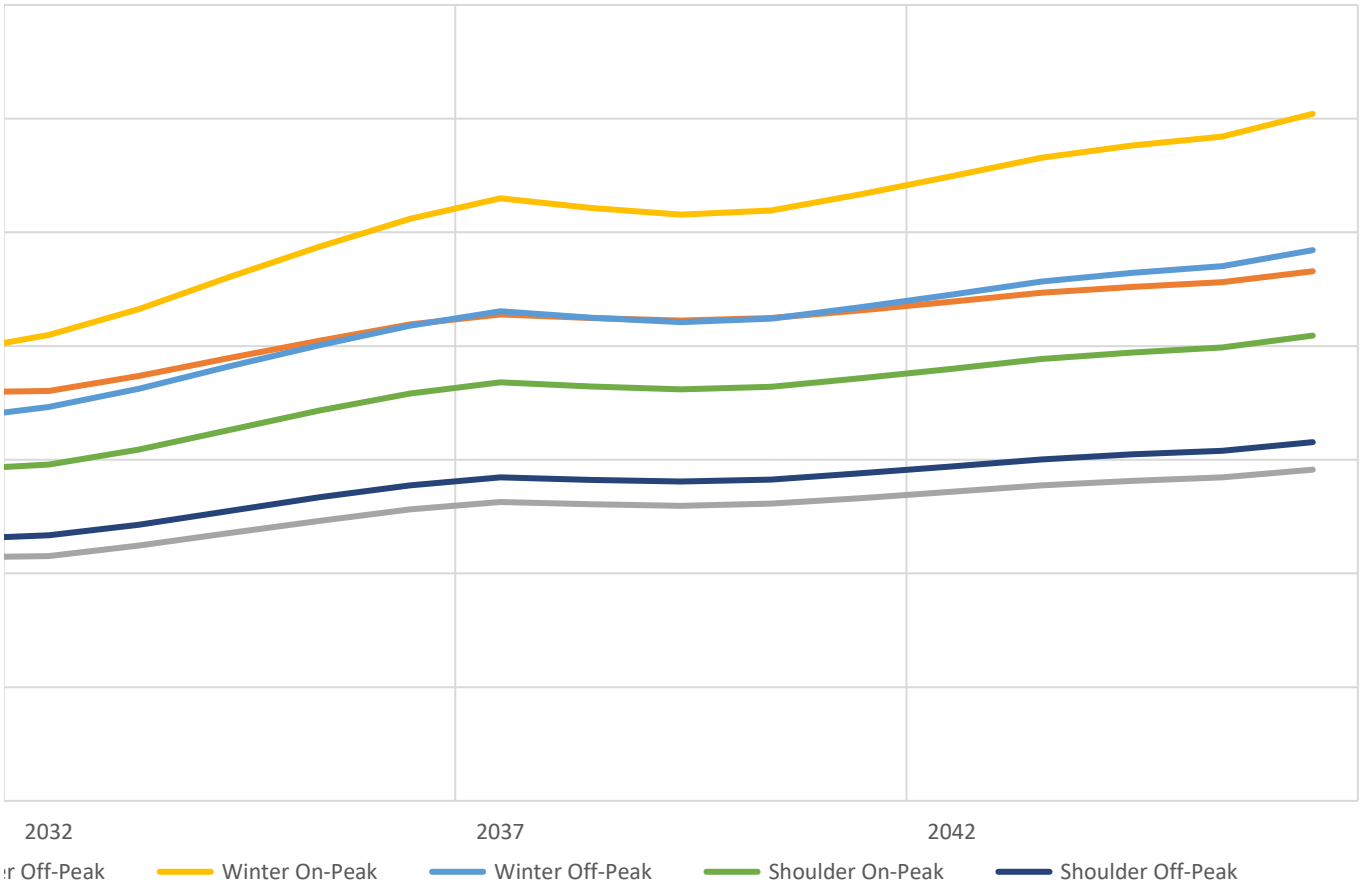
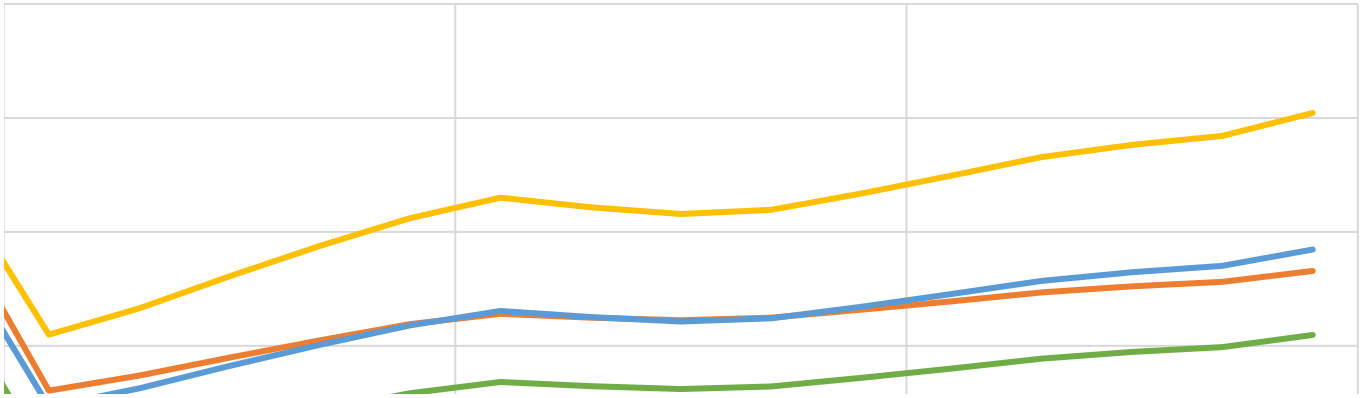
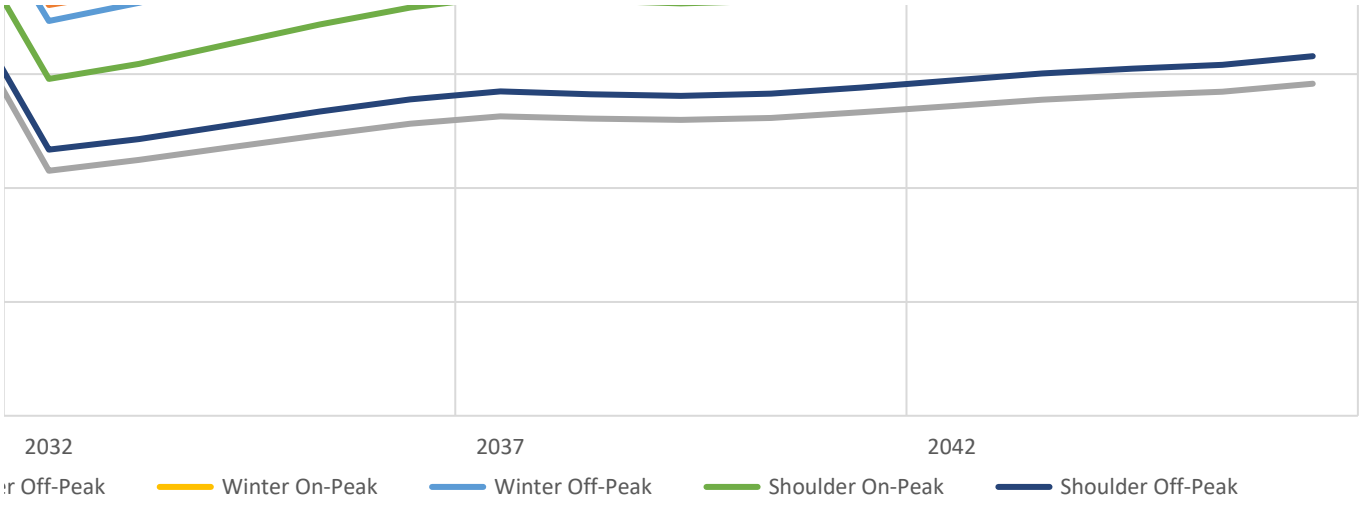


PY18 Avoided Energy Costs



PY19 Avoided Energy Costs





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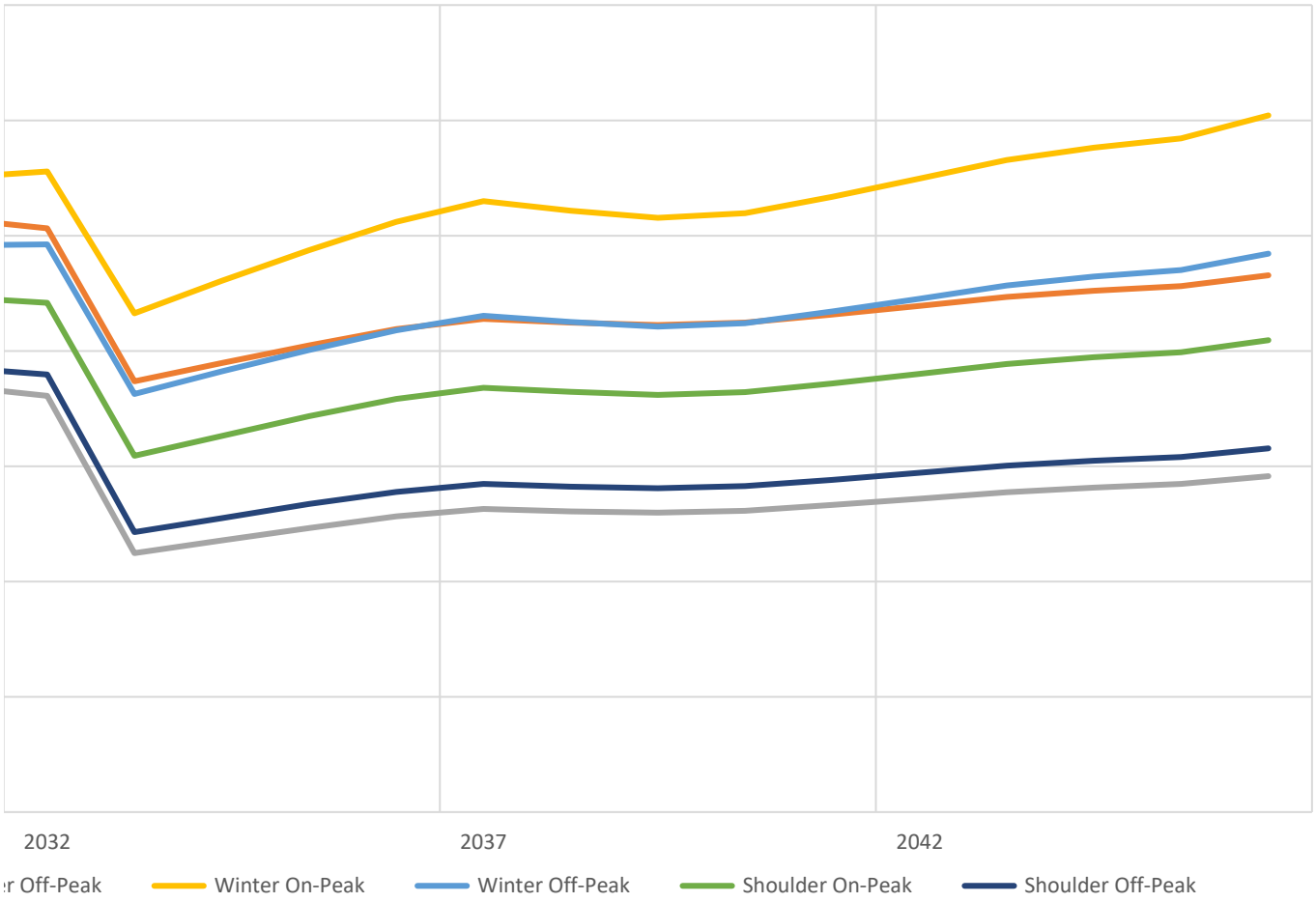

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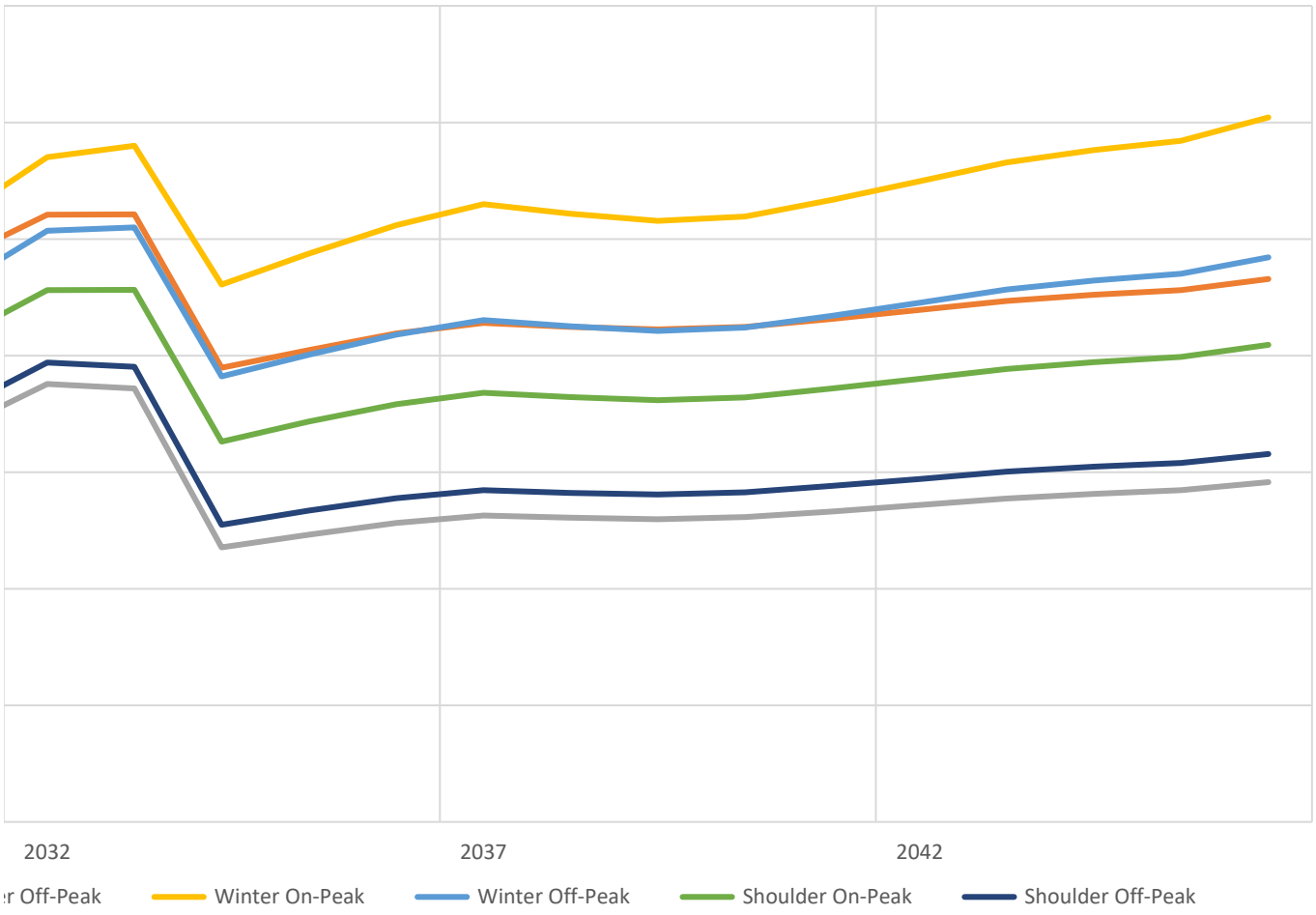
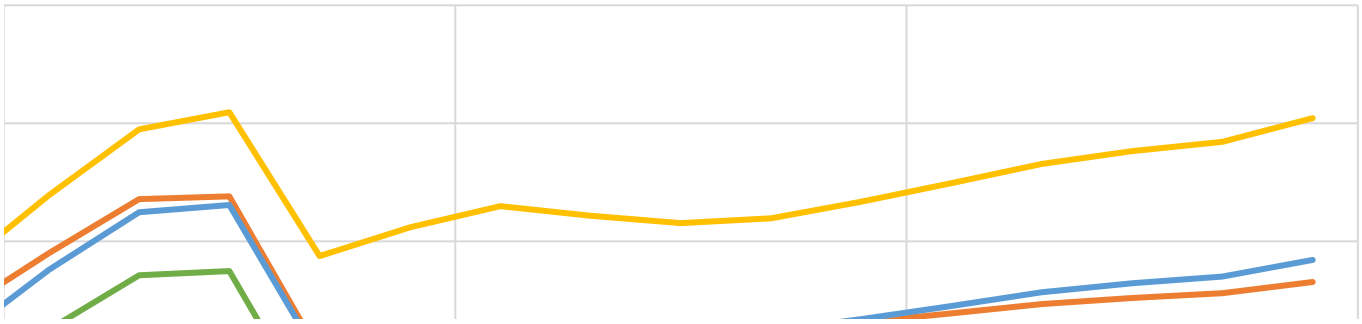
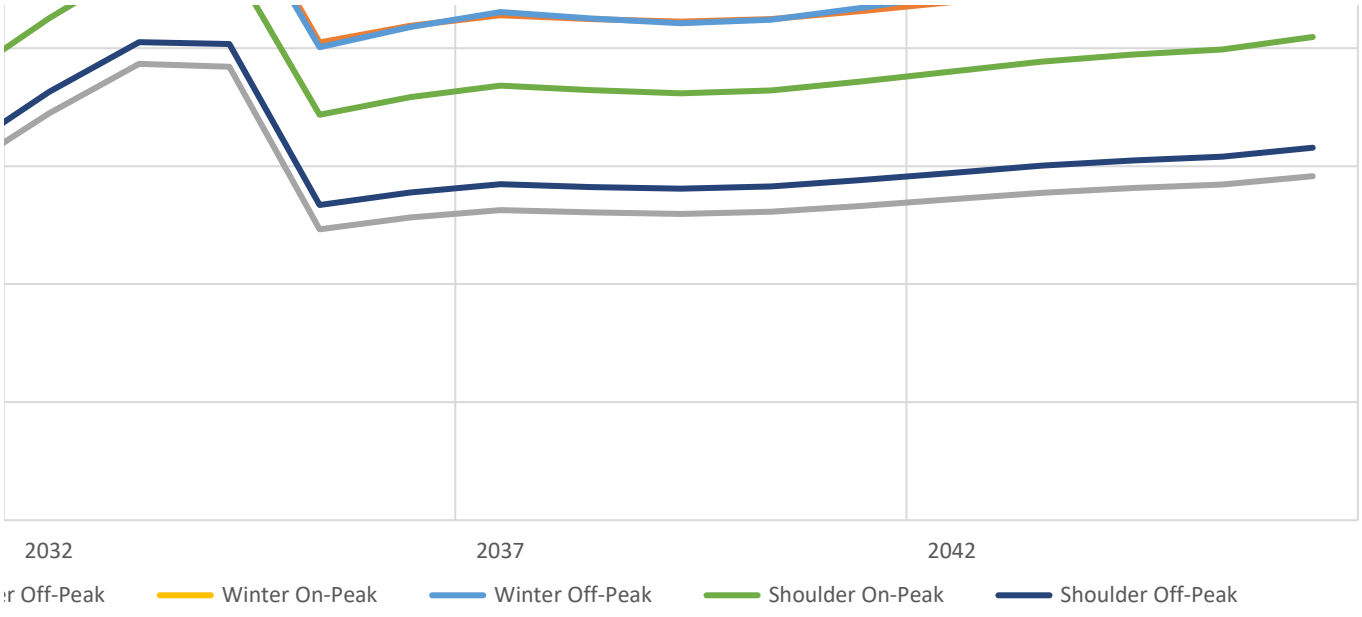


PY22 Avoided Energy Costs




2032
2037
2042
r Off-Peak
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

PY Selection	PY18

SWE Note: This data includes avoided energy costs from the Arrearag

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$104.26	$75.40	$108.41	$96.80	$91.16
19	2028	$114.42	$83.75	$121.71	$109.42	$100.72
20	2029	$121.47	$91.64	$130.15	$117.06	$107.33
21	2030	$119.00	$91.08	$130.46	$116.72	$108.49
22	2031	$91.46	$62.42	$98.72	$86.91	$77.88
23	2032	$92.09	$63.02	$101.94	$89.30	$79.15
24	2033	$95.13	$65.29	$106.91	$92.89	$82.18
25	2034	$98.69	$67.91	$112.95	$97.23	$86.03
26	2035	$102.16	$70.48	$118.69	$101.36	$89.90
27	2036	$105.42	$72.91	$124.00	$105.20	$93.30
28	2037	$107.65	$74.63	$128.03	$108.16	$95.69
29	2038	$107.44	$74.68	$126.83	$107.52	$95.39
30	2039	$107.45	$74.88	$126.07	$107.19	$95.32
31	2040	$108.35	$75.69	$127.29	$108.23	$96.25
32	2041	$110.18	$77.16	$130.60	$110.71	$98.22
33	2042	$112.17	$78.73	$134.24	$113.42	$100.37
34	2043	$114.21	$80.35	$137.99	$116.21	$102.57
35	2044	$115.77	$81.63	$140.62	$118.24	$104.23
36	2045	$117.09	$82.76	$142.70	$119.89	$105.62
37	2046	$119.50	$84.64	$147.23	$123.23	$108.23

PY Selection	PY19

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$106.58	$75.91	$113.87	$101.58	$92.88
20	2029	$115.84	$86.01	$124.52	$111.43	$101.70
21	2030	$121.72	$93.80	$133.18	$119.44	$111.21
22	2031	$119.62	$90.58	$126.88	$115.07	$106.04
23	2032	$92.09	$63.02	$101.94	$89.30	$79.15

24	**2033**	$95.13	$65.29	$106.91	$92.89	$82.18
25	**2034**	$98.69	$67.91	$112.95	$97.23	$86.03
26	**2035**	$102.16	$70.48	$118.69	$101.36	$89.90
27	**2036**	$105.42	$72.91	$124.00	$105.20	$93.30
28	**2037**	$107.65	$74.63	$128.03	$108.16	$95.69
29	**2038**	$107.44	$74.68	$126.83	$107.52	$95.39
30	**2039**	$107.45	$74.88	$126.07	$107.19	$95.32
31	**2040**	$108.35	$75.69	$127.29	$108.23	$96.25
32	**2041**	$110.18	$77.16	$130.60	$110.71	$98.22
33	**2042**	$112.17	$78.73	$134.24	$113.42	$100.37
34	**2043**	$114.21	$80.35	$137.99	$116.21	$102.57
35	**2044**	$115.77	$81.63	$140.62	$118.24	$104.23
36	**2045**	$117.09	$82.76	$142.70	$119.89	$105.62
37	**2046**	$119.50	$84.64	$147.23	$123.23	$108.23

PY Selection	PY20

		Met-Ed Zone Summer ($/MWh)		**Met-Ed Zone Winter ($/MWh)**		**Met-Ed DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$107.67	$77.84	$116.35	$103.26	$93.53
21	**2030**	$115.90	$87.98	$127.36	$113.62	$105.39
22	**2031**	$122.44	$93.40	$129.70	$117.89	$108.86
23	**2032**	$121.26	$92.19	$131.11	$118.47	$108.32
24	**2033**	$95.13	$65.29	$106.91	$92.89	$82.18
25	**2034**	$98.69	$67.91	$112.95	$97.23	$86.03
26	**2035**	$102.16	$70.48	$118.69	$101.36	$89.90
27	**2036**	$105.42	$72.91	$124.00	$105.20	$93.30
28	**2037**	$107.65	$74.63	$128.03	$108.16	$95.69
29	**2038**	$107.44	$74.68	$126.83	$107.52	$95.39
30	**2039**	$107.45	$74.88	$126.07	$107.19	$95.32
31	**2040**	$108.35	$75.69	$127.29	$108.23	$96.25
32	**2041**	$110.18	$77.16	$130.60	$110.71	$98.22
33	**2042**	$112.17	$78.73	$134.24	$113.42	$100.37
34	**2043**	$114.21	$80.35	$137.99	$116.21	$102.57
35	**2044**	$115.77	$81.63	$140.62	$118.24	$104.23
36	**2045**	$117.09	$82.76	$142.70	$119.89	$105.62
37	**2046**	$119.50	$84.64	$147.23	$123.23	$108.23

PY Selection	PY21

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$107.46	$79.54	$118.92	$105.18	$96.95
22	2031	$116.42	$87.38	$123.68	$111.87	$102.84
23	2032	$124.18	$95.11	$134.03	$121.39	$111.24
24	2033	$124.61	$94.77	$136.39	$122.37	$111.66
25	2034	$98.69	$67.91	$112.95	$97.23	$86.03
26	2035	$102.16	$70.48	$118.69	$101.36	$89.90
27	2036	$105.42	$72.91	$124.00	$105.20	$93.30
28	2037	$107.65	$74.63	$128.03	$108.16	$95.69
29	2038	$107.44	$74.68	$126.83	$107.52	$95.39
30	2039	$107.45	$74.88	$126.07	$107.19	$95.32
31	2040	$108.35	$75.69	$127.29	$108.23	$96.25
32	2041	$110.18	$77.16	$130.60	$110.71	$98.22
33	2042	$112.17	$78.73	$134.24	$113.42	$100.37
34	2043	$114.21	$80.35	$137.99	$116.21	$102.57
35	2044	$115.77	$81.63	$140.62	$118.24	$104.23
36	2045	$117.09	$82.76	$142.70	$119.89	$105.62
37	2046	$119.50	$84.64	$147.23	$123.23	$108.23

PY Selection	PY22

		Met-Ed Zone Summer ($/MWh)		Met-Ed Zone Winter ($/MWh)		Met-Ed DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$107.71	$78.67	$114.97	$103.16	$94.13

23	**2032**	$117.95	$88.88	$127.80	$115.16	$105.01
24	**2033**	$127.56	$97.72	$139.34	$125.32	$114.61
25	**2034**	$128.41	$97.63	$142.67	$126.95	$115.75
26	**2035**	$102.16	$70.48	$118.69	$101.36	$89.90
27	**2036**	$105.42	$72.91	$124.00	$105.20	$93.30
28	**2037**	$107.65	$74.63	$128.03	$108.16	$95.69
29	**2038**	$107.44	$74.68	$126.83	$107.52	$95.39
30	**2039**	$107.45	$74.88	$126.07	$107.19	$95.32
31	**2040**	$108.35	$75.69	$127.29	$108.23	$96.25
32	**2041**	$110.18	$77.16	$130.60	$110.71	$98.22
33	**2042**	$112.17	$78.73	$134.24	$113.42	$100.37
34	**2043**	$114.21	$80.35	$137.99	$116.21	$102.57
35	**2044**	$115.77	$81.63	$140.62	$118.24	$104.23
36	**2045**	$117.09	$82.76	$142.70	$119.89	$105.62
37	**2046**	$119.50	$84.64	$147.23	$123.23	$108.23

es Study and should only be applied for low income programs

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$79.03	$99.25	$99.25	$58.92	$0.00	$52.46	$6.70
$88.57	$68.94	$68.94	$60.14	$0.00	$55.82	$7.21
$94.17	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$94.01	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$65.66	$30.81	$30.81	$63.95	$0.00	$65.41	$9.68
$66.70	$31.45	$31.45	$65.28	$0.00	$66.77	$9.88
$68.96	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$71.79	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$74.63	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$77.16	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$78.98	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$78.97	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$79.12	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$79.95	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$81.51	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$83.20	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$84.92	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$86.28	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$87.45	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$89.47	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$80.73	$68.94	$68.94	$60.14	$0.00	$55.82	$7.21
$88.54	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$96.73	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$93.82	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$66.70	$31.45	$31.45	$65.28	$0.00	$66.77	$9.88

$68.96	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$71.79	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$74.63	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$77.16	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$78.98	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$78.97	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$79.12	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$79.95	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$81.51	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$83.20	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$84.92	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$86.28	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$87.45	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$89.47	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

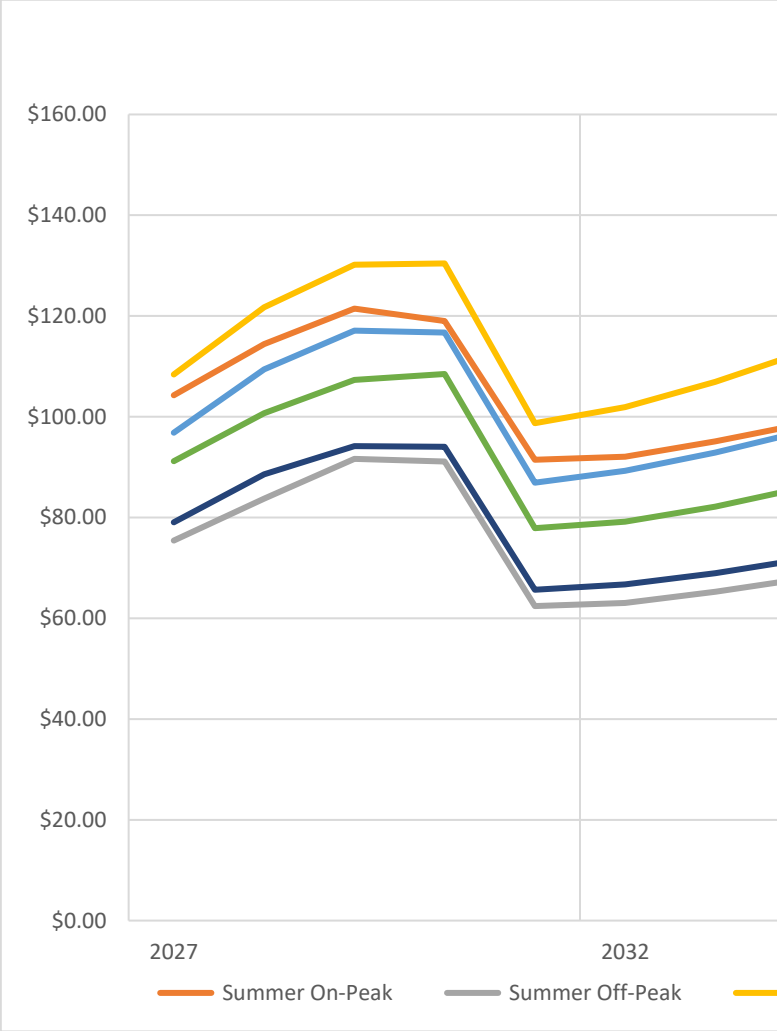
one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$80.37	$70.34	$70.34	$61.38	$0.00	$58.95	$8.16
$90.91	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$96.64	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$95.87	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$68.96	$32.10	$32.10	$66.63	$0.00	$68.15	$10.09
$71.79	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$74.63	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$77.16	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$78.98	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$78.97	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$79.12	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$79.95	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$81.51	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$83.20	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$84.92	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$86.28	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$87.45	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$89.47	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$82.47	$71.76	$71.76	$62.66	$0.00	$62.16	$8.64
$90.62	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68
$98.79	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$98.44	$76.22	$76.22	$66.63	$0.00	$68.15	$10.09
$71.79	$32.77	$32.77	$68.01	$0.00	$69.56	$10.30
$74.63	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$77.16	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$78.98	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$78.97	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$79.12	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$79.95	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$81.51	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$83.20	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$84.92	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$86.28	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$87.45	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$89.47	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

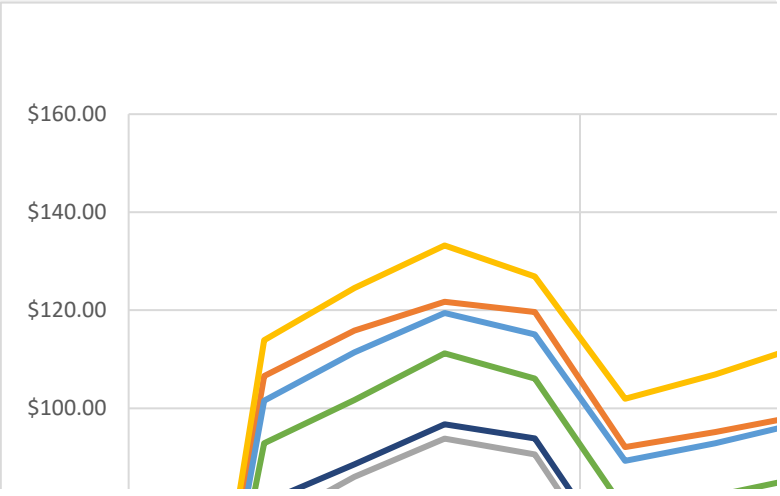
one Shoulder Wh)	Met-Ed Generation Capacity ($/kW/year)		Met-Ed Transmission Capacity ($/kW/year)		Met-Ed Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.91	$73.22	$73.22	$63.95	$0.00	$65.41	$9.68

$92.56	$74.71	$74.71	$65.28	$0.00	$66.77	$9.88
$101.39	$76.22	$76.22	$66.63	$0.00	$68.15	$10.09
$101.51	$77.77	$77.77	$68.01	$0.00	$69.56	$10.30
$74.63	$33.45	$33.45	$69.42	$0.00	$71.00	$10.51
$77.16	$34.14	$34.14	$70.86	$0.00	$72.47	$10.73
$78.98	$34.85	$34.85	$72.33	$0.00	$73.97	$10.95
$78.97	$35.57	$35.57	$73.82	$0.00	$75.51	$11.18
$79.12	$36.31	$36.31	$75.35	$0.00	$77.07	$11.41
$79.95	$37.06	$37.06	$76.92	$0.00	$78.67	$11.65
$81.51	$37.83	$37.83	$78.51	$0.00	$80.30	$11.89
$83.20	$38.61	$38.61	$80.13	$0.00	$81.96	$12.13
$84.92	$39.41	$39.41	$81.79	$0.00	$83.66	$12.39
$86.28	$40.23	$40.23	$83.49	$0.00	$85.39	$12.64
$87.45	$41.06	$41.06	$85.22	$0.00	$87.16	$12.90
$89.47	$41.91	$41.91	$86.98	$0.00	$88.97	$13.17

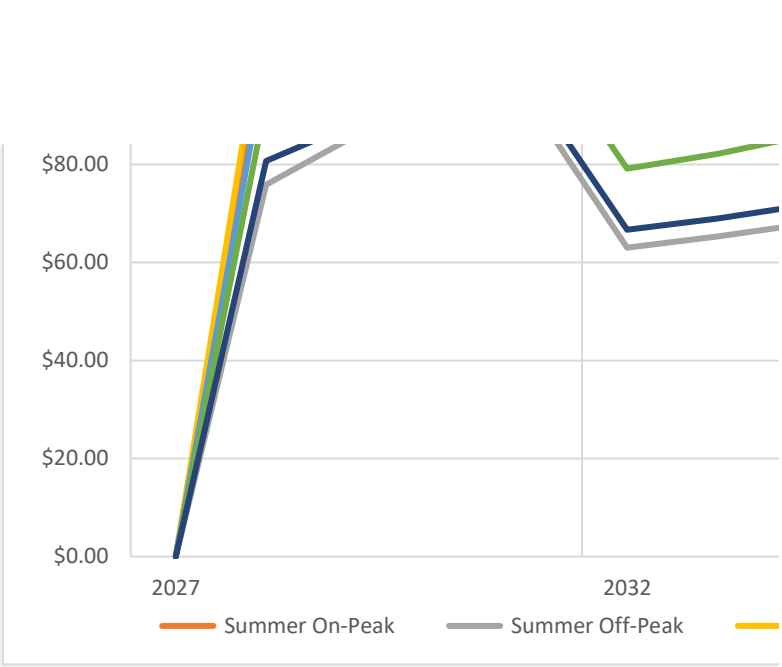
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.60	Segment 1
$3.52	
$3.41	
$3.26	
$3.23	Segment 2
$3.32	
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



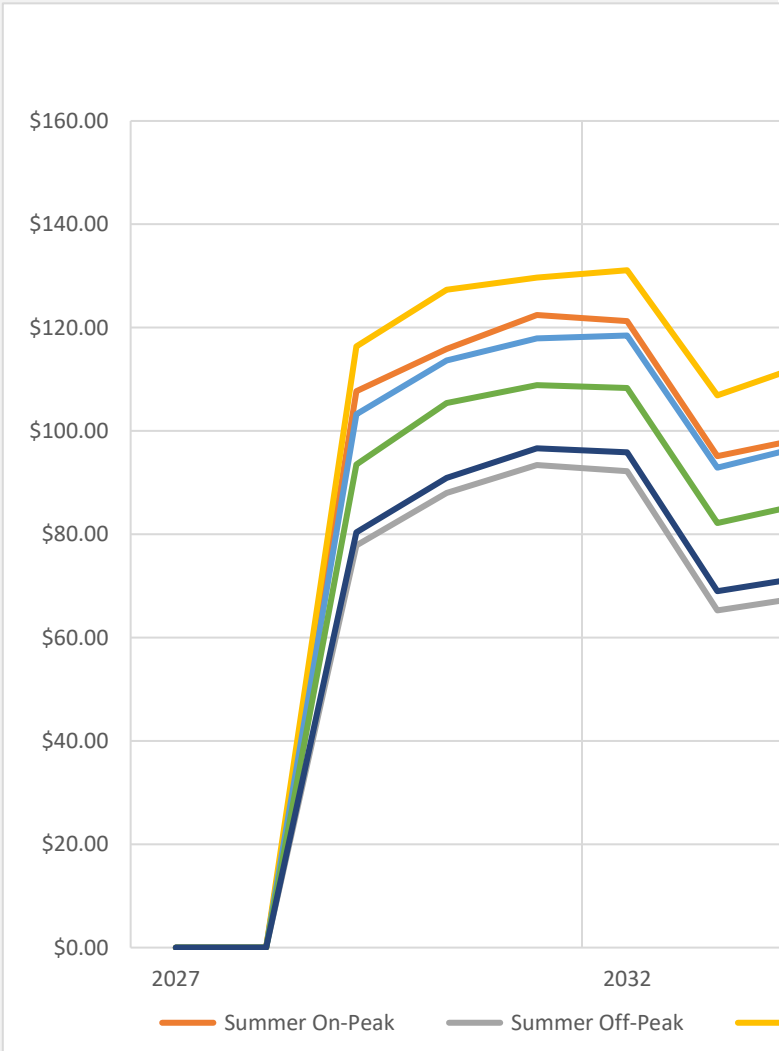
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$3.52	
$3.41	
$3.26	
$3.23	Se
$3.32	



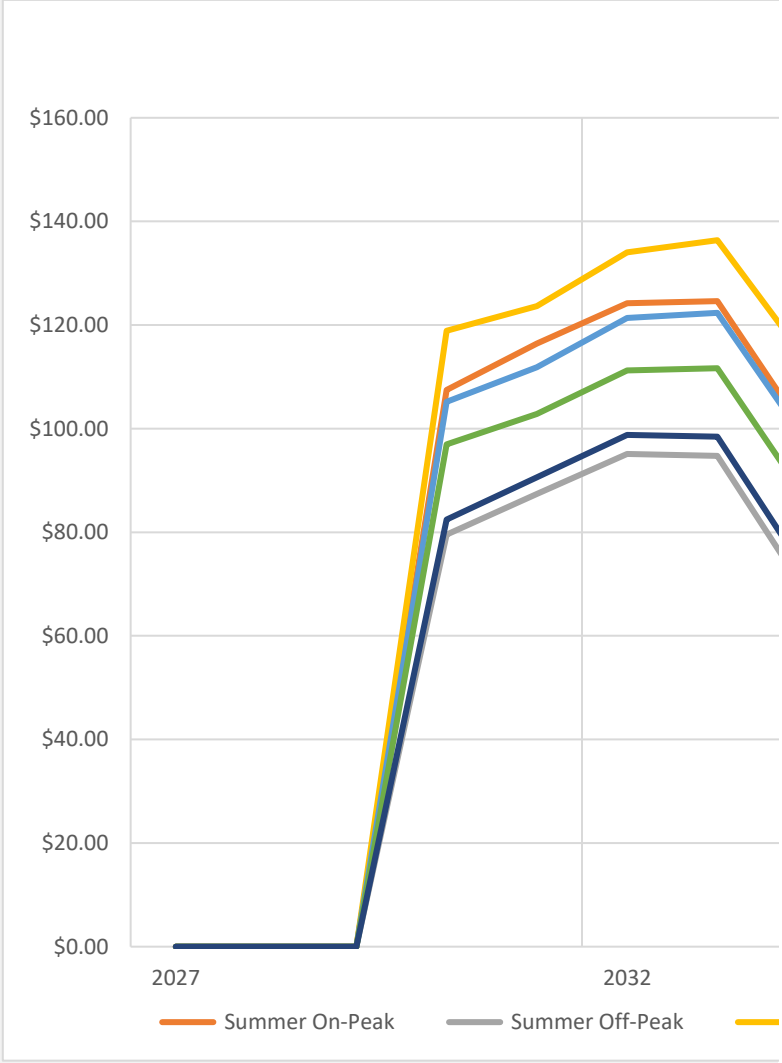
$3.59	Segment 2
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



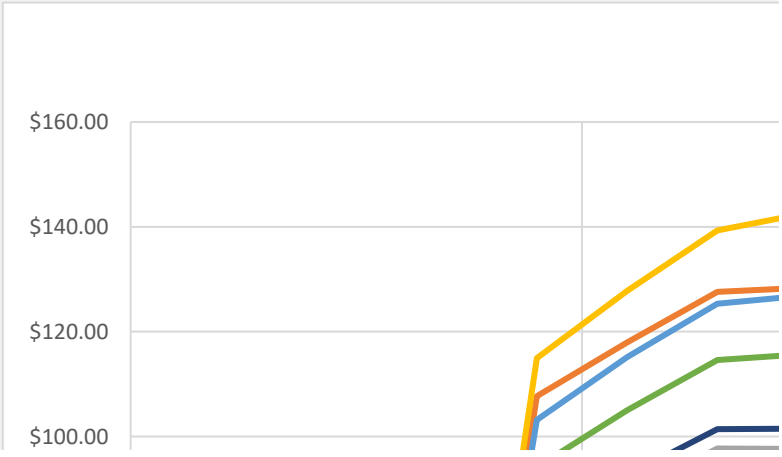
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.41	
$3.26	
$3.23	Segment 2
$3.32	
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



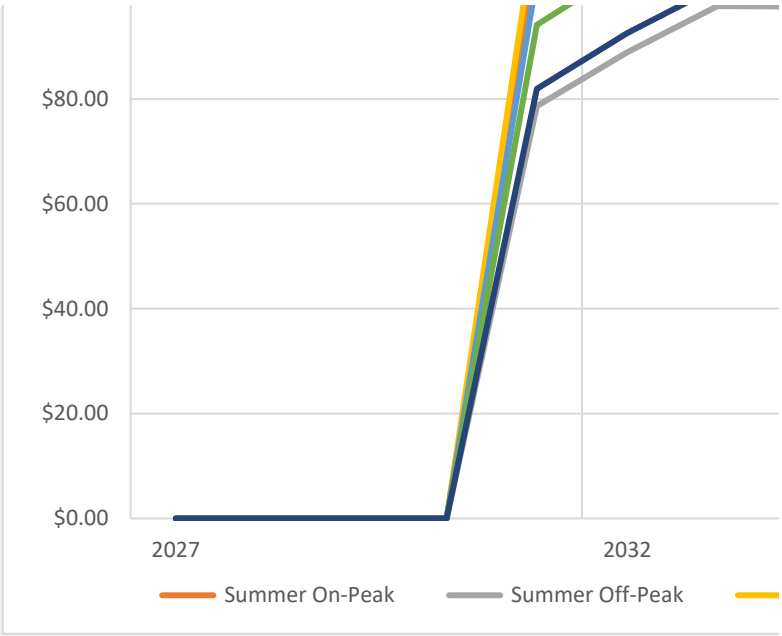
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.26	
$3.23	Segment 2
$3.32	
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



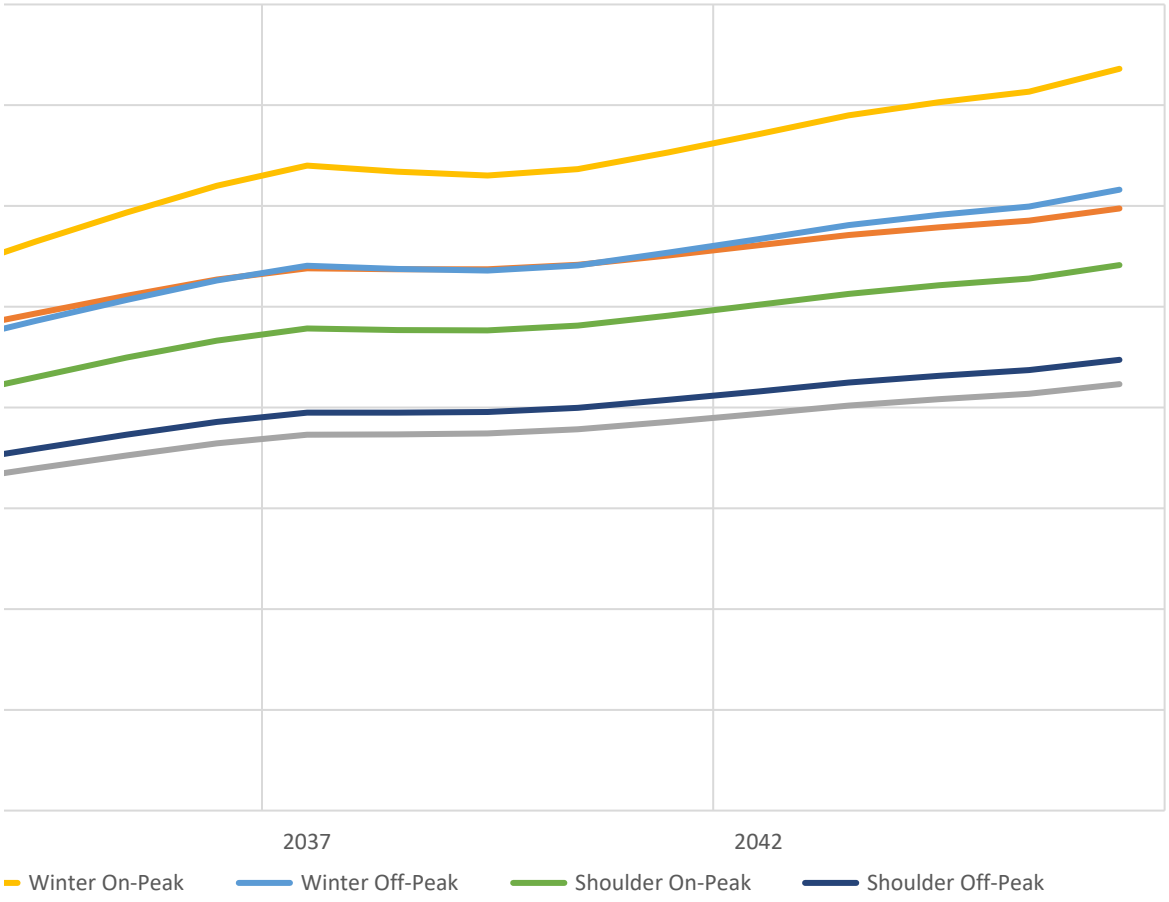
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.23	



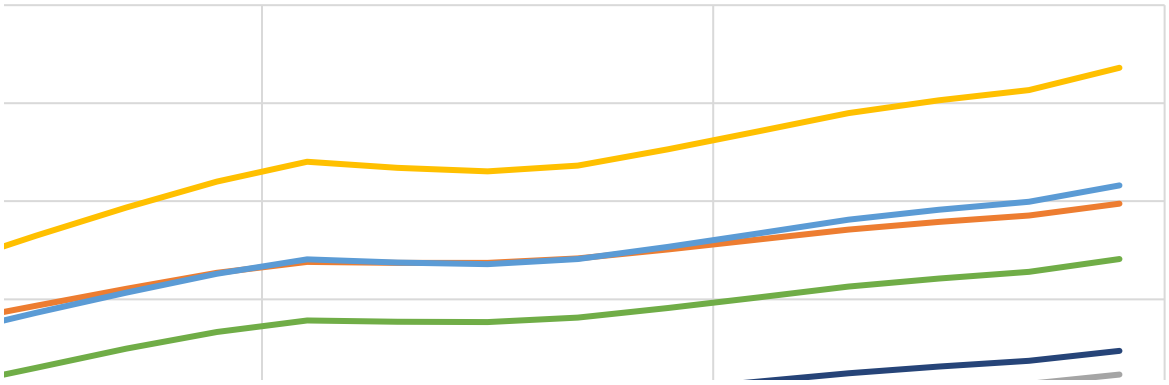
$3.32	Segment 2
$3.59	
$3.92	
$4.25	
$4.54	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

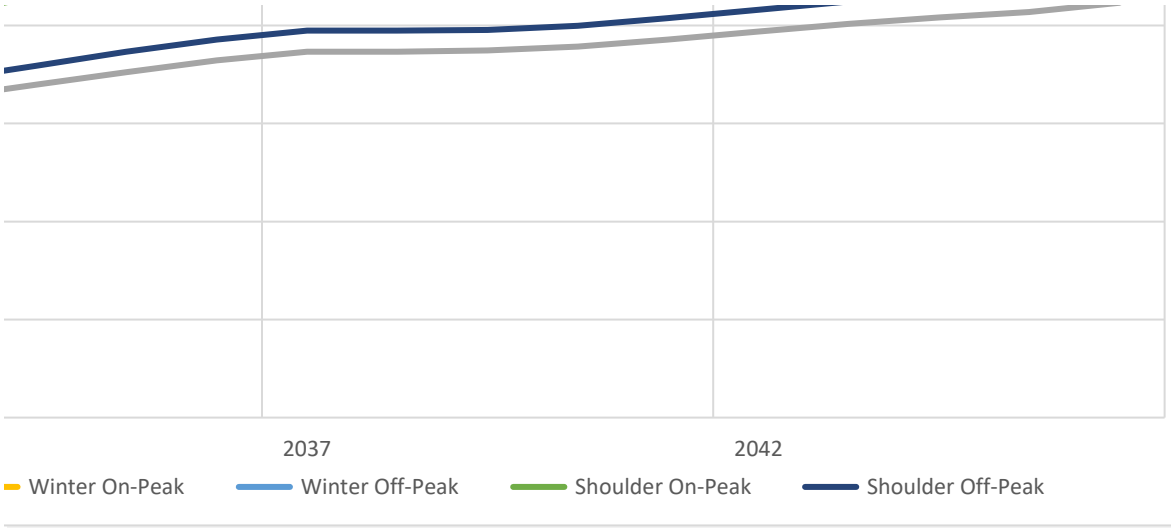


PY18 Avoided Energy Costs



PY19 Avoided Energy Costs





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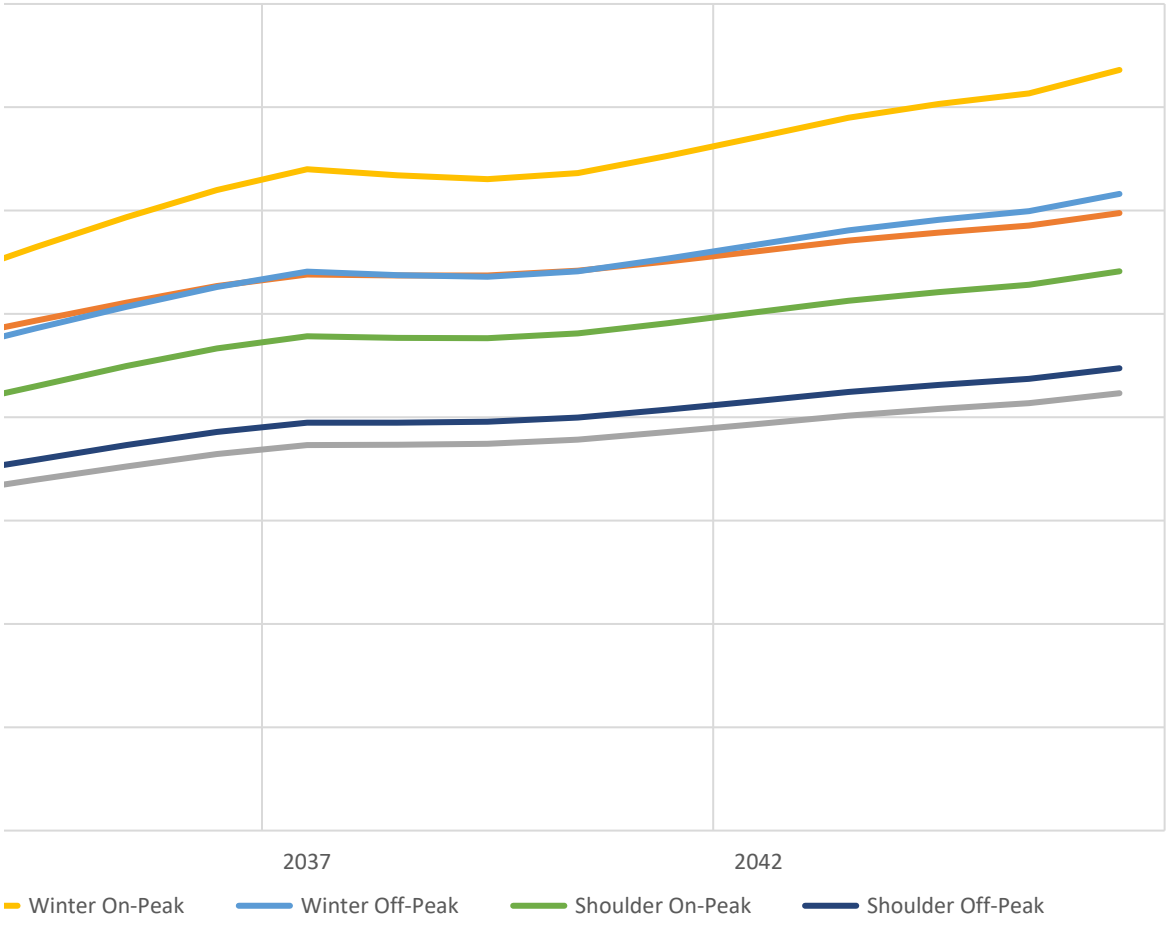
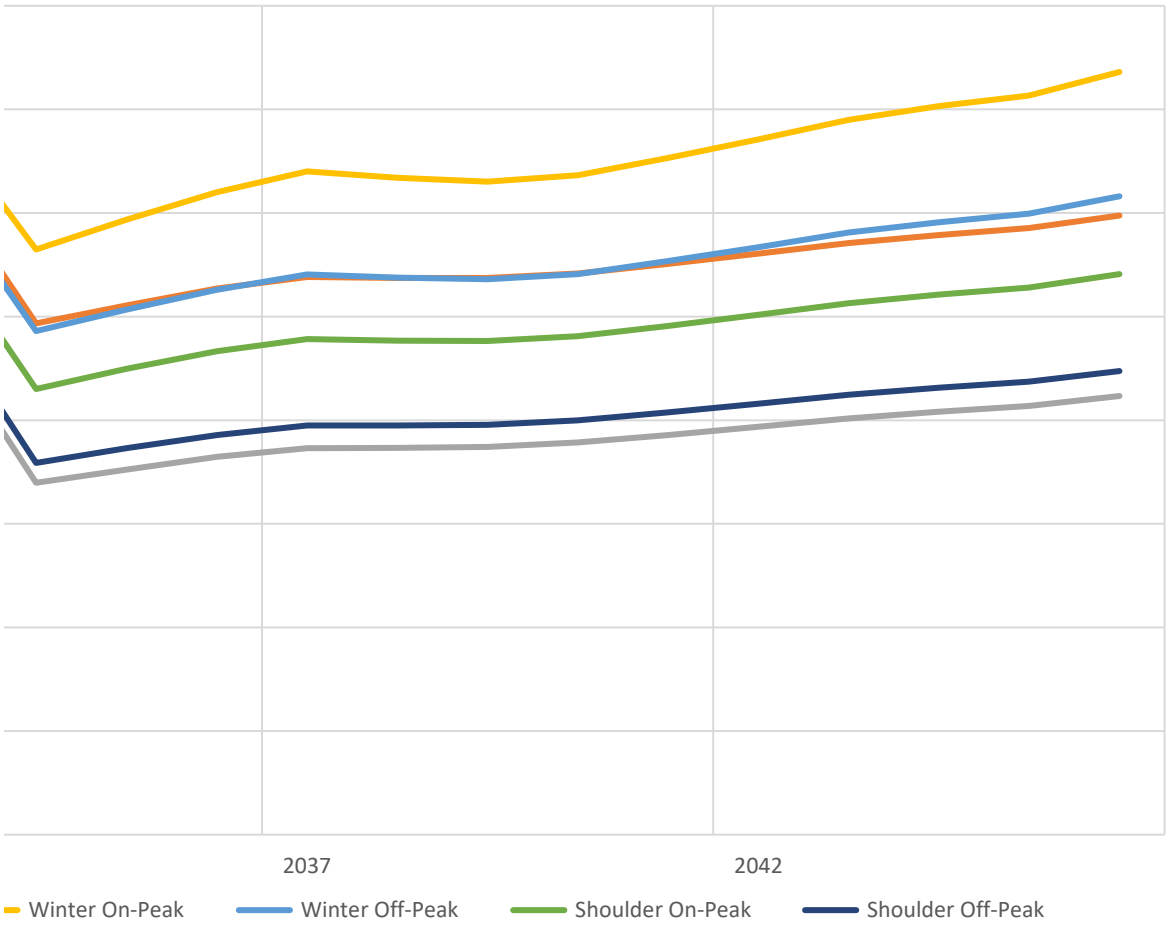


PY21 Avoided Energy Costs



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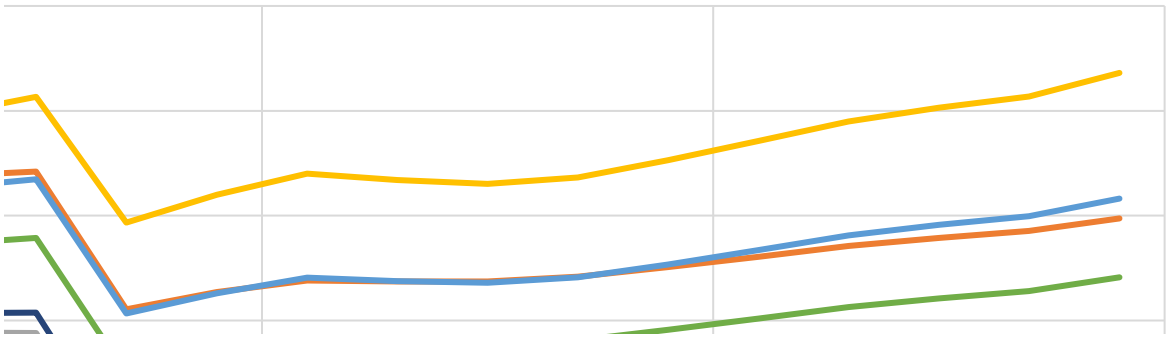

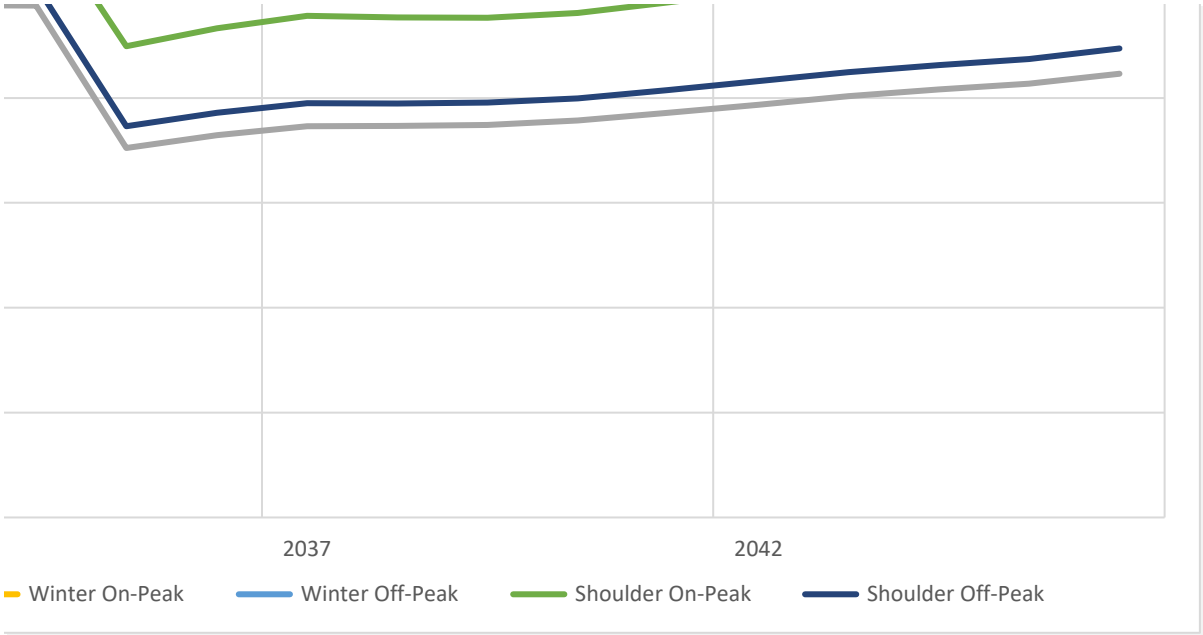
2037
2042
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal $/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal S/MWh)	Met-Ed Zone Adjusted On-Peak (Nominal $/MWh)	Met-Ed Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	$71.02	$56.19	$71.47	$56.54
2	Feb-26	$55.25	$45.15	$55.59	$45.43
3	Mar-26	$48.43	$41.64	$48.73	$41.90
4	Apr-26	$48.50	$41.09	$48.80	$41.34
5	May-26	$45.09	$26.67	$45.37	$26.84
6	Jun-26	$81.13	$33.97	$81.64	$34.18
7	Jul-26	$76.91	$37.46	$77.39	$37.70
8	Aug-26	$51.05	$30.44	$51.37	$30.63
9	Sep-26	$48.05	$29.10	$48.35	$29.28
10	Oct-26	$47.70	$32.60	$48.00	$32.80
11	Nov-26	$47.70	$37.00	$48.00	$37.23
12	Dec-26	$56.15	$46.20	$56.50	$46.49
13	Jan-27	$78.95	$65.15	$79.44	$65.56
14	Feb-27	$66.75	$55.85	$67.17	$56.20
15	Mar-27	$50.55	$41.60	$50.86	$41.86
16	Apr-27	$51.00	$38.70	$51.32	$38.94
17	May-27	$51.50	$33.55	$51.82	$33.76
18	Jun-27	$57.90	$34.00	$58.26	$34.21
19	Jul-27	$85.00	$43.00	$85.53	$43.27
20	Aug-27	$74.35	$37.05	$74.81	$37.28
21	Sep-27	$56.30	$34.05	$56.65	$34.26
22	Oct-27	$53.90	$37.45	$54.24	$37.68
23	Nov-27	$52.50	$42.00	$52.83	$42.26
24	Dec-27	$61.70	$51.80	$62.08	$52.12
25	Jan-28	$85.55	$70.45	$86.08	$70.89
26	Feb-28	$72.95	$61.75	$73.40	$62.13
27	Mar-28	$51.95	$43.00	$52.27	$43.27
28	Apr-28	$51.25	$39.30	$51.57	$39.54
29	May-28	$51.65	$33.35	$51.97	$33.56
30	Jun-28	$58.20	$33.55	$58.56	$33.76
31	Jul-28	$87.45	$41.70	$87.99	$41.96
32	Aug-28	$76.30	$38.30	$76.78	$38.54
33	Sep-28	$56.75	$31.05	$57.10	$31.24
34	Oct-28	$53.85	$36.80	$54.19	$37.03
35	Nov-28	$52.80	$42.45	$53.13	$42.71
36	Dec-28	$61.45	$51.10	$61.83	$51.42
37	Jan-29	$82.50	$70.65	$83.01	$71.09
38	Feb-29	$76.50	$64.05	$76.98	$64.45
39	Mar-29	$51.95	$42.40	$52.27	$42.66
40	Apr-29	$50.70	$37.35	$51.02	$37.58
41	May-29	$51.45	$34.90	$51.77	$35.12
42	Jun-29	$57.15	$34.15	$57.51	$34.36
43	Jul-29	$88.20	$40.90	$88.75	$41.15
44	Aug-29	$77.45	$37.60	$77.93	$37.83
45	Sep-29	$55.95	$34.45	$56.30	$34.66
46	Oct-29	$51.05	$35.35	$51.37	$35.57
47	Nov-29	$54.25	$40.55	$54.59	$40.80
48	Dec-29	$65.00	$50.30	$65.40	$50.61
49	Jan-30	$83.20	$69.15	$83.72	$69.58

50	Feb-30	$76.75	$62.70	$77.23	$63.09
51	Mar-30	$55.80	$46.20	$56.15	$46.49
52	Apr-30	$52.90	$37.15	$53.23	$37.38
53	May-30	$54.80	$35.60	$55.14	$35.82
54	Jun-30	$59.00	$34.75	$59.37	$34.97
55	Jul-30	$82.15	$41.75	$82.66	$42.01
56	Aug-30	$70.85	$38.40	$71.29	$38.64
57	Sep-30	$57.25	$34.85	$57.61	$35.07
58	Oct-30	$52.50	$35.55	$52.83	$35.77
59	Nov-30	$56.25	$41.00	$56.60	$41.26
60	Dec-30	$68.65	$55.80	$69.08	$56.15
End of Segment I					

Real-Time, Load-Weighted LMPs ($/MWh)

Zone	EDC	2020	2021	2022	2023	2024
	Western Hub	$ 20.92	$ 38.88	$ 74.25	$ 31.78	$ 33.24
#REF!	Met-Ed	$ 21.16	$ 39.97	$ 82.20	$ 27.93	$ 29.05

Source: PJM State of the Market Report, Tables in chapter 11

Basis Factor
101%

Natural Gas Futures

Status	*Data Needed: TRC Order Section*
Complete	NYMEX Natural Gas Futures at Henry Hub: B.2.b.i Page 15
Complete	EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars: B.2.b.iii Page 16

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal $/MMBTU)	NYMEX: Met-Ed Natural Gas Price (Nominal $/MMBTU)	EIA AEO Gas Prices (Nominal $/MMBTU)
1	Jan-26	Jan	2026	$4.15	$6.16	$5.83
2	Feb-26	Feb	2026	$3.92	$5.31	$4.99
3	Mar-26	Mar	2026	$3.54	$3.22	$2.94
4	Apr-26	Apr	2026	$3.41	$3.03	$2.50
5	May-26	May	2026	$3.44	$2.69	$2.15
6	Jun-26	Jun	2026	$3.61	$2.80	$2.22
7	Jul-26	Jul	2026	$3.81	$2.98	$2.34
8	Aug-26	Aug	2026	$3.88	$3.03	$2.39
9	Sep-26	Sep	2026	$3.84	$2.61	$2.04
10	Oct-26	Oct	2026	$3.88	$2.51	$1.98
11	Nov-26	Nov	2026	$4.10	$3.18	$2.56
12	Dec-26	Dec	2026	$4.50	$4.99	$4.17
13	Jan-27	Jan	2027	$4.75	$6.75	$5.64
14	Feb-27	Feb	2027	$4.38	$5.76	$4.83
15	Mar-27	Mar	2027	$3.80	$3.48	$2.84
16	Apr-27	Apr	2027	$3.42	$3.04	$2.42
17	May-27	May	2027	$3.39	$2.65	$2.08
18	Jun-27	Jun	2027	$3.54	$2.73	$2.15
19	Jul-27	Jul	2027	$3.72	$2.88	$2.27
20	Aug-27	Aug	2027	$3.78	$2.93	$2.32
21	Sep-27	Sep	2027	$3.75	$2.52	$1.98
22	Oct-27	Oct	2027	$3.80	$2.43	$1.91
23	Nov-27	Nov	2027	$4.01	$3.09	$2.47
24	Dec-27	Dec	2027	$4.44	$4.93	$4.04
25	Jan-28	Jan	2028	$4.73	$6.74	$5.62
26	Feb-28	Feb	2028	$4.39	$5.78	$4.82
27	Mar-28	Mar	2028	$3.77	$3.44	$2.83
28	Apr-28	Apr	2028	$3.30	$2.92	$2.41
29	May-28	May	2028	$3.27	$2.52	$2.07
30	Jun-28	Jun	2028	$3.42	$2.61	$2.14
31	Jul-28	Jul	2028	$3.60	$2.76	$2.26
32	Aug-28	Aug	2028	$3.66	$2.82	$2.31
33	Sep-28	Sep	2028	$3.65	$2.42	$1.97
34	Oct-28	Oct	2028	$3.72	$2.35	$1.91
35	Nov-28	Nov	2028	$3.96	$3.04	$2.46
36	Dec-28	Dec	2028	$4.41	$4.90	$4.02
37	Jan-29	Jan	2029	$4.68	$6.68	$5.88
38	Feb-29	Feb	2029	$4.33	$5.72	$5.04
39	Mar-29	Mar	2029	$3.64	$3.31	$2.97
40	Apr-29	Apr	2029	$3.18	$2.80	$2.52
41	May-29	May	2029	$3.15	$2.41	$2.17
42	Jun-29	Jun	2029	$3.30	$2.49	$2.24

43	Jul-29	Jul	2029	$3.47	$2.64	$2.37
44	Aug-29	Aug	2029	$3.54	$2.70	$2.42
45	Sep-29	Sep	2029	$3.54	$2.31	$2.06
46	Oct-29	Oct	2029	$3.61	$2.24	$2.00
47	Nov-29	Nov	2029	$3.80	$2.88	$2.58
48	Dec-29	Dec	2029	$4.24	$4.73	$4.21
49	Jan-30	Jan	2030	$4.51	$6.55	$6.29
50	Feb-30	Feb	2030	$4.22	$5.63	$5.39
51	Mar-30	Mar	2030	$3.57	$3.24	$3.17
52	Apr-30	Apr	2030	$3.07	$2.68	$2.70
53	May-30	May	2030	$3.04	$2.27	$2.32
54	Jun-30	Jun	2030	$3.17	$2.34	$2.40
55	Jul-30	Jul	2030	$3.32	$2.47	$2.53
56	Aug-30	Aug	2030	$3.39	$2.53	$2.59
57	Sep-30	Sep	2030	$3.37	$2.11	$2.21
58	Oct-30	Oct	2030	$3.44	$2.04	$2.14
59	Nov-30	Nov	2030	$3.63	$2.70	$2.76
60	Dec-30	Dec	2030	$4.06	$4.56	$4.50
61	Jan-31	Jan	2031	$4.33	$6.42	$6.63
62	Feb-31	Feb	2031	$4.06	$5.50	$5.68
63	Mar-31	Mar	2031	$3.43	$3.09	$3.35
64	Apr-31	Apr	2031	$3.03	$2.64	$2.84
65	May-31	May	2031	$3.05	$2.27	$2.45
66	Jun-31	Jun	2031	$3.19	$2.34	$2.52
67	Jul-31	Jul	2031	$3.33	$2.46	$2.67
68	Aug-31	Aug	2031	$3.36	$2.48	$2.73
69	Sep-31	Sep	2031	$3.33	$2.05	$2.33
70	Oct-31	Oct	2031	$3.39	$1.96	$2.25
71	Nov-31	Nov	2031	$3.58	$2.63	$2.91
72	Dec-31	Dec	2031	$4.03	$4.54	$4.75
73	Jan-32	Jan	2032	$4.30	$6.42	$7.61
74	Feb-32	Feb	2032	$4.03	$5.50	$6.52
75	Mar-32	Mar	2032	$3.36	$3.02	$3.84
76	Apr-32	Apr	2032	$2.88	$2.48	$3.26
77	May-32	May	2032	$2.86	$2.07	$2.81
78	Jun-32	Jun	2032	$3.01	$2.15	$2.90
79	Jul-32	Jul	2032	$3.17	$2.28	$3.06
80	Aug-32	Aug	2032	$3.21	$2.31	$3.13
81	Sep-32	Sep	2032	$3.18	$1.88	$2.67
82	Oct-32	Oct	2032	$3.26	$1.80	$2.58
83	Nov-32	Nov	2032	$3.49	$2.51	$3.34
84	Dec-32	Dec	2032	$3.92	$4.43	$5.45
85	Jan-33	Jan	2033	$4.17	$6.33	$8.39
86	Feb-33	Feb	2033	$3.90	$5.40	$7.19
87	Mar-33	Mar	2033	$3.28	$2.93	$4.23
88	Apr-33	Apr	2033	$2.83	$2.42	$3.59
89	May-33	May	2033	$2.86	$2.05	$3.09
90	Jun-33	Jun	2033	$3.00	$2.12	$3.19
91	Jul-33	Jul	2033	$3.17	$2.26	$3.37
92	Aug-33	Aug	2033	$3.21	$2.29	$3.45
93	Sep-33	Sep	2033	$3.18	$1.85	$2.94
94	Oct-33	Oct	2033	$3.23	$1.75	$2.85
95	Nov-33	Nov	2033	$3.49	$2.50	$3.68
96	Dec-33	Dec	2033	$3.89	$4.42	$6.00
97	Jan-34	Jan	2034	$4.14	$6.35	$8.84

98	Feb-34	Feb	2034	$3.90	$5.43	$7.57
99	Mar-34	Mar	2034	$3.30	$2.94	$4.46
100	Apr-34	Apr	2034	$2.90	$2.49	$3.79
101	May-34	May	2034	$2.93	$2.11	$3.26
102	Jun-34	Jun	2034	$3.06	$2.16	$3.36
103	Jul-34	Jul	2034	$3.21	$2.28	$3.56
104	Aug-34	Aug	2034	$3.25	$2.31	$3.63
105	Sep-34	Sep	2034	$3.26	$1.91	$3.10
106	Oct-34	Oct	2034	$3.31	$1.80	$3.00
107	Nov-34	Nov	2034	$3.55	$2.54	$3.87
108	Dec-34	Dec	2034	$3.95	$4.49	$6.32
109	Jan-35	Jan	2035	$4.17	$6.42	$9.10
110	Feb-35	Feb	2035	$3.93	$5.49	$7.80
111	Mar-35	Mar	2035	$3.50	$3.13	$4.59
112	Apr-35	Apr	2035	$3.17	$2.75	$3.90
113	May-35	May	2035	$3.15	$2.31	$3.36
114	Jun-35	Jun	2035	$3.18	$2.27	$3.46
115	Jul-35	Jul	2035	$3.22	$2.28	$3.66
116	Aug-35	Aug	2035	$3.26	$2.31	$3.74
117	Sep-35	Sep	2035	$3.28	$1.90	$3.19
118	Oct-35	Oct	2035	$3.32	$1.78	$3.09
119	Nov-35	Nov	2035	$3.52	$2.49	$3.99
120	Dec-35	Dec	2035	$3.82	$4.37	$6.51
121	Jan-36	Jan	2036	$4.09	$6.39	$9.23
122	Feb-36	Feb	2036	$3.92	$5.51	$7.91
123	Mar-36	Mar	2036	$3.65	$3.28	$4.65
124	Apr-36	Apr	2036	$3.32	$2.89	$3.95
125	May-36	May	2036	$3.30	$2.44	$3.40
126	Jun-36	Jun	2036	$3.34	$2.40	$3.51
127	Jul-36	Jul	2036	$3.38	$2.41	$3.71
128	Aug-36	Aug	2036	$3.42	$2.44	$3.79
129	Sep-36	Sep	2036	$3.43	$2.02	$3.24
130	Oct-36	Oct	2036	$3.48	$1.90	$3.13
131	Nov-36	Nov	2036	$3.55	$2.50	$4.05
132	Dec-36	Dec	2036	$3.70	$4.27	$6.60
133	Jan-37	Jan	2037	$3.93	$6.27	$9.17
134	Feb-37	Feb	2037	$3.78	$5.40	$7.86
135	Mar-37	Mar	2037	$3.58	$3.20	$4.62
136	Apr-37	Apr	2037	$3.25	$2.81	$3.93
137	May-37	May	2037	$3.23	$2.35	$3.38
138	Jun-37	Jun	2037	$3.26	$2.31	$3.49
139	Jul-37	Jul	2037	$3.30	$2.32	$3.69
140	Aug-37	Aug	2037	$3.34	$2.35	$3.77
141	Sep-37	Sep	2037	$3.36	$1.92	$3.22
142	Oct-37	Oct	2037	$3.40	$1.80	$3.11
143	Nov-37	Nov	2037	$3.48	$2.40	$4.02
144	Dec-37	Dec	2037	$3.52	$4.09	$6.56
145	Jan-38	Jan	2038			$8.98
146	Feb-38	Feb	2038			$7.69
147	Mar-38	Mar	2038			$4.53
148	Apr-38	Apr	2038			$3.85
149	May-38	May	2038			$3.31
150	Jun-38	Jun	2038			$3.42
151	Jul-38	Jul	2038			$3.61
152	Aug-38	Aug	2038			$3.69

153	Sep-38	Sep	2038		$3.15
154	Oct-38	Oct	2038		$3.05
155	Nov-38	Nov	2038		$3.94
156	Dec-38	Dec	2038		$6.42
157	Jan-39	Jan	2039		$8.83
158	Feb-39	Feb	2039		$7.57
159	Mar-39	Mar	2039		$4.45
160	Apr-39	Apr	2039		$3.78
161	May-39	May	2039		$3.26
162	Jun-39	Jun	2039		$3.36
163	Jul-39	Jul	2039		$3.55
164	Aug-39	Aug	2039		$3.63
165	Sep-39	Sep	2039		$3.10
166	Oct-39	Oct	2039		$3.00
167	Nov-39	Nov	2039		$3.87
168	Dec-39	Dec	2039		$6.32
169	Jan-40	Jan	2040		$8.89
170	Feb-40	Feb	2040		$7.62
171	Mar-40	Mar	2040		$4.48
172	Apr-40	Apr	2040		$3.81
173	May-40	May	2040		$3.28
174	Jun-40	Jun	2040		$3.38
175	Jul-40	Jul	2040		$3.58
176	Aug-40	Aug	2040		$3.65
177	Sep-40	Sep	2040		$3.12
178	Oct-40	Oct	2040		$3.02
179	Nov-40	Nov	2040		$3.90
180	Dec-40	Dec	2040		$6.37
181	Jan-41	Jan	2041		$9.18
182	Feb-41	Feb	2041		$7.86
183	Mar-41	Mar	2041		$4.63
184	Apr-41	Apr	2041		$3.93
185	May-41	May	2041		$3.38
186	Jun-41	Jun	2041		$3.49
187	Jul-41	Jul	2041		$3.69
188	Aug-41	Aug	2041		$3.77
189	Sep-41	Sep	2041		$3.22
190	Oct-41	Oct	2041		$3.11
191	Nov-41	Nov	2041		$4.02
192	Dec-41	Dec	2041		$6.57
193	Jan-42	Jan	2042		$9.49
194	Feb-42	Feb	2042		$8.13
195	Mar-42	Mar	2042		$4.79
196	Apr-42	Apr	2042		$4.07
197	May-42	May	2042		$3.50
198	Jun-42	Jun	2042		$3.61
199	Jul-42	Jul	2042		$3.82
200	Aug-42	Aug	2042		$3.90
201	Sep-42	Sep	2042		$3.33
202	Oct-42	Oct	2042		$3.22
203	Nov-42	Nov	2042		$4.16
204	Dec-42	Dec	2042		$6.79
205	Jan-43	Jan	2043		$9.82
206	Feb-43	Feb	2043		$8.41
207	Mar-43	Mar	2043		$4.95

208	Apr-43	Apr	2043	$4.21
209	May-43	May	2043	$3.62
210	Jun-43	Jun	2043	$3.74
211	Jul-43	Jul	2043	$3.95
212	Aug-43	Aug	2043	$4.03
213	Sep-43	Sep	2043	$3.44
214	Oct-43	Oct	2043	$3.33
215	Nov-43	Nov	2043	$4.30
216	Dec-43	Dec	2043	$7.02
217	Jan-44	Jan	2044	$10.02
218	Feb-44	Feb	2044	$8.59
219	Mar-44	Mar	2044	$5.05
220	Apr-44	Apr	2044	$4.29
221	May-44	May	2044	$3.70
222	Jun-44	Jun	2044	$3.81
223	Jul-44	Jul	2044	$4.03
224	Aug-44	Aug	2044	$4.12
225	Sep-44	Sep	2044	$3.51
226	Oct-44	Oct	2044	$3.40
227	Nov-44	Nov	2044	$4.39
228	Dec-44	Dec	2044	$7.17
229	Jan-45	Jan	2045	$10.17
230	Feb-45	Feb	2045	$8.71
231	Mar-45	Mar	2045	$5.13
232	Apr-45	Apr	2045	$4.36
233	May-45	May	2045	$3.75
234	Jun-45	Jun	2045	$3.87
235	Jul-45	Jul	2045	$4.09
236	Aug-45	Aug	2045	$4.18
237	Sep-45	Sep	2045	$3.57
238	Oct-45	Oct	2045	$3.45
239	Nov-45	Nov	2045	$4.46
240	Dec-45	Dec	2045	$7.28
241	Jan-46	Jan	2046	$10.57
242	Feb-46	Feb	2046	$9.06
243	Mar-46	Mar	2046	$5.33
244	Apr-46	Apr	2046	$4.53
245	May-46	May	2046	$3.90
246	Jun-46	Jun	2046	$4.02
247	Jul-46	Jul	2046	$4.25
248	Aug-46	Aug	2046	$4.34
249	Sep-46	Sep	2046	$3.71
250	Oct-46	Oct	2046	$3.59
251	Nov-46	Nov	2046	$4.63
252	Dec-46	Dec	2046	$7.57
253	Jan-47	Jan	2047	$0.00
254	Feb-47	Feb	2047	$0.00
255	Mar-47	Mar	2047	$0.00
256	Apr-47	Apr	2047	$0.00
257	May-47	May	2047	$0.00
258	Jun-47	Jun	2047	$0.00
259	Jul-47	Jul	2047	$0.00
260	Aug-47	Aug	2047	$0.00
261	Sep-47	Sep	2047	$0.00
262	Oct-47	Oct	2047	$0.00

263	Nov-47	Nov	2047	$0.00
264	Dec-47	Dec	2047	$0.00

Met-Ed Natural Gas Price (Nominal $/MMBTU)
$6.16
$5.31
$3.22
$3.03
$2.69
$2.80
$2.98
$3.03
$2.61
$2.51
$3.18
$4.99
$6.75
$5.76
$3.48
$3.04
$2.65
$2.73
$2.88
$2.93
$2.52
$2.43
$3.09
$4.93
$6.74
$5.78
$3.44
$2.92
$2.52
$2.61
$2.76
$2.82
$2.42
$2.35
$3.04
$4.90
$6.68
$5.72
$3.31
$2.80
$2.41
$2.49

	EIA AEO Mid-Atlantic Data (Electric Power, Natural Gas 2024 Dollars) [$/MMBTU]				
	3	4	5	6	7
Year	**2025**	**2026**	**2027**	**2028**	**2029**
Real	$2.7247	$2.7802	$2.6369	$2.5768	$2.6437
Nominal	$2.89	$3.01	$2.91	$2.90	$3.04

$2.64
$2.70
$2.31
$2.24
$2.88
$4.73
$6.55
$5.63
$3.24
$2.68
$2.27
$2.34
$2.47
$2.53
$2.11
$2.04
$2.70
$4.56
$6.45
$5.53
$3.13
$2.67
$2.30
$2.36
$2.49
$2.51
$2.09
$2.00
$2.67
$4.57
$6.76
$5.79
$3.25
$2.71
$2.28
$2.36
$2.51
$2.54
$2.10
$2.02
$2.75
$4.72
$7.21
$6.17
$3.49
$2.92
$2.50
$2.58
$2.74
$2.79
$2.32
$2.22
$3.00
$5.10
$7.77

$6.65
$3.81
$3.23
$2.77
$2.85
$3.01
$3.07
$2.59
$2.48
$3.30
$5.54
$8.33
$7.14
$4.17
$3.57
$3.06
$3.12
$3.27
$3.33
$2.82
$2.71
$3.56
$5.90
$8.82
$7.56
$4.46
$3.80
$3.27
$3.35
$3.53
$3.60
$3.06
$2.96
$3.82
$6.27
$9.17
$7.86
$4.62
$3.93
$3.38
$3.49
$3.69
$3.77
$3.22
$3.11
$4.02
$6.56
$8.98
$7.69
$4.53
$3.85
$3.31
$3.42
$3.61
$3.69

$3.15
$3.05
$3.94
$6.42
$8.83
$7.57
$4.45
$3.78
$3.26
$3.36
$3.55
$3.63
$3.10
$3.00
$3.87
$6.32
$8.89
$7.62
$4.48
$3.81
$3.28
$3.38
$3.58
$3.65
$3.12
$3.02
$3.90
$6.37
$9.18
$7.86
$4.63
$3.93
$3.38
$3.49
$3.69
$3.77
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$4.02
$6.57
$9.49
$8.13
$4.79
$4.07
$3.50
$3.61
$3.82
$3.90
$3.33
$3.22
$4.16
$6.79
$9.82
$8.41
$4.95

$4.21
$3.62
$3.74
$3.95
$4.03
$3.44
$3.33
$4.30
$7.02
$10.02
$8.59
$5.05
$4.29
$3.70
$3.81
$4.03
$4.12
$3.51
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$4.39
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$4.46
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$10.57
$9.06
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$4.53
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$4.34
$3.71
$3.59
$4.63
$7.57
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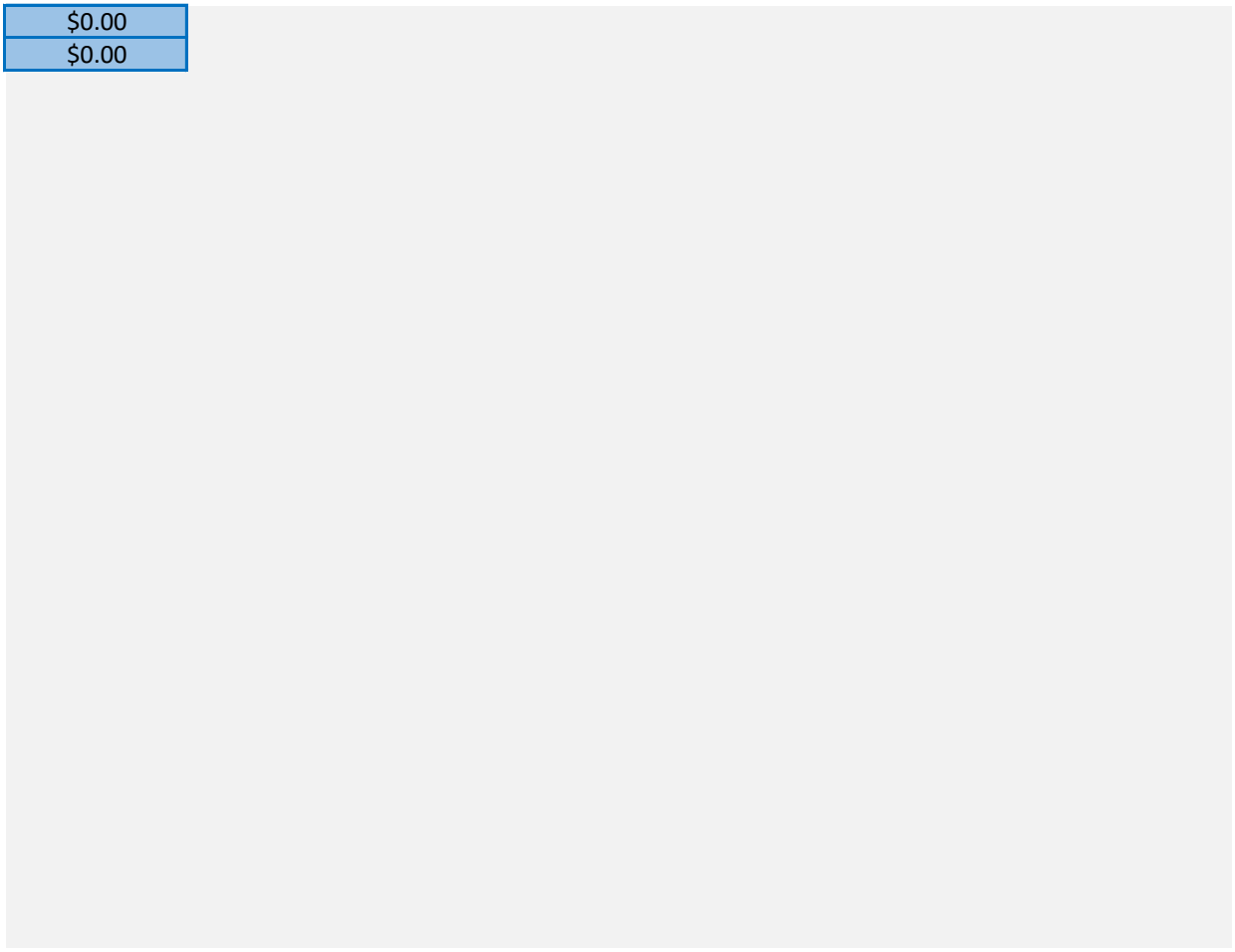
$0.00
$0.00



8	9	10	11	12	13	14	15	16
2030	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**
$2.7737	$2.8665	$3.2230	$3.4834	$3.5980	$3.6316	$3.6108	$3.5182	$3.3769
$3.25	$3.43	$3.93	$4.33	$4.56	$4.70	$4.76	$4.73	$4.64

17	18	19	20	21	22	23	24
2039	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**	**2046**
$3.2569	$3.2155	$3.2524	$3.2982	$3.3440	$3.3472	$3.3295	$3.3936
$4.56	$4.59	$4.74	$4.90	$5.07	$5.17	$5.25	$5.46

Record Field	Period	Month	Year	Season	Met-Ed Zone Adjusted On-Peak (Nominal $/MWh)	Met-Ed Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	Jan	2026	Winter	$71.47	$56.54
2	Feb-26	Feb	2026	Winter	$55.59	$45.43
3	Mar-26	Mar	2026	Shoulder	$48.73	$41.90
4	Apr-26	Apr	2026	Shoulder	$48.80	$41.34
5	May-26	May	2026	Summer	$45.37	$26.84
6	Jun-26	Jun	2026	Summer	$81.64	$34.18
7	Jul-26	Jul	2026	Summer	$77.39	$37.70
8	Aug-26	Aug	2026	Summer	$51.37	$30.63
9	Sep-26	Sep	2026	Summer	$48.35	$29.28
10	Oct-26	Oct	2026	Shoulder	$48.00	$32.80
11	Nov-26	Nov	2026	Shoulder	$48.00	$37.23
12	Dec-26	Dec	2026	Winter	$56.50	$46.49
13	Jan-27	Jan	2027	Winter	$79.44	$65.56
14	Feb-27	Feb	2027	Winter	$67.17	$56.20
15	Mar-27	Mar	2027	Shoulder	$50.86	$41.86
16	Apr-27	Apr	2027	Shoulder	$51.32	$38.94
17	May-27	May	2027	Summer	$51.82	$33.76
18	Jun-27	Jun	2027	Summer	$58.26	$34.21
19	Jul-27	Jul	2027	Summer	$85.53	$43.27
20	Aug-27	Aug	2027	Summer	$74.81	$37.28
21	Sep-27	Sep	2027	Summer	$56.65	$34.26
22	Oct-27	Oct	2027	Shoulder	$54.24	$37.68
23	Nov-27	Nov	2027	Shoulder	$52.83	$42.26
24	Dec-27	Dec	2027	Winter	$62.08	$52.12
25	Jan-28	Jan	2028	Winter	$86.08	$70.89
26	Feb-28	Feb	2028	Winter	$73.40	$62.13
27	Mar-28	Mar	2028	Shoulder	$52.27	$43.27
28	Apr-28	Apr	2028	Shoulder	$51.57	$39.54
29	May-28	May	2028	Summer	$51.97	$33.56
30	Jun-28	Jun	2028	Summer	$58.56	$33.76
31	Jul-28	Jul	2028	Summer	$87.99	$41.96
32	Aug-28	Aug	2028	Summer	$76.78	$38.54
33	Sep-28	Sep	2028	Summer	$57.10	$31.24
34	Oct-28	Oct	2028	Shoulder	$54.19	$37.03
35	Nov-28	Nov	2028	Shoulder	$53.13	$42.71
36	Dec-28	Dec	2028	Winter	$61.83	$51.42
37	Jan-29	Jan	2029	Winter	$83.01	$71.09
38	Feb-29	Feb	2029	Winter	$76.98	$64.45
39	Mar-29	Mar	2029	Shoulder	$52.27	$42.66
40	Apr-29	Apr	2029	Shoulder	$51.02	$37.58
41	May-29	May	2029	Summer	$51.77	$35.12

42	Jun-29	Jun	2029	Summer	$57.51	$34.36
43	Jul-29	Jul	2029	Summer	$88.75	$41.15
44	Aug-29	Aug	2029	Summer	$77.93	$37.83
45	Sep-29	Sep	2029	Summer	$56.30	$34.66
46	Oct-29	Oct	2029	Shoulder	$51.37	$35.57
47	Nov-29	Nov	2029	Shoulder	$54.59	$40.80
48	Dec-29	Dec	2029	Winter	$65.40	$50.61
49	Jan-30	Jan	2030	Winter	$83.72	$69.58
50	Feb-30	Feb	2030	Winter	$77.23	$63.09
51	Mar-30	Mar	2030	Shoulder	$56.15	$46.49
52	Apr-30	Apr	2030	Shoulder	$53.23	$37.38
53	May-30	May	2030	Summer	$55.14	$35.82
54	Jun-30	Jun	2030	Summer	$59.37	$34.97
55	Jul-30	Jul	2030	Summer	$82.66	$42.01
56	Aug-30	Aug	2030	Summer	$71.29	$38.64
57	Sep-30	Sep	2030	Summer	$57.61	$35.07
58	Oct-30	Oct	2030	Shoulder	$52.83	$35.77
59	Nov-30	Nov	2030	Shoulder	$56.60	$41.26
60	Dec-30	Dec	2030	Winter	$69.08	$56.15
61	Jan-31	Jan	2031	Winter	$0.00	$0.00
62	Feb-31	Feb	2031	Winter	$0.00	$0.00
63	Mar-31	Mar	2031	Shoulder	$0.00	$0.00
64	Apr-31	Apr	2031	Shoulder	$0.00	$0.00
65	May-31	May	2031	Summer	$0.00	$0.00
66	Jun-31	Jun	2031	Summer	$0.00	$0.00
67	Jul-31	Jul	2031	Summer	$0.00	$0.00
68	Aug-31	Aug	2031	Summer	$0.00	$0.00
69	Sep-31	Sep	2031	Summer	$0.00	$0.00
70	Oct-31	Oct	2031	Shoulder	$0.00	$0.00
71	Nov-31	Nov	2031	Shoulder	$0.00	$0.00
72	Dec-31	Dec	2031	Winter	$0.00	$0.00
73	Jan-32	Jan	2032	Winter	$0.00	$0.00
74	Feb-32	Feb	2032	Winter	$0.00	$0.00
75	Mar-32	Mar	2032	Shoulder	$0.00	$0.00
76	Apr-32	Apr	2032	Shoulder	$0.00	$0.00
77	May-32	May	2032	Summer	$0.00	$0.00
78	Jun-32	Jun	2032	Summer	$0.00	$0.00
79	Jul-32	Jul	2032	Summer	$0.00	$0.00
80	Aug-32	Aug	2032	Summer	$0.00	$0.00
81	Sep-32	Sep	2032	Summer	$0.00	$0.00
82	Oct-32	Oct	2032	Shoulder	$0.00	$0.00
83	Nov-32	Nov	2032	Shoulder	$0.00	$0.00
84	Dec-32	Dec	2032	Winter	$0.00	$0.00
85	Jan-33	Jan	2033	Winter	$0.00	$0.00
86	Feb-33	Feb	2033	Winter	$0.00	$0.00
87	Mar-33	Mar	2033	Shoulder	$0.00	$0.00
88	Apr-33	Apr	2033	Shoulder	$0.00	$0.00

89	May-33	May	2033	Summer	$0.00	$0.00
90	Jun-33	Jun	2033	Summer	$0.00	$0.00
91	Jul-33	Jul	2033	Summer	$0.00	$0.00
92	Aug-33	Aug	2033	Summer	$0.00	$0.00
93	Sep-33	Sep	2033	Summer	$0.00	$0.00
94	Oct-33	Oct	2033	Shoulder	$0.00	$0.00
95	Nov-33	Nov	2033	Shoulder	$0.00	$0.00
96	Dec-33	Dec	2033	Winter	$0.00	$0.00
97	Jan-34	Jan	2034	Winter	$0.00	$0.00
98	Feb-34	Feb	2034	Winter	$0.00	$0.00
99	Mar-34	Mar	2034	Shoulder	$0.00	$0.00
100	Apr-34	Apr	2034	Shoulder	$0.00	$0.00
101	May-34	May	2034	Summer	$0.00	$0.00
102	Jun-34	Jun	2034	Summer	$0.00	$0.00
103	Jul-34	Jul	2034	Summer	$0.00	$0.00
104	Aug-34	Aug	2034	Summer	$0.00	$0.00
105	Sep-34	Sep	2034	Summer	$0.00	$0.00
106	Oct-34	Oct	2034	Shoulder	$0.00	$0.00
107	Nov-34	Nov	2034	Shoulder	$0.00	$0.00
108	Dec-34	Dec	2034	Winter	$0.00	$0.00
109	Jan-35	Jan	2035	Winter	$0.00	$0.00
110	Feb-35	Feb	2035	Winter	$0.00	$0.00
111	Mar-35	Mar	2035	Shoulder	$0.00	$0.00
112	Apr-35	Apr	2035	Shoulder	$0.00	$0.00
113	May-35	May	2035	Summer	$0.00	$0.00
114	Jun-35	Jun	2035	Summer	$0.00	$0.00
115	Jul-35	Jul	2035	Summer	$0.00	$0.00
116	Aug-35	Aug	2035	Summer	$0.00	$0.00
117	Sep-35	Sep	2035	Summer	$0.00	$0.00
118	Oct-35	Oct	2035	Shoulder	$0.00	$0.00
119	Nov-35	Nov	2035	Shoulder	$0.00	$0.00
120	Dec-35	Dec	2035	Winter	$0.00	$0.00
121	Jan-36	Jan	2036	Winter	$0.00	$0.00
122	Feb-36	Feb	2036	Winter	$0.00	$0.00
123	Mar-36	Mar	2036	Shoulder	$0.00	$0.00
124	Apr-36	Apr	2036	Shoulder	$0.00	$0.00
125	May-36	May	2036	Summer	$0.00	$0.00
126	Jun-36	Jun	2036	Summer	$0.00	$0.00
127	Jul-36	Jul	2036	Summer	$0.00	$0.00
128	Aug-36	Aug	2036	Summer	$0.00	$0.00
129	Sep-36	Sep	2036	Summer	$0.00	$0.00
130	Oct-36	Oct	2036	Shoulder	$0.00	$0.00
131	Nov-36	Nov	2036	Shoulder	$0.00	$0.00
132	Dec-36	Dec	2036	Winter	$0.00	$0.00
133	Jan-37	Jan	2037	Winter	$0.00	$0.00
134	Feb-37	Feb	2037	Winter	$0.00	$0.00
135	Mar-37	Mar	2037	Shoulder	$0.00	$0.00

136	Apr-37	Apr	2037	Shoulder	$0.00	$0.00
137	May-37	May	2037	Summer	$0.00	$0.00
138	Jun-37	Jun	2037	Summer	$0.00	$0.00
139	Jul-37	Jul	2037	Summer	$0.00	$0.00
140	Aug-37	Aug	2037	Summer	$0.00	$0.00
141	Sep-37	Sep	2037	Summer	$0.00	$0.00
142	Oct-37	Oct	2037	Shoulder	$0.00	$0.00
143	Nov-37	Nov	2037	Shoulder	$0.00	$0.00
144	Dec-37	Dec	2037	Winter	$0.00	$0.00
145	Jan-38	Jan	2038	Winter	$0.00	$0.00
146	Feb-38	Feb	2038	Winter	$0.00	$0.00
147	Mar-38	Mar	2038	Shoulder	$0.00	$0.00
148	Apr-38	Apr	2038	Shoulder	$0.00	$0.00
149	May-38	May	2038	Summer	$0.00	$0.00
150	Jun-38	Jun	2038	Summer	$0.00	$0.00
151	Jul-38	Jul	2038	Summer	$0.00	$0.00
152	Aug-38	Aug	2038	Summer	$0.00	$0.00
153	Sep-38	Sep	2038	Summer	$0.00	$0.00
154	Oct-38	Oct	2038	Shoulder	$0.00	$0.00
155	Nov-38	Nov	2038	Shoulder	$0.00	$0.00
156	Dec-38	Dec	2038	Winter	$0.00	$0.00
157	Jan-39	Jan	2039	Winter	$0.00	$0.00
158	Feb-39	Feb	2039	Winter	$0.00	$0.00
159	Mar-39	Mar	2039	Shoulder	$0.00	$0.00
160	Apr-39	Apr	2039	Shoulder	$0.00	$0.00
161	May-39	May	2039	Summer	$0.00	$0.00
162	Jun-39	Jun	2039	Summer	$0.00	$0.00
163	Jul-39	Jul	2039	Summer	$0.00	$0.00
164	Aug-39	Aug	2039	Summer	$0.00	$0.00
165	Sep-39	Sep	2039	Summer	$0.00	$0.00
166	Oct-39	Oct	2039	Shoulder	$0.00	$0.00
167	Nov-39	Nov	2039	Shoulder	$0.00	$0.00
168	Dec-39	Dec	2039	Winter	$0.00	$0.00
169	Jan-40	Jan	2040	Winter	$0.00	$0.00
170	Feb-40	Feb	2040	Winter	$0.00	$0.00
171	Mar-40	Mar	2040	Shoulder	$0.00	$0.00
172	Apr-40	Apr	2040	Shoulder	$0.00	$0.00
173	May-40	May	2040	Summer	$0.00	$0.00
174	Jun-40	Jun	2040	Summer	$0.00	$0.00
175	Jul-40	Jul	2040	Summer	$0.00	$0.00
176	Aug-40	Aug	2040	Summer	$0.00	$0.00
177	Sep-40	Sep	2040	Summer	$0.00	$0.00
178	Oct-40	Oct	2040	Shoulder	$0.00	$0.00
179	Nov-40	Nov	2040	Shoulder	$0.00	$0.00
180	Dec-40	Dec	2040	Winter	$0.00	$0.00
181	Jan-41	Jan	2041	Winter	$0.00	$0.00
182	Feb-41	Feb	2041	Winter	$0.00	$0.00

183	Mar-41	Mar	2041	Shoulder	$0.00	$0.00
184	Apr-41	Apr	2041	Shoulder	$0.00	$0.00
185	May-41	May	2041	Summer	$0.00	$0.00
186	Jun-41	Jun	2041	Summer	$0.00	$0.00
187	Jul-41	Jul	2041	Summer	$0.00	$0.00
188	Aug-41	Aug	2041	Summer	$0.00	$0.00
189	Sep-41	Sep	2041	Summer	$0.00	$0.00
190	Oct-41	Oct	2041	Shoulder	$0.00	$0.00
191	Nov-41	Nov	2041	Shoulder	$0.00	$0.00
192	Dec-41	Dec	2041	Winter	$0.00	$0.00
193	Jan-42	Jan	2042	Winter	$0.00	$0.00
194	Feb-42	Feb	2042	Winter	$0.00	$0.00
195	Mar-42	Mar	2042	Shoulder	$0.00	$0.00
196	Apr-42	Apr	2042	Shoulder	$0.00	$0.00
197	May-42	May	2042	Summer	$0.00	$0.00
198	Jun-42	Jun	2042	Summer	$0.00	$0.00
199	Jul-42	Jul	2042	Summer	$0.00	$0.00
200	Aug-42	Aug	2042	Summer	$0.00	$0.00
201	Sep-42	Sep	2042	Summer	$0.00	$0.00
202	Oct-42	Oct	2042	Shoulder	$0.00	$0.00
203	Nov-42	Nov	2042	Shoulder	$0.00	$0.00
204	Dec-42	Dec	2042	Winter	$0.00	$0.00
205	Jan-43	Jan	2043	Winter	$0.00	$0.00
206	Feb-43	Feb	2043	Winter	$0.00	$0.00
207	Mar-43	Mar	2043	Shoulder	$0.00	$0.00
208	Apr-43	Apr	2043	Shoulder	$0.00	$0.00
209	May-43	May	2043	Summer	$0.00	$0.00
210	Jun-43	Jun	2043	Summer	$0.00	$0.00
211	Jul-43	Jul	2043	Summer	$0.00	$0.00
212	Aug-43	Aug	2043	Summer	$0.00	$0.00
213	Sep-43	Sep	2043	Summer	$0.00	$0.00
214	Oct-43	Oct	2043	Shoulder	$0.00	$0.00
215	Nov-43	Nov	2043	Shoulder	$0.00	$0.00
216	Dec-43	Dec	2043	Winter	$0.00	$0.00
217	Jan-44	Jan	2044	Winter	$0.00	$0.00
218	Feb-44	Feb	2044	Winter	$0.00	$0.00
219	Mar-44	Mar	2044	Shoulder	$0.00	$0.00
220	Apr-44	Apr	2044	Shoulder	$0.00	$0.00
221	May-44	May	2044	Summer	$0.00	$0.00
222	Jun-44	Jun	2044	Summer	$0.00	$0.00
223	Jul-44	Jul	2044	Summer	$0.00	$0.00
224	Aug-44	Aug	2044	Summer	$0.00	$0.00
225	Sep-44	Sep	2044	Summer	$0.00	$0.00
226	Oct-44	Oct	2044	Shoulder	$0.00	$0.00
227	Nov-44	Nov	2044	Shoulder	$0.00	$0.00
228	Dec-44	Dec	2044	Winter	$0.00	$0.00
229	Jan-45	Jan	2045	Winter	$0.00	$0.00

230	Feb-45	Feb	2045	Winter	$0.00	$0.00
231	Mar-45	Mar	2045	Shoulder	$0.00	$0.00
232	Apr-45	Apr	2045	Shoulder	$0.00	$0.00
233	May-45	May	2045	Summer	$0.00	$0.00
234	Jun-45	Jun	2045	Summer	$0.00	$0.00
235	Jul-45	Jul	2045	Summer	$0.00	$0.00
236	Aug-45	Aug	2045	Summer	$0.00	$0.00
237	Sep-45	Sep	2045	Summer	$0.00	$0.00
238	Oct-45	Oct	2045	Shoulder	$0.00	$0.00
239	Nov-45	Nov	2045	Shoulder	$0.00	$0.00
240	Dec-45	Dec	2045	Winter	$0.00	$0.00
241	Jan-46	Jan	2046	Winter	$0.00	$0.00
242	Feb-46	Feb	2046	Winter	$0.00	$0.00
243	Mar-46	Mar	2046	Shoulder	$0.00	$0.00
244	Apr-46	Apr	2046	Shoulder	$0.00	$0.00
245	May-46	May	2046	Summer	$0.00	$0.00
246	Jun-46	Jun	2046	Summer	$0.00	$0.00
247	Jul-46	Jul	2046	Summer	$0.00	$0.00
248	Aug-46	Aug	2046	Summer	$0.00	$0.00
249	Sep-46	Sep	2046	Summer	$0.00	$0.00
250	Oct-46	Oct	2046	Shoulder	$0.00	$0.00
251	Nov-46	Nov	2046	Shoulder	$0.00	$0.00
252	Dec-46	Dec	2046	Winter	$0.00	$0.00
253	Jan-47	Jan	2047	Winter	$0.00	$0.00
254	Feb-47	Feb	2047	Winter	$0.00	$0.00
255	Mar-47	Mar	2047	Shoulder	$0.00	$0.00
256	Apr-47	Apr	2047	Shoulder	$0.00	$0.00
257	May-47	May	2047	Summer	$0.00	$0.00
258	Jun-47	Jun	2047	Summer	$0.00	$0.00
259	Jul-47	Jul	2047	Summer	$0.00	$0.00
260	Aug-47	Aug	2047	Summer	$0.00	$0.00
261	Sep-47	Sep	2047	Summer	$0.00	$0.00
262	Oct-47	Oct	2047	Shoulder	$0.00	$0.00
263	Nov-47	Nov	2047	Shoulder	$0.00	$0.00
264	Dec-47	Dec	2047	Winter	$0.00	$0.00

Met-Ed Zone NG Converted On-Peak (Nominal $/MWh)	Met-Ed Zone NG Converted Off-Peak (Nominal $/MWh)	Met-Ed Zone Spark Spread On-Peak (Nominal $/MWh)	Met-Ed Zone Spark Spread Off-Peak (Nominal $/MWh)	Met-Ed Zone On-Peak (Nominal $/MWh)	Met-Ed Zone Off-Peak (Nominal $/MWh)
$67.90	$46.76	$3.56	$9.78	$71.47	$56.54
$58.55	$40.32	-$2.96	$5.11	$55.59	$45.43
$35.47	$24.43	$13.26	$17.47	$48.73	$41.90
$33.44	$23.03	$15.36	$18.31	$48.80	$41.34
$29.68	$20.44	$15.69	$6.40	$45.37	$26.84
$30.87	$21.26	$50.76	$12.92	$81.64	$34.18
$32.82	$22.60	$44.57	$15.09	$77.39	$37.70
$33.40	$23.00	$17.97	$7.63	$51.37	$30.63
$28.79	$19.83	$19.56	$9.45	$48.35	$29.28
$27.72	$19.09	$20.28	$13.71	$48.00	$32.80
$35.07	$24.15	$12.92	$13.08	$48.00	$37.23
$55.00	$37.88	$1.50	$8.61	$56.50	$46.49
$74.47	$51.28	$4.98	$14.27	$79.44	$65.56
$63.57	$43.78	$3.60	$12.42	$67.17	$56.20
$38.35	$26.41	$12.51	$15.45	$50.86	$41.86
$33.55	$23.11	$17.77	$15.84	$51.32	$38.94
$29.20	$20.11	$22.62	$13.65	$51.82	$33.76
$30.09	$20.72	$28.17	$13.49	$58.26	$34.21
$31.80	$21.90	$53.73	$21.37	$85.53	$43.27
$32.35	$22.28	$42.46	$15.00	$74.81	$37.28
$27.79	$19.14	$28.86	$15.13	$56.65	$34.26
$26.84	$18.48	$27.40	$19.20	$54.24	$37.68
$34.12	$23.50	$18.70	$18.76	$52.83	$42.26
$54.33	$37.41	$7.76	$14.71	$62.08	$52.12
$74.30	$51.17	$11.78	$19.72	$86.08	$70.89
$63.72	$43.88	$9.68	$18.25	$73.40	$62.13
$37.97	$26.15	$14.31	$17.12	$52.27	$43.27
$32.23	$22.19	$19.34	$17.35	$51.57	$39.54
$27.82	$19.16	$24.15	$14.40	$51.97	$33.56
$28.74	$19.80	$29.82	$13.96	$58.56	$33.76
$30.42	$20.95	$57.58	$21.01	$87.99	$41.96
$31.07	$21.40	$45.70	$17.14	$76.78	$38.54
$26.71	$18.39	$30.40	$12.85	$57.10	$31.24
$25.87	$17.81	$28.32	$19.21	$54.19	$37.03
$33.54	$23.10	$19.59	$19.62	$53.13	$42.71
$54.04	$37.21	$7.79	$14.20	$61.83	$51.42
$73.65	$50.72	$9.36	$20.37	$83.01	$71.09
$63.06	$43.43	$13.92	$21.02	$76.98	$64.45
$36.54	$25.17	$15.73	$17.50	$52.27	$42.66
$30.87	$21.26	$20.15	$16.32	$51.02	$37.58
$26.55	$18.29	$25.22	$16.83	$51.77	$35.12

$27.46	$18.91	$30.04	$15.45	$57.51	$34.36
$29.08	$20.03	$59.67	$21.13	$88.75	$41.15
$29.75	$20.49	$48.18	$17.35	$77.93	$37.83
$25.49	$17.56	$30.81	$17.11	$56.30	$34.66
$24.72	$17.02	$26.65	$18.55	$51.37	$35.57
$31.77	$21.88	$22.81	$18.92	$54.59	$40.80
$52.15	$35.92	$13.25	$14.70	$65.40	$50.61
$72.22	$49.73	$11.50	$19.85	$83.72	$69.58
$62.12	$42.78	$15.11	$20.31	$77.23	$63.09
$35.70	$24.58	$20.45	$21.90	$56.15	$46.49
$29.58	$20.37	$23.64	$17.01	$53.23	$37.38
$25.09	$17.28	$30.05	$18.54	$55.14	$35.82
$25.83	$17.79	$33.54	$17.18	$59.37	$34.97
$27.23	$18.75	$55.43	$23.26	$82.66	$42.01
$27.87	$19.19	$43.43	$19.45	$71.29	$38.64
$23.33	$16.06	$34.28	$19.00	$57.61	$35.07
$22.54	$15.53	$30.28	$20.25	$52.83	$35.77
$29.74	$20.48	$26.86	$20.77	$56.60	$41.26
$50.33	$34.66	$18.75	$21.49	$69.08	$56.15
$71.12	$48.98	$9.60	$18.94	$80.72	$67.92
$60.99	$42.00	$10.80	$18.38	$71.79	$60.38
$34.48	$23.75	$16.08	$18.37	$50.56	$42.11
$29.44	$20.28	$20.64	$16.97	$50.09	$37.25
$25.35	$17.46	$26.04	$16.18	$51.39	$33.64
$26.08	$17.96	$31.02	$15.33	$57.11	$33.29
$27.46	$18.91	$57.77	$22.14	$85.24	$41.05
$27.72	$19.09	$45.87	$17.59	$73.60	$36.68
$23.03	$15.86	$31.73	$16.35	$54.77	$32.22
$22.11	$15.22	$28.74	$19.70	$50.85	$34.92
$29.42	$20.26	$22.45	$19.92	$51.86	$40.18
$50.38	$34.69	$12.13	$16.61	$62.51	$51.30
$74.58	$51.36	$9.60	$18.94	$84.18	$70.30
$63.85	$43.97	$10.80	$18.38	$74.65	$62.35
$35.86	$24.70	$16.08	$18.37	$51.94	$43.06
$29.84	$20.55	$20.64	$16.97	$50.49	$37.52
$25.16	$17.33	$26.04	$16.18	$51.20	$33.51
$26.06	$17.95	$31.02	$15.33	$57.08	$33.28
$27.65	$19.04	$57.77	$22.14	$85.42	$41.18
$28.02	$19.30	$45.87	$17.59	$73.90	$36.89
$23.21	$15.98	$31.73	$16.35	$54.94	$32.34
$22.33	$15.38	$28.74	$19.70	$51.07	$35.08
$30.30	$20.87	$22.45	$19.92	$52.75	$40.79
$52.10	$35.88	$12.13	$16.61	$64.23	$52.49
$79.56	$54.79	$9.60	$18.94	$89.16	$73.73
$68.00	$46.83	$10.80	$18.38	$78.80	$65.20
$38.44	$26.47	$16.08	$18.37	$54.52	$44.84
$32.26	$22.22	$20.64	$16.97	$52.90	$39.19

$27.56	$18.98	$26.04	$16.18	$53.60	$35.16
$28.46	$19.60	$31.02	$15.33	$59.48	$34.93
$30.20	$20.80	$57.77	$22.14	$87.97	$42.94
$30.73	$21.16	$45.87	$17.59	$76.60	$38.75
$25.59	$17.62	$31.73	$16.35	$57.32	$33.98
$24.45	$16.84	$28.74	$19.70	$53.20	$36.54
$33.11	$22.80	$22.45	$19.92	$55.56	$42.73
$56.22	$38.72	$12.13	$16.61	$68.35	$55.33
$85.74	$59.04	$9.60	$18.94	$95.34	$77.98
$73.40	$50.55	$10.80	$18.38	$84.20	$68.92
$42.00	$28.92	$16.08	$18.37	$58.07	$47.29
$35.62	$24.53	$20.64	$16.97	$56.27	$41.51
$30.51	$21.01	$26.04	$16.18	$56.55	$37.20
$31.43	$21.64	$31.02	$15.33	$62.45	$36.98
$33.20	$22.87	$57.77	$22.14	$90.98	$45.01
$33.82	$23.29	$45.87	$17.59	$79.69	$40.88
$28.55	$19.66	$31.73	$16.35	$60.28	$36.02
$27.39	$18.86	$28.74	$19.70	$56.14	$38.57
$36.41	$25.08	$22.45	$19.92	$58.86	$45.00
$61.08	$42.07	$12.13	$16.61	$73.22	$58.68
$91.93	$63.31	$9.60	$18.94	$101.53	$82.24
$78.72	$54.21	$10.80	$18.38	$89.51	$72.58
$46.01	$31.69	$16.08	$18.37	$62.09	$50.05
$39.36	$27.11	$20.64	$16.97	$60.01	$44.08
$33.71	$23.21	$26.04	$16.18	$59.74	$39.40
$34.42	$23.70	$31.02	$15.33	$65.44	$39.03
$36.02	$24.81	$57.77	$22.14	$93.79	$46.95
$36.72	$25.29	$45.87	$17.59	$82.60	$42.88
$31.11	$21.42	$31.73	$16.35	$62.84	$37.78
$29.93	$20.61	$28.74	$19.70	$58.68	$40.32
$39.28	$27.05	$22.45	$19.92	$61.72	$46.97
$65.08	$44.82	$12.13	$16.61	$77.22	$61.43
$97.31	$67.01	$9.60	$18.94	$106.91	$85.95
$83.44	$57.46	$10.80	$18.38	$94.23	$75.84
$49.15	$33.85	$16.08	$18.37	$65.23	$52.22
$41.93	$28.88	$20.64	$16.97	$62.57	$45.85
$36.03	$24.81	$26.04	$16.18	$62.06	$40.99
$36.98	$25.47	$31.02	$15.33	$68.00	$40.80
$38.90	$26.79	$57.77	$22.14	$96.67	$48.93
$39.69	$27.33	$45.87	$17.59	$85.56	$44.92
$33.78	$23.26	$31.73	$16.35	$65.51	$39.61
$32.60	$22.45	$28.74	$19.70	$61.34	$42.15
$42.18	$29.05	$22.45	$19.92	$64.63	$48.97
$69.15	$47.62	$12.13	$16.61	$81.29	$64.23
$101.15	$69.66	$9.60	$18.94	$110.75	$88.59
$86.67	$59.69	$10.80	$18.38	$97.47	$78.06
$51.00	$35.12	$16.08	$18.37	$67.08	$53.49

$43.34	$29.84	$20.64	$16.97	$63.98	$46.82
$37.31	$25.69	$26.04	$16.18	$63.34	$41.87
$38.49	$26.51	$31.02	$15.33	$69.52	$41.84
$40.69	$28.02	$57.77	$22.14	$98.47	$50.16
$41.55	$28.62	$45.87	$17.59	$87.43	$46.21
$35.47	$24.43	$31.73	$16.35	$67.20	$40.78
$34.32	$23.64	$28.74	$19.70	$63.06	$43.34
$44.35	$30.54	$22.45	$19.92	$66.79	$50.46
$72.38	$49.85	$12.13	$16.61	$84.52	$66.46
$99.03	$68.20	$9.60	$18.94	$108.63	$87.13
$84.85	$58.44	$10.80	$18.38	$95.65	$76.81
$49.93	$34.39	$16.08	$18.37	$66.01	$52.75
$42.43	$29.22	$20.64	$16.97	$63.07	$46.19
$36.52	$25.15	$26.04	$16.18	$62.56	$41.34
$37.69	$25.95	$31.02	$15.33	$68.71	$41.29
$39.84	$27.44	$57.77	$22.14	$97.61	$49.58
$40.68	$28.02	$45.87	$17.59	$86.56	$45.61
$34.72	$23.91	$31.73	$16.35	$66.45	$40.27
$33.60	$23.14	$28.74	$19.70	$62.35	$42.84
$43.42	$29.90	$22.45	$19.92	$65.86	$49.82
$70.87	$48.80	$12.13	$16.61	$83.00	$65.42
$97.42	$67.09	$9.60	$18.94	$107.02	$86.03
$83.48	$57.49	$10.80	$18.38	$94.27	$75.86
$49.12	$33.83	$16.08	$18.37	$65.20	$52.19
$41.74	$28.74	$20.64	$16.97	$62.38	$45.72
$35.93	$24.74	$26.04	$16.18	$61.97	$40.93
$37.08	$25.53	$31.02	$15.33	$68.10	$40.86
$39.19	$26.99	$57.77	$22.14	$96.97	$49.13
$40.02	$27.56	$45.87	$17.59	$85.90	$45.15
$34.16	$23.53	$31.73	$16.35	$65.89	$39.88
$33.06	$22.76	$28.74	$19.70	$61.80	$42.47
$42.71	$29.42	$22.45	$19.92	$65.16	$49.34
$69.72	$48.01	$12.13	$16.61	$81.85	$64.62
$98.11	$67.56	$9.60	$18.94	$107.71	$86.50
$84.06	$57.89	$10.80	$18.38	$94.86	$76.27
$49.47	$34.07	$16.08	$18.37	$65.54	$52.43
$42.03	$28.95	$20.64	$16.97	$62.68	$45.92
$36.18	$24.92	$26.04	$16.18	$62.22	$41.10
$37.34	$25.71	$31.02	$15.33	$68.36	$41.04
$39.47	$27.18	$57.77	$22.14	$97.24	$49.32
$40.30	$27.76	$45.87	$17.59	$86.18	$45.35
$34.40	$23.69	$31.73	$16.35	$66.13	$40.04
$33.29	$22.92	$28.74	$19.70	$62.03	$42.63
$43.01	$29.62	$22.45	$19.92	$65.46	$49.54
$70.21	$48.35	$12.13	$16.61	$82.34	$64.96
$101.22	$69.70	$9.60	$18.94	$110.82	$88.64
$86.73	$59.73	$10.80	$18.38	$97.53	$78.10

$51.03	$35.15	$16.08	$18.37	$67.11	$53.51
$43.37	$29.86	$20.64	$16.97	$64.01	$46.84
$37.33	$25.71	$26.04	$16.18	$63.37	$41.89
$38.52	$26.53	$31.02	$15.33	$69.54	$41.86
$40.72	$28.04	$57.77	$22.14	$98.49	$50.18
$41.58	$28.64	$45.87	$17.59	$87.46	$46.23
$35.49	$24.44	$31.73	$16.35	$67.22	$40.80
$34.34	$23.65	$28.74	$19.70	$63.09	$43.35
$44.38	$30.56	$22.45	$19.92	$66.82	$50.48
$72.43	$49.88	$12.13	$16.61	$84.57	$66.49
$104.69	$72.10	$9.60	$18.94	$114.29	$91.04
$89.71	$61.78	$10.80	$18.38	$100.50	$80.15
$52.79	$36.35	$16.08	$18.37	$68.86	$54.72
$44.85	$30.89	$20.64	$16.97	$65.50	$47.86
$38.61	$26.59	$26.04	$16.18	$64.65	$42.77
$39.84	$27.44	$31.02	$15.33	$70.86	$42.77
$42.12	$29.01	$57.77	$22.14	$99.89	$51.15
$43.01	$29.62	$45.87	$17.59	$88.88	$47.21
$36.71	$25.28	$31.73	$16.35	$68.44	$41.64
$35.52	$24.46	$28.74	$19.70	$64.27	$44.17
$45.90	$31.61	$22.45	$19.92	$68.35	$51.53
$74.92	$51.60	$12.13	$16.61	$87.05	$68.21
$108.27	$74.56	$9.60	$18.94	$117.87	$93.50
$92.77	$63.89	$10.80	$18.38	$103.57	$82.27
$54.59	$37.60	$16.08	$18.37	$70.67	$55.96
$46.39	$31.95	$20.64	$16.97	$67.03	$48.92
$39.93	$27.50	$26.04	$16.18	$65.97	$43.68
$41.20	$28.38	$31.02	$15.33	$72.23	$43.71
$43.56	$30.00	$57.77	$22.14	$101.33	$52.14
$44.48	$30.63	$45.87	$17.59	$90.35	$48.22
$37.96	$26.15	$31.73	$16.35	$69.70	$42.50
$36.74	$25.30	$28.74	$19.70	$65.48	$45.00
$47.47	$32.69	$22.45	$19.92	$69.92	$52.61
$77.48	$53.36	$12.13	$16.61	$89.62	$69.97
$110.54	$76.13	$9.60	$18.94	$120.14	$95.06
$94.72	$65.23	$10.80	$18.38	$105.52	$83.61
$55.74	$38.38	$16.08	$18.37	$71.81	$56.75
$47.36	$32.62	$20.64	$16.97	$68.00	$49.59
$40.77	$28.08	$26.04	$16.18	$66.81	$44.26
$42.07	$28.97	$31.02	$15.33	$73.09	$44.30
$44.47	$30.63	$57.77	$22.14	$102.24	$52.77
$45.41	$31.28	$45.87	$17.59	$91.29	$48.87
$38.76	$26.69	$31.73	$16.35	$70.49	$43.05
$37.51	$25.83	$28.74	$19.70	$66.25	$45.53
$48.47	$33.38	$22.45	$19.92	$70.91	$53.30
$79.11	$54.48	$12.13	$16.61	$91.24	$71.09
$112.16	$77.24	$9.60	$18.94	$121.76	$96.18

$96.10	$66.18	$10.80	$18.38	$106.90	$84.56
$56.55	$38.94	$16.08	$18.37	$72.63	$57.31
$48.05	$33.09	$20.64	$16.97	$68.70	$50.07
$41.37	$28.49	$26.04	$16.18	$67.40	$44.67
$42.68	$29.39	$31.02	$15.33	$73.71	$44.73
$45.12	$31.07	$57.77	$22.14	$102.89	$53.21
$46.08	$31.73	$45.87	$17.59	$91.95	$49.32
$39.33	$27.08	$31.73	$16.35	$71.06	$43.44
$38.06	$26.21	$28.74	$19.70	$66.80	$45.91
$49.17	$33.86	$22.45	$19.92	$71.62	$53.79
$80.26	$55.27	$12.13	$16.61	$92.40	$71.89
$116.60	$80.30	$9.60	$18.94	$126.20	$99.24
$99.91	$68.81	$10.80	$18.38	$110.71	$87.18
$58.79	$40.49	$16.08	$18.37	$74.87	$58.85
$49.96	$34.40	$20.64	$16.97	$70.60	$51.38
$43.01	$29.62	$26.04	$16.18	$69.04	$45.80
$44.37	$30.56	$31.02	$15.33	$75.40	$45.89
$46.91	$32.30	$57.77	$22.14	$104.68	$54.44
$47.90	$32.99	$45.87	$17.59	$93.78	$50.58
$40.89	$28.16	$31.73	$16.35	$72.62	$44.51
$39.56	$27.25	$28.74	$19.70	$68.31	$46.95
$51.12	$35.21	$22.45	$19.92	$73.57	$55.13
$83.44	$57.46	$12.13	$16.61	$95.58	$74.08
$0.00	$0.00	$9.60	$18.94	$9.60	$18.94
$0.00	$0.00	$10.80	$18.38	$10.80	$18.38
$0.00	$0.00	$16.08	$18.37	$16.08	$18.37
$0.00	$0.00	$20.64	$16.97	$20.64	$16.97
$0.00	$0.00	$26.04	$16.18	$26.04	$16.18
$0.00	$0.00	$31.02	$15.33	$31.02	$15.33
$0.00	$0.00	$57.77	$22.14	$57.77	$22.14
$0.00	$0.00	$45.87	$17.59	$45.87	$17.59
$0.00	$0.00	$31.73	$16.35	$31.73	$16.35
$0.00	$0.00	$28.74	$19.70	$28.74	$19.70
$0.00	$0.00	$22.45	$19.92	$22.45	$19.92
$0.00	$0.00	$12.13	$16.61	$12.13	$16.61

Record Field	Period	Month	Year	Transco 6 (Non-NY)	Locational Gas Adjustment ($/MMBtu)
1	Jan-26	Jan	2026	$4.76	$0.608
2	Feb-26	Feb	2026	$3.98	$0.056
3	Mar-26	Mar	2026	$3.62	$0.078
4	Apr-26	Apr	2026	$3.17	-$0.238
5	May-26	May	2026	$2.33	-$1.107
6	Jun-26	Jun	2026	$2.13	-$1.483
7	Jul-26	Jul	2026	$2.13	-$1.683
8	Aug-26	Aug	2026	$2.48	-$1.395
9	Sep-26	Sep	2026	$1.84	-$2.001
10	Oct-26	Oct	2026	$1.76	-$2.119
11	Nov-26	Nov	2026	$2.52	-$1.578
12	Dec-26	Dec	2026	$4.23	-$0.263
13	Jan-27	Jan	2027	$6.76	$2.007
14	Feb-27	Feb	2027	$5.70	$1.320
15	Mar-27	Mar	2027	$3.11	-$0.693
16	Apr-27	Apr	2027	$2.74	-$0.675
17	May-27	May	2027	$2.56	-$0.832
18	Jun-27	Jun	2027	$2.81	-$0.737
19	Jul-27	Jul	2027	$3.12	-$0.602
20	Aug-27	Aug	2027	$3.08	-$0.700
21	Sep-27	Sep	2027	$2.61	-$1.141
22	Oct-27	Oct	2027	$2.58	-$1.225
23	Nov-27	Nov	2027	$3.23	-$0.786
24	Dec-27	Dec	2027	$5.10	$0.659
25	Jan-28	Jan	2028	$7.24	$2.503
26	Feb-28	Feb	2028	$6.23	$1.838
27	Mar-28	Mar	2028	$3.28	-$0.493
28	Apr-28	Apr	2028	$2.95	-$0.345
29	May-28	May	2028	$2.63	-$0.640
30	Jun-28	Jun	2028	$2.85	-$0.570
31	Jul-28	Jul	2028	$3.07	-$0.525
32	Aug-28	Aug	2028	$3.02	-$0.642
33	Sep-28	Sep	2028	$2.70	-$0.950
34	Oct-28	Oct	2028	$2.58	-$1.137
35	Nov-28	Nov	2028	$3.31	-$0.645
36	Dec-28	Dec	2028	$5.09	$0.678
37	Jan-29	Jan	2029	$7.57	$2.891
38	Feb-29	Feb	2029	$6.66	$2.322
39	Mar-29	Mar	2029	$3.44	-$0.196
40	Apr-29	Apr	2029	$2.93	-$0.247
41	May-29	May	2029	$2.75	-$0.407
42	Jun-29	Jun	2029	$2.84	-$0.466
43	Jul-29	Jul	2029	$2.94	-$0.539
44	Aug-29	Aug	2029	$2.89	-$0.650
45	Sep-29	Sep	2029	$2.72	-$0.815
46	Oct-29	Oct	2029	$2.61	-$0.998
47	Nov-29	Nov	2029	$3.14	-$0.660

Month	Locational Adjustment ($/MMBtu)
Jan	$2.00
Feb	$1.38
Mar	-$0.33
Apr	-$0.38
May	-$0.75
Jun	-$0.81
Jul	-$0.84
Aug	-$0.85
Sep	-$1.23
Oct	-$1.37
Nov	-$0.92
Dec	$0.49

48	Dec-29	Dec	2029	$5.12	$0.883

Load Shape	Spark Spread On-Peak ($/MWh)	Spark Spread Off-Peak ($/MWh)
193.7%	$9.41	$18.55
166.0%	$10.58	$18.00
97.7%	$15.75	$17.99
83.0%	$20.22	$16.63
71.4%	$25.51	$15.85
73.7%	$30.39	$15.02
77.9%	$56.60	$21.69
79.6%	$44.94	$17.23
67.9%	$31.09	$16.02
65.7%	$28.16	$19.30
84.9%	$21.99	$19.52
138.6%	$11.89	$16.27

Commentary:	In some cases, the spark spread may be a negative monetary value. In the marketplace, this may occur for a short period, but usually for an entire month. However, this factor accounts for differences in the heat rate assumptions and the real market values. Escalation is later applied in a positive manner as not to over devalue future spark spreads.

	Henry,H,F	Panhandle	TCO,TCO,F	TETCO-M3	Transco-Z6
				Tetco M-3	Transco 6 (N
1/1/2025	3.514	3.946	3.174	5.874	4.762
2/1/2025	3.535	3.57	3.3	4.5	3.98
3/1/2025	3.906	3.35	3.51	3.69	3.62
4/1/2025	3.95	3.09	3.23	3.22	3.17
5/1/2025	3.17	2.49	2.54	2.4	2.33
6/1/2025	3.204	2.6	2.45	2.17	2.13
7/1/2025	3.261	2.51	2.2	2.17	2.13
8/1/2025	3.081	2.61	2.53	2.5	2.48
Sep-25	2.83	2.361	2.076	1.934	1.836
Oct-25	2.91	2.369	1.946	1.859	1.764
Nov-25	3.25	2.805	2.542	2.615	2.519
Dec-25	3.82	3.732	3.37	4.544	4.234
Jan-26	4.15	4.429	3.782	7.296	6.756
Feb-26	3.92	4.199	3.594	6.339	5.699
Mar-26	3.54	3.142	3.124	3.147	3.11
Apr-26	3.41	2.863	2.913	2.848	2.743
May-26	3.44	2.825	2.809	2.709	2.562
Jun-26	3.61	2.905	2.873	2.805	2.805
Jul-26	3.81	3.241	3.103	3.118	3.118
Aug-26	3.88	3.33	3.015	3.07	3.08
Sep-26	3.84	3.197	2.799	2.617	2.605
Oct-26	3.88	3.183	2.688	2.573	2.578
Nov-26	4.10	3.552	3.077	3.202	3.225
Dec-26	4.50	4.369	3.837	5.245	5.095
Jan-27	4.75	5.011	4.331	7.569	7.237
Feb-27	4.38	4.674	3.964	7.069	6.231
Mar-27	3.80	3.323	3.345	3.413	3.275
Apr-27	3.42	2.89	2.983	2.873	2.953
May-27	3.39	2.789	2.782	2.736	2.629
Jun-27	3.54	2.944	2.83	2.867	2.85
Jul-27	3.72	3.188	2.888	3.045	3.07
Aug-27	3.78	3.238	2.888	2.968	3.022
Sep-27	3.75	3.196	2.816	2.606	2.698
Oct-27	3.80	3.171	2.753	2.731	2.578
Nov-27	4.01	3.556	3.063	3.356	3.313
Dec-27	4.44	4.281	3.748	5.466	5.088
Jan-28	4.73	4.932	4.366	7.862	7.566
Feb-28	4.39	4.581	4.038	7.303	6.655
Mar-28	3.77	3.476	3.386	3.65	3.443
Apr-28	3.30	2.808	2.676	2.838	2.928
May-28	3.27	2.739	2.629	2.697	2.747
Jun-28	3.42	2.895	2.742	2.83	2.838
Jul-28	3.60	3.13	2.895	2.855	2.935
Aug-28	3.66	3.194	2.924	2.812	2.894
Sep-28	3.65	3.128	2.87	2.613	2.723
Oct-28	3.72	3.14	2.993	2.753	2.613
Nov-28	3.96	3.366	3.403	3.636	3.138

Dec-28	4.41	4.18	3.832	5.28	5.122
Jan-29	4.68	4.865	4.185	7.967	7.827
Feb-29	4.33	4.508	3.871	6.875	6.601
Mar-29	3.64	3.727	3.141	3.767	3.574
Apr-29	3.18	2.705	2.603	2.653	2.755
May-29	3.15	2.636	2.564	2.516	2.454
Jun-29	3.30	2.792	2.676	2.652	2.672
Jul-29	3.47	3.026	2.872	2.746	2.784
Aug-29	3.54	3.092	2.899	2.792	2.864
Sep-29	3.54	3.076	2.85	2.596	2.706
Oct-29	3.61	3.116	2.953	2.749	2.799
Nov-29	3.80	3.388	3.308	3.773	3.198
Dec-29	4.24	3.847	3.727	4.994	4.797
Jan-30	4.51	4.65	4.087	6.953	7.135
Feb-30	4.22	4.35	3.825	6.42	6.618
Mar-30	3.57	3.947	3.144	3.501	3.471
Apr-30	3.07	2.628	2.501	2.541	2.588
May-30	3.04	2.551	2.454	2.396	2.264
Jun-30	3.17	2.692	2.552	2.517	2.472
Jul-30	3.32	2.908	2.698	2.548	2.541
Aug-30	3.39	2.97	2.725	2.59	2.618
Sep-30	3.37	2.936	2.658	2.378	2.448
Oct-30	3.44	3.013	2.793	2.531	2.536
Nov-30	3.63	3.19	3.077	3.54	2.857
Dec-30	4.06	3.382	3.489	4.752	4.559
Jan-31	4.33	4.479	3.929	6.716	6.926
Feb-31	4.06	4.194	3.682	6.122	6.412
Mar-31	3.43	3.807	3.017	3.227	3.294
Apr-31	3.03	2.597	2.467	2.534	2.584
May-31	3.05	2.568	2.468	2.442	2.32
Jun-31	3.19	2.707	2.565	2.557	2.515
Jul-31	3.33	2.919	2.706	2.561	2.556
Aug-31	3.36	2.941	2.694	2.564	2.594
Sep-31	3.33	2.897	2.617	2.345	2.407
Oct-31	3.39	2.963	2.74	2.483	2.49
Nov-31	3.58	3.221	3.269	3.511	2.886
Dec-31	4.03	3.428	3.696	4.75	4.59
Jan-32	4.30	4.298	4.298	6.718	6.96
Feb-32	4.03	4.028	4.028	6.046	6.443
Mar-32	3.36	3.363	3.363	3.128	3.298
Apr-32	2.88	2.883	2.883	2.371	2.345
May-32	2.86	2.863	2.863	2.235	2.033
Jun-32	3.01	3.013	3.013	2.371	2.253
Jul-32	3.17	3.173	3.173	2.423	2.348
Aug-32	3.21	3.205	3.205	2.43	2.39
Sep-32	3.18	3.18	3.18	2.218	2.218
Oct-32	3.26	3.255	3.255	2.37	2.307
Nov-32	3.49	3.485	3.485	3.117	2.47
Dec-32	3.92	3.915	3.915	4.327	4.145

Jan-33	4.17	4.165	4.165	6.625	6.493
Feb-33	3.90	3.9	3.9	5.88	6.002
Mar-33	3.28	3.28	3.28	3.015	2.878
Apr-33	2.83	2.83	2.83	2.258	2.22
May-33	2.86	2.86	2.86	2.172	1.955
Jun-33	3.00	3.002	3.002	2.3	2.17
Jul-33	3.17	3.167	3.167	2.469	2.379
Aug-33	3.21	3.207	3.207	2.485	2.429
Sep-33	3.18	3.182	3.182	2.27	2.257
Oct-33	3.23	3.228	3.228	2.396	2.318
Nov-33	3.49	3.488	3.488	4.186	2.53
Dec-33	3.89	3.888	3.888	5.366	4.176
Jan-34	4.14	4.143	4.143	6.675	6.531
Feb-34	3.90	3.903	3.903	5.878	6.063
Mar-34	3.30	3.303	3.303	3.041	2.963
Apr-34	2.90	2.903	2.903	2.348	2.435
May-34	2.93	2.933	2.933	2.263	2.165
Jun-34	3.06	3.063	3.063	2.378	2.373
Jul-34	3.21	3.208	3.208	2.528	2.558
Aug-34	3.25	3.248	3.248	2.543	2.608
Sep-34	3.26	3.263	3.263	2.368	2.481
Oct-34	3.31	3.309	3.309	2.494	2.537
Nov-34	3.55	3.549	3.549	5.394	2.579
Dec-34	3.95	3.949	3.949	6.574	4.219
Jan-35	4.17	4.169	4.169	6.701	6.401
Feb-35	3.93	3.929	3.929	5.904	5.949
Mar-35	3.50	3.499	3.499	3.237	3.004
Apr-35	3.17	3.169	3.169	2.614	2.631
May-35	3.15	3.147	3.147	2.477	2.312
Jun-35	3.18	3.182	3.182	2.497	2.422
Jul-35	3.22	3.222	3.222	2.542	2.504
Aug-35	3.26	3.262	3.262	2.557	2.554
Sep-35	3.28	3.277	3.277	2.382	2.425
Oct-35	3.32	3.323	3.323	2.508	2.483
Nov-35	3.52	3.523	3.523	5.341	2.325
Dec-35	3.82	3.823	3.823	6.421	3.865
Jan-36	4.09	4.093	4.093	4.093	6.233
Feb-36	3.92	3.923	3.923	3.923	5.851
Mar-36	3.65	3.653	3.653	3.653	3.063
Apr-36	3.32	3.323	3.323	3.323	2.721
May-36	3.30	3.301	3.301	3.301	2.401
Jun-36	3.34	3.336	3.336	3.336	2.511
Jul-36	3.38	3.376	3.376	3.376	2.594
Aug-36	3.42	3.416	3.416	3.416	2.644
Sep-36	3.43	3.431	3.431	3.431	2.513
Oct-36	3.48	3.477	3.477	3.477	2.572
Nov-36	3.55	3.549	3.549	3.549	2.287

	Dec-36	3.70	3.704	3.704	3.704	3.682
	Jan-37	3.93	3.929	3.929	3.929	3.929
	Feb-37	3.78	3.779	3.779	3.779	3.779
	Mar-37	3.58	3.579	3.579	3.579	3.579
	Apr-37	3.25	3.249	3.249	3.249	3.249
	May-37	3.23	3.227	3.227	3.227	3.227
	Jun-37	3.26	3.262	3.262	3.262	3.262
	Jul-37	3.30	3.302	3.302	3.302	3.302
	Aug-37	3.34	3.342	3.342	3.342	3.342
	Sep-37	3.36	3.357	3.357	3.357	3.357
	Oct-37	3.40	3.403	3.403	3.403	3.403
	Nov-37	3.48	3.475	3.475	3.475	3.475
		3.515	3.493	2.835	6.063	3.493

Transco-Z6 (NY),TZS,F

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6.583					
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1.983					
1.884					
3.791					
4.147					
6.179					
6.919					
4.161					
2.861		-0.555	2.61	-0.5375	2.63 checks
2.429		-0.67	2.477	-0.835	2.31 checks
2.577	note: NG values beyond May 2035 are not used				
2.61					
2.64					
1.997					
1.898					
3.185					
3.441					
4.093					
3.923					
3.653					
3.323					
3.301					
3.336					
3.376					
3.416					
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3.704
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3.357
3.403
3.475
2.945

PPI Industry Data
Original Data Value

Source:	https://data.bls.gov/timeseries/PCU221110221110
Series ID:	PCU221110221110
Series Title:	PPI industry data for Electric power generation, not seasonally
Industry:	Electric power generation
Product:	Electric power generation
Base Date:	200312
Years:	2015 to 2025

Years in Escalation Rate	5

Year	Jan	Feb	Mar	Apr	May	Jun	Jul
2019	134.3	150.9	152.9	132.0	129.9	136.1	137.4
2020	126.7	124.0	122.6	120.6	118.5	124.9	134.0
2021	133.3	744.7	154.3	139.2	141.7	172.2	175.8
2022	167.9	168.5	169.4	193.2	277.7	234.3	296.1
2023	265.8	165.2	175.3	153.9	136.2	150.9	178.8
2024	194.3	147.4	142.8	136.6	155.6	146.8	171.1
2025	160.2	166.0	153.0	149.5	153.1	158.0	

Aug	Sep	Oct	Nov	Dec	Annual Avg.	Full Year Flag
170.1	169.5	140.4	140.2	131.5	143.8	1
153.0	139.4	140.8	141.6	136.5	131.9	1
181.2	187.2	191.0	180.4	163.1	213.7	1
274.9	286.9	207.8	194.1	310.7	231.8	1
280.5	201.8	159.5	167.5	155.5	182.6	1
170.3	165.8	160.9	141.6	159.1	157.7	1
					Data Missing	0

PPI Inflation Rate	**3.64%**
CPI Inflation Rate	**3.57%**
BLS Escalation Rate	**0.07%**

Commentary:

CPI-U, All Items Less Food and Ene

The BLS escalation rate is based on the latest five full years of available data. It is important to have a full year of data as the historical trend is that months early in the year have a higher value than the annual average.

Year	Jan	Feb
2019	260.1	261.1
2020	266.0	267.3
2021	269.8	270.7
2022	286.0	288.1
2023	302.0	304.0
2024	313.6	315.4
2025	323.8	325.3

rgy

Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
261.8	262.3	262.6	263.2	263.6	264.2	264.5	265.1	265.1
267.3	266.1	265.8	266.3	267.7	268.8	269.1	269.3	269.5
271.7	274.0	275.9	278.2	279.1	279.5	279.9	281.6	282.8
289.3	290.8	292.5	294.7	295.6	297.2	298.4	299.3	299.6
305.5	306.9	308.1	308.9	309.4	310.1	310.8	311.4	311.6
317.1	318.0	318.6	319.0	319.2	320.0	321.1	321.8	321.9
325.9	326.8	327.5	328.4					
								CPI Infl

Dec	Annual Avg.	Flag
264.9	263.2	1
269.2	267.7	1
283.9	277.3	1
300.1	294.3	1
311.9	308.4	1
322.0	319.0	1
	Data Missing	0
ation Rate	**3.56811%**	

Generation Capacity

Status | *Data Needed: TRC Order Section*

Complete | PJM Base Residual Auction Results: B.6 Page 17

		Seasor			
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$25.00	$17.07	$14.46	$134.96
Met-Ed	METED	$47.90	$24.75	$24.75	$134.96
PECO	PECO	$48.93	$24.75	$27.48	$134.96
Penelec	PENLC	$47.90	$24.75	$24.75	$134.96
Penn Power	ATSI	$25.00	$17.07	$14.46	$134.96
PPL	PL	$47.90	$24.75	$24.75	$134.96
West Penn	APS	$25.00	$17.07	$14.46	$134.96

Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$60.07	$60.07	$60.07
19	2027	2028	$25.99	$28.98	$29.25
20	2028	2029	$26.53	$29.58	$29.86
21	2029	2030	$27.08	$30.19	$30.48
22	2030	2031	$27.64	$30.81	$31.11
23	2031	2032	$28.21	$31.45	$31.75
24	2032	2033	$28.80	$32.10	$32.41
25	2033	2034	$29.40	$32.77	$33.08
26	2034	2035	$30.00	$33.45	$33.77
27	2035	2036	$30.63	$34.14	$34.46
28	2036	2037	$31.26	$34.85	$35.18
29	2037	2038	$31.91	$35.57	$35.91
30	2038	2039	$32.57	$36.31	$36.65
31	2039	2040	$33.24	$37.06	$37.41
32	2040	2041	$33.93	$37.83	$38.19
33	2041	2042	$34.64	$38.61	$38.98
34	2042	2043	$35.35	$39.41	$39.78
35	2043	2044	$36.09	$40.23	$40.61
36	2044	2045	$36.83	$41.06	$41.45
37	2045	2046	$37.60	$41.91	$42.31
38	2046	2047	$38.37	$42.78	$43.18
39	2047	2048	$39.17	$43.66	$44.08

ıally Adjusted BRA Results (Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$48.93	$24.75	$27.48	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal $/kW-year)					
Summer					
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$60.07	$60.07	$60.07	$60.07	$60.07	$60.07
$28.98	$25.99	$28.98	$25.99	$25.99	$28.98
$29.58	$26.53	$29.58	$26.53	$26.53	$29.58
$30.19	$27.08	$30.19	$27.08	$27.08	$30.19
$30.81	$27.64	$30.81	$27.64	$27.64	$30.81
$31.45	$28.21	$31.45	$28.21	$28.21	$31.45
$32.10	$28.80	$32.10	$28.80	$28.80	$32.10
$32.77	$29.40	$32.77	$29.40	$29.40	$32.77
$33.45	$30.00	$33.45	$30.00	$30.00	$33.45
$34.14	$30.63	$34.14	$30.63	$30.63	$34.14
$34.85	$31.26	$34.85	$31.26	$31.26	$34.85
$35.57	$31.91	$35.57	$31.91	$31.91	$35.57
$36.31	$32.57	$36.31	$32.57	$32.57	$36.31
$37.06	$33.24	$37.06	$33.24	$33.24	$37.06
$37.83	$33.93	$37.83	$33.93	$33.93	$37.83
$38.61	$34.64	$38.61	$34.64	$34.64	$38.61
$39.41	$35.35	$39.41	$35.35	$35.35	$39.41
$40.23	$36.09	$40.23	$36.09	$36.09	$40.23
$41.06	$36.83	$41.06	$36.83	$36.83	$41.06
$41.91	$37.60	$41.91	$37.60	$37.60	$41.91
$42.78	$38.37	$42.78	$38.37	$38.37	$42.78
$43.66	$39.17	$43.66	$39.17	$39.17	$43.66

Seasonally Adjusted PJM BRA Res					
Summer					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

Winter					
PECO	Penelec	Penn Power	PPL	West Penn	Inflation Flag
$60.07	$60.07	$60.07	$60.07	$60.07	0
$29.25	$28.98	$25.99	$28.98	$25.99	0
$29.86	$29.58	$26.53	$29.58	$26.53	1
$30.48	$30.19	$27.08	$30.19	$27.08	1
$31.11	$30.81	$27.64	$30.81	$27.64	1
$31.75	$31.45	$28.21	$31.45	$28.21	1
$32.41	$32.10	$28.80	$32.10	$28.80	1
$33.08	$32.77	$29.40	$32.77	$29.40	1
$33.77	$33.45	$30.00	$33.45	$30.00	1
$34.46	$34.14	$30.63	$34.14	$30.63	1
$35.18	$34.85	$31.26	$34.85	$31.26	1
$35.91	$35.57	$31.91	$35.57	$31.91	1
$36.65	$36.31	$32.57	$36.31	$32.57	1
$37.41	$37.06	$33.24	$37.06	$33.24	1
$38.19	$37.83	$33.93	$37.83	$33.93	1
$38.98	$38.61	$34.64	$38.61	$34.64	1
$39.78	$39.41	$35.35	$39.41	$35.35	1
$40.61	$40.23	$36.09	$40.23	$36.09	1
$41.45	$41.06	$36.83	$41.06	$36.83	1
$42.31	$41.91	$37.60	$41.91	$37.60	1
$43.18	$42.78	$38.37	$42.78	$38.37	1
$44.08	$43.66	$39.17	$43.66	$39.17	1

sults (Real $/kW-year)					
Winter					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

Input Flag
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Years Averaged	5

Demand Split	
Summer	50%
Winter	50%

PJM BRA Results (					
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$50.00	$34.13	$28.92	$269.92
Met-Ed	METED	$95.79	$49.49	$49.49	$269.92
PECO	PECO	$97.86	$49.49	$54.95	$269.92
Penelec	PENLC	$95.79	$49.49	$49.49	$269.92
Penn Power	ATSI	$50.00	$34.13	$28.92	$269.92
PPL	PL	$95.79	$49.49	$49.49	$269.92
West Penn	APS	$50.00	$34.13	$28.92	$269.92

Note: Data through 2024-25 BRA auction does not include winter peak values. Assumed BRA results encompa

Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$97.86	$49.49	$54.95	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17

ass value for both summer and winter peak. This may change for future auctions

Avoided Transmission Capacity Forecast in Nominal Dollars					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$61.07	$58.92	$22.48
19	2027	2028	$62.33	$60.14	$22.94
20	2028	2029	$63.62	$61.38	$23.42
21	2029	2030	$64.94	$62.66	$23.90
22	2030	2031	$66.29	$63.95	$24.40
23	2031	2032	$67.66	$65.28	$24.90
24	2032	2033	$69.06	$66.63	$25.42
25	2033	2034	$70.49	$68.01	$25.95
26	2034	2035	$71.95	$69.42	$26.48
27	2035	2036	$73.44	$70.86	$27.03
28	2036	2037	$74.96	$72.33	$27.59
29	2037	2038	$76.52	$73.82	$28.16
30	2038	2039	$78.10	$75.35	$28.75
31	2039	2040	$79.72	$76.92	$29.34
32	2040	2041	$81.37	$78.51	$29.95
33	2041	2042	$83.06	$80.13	$30.57
34	2042	2043	$84.78	$81.79	$31.20
35	2043	2044	$86.53	$83.49	$31.85
36	2044	2045	$88.33	$85.22	$32.51
37	2045	2046	$90.16	$86.98	$33.18

Avoided Transmission Capacity Forecast in Nominal Dollar					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$0.00	$0.00	$0.00
19	2027	2028	$0.00	$0.00	$0.00
20	2028	2029	$0.00	$0.00	$0.00
21	2029	2030	$0.00	$0.00	$0.00
22	2030	2031	$0.00	$0.00	$0.00
23	2031	2032	$0.00	$0.00	$0.00
24	2032	2033	$0.00	$0.00	$0.00
25	2033	2034	$0.00	$0.00	$0.00
26	2034	2035	$0.00	$0.00	$0.00
27	2035	2036	$0.00	$0.00	$0.00
28	2036	2037	$0.00	$0.00	$0.00
29	2037	2038	$0.00	$0.00	$0.00
30	2038	2039	$0.00	$0.00	$0.00
31	2039	2040	$0.00	$0.00	$0.00
32	2040	2041	$0.00	$0.00	$0.00
33	2041	2042	$0.00	$0.00	$0.00
34	2042	2043	$0.00	$0.00	$0.00
35	2043	2044	$0.00	$0.00	$0.00
36	2044	2045	$0.00	$0.00	$0.00
37	2045	2046	$0.00	$0.00	$0.00

s ($/kW-year) - Summer				Avoided Distrl	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$44.19	$77.10	$48.00	$8.83	$59.28	$52.46
$45.10	$78.69	$48.99	$9.01	$64.43	$55.82
$46.04	$80.32	$50.00	$9.20	$69.93	$58.95
$46.99	$81.99	$51.04	$9.39	$76.21	$62.16
$47.97	$83.69	$52.10	$9.58	$81.30	$65.41
$48.96	$85.42	$53.18	$9.78	$82.99	$66.77
$49.97	$87.19	$54.28	$9.98	$84.71	$68.15
$51.01	$88.99	$55.40	$10.19	$86.46	$69.56
$52.07	$90.84	$56.55	$10.40	$88.25	$71.00
$53.14	$92.72	$57.72	$10.62	$90.08	$72.47
$54.24	$94.64	$58.92	$10.84	$91.95	$73.97
$55.37	$96.60	$60.14	$11.06	$93.85	$75.51
$56.52	$98.60	$61.38	$11.29	$95.80	$77.07
$57.69	$100.64	$62.66	$11.53	$97.78	$78.67
$58.88	$102.73	$63.95	$11.76	$99.81	$80.30
$60.10	$104.86	$65.28	$12.01	$101.87	$81.96
$61.35	$107.03	$66.63	$12.26	$103.98	$83.66
$62.62	$109.25	$68.01	$12.51	$106.14	$85.39
$63.91	$111.51	$69.42	$12.77	$108.34	$87.16
$65.24	$113.82	$70.86	$13.03	$110.58	$88.97

s ($/kW-year) - Winter				Avoided Distr	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$14.73	$0.00	$48.00	$8.83	$0.21	$6.70
$15.03	$0.00	$48.99	$9.01	$0.12	$7.21
$15.35	$0.00	$50.00	$9.20	$0.18	$8.16
$15.66	$0.00	$51.04	$9.39	$0.18	$8.64
$15.99	$0.00	$52.10	$9.58	$0.29	$9.68
$16.32	$0.00	$53.18	$9.78	$0.29	$9.88
$16.66	$0.00	$54.28	$9.98	$0.30	$10.09
$17.00	$0.00	$55.40	$10.19	$0.30	$10.30
$17.36	$0.00	$56.55	$10.40	$0.31	$10.51
$17.71	$0.00	$57.72	$10.62	$0.32	$10.73
$18.08	$0.00	$58.92	$10.84	$0.32	$10.95
$18.46	$0.00	$60.14	$11.06	$0.33	$11.18
$18.84	$0.00	$61.38	$11.29	$0.34	$11.41
$19.23	$0.00	$62.66	$11.53	$0.34	$11.65
$19.63	$0.00	$63.95	$11.76	$0.35	$11.89
$20.03	$0.00	$65.28	$12.01	$0.36	$12.13
$20.45	$0.00	$66.63	$12.26	$0.37	$12.39
$20.87	$0.00	$68.01	$12.51	$0.37	$12.64
$21.30	$0.00	$69.42	$12.77	$0.38	$12.90
$21.75	$0.00	$70.86	$13.03	$0.39	$13.17

ɔution Capacity Forecast in Nominal Dollars ($/kW-year) - Summer				
PECO	Penelec	Penn Power	PPL	West Penn
$39.61	$37.18	$43.52	$25.11	$41.25
$47.21	$42.64	$45.52	$26.68	$46.27
$49.64	$47.98	$45.17	$29.00	$51.89
$51.04	$53.05	$45.79	$31.55	$56.92
$50.53	$57.97	$45.98	$33.94	$62.19
$51.57	$59.17	$46.93	$34.64	$63.48
$52.64	$60.39	$47.91	$35.36	$64.80
$53.73	$61.65	$48.90	$36.09	$66.14
$54.85	$62.92	$49.91	$36.84	$67.51
$55.98	$64.23	$50.94	$37.60	$68.91
$57.14	$65.56	$52.00	$38.38	$70.34
$58.33	$66.91	$53.08	$39.17	$71.79
$59.53	$68.30	$54.18	$39.99	$73.28
$60.77	$69.72	$55.30	$40.81	$74.80
$62.03	$71.16	$56.44	$41.66	$76.35
$63.31	$72.63	$57.61	$42.52	$77.93
$64.62	$74.14	$58.81	$43.40	$79.54
$65.96	$75.67	$60.03	$44.30	$81.19
$67.33	$77.24	$61.27	$45.22	$82.87
$68.72	$78.84	$62.54	$46.16	$84.59

ɾbution Capacity Forecast in Nominal Dollars ($/kW-year) - Winter				
PECO	Penelec	Penn Power	PPL	West Penn
$10.26	$5.79	$16.27	$32.44	$5.05
$5.67	$5.97	$16.76	$36.48	$6.06
$5.54	$6.24	$19.33	$39.40	$7.01
$5.08	$6.58	$20.57	$41.88	$7.93
$7.16	$7.24	$22.70	$44.30	$9.02
$7.31	$7.39	$23.17	$45.22	$9.21
$7.46	$7.54	$23.65	$46.16	$9.40
$7.62	$7.69	$24.14	$47.12	$9.59
$7.78	$7.85	$24.64	$48.09	$9.79
$7.94	$8.02	$25.15	$49.09	$9.99
$8.10	$8.18	$25.67	$50.10	$10.20
$8.27	$8.35	$26.20	$51.14	$10.41
$8.44	$8.53	$26.74	$52.20	$10.63
$8.62	$8.70	$27.30	$53.28	$10.85
$8.80	$8.88	$27.86	$54.39	$11.07
$8.98	$9.07	$28.44	$55.51	$11.30
$9.16	$9.25	$29.03	$56.66	$11.53
$9.35	$9.45	$29.63	$57.84	$11.77
$9.55	$9.64	$30.25	$59.04	$12.02
$9.75	$9.84	$30.87	$60.26	$12.27

Summer Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$22.48	PECO
PPL	$48.00	PPL
Duquesne Light	$61.07	DLC
FE: Met-Ed	$58.92	Met-Ed
FE: Penelec	$44.19	Penelec
FE: Penn Power	$77.10	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Winter Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$0.00	PECO
PPL	$48.00	PPL
Duquesne Light	$0.00	DLC
FE: Met-Ed	$0.00	Met-Ed
FE: Penelec	$14.73	Penelec
FE: Penn Power	$0.00	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Summer Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$39.61	$47.21	$49.64	$51.04	$50.53	PECO
$25.11	$26.68	$29.00	$31.55	$33.94	PPL
$59.28	$64.43	$69.93	$76.21	$81.30	DLC
$52.46	$55.82	$58.95	$62.16	$65.41	Met-Ed
$37.18	$42.64	$47.98	$53.05	$57.97	Penelec
$43.52	$45.52	$45.17	$45.79	$45.98	Penn Power
$41.25	$46.27	$51.89	$56.92	$62.19	West Penn

Winter Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$10.26	$5.67	$5.54	$5.08	$7.16	PECO
$32.44	$36.48	$39.40	$41.88	$44.30	PPL
$0.21	$0.12	$0.18	$0.18	$0.29	DLC
$6.70	$7.21	$8.16	$8.64	$9.68	Met-Ed
$5.79	$5.97	$6.24	$6.58	$7.24	Penelec
$16.27	$16.76	$19.33	$20.57	$22.70	Penn Power
$5.05	$6.06	$7.01	$7.93	$9.02	West Penn

Alternative Energy Portfolio Standards (AEPS) Act

Year	2026
Load (MWh)	1,000

Credit	**Tier Req (weight)**	**Price**		**Required Credits**	**Cost**
Solar	0.5%	$37.25		5	$186
Tier I	8.0%	$34.20		80	$2,736
Tier II	10.0%	$39.63		100	$3,963
			Total	**185**	**$6,885**

Weighted Avg. Price (Per Credit)
$37.21

Weighted Avg. Price (Per MWh)
$6.88

Alternative Enery Credit Prices as of 05/01/24				
Tier	**Reporting Year**	**Marex (Bid price)**	**Marex (Offer price)**	**Avg Price**
Solar	2024	$34.50	$35.50	$35.00
	2025	$37.00	$38.00	$37.50
	2026	$36.75	$37.75	$37.25
	2027	$36.50	$37.50	$37.00
Tier I	2023	$34.55	$35.05	$34.80
	2024	$34.50	$35.00	$34.75
	2025	$34.55	$35.05	$34.80
	2026	$33.95	$34.45	$34.20
Tier II	2023	$33.50	$34.25	$33.88
	2024	$35.00	$35.75	$35.38
	2025	$38.50	$39.25	$38.88
	2026	$39.25	$40.00	$39.63

Program Year	PY Start	PY End.	AEPS Cost
18	2027	2028	$6.88
19	2028	2029	$7.02
20	2029	2030	$7.16
21	2030	2031	$7.31
22	2031	2032	$7.45
23	2032	2033	$7.60
24	2033	2034	$7.75
25	2034	2035	$7.91
26	2035	2036	$8.07
27	2036	2037	$8.23
28	2037	2038	$8.39
29	2038	2039	$8.56
30	2039	2040	$8.73
31	2040	2041	$8.91
32	2041	2042	$9.08
33	2042	2043	$9.27
34	2043	2044	$9.45
35	2044	2045	$9.64
36	2045	2046	$9.83
37	2046	2047	$10.03
38	2047	2048	$10.23
39	2048	2049	$10.43
40	2049	2050	$10.64
41	2050	2051	$10.86
42	2051	2052	$11.07
43	2052	2053	$11.30
44	2053	2054	$11.52
45	2054	2055	$11.75
46	2055	2056	$11.99
47	2056	2057	$12.23

	EDC Name:	Met-Ed
	Column Start:	12

Demand Split	
Summer	50%
Winter	50%

DY/PY Start	Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 78.36	$ -	$ -	$ -	$ -
2028	$ 79.92	$ 79.92	$ -	$ -	$ -
2029	$ 81.52	$ 81.52	$ 81.52	$ -	$ -
2030	$ 83.15	$ 83.15	$ 83.15	$ 83.15	$ -
2031	$ -	$ 84.82	$ 84.82	$ 84.82	$ 84.82
2032	$ -	$ -	$ 86.51	$ 86.51	$ 86.51
2033	$ -	$ -	$ -	$ 88.24	$ 88.24
2034	$ -	$ -	$ -	$ -	$ 90.01
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Summer Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 39.18	$ -	$ -	$ -	$ -
2028	$ 39.96	$ 39.96	$ -	$ -	$ -
2029	$ 40.76	$ 40.76	$ 40.76	$ -	$ -
2030	$ 41.58	$ 41.58	$ 41.58	$ 41.58	$ -
2031	$ -	$ 42.41	$ 42.41	$ 42.41	$ 42.41
2032	$ -	$ -	$ 43.26	$ 43.26	$ 43.26
2033	$ -	$ -	$ -	$ 44.12	$ 44.12
2034	$ -	$ -	$ -	$ -	$ 45.01
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

DRIPE

Status

Complete

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

To Output Table

DY/PY Start	Energy DRIPE ($/MWh)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 13.86	$ -	$ -	$ -	$ -
2028	$ 22.45	$ 14.61	$ -	$ -	$ -
2029	$ 29.02	$ 23.39	$ 15.22	$ -	$ -
2030	$ 27.27	$ 29.99	$ 24.17	$ 15.73	$ -
2031	$ -	$ 28.16	$ 30.98	$ 24.96	$ 16.25
2032	$ -	$ -	$ 29.17	$ 32.09	$ 25.86
2033	$ -	$ -	$ -	$ 29.48	$ 32.43
2034	$ -	$ -	$ -	$ -	$ 29.72
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Winter Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 39.18	$ -	$ -	$ -	$ -
2028	$ 39.96	$ 39.96	$ -	$ -	$ -
2029	$ 40.76	$ 40.76	$ 40.76	$ -	$ -
2030	$ 41.58	$ 41.58	$ 41.58	$ 41.58	$ -
2031	$ -	$ 42.41	$ 42.41	$ 42.41	$ 42.41
2032	$ -	$ -	$ 43.26	$ 43.26	$ 43.26
2033	$ -	$ -	$ -	$ 44.12	$ 44.12
2034	$ -	$ -	$ -	$ -	$ 45.01
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

***Data Source** : PA_DRIPE_Study_Report_05.03.2024*

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$67.54	$68.89	$70.26	$71.67	$78.36	$79.92	$81.52	$83.15	$25.04
$68.89	$70.26	$71.67	$73.10	$79.92	$81.52	$83.15	$84.82	$25.54
$70.26	$71.67	$73.10	$74.56	$81.52	$83.15	$84.82	$86.51	$26.05
$71.67	$73.10	$74.56	$76.06	$83.15	$84.82	$86.51	$88.24	$26.57
$73.10	$74.56	$76.06	$77.58	$84.82	$86.51	$88.24	$90.01	$27.10

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$14.65	$24.23	$31.97	$30.62	$14.72	$24.39	$32.25	$30.98	$14.69
$15.77	$25.77	$33.68	$32.26	$15.87	$25.99	$34.08	$32.75	$15.81
$16.77	$27.15	$35.49	$34.13	$16.92	$27.46	$36.02	$34.78	$16.78
$17.67	$28.60	$37.55	$35.25	$17.88	$29.03	$38.26	$36.06	$17.68
$18.61	$30.26	$38.77	$36.41	$18.90	$30.83	$39.67	$37.42	$18.61

Generation Capacity DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$25.54	$26.05	$26.57	$78.36	$79.92	$81.52	$83.15	$78.36	$79.92
$26.05	$26.57	$27.10	$79.92	$81.52	$83.15	$84.82	$79.92	$81.52
$26.57	$27.10	$27.64	$81.52	$83.15	$84.82	$86.51	$81.52	$83.15
$27.10	$27.64	$28.20	$83.15	$84.82	$86.51	$88.24	$83.15	$84.82
$27.64	$28.20	$28.76	$84.82	$86.51	$88.24	$90.01	$84.82	$86.51

Electric Energy DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$24.28	$32.00	$30.64	$13.86	$22.45	$29.02	$27.27	$14.79	$24.53
$25.79	$33.70	$32.26	$14.61	$23.39	$29.99	$28.16	$15.96	$26.17
$27.16	$35.48	$34.12	$15.22	$24.17	$30.98	$29.17	$17.03	$27.66
$28.60	$37.53	$35.17	$15.73	$24.96	$32.09	$29.48	$18.00	$29.23
$30.25	$38.69	$36.28	$16.25	$25.86	$32.43	$29.72	$19.03	$31.02

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$81.52	$83.15	$14.65	$14.94	$15.24	$15.54	$25.04	$25.54	$26.05
$83.15	$84.82	$14.94	$15.24	$15.54	$15.85	$25.54	$26.05	$26.57
$84.82	$86.51	$15.24	$15.54	$15.85	$16.17	$26.05	$26.57	$27.10
$86.51	$88.24	$15.54	$15.85	$16.17	$16.49	$26.57	$27.10	$27.64
$88.24	$90.01	$15.85	$16.17	$16.49	$16.82	$27.10	$27.64	$28.20

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$32.47	$31.20	$14.73	$24.38	$32.24	$30.98	$13.25	$21.65	$28.61
$34.32	$32.97	$15.87	$25.98	$34.08	$32.77	$14.09	$23.06	$30.21
$36.27	$34.99	$16.91	$27.46	$36.05	$34.83	$15.01	$24.35	$31.97
$38.49	$36.25	$17.87	$29.05	$38.31	$36.14	$15.85	$25.76	$34.00
$39.88	$37.58	$18.91	$30.88	$39.75	$37.50	$16.77	$27.40	$35.31

Year 4
$26.57
$27.10
$27.64
$28.20
$28.76

Year 4
$27.47
$29.06
$30.90
$32.09
$33.36

To LI Output Table

PA ACT 129 Program Year	DY/PY Start	PECO	PPL	DLC	Met-Ed	Penelec	Penn Power
18	2027	$58.14	$44.87	$18.67	$18.10	$18.10	$18.10
19	2028	$59.30	$45.77	$19.04	$18.46	$18.46	$18.46
20	2029	$60.49	$46.68	$19.42	$18.83	$18.83	$18.83
21	2030	$61.70	$47.62	$19.81	$19.21	$19.21	$19.21
22	2031	$62.93	$48.57	$20.21	$19.59	$19.59	$19.59
23	2032	$64.19	$49.54	$20.61	$19.98	$19.98	$19.98
24	2033	$65.48	$50.53	$21.03	$20.38	$20.38	$20.38
25	2034	$66.78	$51.54	$21.45	$20.79	$20.79	$20.79
26	2035	$68.12	$52.57	$21.87	$21.21	$21.21	$21.21
27	2036	$69.48	$53.62	$22.31	$21.63	$21.63	$21.63
28	2037	$70.87	$54.70	$22.76	$22.06	$22.06	$22.06
29	2038	$72.29	$55.79	$23.21	$22.51	$22.51	$22.51
30	2039	$73.74	$56.91	$23.68	$22.96	$22.96	$22.96
31	2040	$75.21	$58.04	$24.15	$23.41	$23.41	$23.41
32	2041	$76.71	$59.21	$24.63	$23.88	$23.88	$23.88
33	2042	$78.25	$60.39	$25.13	$24.36	$24.36	$24.36
34	2043	$79.81	$61.60	$25.63	$24.85	$24.85	$24.85
35	2044	$81.41	$62.83	$26.14	$25.34	$25.34	$25.34
36	2045	$83.04	$64.09	$26.67	$25.85	$25.85	$25.85
37	2046	$84.70	$65.37	$27.20	$26.37	$26.37	$26.37

West Penn
$18.10
$18.46
$18.83
$19.21
$19.59
$19.98
$20.38
$20.79
$21.21
$21.63
$22.06
$22.51
$22.96
$23.41
$23.88
$24.36
$24.85
$25.34
$25.85
$26.37

Arrearages 2026 Data

EDC	Average kWh savings per participant (System Level)	Total Annual Impact Per MWh, $2026
PECO	288	$58.14
PPL	382	$44.87
DLC	556	$18.67
Met-Ed	350	$18.10
Penelec	325	$18.10
Penn Power	358	$18.10
West Penn	372	$18.10

Source
EDC specific (per draft memo)
EDC specific (per draft memo)
EDC specific (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)

Sector	Building Type	End Use	Summer Peak
Commercial	Composite	cooling	57.6%
Commercial	Composite	exterior_lighting	9.2%
Commercial	Composite	fans	25.9%
Commercial	Composite	heat_recovery	23.5%
Commercial	Composite	heat_rejection	57.2%
Commercial	Composite	heating	0.5%
Commercial	Composite	interior_equipment	24.1%
Commercial	Composite	interior_lighting	29.8%
Commercial	Composite	pumps	15.2%
Commercial	Composite	refrigeration	22.9%
Commercial	Composite	water_heating	25.0%
Commercial	Composite	whole_building	25.2%
Commercial	Education	cooling	64.2%
Commercial	Education	exterior_lighting	9.1%
Commercial	Education	fans	26.8%
Commercial	Education	heat_recovery	22.9%
Commercial	Education	heat_rejection	53.7%
Commercial	Education	heating	1.1%
Commercial	Education	interior_equipment	23.5%
Commercial	Education	interior_lighting	31.0%
Commercial	Education	pumps	25.7%
Commercial	Education	refrigeration	23.0%
Commercial	Education	water_heating	26.8%
Commercial	Education	whole_building	23.5%
Commercial	Grocery	cooling	56.4%
Commercial	Grocery	exterior_lighting	9.2%
Commercial	Grocery	fans	24.1%
Commercial	Grocery	heat_recovery	22.2%
Commercial	Grocery	heating	0.1%
Commercial	Grocery	interior_equipment	23.9%
Commercial	Grocery	interior_lighting	22.5%
Commercial	Grocery	pumps	8.4%
Commercial	Grocery	whole_building	24.0%
Commercial	Health	cooling	50.6%
Commercial	Health	exterior_lighting	9.1%
Commercial	Health	fans	23.2%
Commercial	Health	heat_recovery	20.5%
Commercial	Health	heat_rejection	50.1%
Commercial	Health	heating	1.4%
Commercial	Health	interior_equipment	23.3%
Commercial	Health	interior_lighting	27.8%
Commercial	Health	pumps	33.2%
Commercial	Health	refrigeration	23.7%
Commercial	Health	water_heating	22.2%
Commercial	Health	whole_building	25.8%
Commercial	Lodging	cooling	38.6%
Commercial	Lodging	exterior_lighting	9.2%
Commercial	Lodging	fans	27.9%
Commercial	Lodging	heat_recovery	19.6%
Commercial	Lodging	heat_rejection	47.6%
Commercial	Lodging	heating	0.2%
Commercial	Lodging	interior_equipment	19.6%
Commercial	Lodging	interior_lighting	21.7%
Commercial	Lodging	pumps	19.4%

Commercial	Lodging	refrigeration	21.5%
Commercial	Lodging	water_heating	18.8%
Commercial	Lodging	whole_building	22.0%
Commercial	Office	cooling	54.2%
Commercial	Office	exterior_lighting	9.2%
Commercial	Office	fans	25.0%
Commercial	Office	heat_recovery	25.9%
Commercial	Office	heat_rejection	56.6%
Commercial	Office	heating	0.2%
Commercial	Office	interior_equipment	21.8%
Commercial	Office	interior_lighting	32.8%
Commercial	Office	pumps	24.5%
Commercial	Office	water_heating	25.8%
Commercial	Office	whole_building	25.4%
Commercial	Restaurant	cooling	49.7%
Commercial	Restaurant	exterior_lighting	9.1%
Commercial	Restaurant	fans	24.4%
Commercial	Restaurant	heat_recovery	19.7%
Commercial	Restaurant	heating	0.7%
Commercial	Restaurant	interior_equipment	24.7%
Commercial	Restaurant	interior_lighting	25.0%
Commercial	Restaurant	pumps	8.4%
Commercial	Restaurant	refrigeration	22.0%
Commercial	Restaurant	water_heating	24.7%
Commercial	Restaurant	whole_building	24.3%
Commercial	Retail	cooling	56.0%
Commercial	Retail	exterior_lighting	9.2%
Commercial	Retail	fans	26.6%
Commercial	Retail	heat_recovery	22.7%
Commercial	Retail	heat_rejection	54.5%
Commercial	Retail	heating	0.9%
Commercial	Retail	interior_equipment	23.0%
Commercial	Retail	interior_lighting	30.6%
Commercial	Retail	pumps	4.3%
Commercial	Retail	water_heating	24.3%
Commercial	Retail	whole_building	26.4%
Commercial	Warehouse	cooling	64.1%
Commercial	Warehouse	exterior_lighting	9.3%
Commercial	Warehouse	fans	27.3%
Commercial	Warehouse	heat_recovery	23.7%
Commercial	Warehouse	heat_rejection	64.5%
Commercial	Warehouse	heating	0.0%
Commercial	Warehouse	interior_equipment	28.2%
Commercial	Warehouse	interior_lighting	30.0%
Commercial	Warehouse	pumps	2.5%
Commercial	Warehouse	whole_building	26.2%
Residential	Composite	ceiling_fan	19.3%
Residential	Composite	clothes_dryer	23.9%
Residential	Composite	clothes_washer	25.3%
Residential	Composite	cooling	48.8%
Residential	Composite	cooling_fans_pumps	52.2%
Residential	Composite	dishwasher	26.0%
Residential	Composite	freezer	22.3%
Residential	Composite	heating	0.7%
Residential	Composite	heating_fans_pumps	0.8%

Residential	Composite	heating_hp_bkup	0.0%
Residential	Composite	hot_tub_heater	22.2%
Residential	Composite	hot_tub_pump	22.5%
Residential	Composite	interior_lighting	20.8%
Residential	Composite	lighting_exterior	17.2%
Residential	Composite	lighting_garage	16.6%
Residential	Composite	mech_vent	21.4%
Residential	Composite	net	18.6%
Residential	Composite	plug_loads	18.8%
Residential	Composite	pool_heater	23.9%
Residential	Composite	pool_pump	24.0%
Residential	Composite	pv	34.8%
Residential	Composite	range_oven	22.7%
Residential	Composite	refrigerator	22.1%
Residential	Composite	water_heating	19.8%
Residential	Composite	well_pump	21.2%
Residential	Composite	whole_home	18.6%
Residential	Multi Family	ceiling_fan	19.3%
Residential	Multi Family	clothes_dryer	24.0%
Residential	Multi Family	clothes_washer	25.1%
Residential	Multi Family	cooling	47.9%
Residential	Multi Family	cooling_fans_pumps	49.5%
Residential	Multi Family	dishwasher	25.7%
Residential	Multi Family	freezer	22.3%
Residential	Multi Family	heating	0.5%
Residential	Multi Family	heating_fans_pumps	0.6%
Residential	Multi Family	heating_hp_bkup	0.0%
Residential	Multi Family	hot_tub_heater	22.2%
Residential	Multi Family	hot_tub_pump	22.6%
Residential	Multi Family	interior_lighting	20.8%
Residential	Multi Family	lighting_exterior	17.0%
Residential	Multi Family	mech_vent	22.1%
Residential	Multi Family	net	16.1%
Residential	Multi Family	plug_loads	18.8%
Residential	Multi Family	range_oven	22.8%
Residential	Multi Family	refrigerator	22.1%
Residential	Multi Family	water_heating	19.6%
Residential	Multi Family	well_pump	21.2%
Residential	Multi Family	whole_home	16.1%
Residential	Single Family	ceiling_fan	19.3%
Residential	Single Family	clothes_dryer	23.9%
Residential	Single Family	clothes_washer	25.3%
Residential	Single Family	cooling	49.1%
Residential	Single Family	cooling_fans_pumps	52.9%
Residential	Single Family	dishwasher	26.0%
Residential	Single Family	freezer	22.3%
Residential	Single Family	heating	0.8%
Residential	Single Family	heating_fans_pumps	0.8%
Residential	Single Family	heating_hp_bkup	0.0%
Residential	Single Family	hot_tub_heater	22.2%
Residential	Single Family	hot_tub_pump	22.5%
Residential	Single Family	interior_lighting	20.8%
Residential	Single Family	lighting_exterior	17.2%
Residential	Single Family	lighting_garage	16.6%
Residential	Single Family	mech_vent	21.2%

Residential	Single Family	net	19.3%
Residential	Single Family	plug_loads	18.8%
Residential	Single Family	pool_heater	23.9%
Residential	Single Family	pool_pump	24.0%
Residential	Single Family	pv	34.8%
Residential	Single Family	range_oven	22.7%
Residential	Single Family	refrigerator	22.1%
Residential	Single Family	water_heating	19.8%
Residential	Single Family	well_pump	21.2%
Residential	Single Family	whole_home	19.3%

Summer Off Peak	Winter Peak	Winter Off Peak	Shoulder Peak
29.0%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.8%	11.4%	17.6%
16.5%	14.2%	12.1%	19.3%
31.8%	1.3%	0.5%	6.0%
1.0%	24.6%	36.5%	16.0%
17.1%	14.3%	10.6%	20.3%
11.8%	17.2%	7.5%	23.8%
13.3%	15.4%	21.8%	15.5%
22.3%	11.0%	12.0%	15.9%
12.7%	18.7%	8.5%	24.7%
16.3%	14.3%	12.9%	17.9%
24.9%	1.2%	0.2%	7.0%
26.2%	8.7%	20.9%	10.1%
14.4%	15.6%	10.2%	21.0%
15.2%	14.6%	12.5%	20.0%
35.2%	1.2%	0.4%	5.9%
1.9%	27.5%	27.6%	20.9%
13.8%	16.8%	9.7%	23.7%
8.1%	19.9%	5.6%	27.6%
18.6%	12.3%	14.0%	15.4%
22.2%	11.1%	11.9%	16.0%
4.9%	26.5%	3.3%	34.7%
12.4%	17.2%	14.2%	19.0%
32.3%	1.2%	0.6%	6.1%
26.0%	8.8%	20.8%	10.2%
18.4%	13.8%	11.0%	18.9%
18.0%	13.5%	12.7%	18.2%
0.8%	24.7%	31.9%	18.5%
18.0%	13.4%	11.2%	19.4%
19.4%	12.8%	11.8%	17.7%
7.8%	16.4%	29.0%	14.3%
16.7%	14.0%	14.1%	16.7%
35.2%	1.9%	0.7%	7.4%
26.2%	8.7%	20.9%	10.1%
21.1%	11.7%	11.7%	16.9%
21.2%	11.6%	13.2%	16.5%
39.0%	1.1%	0.3%	5.6%
2.2%	21.6%	34.8%	15.2%
18.6%	13.6%	11.1%	19.1%
14.1%	15.8%	8.9%	21.8%
34.4%	5.4%	5.4%	11.5%
22.1%	11.1%	11.6%	16.1%
17.0%	14.9%	11.7%	19.9%
20.0%	12.2%	12.0%	16.2%
30.8%	5.3%	5.1%	10.8%
26.1%	8.8%	20.8%	10.2%
23.8%	10.2%	11.6%	13.8%
14.9%	15.3%	13.2%	21.0%
42.8%	0.9%	0.2%	4.9%
0.4%	26.4%	38.9%	15.1%
22.3%	11.1%	13.5%	15.9%
20.2%	12.4%	12.3%	17.0%
22.5%	11.1%	13.5%	15.8%

22.7%	10.8%	12.7%	15.6%
19.7%	12.6%	14.5%	17.0%
22.4%	11.1%	14.0%	14.5%
28.7%	2.4%	1.7%	8.2%
26.1%	8.7%	20.8%	10.2%
19.3%	12.3%	11.8%	17.2%
15.4%	15.6%	9.3%	21.6%
30.5%	1.5%	0.7%	7.1%
0.9%	24.3%	34.8%	16.8%
20.1%	12.5%	12.2%	17.8%
9.2%	18.6%	6.0%	25.7%
21.7%	10.7%	13.3%	14.7%
14.0%	17.4%	8.7%	23.0%
18.1%	13.0%	12.6%	16.9%
26.8%	4.6%	2.6%	10.5%
26.1%	8.8%	20.8%	10.2%
18.5%	13.4%	10.8%	19.1%
17.8%	12.8%	15.0%	17.0%
1.8%	25.2%	30.2%	19.9%
17.2%	14.5%	10.1%	20.3%
17.3%	13.9%	10.4%	19.4%
7.3%	16.6%	28.5%	15.0%
22.9%	10.6%	12.6%	15.4%
13.9%	17.1%	9.9%	22.5%
17.0%	14.2%	12.3%	18.4%
30.3%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.7%	10.7%	18.0%
18.4%	13.0%	12.3%	18.4%
27.7%	2.9%	1.5%	8.8%
1.6%	27.6%	30.8%	19.5%
18.9%	13.2%	11.5%	18.7%
11.3%	17.4%	7.3%	24.0%
3.5%	22.6%	25.4%	21.0%
14.5%	16.4%	10.4%	21.9%
17.5%	13.7%	12.3%	17.2%
28.5%	0.8%	0.1%	5.1%
26.0%	8.8%	20.8%	10.3%
19.8%	12.2%	12.1%	16.1%
15.7%	14.0%	13.7%	17.8%
30.0%	0.3%	0.0%	3.7%
0.1%	22.2%	48.6%	9.7%
13.6%	16.3%	8.3%	23.0%
12.1%	16.8%	7.4%	23.5%
2.2%	21.2%	36.0%	14.8%
14.0%	15.5%	12.7%	19.7%
19.4%	14.1%	14.2%	16.8%
15.6%	15.6%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.3%	2.0%	2.5%	5.1%
40.4%	0.1%	0.1%	4.5%
13.6%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.3%	37.3%	12.7%
1.9%	28.2%	37.5%	12.7%

0.2%	34.0%	50.3%	5.6%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.6%	12.3%	12.4%	17.4%
16.5%	16.5%	18.6%	14.8%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.3%	15.5%	10.7%	20.0%
23.7%	9.5%	11.0%	16.5%
16.1%	15.5%	13.5%	19.8%
17.1%	14.5%	14.0%	18.5%
16.5%	16.5%	18.6%	14.8%
19.4%	14.1%	14.2%	16.9%
15.7%	15.4%	11.2%	20.7%
17.8%	14.2%	10.0%	19.9%
38.0%	1.7%	2.0%	5.9%
39.9%	0.3%	0.3%	6.2%
13.7%	16.9%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.5%	28.7%	38.8%	11.8%
1.5%	29.1%	39.3%	11.5%
0.1%	36.3%	53.0%	3.7%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	14.0%	16.7%	16.0%
19.8%	12.7%	11.9%	18.1%
14.7%	18.0%	21.4%	14.3%
20.4%	13.3%	14.3%	16.5%
17.3%	15.5%	10.6%	20.2%
23.8%	9.5%	11.0%	16.5%
16.2%	15.5%	13.6%	19.6%
17.1%	14.5%	14.0%	18.5%
14.7%	18.0%	21.4%	14.3%
19.4%	14.1%	14.2%	16.8%
15.6%	15.7%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.2%	2.1%	2.7%	4.8%
40.5%	0.1%	0.1%	4.1%
13.5%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.2%	36.9%	13.0%
2.0%	28.0%	37.0%	13.0%
0.2%	33.4%	49.6%	6.1%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
19.0%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.8%	12.1%	12.5%	17.2%

17.0%	16.1%	17.9%	14.9%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.4%	15.5%	10.7%	19.9%
23.7%	9.5%	11.0%	16.5%
16.1%	15.6%	13.4%	19.8%
17.1%	14.5%	14.0%	18.5%
17.0%	16.1%	17.8%	14.9%

Shoulder Off Peak
3.6%
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Source
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
PA Statewide Act 129 2014 Commercial and Residential Light Metering Study
NREL 2023 Comstock End-Use Load Profiles (AMY2018)
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PA Statewide Act 129 2014 Commercial and Residential Light Metering Study
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			LW - LMP 2018	LW - LMP 2019	LW - LMP 2020	LW - LMP 2021	LW - LMP 2022
Duqu	DLC	DLCO/DUQ	39.98	27.69	22.79	39.17	74.76
Metr	Met-Ed	Met-Ed/MEC	37.06	26.34	21.16	39.97	82.2
PECO	PECO	PECO	36.36	24.75	19.29	33.55	71.67
Penn	Penelec	PENELEC/PE	37.9	26.17	20.84	37.73	73.26
Penn	Penn Power	ATSI	40.19	28.06	22.55	39.47	74.96
PPL U	PPL	PPL	35.95	24.85	19.42	35.92	75.74
West	West Penn	APS	39.78	27.83	22.4	40.44	79.01
	Western Hub	Western Hub	36.95	26.7	20.92	38.88	74.25

LW - LMP	LMP
2023	2024
31.31	
27.93	29.05
23.63	
31.01	31.8
31.05	31.96
25.73	
32.49	32.39
31.78	31.48

Table 11-6 Zonal and PJM real-time, load-weighted averag

	2018				
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP
AECO	$37.06	$37.68	($1.45)	$0.83	$25.07
AEP	$37.79	$38.16	$0.08	($0.44)	$28.21
APS	$39.78	$38.40	$1.12	$0.25	$27.83
ATSI	$40.19	$37.60	$1.99	$0.60	$28.06
BGE	$44.03	$38.86	$3.81	$1.36	$30.82
ComEd	$30.05	$37.42	($5.52)	($1.84)	$24.72
DAY	$38.96	$38.12	$0.17	$0.66	$29.52
DEOK	$39.16	$38.10	$1.99	($0.93)	$28.49
DLCO	$39.98	$37.68	$2.16	$0.14	$27.69
Dominion	$43.16	$39.04	$3.61	$0.52	$29.08
DPL	$43.76	$39.07	$3.15	$1.54	$27.71
EKPC	$36.20	$39.71	($2.30)	($1.21)	$28.18
JCPL	$37.08	$38.08	($1.65)	$0.65	$25.40
Met-Ed	$37.06	$38.09	($1.36)	$0.33	$26.34
OVEC	$30.89	$32.12	($0.25)	($0.97)	$26.23
PECO	$36.36	$38.11	($2.11)	$0.37	$24.75
PENELEC	$37.90	$37.69	($0.19)	$0.40	$26.17
Pepco	$42.60	$38.72	$2.97	$0.91	$29.68
PPL	$35.95	$38.34	($2.37)	($0.02)	$24.85
PSEG	$36.68	$37.57	($1.48)	$0.59	$25.28
RECO	$37.40	$37.81	($0.97)	$0.56	$25.72
PJM	$38.24	$38.19	$0.04	$0.02	$27.32

Table 11-8 Hub real-time, average LMP component

	2018			
	Real-Time LMP	Energy Component	Congestion Component	Compon
AEP Gen Hub	$33.29	$36.04	($1.34)	($1
AEP-DAY Hub	$34.74	$36.04	($0.71)	($0
ATSI Gen Hub	$36.94	$36.04	$1.01	($0
Chicago Gen Hub	$28.08	$36.04	($5.73)	($2
Chicago Hub	$28.61	$36.04	($5.71)	($1
Dominion Hub	$39.55	$36.04	$3.31	$0
Eastern Hub	$38.35	$36.04	$1.12	$
N Illinois Hub	$28.40	$36.04	($5.73)	($1
New Jersey Hub	$34.57	$36.04	($1.97)	$0
Ohio Hub	$34.56	$36.04	($0.89)	($0
West Interface Hub	$38.13	$36.04	$2.37	($0
Western Hub	$36.95	$36.04	$0.77	$0

The day-ahead components of LMP for each hub a

Table 11-5 Zonal real-time load-weig per MWh): January through June, 20

	2024 (Jan - Jun)			
	Real-Time LMP	Energy Component	Congestion Component	Com
ACEC	$27.72	$31.95	($4.66)	
AEP	$31.64	$31.46	$0.54	
APS	$32.39	$31.68	$0.56	
ATSI	$31.96	$31.30	$0.59	
BGE	$38.82	$32.06	$5.57	
COMED	$26.08	$31.50	($3.98)	
DAY	$33.44	$31.74	$1.08	
DOM	$37.66	$31.54	$5.46	
DPL	$29.31	$32.10	($3.71)	
DUKE	$32.24	$31.84	$0.66	
DUQ	$32.17	$31.37	$1.06	
EKPC	$32.74	$32.60	$0.55	
JCPLC	$28.17	$32.20	($4.49)	
MEC	$29.05	$31.56	($2.66)	
OVEC	$28.80	$30.05	($0.35)	
PE	$31.80	$31.08	$0.40	
PECO	$26.86	$31.66	($4.84)	
PEPCO	$38.06	$32.06	$5.00	
PPL	$26.71	$31.49	($4.53)	
PSEG	$28.53	$31.60	($3.48)	
REC	$30.70	$31.97	($1.67)	
PJM	$31.70	$31.61	$0.06	

Hub Components

The real-time components of LMP

Table 11-7 Hub real-time average L

		2024 (Ja
	Real-Time LMP	Energy Component
AEP Gen Hub	$28.50	$29.64
AEP-DAY Hub	$29.21	$29.64
ATSI Gen Hub	$29.87	$29.64
Chicago Gen Hub	$23.17	$29.64
Chicago Hub	$24.31	$29.64
Dominion Hub	$32.98	$29.64

Dominion Hub	$32.96	$29.64
Eastern Hub	$26.61	$29.64
N Illinois Hub	$23.93	$29.64
New Jersey Hub	$26.28	$29.64
Ohio Hub	$29.16	$29.64
West Interface Hub	$30.72	$29.64
Western Hub	$31.48	$29.64

ge LMP components (Dollars per MWh): 2018 and 2019

2019		
Energy Component	Congestion Component	Loss Component
$27.28	($2.39)	$0.17
$27.24	$1.00	($0.03)
$27.28	$0.52	$0.03
$27.16	$0.50	$0.41
$27.49	$2.47	$0.86
$27.12	($1.54)	($0.86)
$27.38	$1.12	$1.02
$27.33	$1.17	($0.00)
$27.18	$0.56	($0.05)
$27.39	$1.42	$0.28
$27.54	($0.39)	$0.56
$27.69	$0.65	($0.16)
$27.49	($2.18)	$0.09
$27.26	($0.74)	($0.18)
$26.39	$0.52	($0.68)
$27.25	($2.33)	($0.17)
$27.03	($0.76)	($0.10)
$27.46	$1.69	$0.53
$27.25	($1.97)	($0.42)
$27.14	($1.84)	($0.02)
$27.39	($1.64)	($0.03)
$27.28	$0.02	$0.02

s (Dollars per MWh): 2018 and 2019

		2019		
Loss nent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.41)	$26.03	$26.25	$0.48	($0.71)
.58)	$27.16	$26.25	$0.97	($0.06)
.11)	$26.77	$26.25	$0.57	($0.05)
.22)	$23.53	$26.25	($1.59)	($1.14)
.72)	$23.91	$26.25	($1.59)	($0.76)
0.20	$27.53	$26.25	$1.22	$0.06
1.19	$25.28	$26.25	($1.37)	$0.40
.91)	$23.74	$26.25	($1.61)	($0.90)
0.51	$24.03	$26.25	($2.19)	($0.03)
.58)	$27.29	$26.25	$1.05	($0.02)
.28)	$26.79	$26.25	$0.73	($0.19)
0.14	$26.70	$26.25	$0.53	($0.09)

ıre presented in Table 11-9 for 2018 and 2019.

Table 11-6 Zonal real-time loa

		2020	
	Real-Time LMP	Energy Component	Co Co
ACEC	$19.72	$22.04	
AEP	$22.14	$21.60	
APS	$22.40	$21.64	
ATSI	$22.55	$21.67	
BGE	$25.78	$21.89	
COMED	$20.18	$21.70	
DAY	$23.23	$21.76	
DOM	$23.05	$21.77	
DPL	$22.90	$21.94	
DUKE	$22.37	$21.72	
DUQ	$22.79	$21.75	
EKPC	$22.14	$21.79	
JCPLC	$20.05	$22.13	
MEC	$21.16	$21.74	
OVEC	$20.75	$20.78	
PE	$20.84	$21.50	
PECO	$19.29	$21.78	
PEPCO	$23.59	$21.85	
PPL	$19.42	$21.65	
PSEG	$19.69	$21.77	
REC	$20.74	$22.16	
PJM	$21.77	$21.73	

Hub Component

The real-time compone

Table 11-8 Hub real-ti

	Real-Ti LM
AEP Gen Hub	$20.
AEP-DAY Hub	$21.
ATSI Gen Hub	$20.
Chicago Gen Hub	$18.
Chicago Hub	$19.
Dominion Hub	$21.
Eastern Hub	$20.
N Illinois Hub	$19.
New Jersey Hub	$18.
Ohio Hub	$21.
West Interface Hub	$20.
Western Hub	$20.

The day-ahead compor

ghted average LMP components (Dollars
024 and 2025

		2025 (Jan - Jun)		
Loss ponent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
$0.44	$49.28	$53.87	($5.89)	$1.30
($0.36)	$49.50	$50.64	($0.36)	($0.78)
$0.16	$52.22	$51.49	$0.31	$0.43
$0.06	$48.29	$50.68	($2.29)	($0.09)
$1.19	$63.19	$53.06	$7.93	$2.20
($1.44)	$37.31	$51.32	($11.20)	($2.82)
$0.63	$48.80	$51.37	($3.01)	$0.45
$0.66	$67.75	$51.43	$15.08	$1.23
$0.92	$51.34	$53.44	($4.12)	$2.02
($0.26)	$47.20	$51.60	($3.33)	($1.07)
($0.26)	$47.46	$51.12	($2.93)	($0.72)
($0.40)	$49.88	$52.77	($1.62)	($1.27)
$0.46	$49.91	$53.98	($5.30)	$1.22
$0.15	$49.53	$51.73	($2.55)	$0.34
($0.91)	$42.51	$48.11	($3.80)	($1.81)
$0.32	$51.49	$50.41	$0.49	$0.60
$0.04	$46.19	$52.16	($6.42)	$0.46
$1.00	$63.40	$52.95	$8.60	$1.85
($0.25)	$45.37	$51.48	($5.95)	($0.16)
$0.40	$49.25	$52.46	($4.35)	$1.13
$0.40	$53.26	$53.36	($1.23)	$1.12
$0.02	$51.75	$51.58	$0.12	$0.04

for each hub are presented in Table 11-7 for the first six months of 2

.MP components (Dollars per MWh): January through June, 2024 and

n - Jun)		2025 (Jan - Jun)			
Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($0.10)	($1.04)	$42.04	$46.93	($3.04)	($1.85)
$0.05	($0.48)	$44.12	$46.93	($1.78)	($1.03)
$0.65	($0.41)	$44.00	$46.93	($1.89)	($1.05)
($4.78)	($1.69)	$32.37	$46.93	($11.46)	($3.09)
($4.03)	($1.29)	$33.31	$46.93	($11.17)	($2.45)
$3.26	$0.09	$52.14	$46.93	$5.06	$0.15

($3.75)	$0.72	$43.46	$46.93	($4.94)	$1.48
($4.25)	($1.45)	$33.23	$46.93	($10.98)	($2.72)
($3.69)	$0.34	$42.85	$46.93	($4.95)	$0.87
($0.00)	($0.47)	$44.28	$46.93	($1.57)	($1.08)
$1.46	($0.37)	$47.30	$46.93	$0.98	($0.61)
$1.50	$0.34	$48.89	$46.93	$1.43	$0.54

ıd-weighted average LMP components (Dollars per MWh): 2020 and 2021

			2021		
ıngestion mponent	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($2.36)	$0.05	$34.13	$40.20	($6.35)	$0.28
$0.45	$0.09	$40.31	$39.50	$0.83	($0.02)
$0.82	($0.06)	$40.44	$39.52	$0.94	($0.03)
$0.58	$0.30	$39.47	$39.66	($0.36)	$0.17
$3.30	$0.59	$45.77	$39.92	$4.79	$1.07
($1.08)	($0.44)	$37.00	$39.81	($1.69)	($1.13)
$0.49	$0.98	$42.92	$39.89	$1.51	$1.51
$1.23	$0.05	$44.67	$39.78	$4.34	$0.55
$0.65	$0.30	$40.24	$39.88	($0.31)	$0.67
$0.51	$0.14	$41.49	$39.84	$1.61	$0.04
$1.18	($0.15)	$39.17	$39.70	($0.04)	($0.49)
$0.31	$0.04	$41.20	$39.93	$1.35	($0.07)
($2.12)	$0.04	$34.52	$40.27	($5.96)	$0.21
($0.40)	($0.18)	$39.97	$39.69	$0.44	($0.16)
$0.32	($0.34)	$37.98	$38.08	$0.74	($0.84)
($0.52)	($0.14)	$37.73	$39.39	($1.38)	($0.27)
($2.25)	($0.23)	$33.55	$39.73	($5.92)	($0.25)
$1.47	$0.28	$44.62	$39.95	$3.96	$0.72
($1.85)	($0.39)	$35.92	$39.47	($3.00)	($0.55)
($2.03)	($0.04)	$35.78	$39.81	($4.17)	$0.14
($1.45)	$0.03	$38.80	$40.28	($1.71)	$0.23
$0.02	$0.01	$39.78	$39.72	$0.04	$0.02

S

ents of LMP for each hub are presented in Table 11-8 for 2020 and 2021.[15]

me average LMP components (Dollars per MWh): 2020 and 2021

	2020			2021			
me MP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.38	$20.63	$0.19	($0.44)	$37.44	$38.12	$0.36	($1.04)
.17	$20.63	$0.47	$0.07	$38.63	$38.12	$0.63	($0.12)
.91	$20.63	$0.33	($0.04)	$37.20	$38.12	($0.41)	($0.51)
.72	$20.63	($1.23)	($0.67)	$34.31	$38.12	($2.25)	($1.57)
.12	$20.63	($1.12)	($0.38)	$35.21	$38.12	($1.90)	($1.02)
.39	$20.62	$0.89	($0.13)	$41.47	$38.12	$3.17	$0.18
.40	$20.63	($0.42)	$0.20	$37.20	$38.12	($1.45)	$0.52
.02	$20.63	($1.11)	($0.49)	$34.96	$38.12	($1.94)	($1.23)
.63	$20.63	($1.93)	($0.07)	$33.20	$38.12	($4.98)	$0.06
.22	$20.63	$0.47	$0.13	$38.60	$38.12	$0.54	($0.06)
.93	$20.63	$0.48	($0.18)	$38.61	$38.12	$0.94	($0.46)
.92	$20.63	$0.41	($0.11)	$38.88	$38.12	$0.89	($0.14)

nents of LMP for each hub are presented in Table 11-9 for 2020 and 2021.

2024 and 2025.[1]

2025

Table 11-5 Zonal real-time load-weighted average LMP components (Dollars per M

	2022				2023			
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	L Compon
ACEC	$74.27	$82.01	($9.07)	$1.33	$24.94	$31.51	($6.80)	$(
AEP	$77.54	$79.32	($1.11)	($0.67)	$31.19	$30.83	$0.55	($0.
APS	$79.01	$79.61	($0.60)	$0.00	$32.49	$30.97	$1.47	$(
ATSI	$74.96	$78.32	($3.02)	($0.34)	$31.05	$30.80	$0.25	($0
BGE	$95.44	$81.87	$10.24	$3.33	$38.80	$31.29	$6.43	$1
COMED	$66.25	$78.91	($9.02)	($3.63)	$27.47	$30.88	($2.35)	($1
DAY	$80.43	$79.74	($1.06)	$1.74	$32.70	$31.03	$0.83	$(
DOM	$99.52	$81.08	$16.57	$1.88	$37.50	$31.00	$5.88	$(
DPL	$83.32	$82.21	($1.48)	$2.58	$31.06	$31.41	($0.94)	$(
DUKE	$79.54	$80.61	($0.37)	($0.70)	$32.10	$31.02	$1.02	$(
DUQ	$74.76	$79.27	($3.09)	($1.42)	$31.31	$30.86	$0.83	($0
EKPC	$83.16	$83.66	$0.05	($0.56)	$31.93	$31.17	$0.84	($0
JCPLC	$76.02	$82.22	($7.28)	$1.07	$25.89	$31.63	($5.93)	$(
MEC	$82.20	$79.14	$2.43	$0.63	$27.93	$31.08	($3.10)	($0
OVEC	$71.39	$74.99	($1.39)	($2.21)	$29.80	$29.81	$0.70	($0
PE	$73.26	$77.37	($3.65)	($0.46)	$31.01	$30.73	$0.23	$(
PECO	$71.67	$80.53	($9.11)	$0.25	$23.63	$31.14	($7.32)	($0
PEPCO	$91.68	$81.50	$7.61	$2.56	$36.59	$31.30	$4.46	$(
PPL	$75.74	$78.97	($2.95)	($0.28)	$25.73	$30.93	($4.78)	($0
PSEG	$74.74	$79.97	($6.06)	$0.83	$25.66	$31.11	($5.59)	$(
REC	$77.95	$81.82	($4.56)	$0.69	$27.90	$31.51	($3.75)	$(
PJM	$80.14	$79.98	$0.10	$0.06	$31.08	$31.00	$0.06	$(

Hub Components

The real-time components of LMP for each hub are presented in Table

Table 11-7 Hub real-time average LMP components (Dollars per MWh):

	2022					
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Ener Compone
AEP Gen Hub	$69.25	$73.38	($1.60)	($2.53)	$29.20	$29.
AEP-DAY Hub	$70.68	$73.38	($1.72)	($0.98)	$29.77	$29.
ATSI Gen Hub	$68.74	$73.38	($2.89)	($1.75)	$29.17	$29.
Chicago Gen Hub	$59.80	$73.38	($9.27)	($4.32)	$25.32	$29.
Chicago Hub	$61.15	$73.38	($8.97)	($3.27)	$25.83	$29.
Dominion Hub	$79.56	$73.38	$5.44	$0.74	$32.56	$29.
Eastern Hub	$70.80	$73.38	($4.41)	$1.83	$27.32	$29.
N Illinois Hub	$60.71	$73.38	($9.00)	($3.67)	$25.85	$29.
New Jersey Hub	$67.42	$73.38	($6.61)	$0.64	$24.06	$29.
Ohio Hub	$70.51	$73.38	($1.92)	($0.95)	$29.72	$29.
West Interface Hub	$72.66	$73.38	$0.33	($1.06)	$30.68	$29.
Western Hub	$74.25	$73.38	$0.65	$0.22	$31.78	$29.

(Wh): 2022 and 2023

Loss ient
0.22
(.19)
0.05
(.00)
1.08
(.06)
0.84
0.62
0.59
0.07
(.38)
(.08)
0.19
(.05)
(.70)
0.04
(.19)
0.83
(.43)
0.14
0.15
0.02

Table 3-34 Day-ahead and real-time zonal average l

	2024				
	Day-Ahead				
Zone	Average DLMP	Average PLMP	Difference	Percent Difference	Average DLMP
ACEC	$27.49	$27.54	$0.05	0.2%	$25.90
AEP	$31.12	$31.18	$0.06	0.2%	$29.05
APS	$32.27	$32.33	$0.06	0.2%	$29.80
ATSI	$31.46	$31.47	$0.01	0.0%	$29.08
BGE	$40.03	$40.11	$0.08	0.2%	$36.60
COMED	$25.48	$25.55	$0.07	0.3%	$23.28
DAY	$32.62	$32.69	$0.06	0.2%	$30.30
DUKE	$31.22	$31.28	$0.06	0.2%	$28.90
DOM	$36.96	$37.02	$0.06	0.2%	$33.54
DPL	$31.27	$31.36	$0.09	0.3%	$28.44
DUQ	$30.93	$30.97	$0.04	0.1%	$29.02
EKPC	$30.58	$30.64	$0.06	0.2%	$28.57
JCPLC	$27.52	$27.57	$0.06	0.2%	$26.00
MEC	$28.66	$28.71	$0.06	0.2%	$26.28
OVEC	$29.88	$29.93	$0.06	0.2%	$27.73
PECO	$27.11	$27.17	$0.05	0.2%	$25.56
PE	$32.06	$32.10	$0.04	0.1%	$29.46
PEPCO	$38.11	$38.18	$0.07	0.2%	$34.85
PPL	$26.76	$26.82	$0.06	0.2%	$24.86
PSEG	$27.78	$27.83	$0.06	0.2%	$26.33
REC	$30.13	$30.18	$0.05	0.2%	$28.14

11-7 for 2022 and 2023.[11]

2022 and 2023

2023		
rgy ent	Congestion Component	Loss Component
.61	$0.45	($0.86)
.61	$0.43	($0.27)
.61	$0.04	($0.48)
.61	($2.93)	($1.36)
.61	($2.80)	($0.98)
.61	$2.78	$0.17
.61	($2.73)	$0.44
.61	($2.62)	($1.13)
.61	($5.63)	$0.07
.61	$0.34	($0.23)
.61	$1.43	($0.35)
.61	$1.96	$0.20

Table 3-35 Day-ahead and real-time ave

	Day-Ahead		
Hub	Average DLMP	Average PLMP	Differen
AEP GEN HUB	$29.76	$29.79	$0.
AEP-DAYTON HUB	$30.70	$30.73	$0.
ATSI GEN HUB	$30.99	$31.01	$0.
CHICAGO GEN HUB	$24.78	$24.88	$0.
CHICAGO HUB	$25.75	$25.77	$0.
DOMINION HUB	$34.03	$34.07	$0.
EASTERN HUB	$31.23	$31.28	$0.
N ILLINOIS HUB	$25.36	$25.46	$0.
NEW JERSEY HUB	$27.65	$27.68	$0.
OHIO HUB	$30.66	$30.69	$0.
WEST INT HUB	$32.17	$32.19	$0.
WESTERN HUB	$33.80	$33.83	$0.

DLMP and PLMP (Dollars per

Real-Time		
Average PLMP	Difference	Percent Difference
$27.52	$1.62	6.3%
$31.35	$2.31	7.9%
$32.18	$2.38	8.0%
$31.32	$2.24	7.7%
$39.53	$2.93	8.0%
$25.22	$1.94	8.3%
$32.75	$2.46	8.1%
$31.21	$2.31	8.0%
$36.15	$2.61	7.8%
$30.94	$2.50	8.8%
$31.23	$2.21	7.6%
$30.84	$2.27	8.0%
$27.67	$1.67	6.4%
$28.15	$1.87	7.1%
$29.94	$2.20	7.9%
$27.12	$1.56	6.1%
$31.61	$2.15	7.3%
$37.61	$2.76	7.9%
$26.58	$1.72	6.9%
$28.02	$1.69	6.4%
$29.93	$1.79	6.4%

Zonal LMP

Table 3-54 sho

Table 3-54 Real

	Real-T
Zone	2023
ACEC	$23.30
AEP	$30.05
APS	$31.07
ATSI	$29.88
BGE	$36.40
COMED	$25.82
DAY	$31.28
DUKE	$30.69
DOM	$35.75
DPL	$27.03
DUQ	$30.14
EKPC	$30.41
JCPLC	$24.15
MEC	$26.59
OVEC	$29.67
PECO	$22.34
PE	$29.81
PEPCO	$34.36
PPL	$24.60
PSEG	$24.32
REC	$26.04
PJM	$29.69

erage DLMP and PLMP for PJM hubs (Dollars per MWh): 2024

2024					
		Real-Time			
ice	Percent Difference	Average DLMP	Average PLMP	Difference	Percent Difference
04	0.1%	$27.69	$29.92	$2.23	8.1%
03	0.1%	$28.42	$30.69	$2.27	8.0%
02	0.1%	$28.32	$30.50	$2.18	7.7%
09	0.4%	$22.31	$24.29	$1.98	8.9%
02	0.1%	$23.49	$25.44	$1.95	8.3%
04	0.1%	$31.26	$33.76	$2.50	8.0%
05	0.2%	$28.30	$30.79	$2.48	8.8%
.11	0.4%	$23.30	$25.23	$1.94	8.3%
03	0.1%	$26.11	$27.79	$1.67	6.4%
03	0.1%	$28.36	$30.62	$2.26	8.0%
02	0.1%	$29.80	$32.15	$2.35	7.9%
03	0.1%	$30.84	$33.24	$2.40	7.8%

' and Dispatch

ws real-time zonal average and load-weighted average LMP for 2023 and 2024.

l-time zonal average and load-weighted average LMP (Dollars per MWh): 2023 and 2024

Time Average LMP		Real-Time Load-Weighted Average LMP		
2024	Percent Change	2023	2024	Percent Change
$27.52	18.1%	$24.94	$30.60	22.7%
$31.35	4.3%	$31.19	$33.22	6.5%
$32.18	3.6%	$32.49	$34.49	6.2%
$31.32	4.8%	$31.05	$33.32	7.3%
$39.53	8.6%	$38.80	$44.87	15.7%
$25.22	(2.4%)	$27.47	$27.69	0.8%
$32.75	4.7%	$32.70	$35.23	7.7%
$31.21	1.7%	$32.10	$33.49	4.3%
$36.15	1.1%	$37.50	$39.07	4.2%
$30.94	14.5%	$31.06	$35.67	14.9%
$31.23	3.6%	$31.31	$33.42	6.8%
$30.84	1.4%	$31.93	$33.49	4.9%
$27.67	14.6%	$25.89	$30.79	18.9%
$28.15	5.9%	$27.93	$30.46	9.1%
$29.94	0.9%	$29.80	$30.14	1.1%
$27.12	21.4%	$23.63	$29.87	26.4%
$31.61	6.0%	$31.01	$33.24	7.2%
$37.61	9.4%	$36.59	$42.06	15.0%
$26.58	8.0%	$25.73	$28.53	10.9%
$28.02	15.2%	$25.66	$30.35	18.3%
$29.93	14.9%	$27.90	$32.65	17.0%
$31.32	5.5%	$31.08	$33.74	8.5%

DRIPE EDC-Column Lookup

EDC	DRIPE Column Ref
PECO	0
PPL	4
DLC	8
Met-Ed	12
Penelec	16
Penn Power	20
West Penn	24

Stacked Bars Offset Row Lookup

EDC	2026	2021
DLC	0	0
MetEd	4	5
PECO	8	10
Penelec	12	15
Penn Power	16	20
PPL	20	25
West Penn	24	30

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator
This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references. For Phase V, the start year shall be set to Program Year 18 (6/1/2026/5/31/2027). The user shall gather publicly available data sets as inputs. This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

Data Needed	TRC Test Order Section
EDC Name	
Start Year	
Inflation Rate	A.7 Page 8
Plant Heat Rates	B.2.b.v Page 18
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18
PJM Base Residual Auction Results	B.7 Page 21
Transmission and Distribution Capacity Costs	B.8 Page 22
AEPS Avoided Costs	B.9 Page 24
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25
Benefits Incurreced Through Reduced Arrearages Activity	B.12 Page 29

Monetary Issues:	All output dollars are nominal

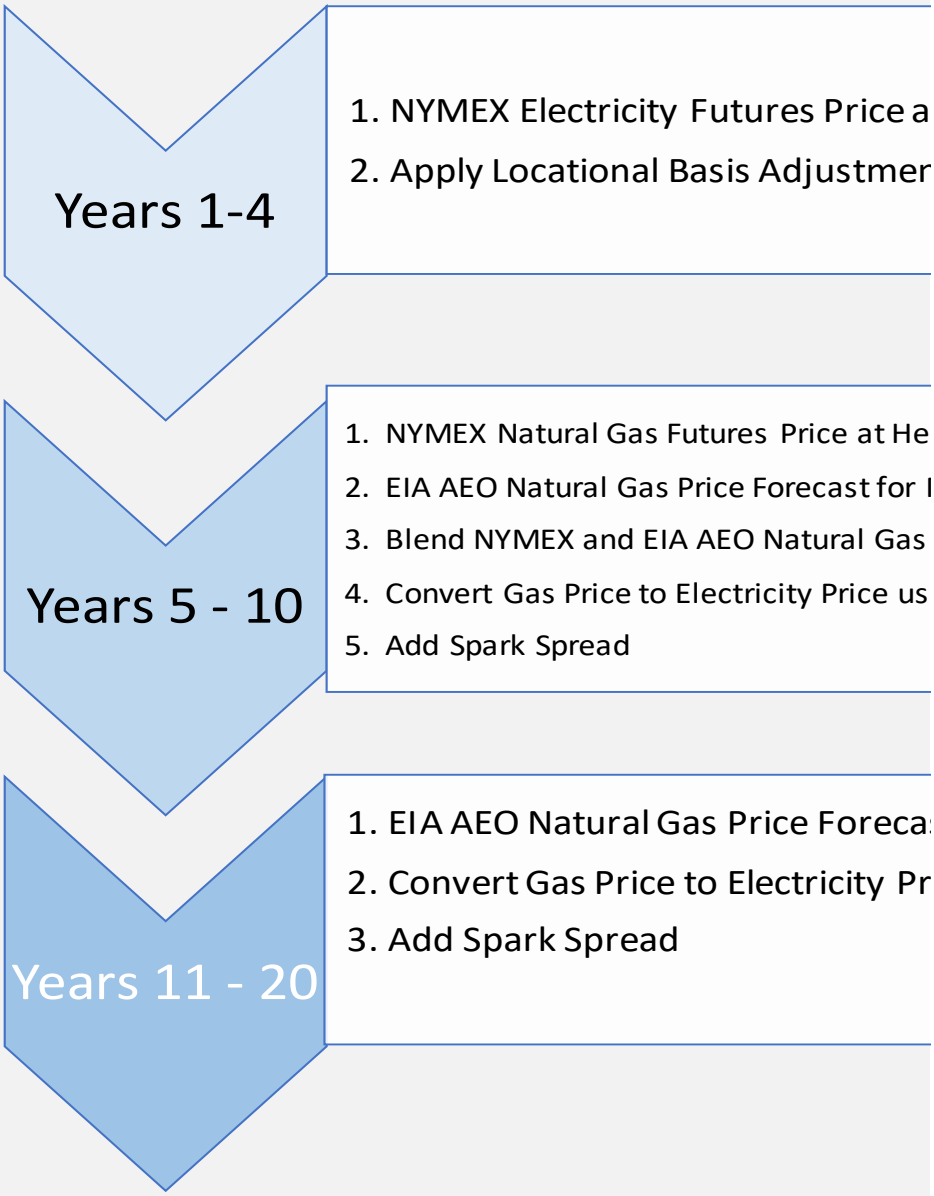
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

1. Included latest PJM Capacity Auction Results (2026/2027) per 2026 TRC Order, at page 38 ""EDC inclusion of the upco
of generation capacity calculation wil be an important mechanism to capture any market shifts."
Note that on Generation Capacity Tab, annual labels on Row 14 required correction.
3. Updated BLS data for CPI and PPI to add 2024 data.
2. Updated data with ICE August 21 values for PJM Western Hub, HH NG, Transco, and Tetco
4. Per SWE August 29, 2025 Guidance Memo:

* Correction Steps 1 and 2. Fixed calendarization issue, per steps outlined in the SWE memo. Please note that EIA Natu
* Additional issue 1: Not Applicable
* Additional Issue 2: Used 2025 PJM SOM Report for 2024 values, Tables 11-5 and 11-7 (See also SWE follow up email t
* Additional Issue 3: Switched from using NYMEX to ICE data (see 2. above)

5. EIA AEO data was updated to 2025 report for Mid Atlantic Region, Table 3, line 39, Natural Gas $/mmbtu in real dolla

Summary of Avoided Energy C



Input Tab
General Inputs
General Inputs
General Inputs
General Inputs
Elec Futures
Elec Futures
NG Futures
NG Futures
Adjustments
BLS Input
Generation Capacity
T&D Capacity
AEPS
DRIPE
Arrearages

ming auction results [2026/2027] within the PH V avoided cost

ıral Gas information had to be extended to 2046.

o Ed Miller from Patrick Burns dated: Sept 17, 2025.)

rs

ost Methodology

t PJM West Hub

nt from PJM West Hub to Operating Company Zone

nry Hub with Locational Adjustment

Mid-Atlantic Region

Price Forecast over 6 Year Period

ing On-Peak and Off-Peak Plant Heat Rates

st for Mid-Atlantic Region

ice using On-Peak and Off-Peak Plant Heat Rates

General			Act 129 PY
Company Name	Penelec		
Start Year (Program)	18	2027	18
Discount Rate	5%	TRC Test Order A.4 page 10	19
Inflation Rate	2%	TRC Test Order B.4 page 18	20
Plant Specifications			21
	Heat Rate (Btu/kWh)		22
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24
EDC Natural Gas Futures Source			25
Electric Distribution Companies	**EDC Abbreviation**	**NYMEX NG Futures Source**	26
Duquesne Light Co	DLC	Tetco M-3	27
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28
PECO Energy Co	PECO	Transco 6 (Non-NY)	29
Pennsylvania Electric Co	Penelec	Tetco M-3	30
Pennsylvania Power Co	Penn Power	Tetco M-3	31
PPL Utilities	PPL	Transco 6 (Non-NY)	32
West Penn Power Co	West Penn	Tetco M-3	33
Seasonal Definitions			34
Jan	Winter		35
Feb	Winter		36
Mar	Shoulder		37
Apr	Shoulder		38
May	Summer		39
Jun	Summer		40
Jul	Summer		41
Aug	Summer		42
Sep	Summer		43
Oct	Shoulder		44
Nov	Shoulder		45
Dec	Winter		46
			47

Calendar		
PY Start	**PY End**	**Avoided Energy YR**
2026	2027	2027
2027	2028	2028
2028	2029	2029
2029	2030	2030
2030	2031	2031
2031	2032	2032
2032	2033	2033
2033	2034	2034
2034	2035	2035
2035	2036	2036
2036	2037	2037
2037	2038	2038
2038	2039	2039
2039	2040	2040
2040	2041	2041
2041	2042	2042
2042	2043	2043
2043	2044	2044
2044	2045	2045
2045	2046	2046
2046	2047	2047
2047	2048	2048
2048	2049	2049
2049	2050	2050
2050	2051	2051
2051	2052	2052
2052	2053	2053
2053	2054	2054
2054	2055	2055
2055	2056	2056

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arrearag

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$85.24	$57.20	$89.27	$77.99	$72.51
19	2028	$96.15	$66.35	$103.24	$91.29	$82.85
20	2029	$104.20	$75.22	$112.64	$99.93	$90.46
21	2030	$101.87	$74.75	$113.01	$99.66	$91.66
22	2031	$69.79	$41.65	$76.61	$65.30	$56.57
23	2032	$69.81	$41.71	$79.18	$67.11	$57.23
24	2033	$72.19	$43.40	$83.52	$70.15	$59.65
25	2034	$75.08	$45.44	$88.92	$73.91	$62.86
26	2035	$77.87	$47.41	$93.96	$77.44	$66.07
27	2036	$80.46	$49.24	$98.52	$80.63	$68.81
28	2037	$82.02	$50.37	$101.71	$82.87	$70.52
29	2038	$81.41	$50.00	$99.98	$81.74	$69.79
30	2039	$80.99	$49.77	$98.72	$80.92	$69.29
31	2040	$81.42	$50.11	$99.51	$81.52	$69.75
32	2041	$82.74	$51.08	$102.46	$83.60	$71.24
33	2042	$84.19	$52.14	$105.74	$85.92	$72.89
34	2043	$85.69	$53.22	$109.12	$88.30	$74.59
35	2044	$86.71	$53.99	$111.33	$89.89	$75.74
36	2045	$87.50	$54.59	$112.96	$91.07	$76.61
37	2046	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY19

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$87.58	$57.78	$94.67	$82.72	$74.28
20	2029	$97.90	$68.92	$106.34	$93.63	$84.16
21	2030	$104.99	$77.87	$116.13	$102.78	$94.78
22	2031	$102.76	$74.62	$109.58	$98.27	$89.54
23	2032	$69.81	$41.71	$79.18	$67.11	$57.23

24	**2033**	$72.19	$43.40	$83.52	$70.15	$59.65
25	**2034**	$75.08	$45.44	$88.92	$73.91	$62.86
26	**2035**	$77.87	$47.41	$93.96	$77.44	$66.07
27	**2036**	$80.46	$49.24	$98.52	$80.63	$68.81
28	**2037**	$82.02	$50.37	$101.71	$82.87	$70.52
29	**2038**	$81.41	$50.00	$99.98	$81.74	$69.79
30	**2039**	$80.99	$49.77	$98.72	$80.92	$69.29
31	**2040**	$81.42	$50.11	$99.51	$81.52	$69.75
32	**2041**	$82.74	$51.08	$102.46	$83.60	$71.24
33	**2042**	$84.19	$52.14	$105.74	$85.92	$72.89
34	**2043**	$85.69	$53.22	$109.12	$88.30	$74.59
35	**2044**	$86.71	$53.99	$111.33	$89.89	$75.74
36	**2045**	$87.50	$54.59	$112.96	$91.07	$76.61
37	**2046**	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY20

		Penelec Zone Summer ($/MWh)		**Penelec Zone Winter ($/MWh)**		**Penelec DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$88.76	$59.78	$97.20	$84.49	$75.02
21	**2030**	$98.33	$71.21	$109.47	$96.12	$88.12
22	**2031**	$106.06	$77.92	$112.88	$101.57	$92.84
23	**2032**	$104.80	$76.70	$114.17	$102.10	$92.22
24	**2033**	$72.19	$43.40	$83.52	$70.15	$59.65
25	**2034**	$75.08	$45.44	$88.92	$73.91	$62.86
26	**2035**	$77.87	$47.41	$93.96	$77.44	$66.07
27	**2036**	$80.46	$49.24	$98.52	$80.63	$68.81
28	**2037**	$82.02	$50.37	$101.71	$82.87	$70.52
29	**2038**	$81.41	$50.00	$99.98	$81.74	$69.79
30	**2039**	$80.99	$49.77	$98.72	$80.92	$69.29
31	**2040**	$81.42	$50.11	$99.51	$81.52	$69.75
32	**2041**	$82.74	$51.08	$102.46	$83.60	$71.24
33	**2042**	$84.19	$52.14	$105.74	$85.92	$72.89
34	**2043**	$85.69	$53.22	$109.12	$88.30	$74.59
35	**2044**	$86.71	$53.99	$111.33	$89.89	$75.74
36	**2045**	$87.50	$54.59	$112.96	$91.07	$76.61
37	**2046**	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY21

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$88.67	$61.55	$99.81	$86.46	$78.46
22	2031	$99.02	$70.88	$105.84	$94.53	$85.80
23	2032	$108.30	$80.20	$117.67	$105.60	$95.72
24	2033	$108.44	$79.65	$119.77	$106.40	$95.90
25	2034	$75.08	$45.44	$88.92	$73.91	$62.86
26	2035	$77.87	$47.41	$93.96	$77.44	$66.07
27	2036	$80.46	$49.24	$98.52	$80.63	$68.81
28	2037	$82.02	$50.37	$101.71	$82.87	$70.52
29	2038	$81.41	$50.00	$99.98	$81.74	$69.79
30	2039	$80.99	$49.77	$98.72	$80.92	$69.29
31	2040	$81.42	$50.11	$99.51	$81.52	$69.75
32	2041	$82.74	$51.08	$102.46	$83.60	$71.24
33	2042	$84.19	$52.14	$105.74	$85.92	$72.89
34	2043	$85.69	$53.22	$109.12	$88.30	$74.59
35	2044	$86.71	$53.99	$111.33	$89.89	$75.74
36	2045	$87.50	$54.59	$112.96	$91.07	$76.61
37	2046	$89.32	$55.91	$117.12	$94.00	$78.68

PY Selection	PY22

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$88.82	$60.68	$95.64	$84.33	$75.60

23	**2032**	$100.83	$72.73	$110.20	$98.13	$88.25
24	**2033**	$112.07	$83.28	$123.40	$110.03	$99.53
25	**2034**	$112.66	$83.02	$126.50	$111.49	$100.44
26	**2035**	$77.87	$47.41	$93.96	$77.44	$66.07
27	**2036**	$80.46	$49.24	$98.52	$80.63	$68.81
28	**2037**	$82.02	$50.37	$101.71	$82.87	$70.52
29	**2038**	$81.41	$50.00	$99.98	$81.74	$69.79
30	**2039**	$80.99	$49.77	$98.72	$80.92	$69.29
31	**2040**	$81.42	$50.11	$99.51	$81.52	$69.75
32	**2041**	$82.74	$51.08	$102.46	$83.60	$71.24
33	**2042**	$84.19	$52.14	$105.74	$85.92	$72.89
34	**2043**	$85.69	$53.22	$109.12	$88.30	$74.59
35	**2044**	$86.71	$53.99	$111.33	$89.89	$75.74
36	**2045**	$87.50	$54.59	$112.96	$91.07	$76.61
37	**2046**	$89.32	$55.91	$117.12	$94.00	$78.68

es study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$60.72	$99.25	$99.25	$44.19	$14.73	$37.18	$5.79
$71.04	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$77.68	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$77.59	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$44.78	$30.81	$30.81	$47.97	$15.99	$57.97	$7.24
$45.29	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39
$46.99	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.47	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$71.38	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$80.71	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$77.75	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$45.29	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39

$46.99	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

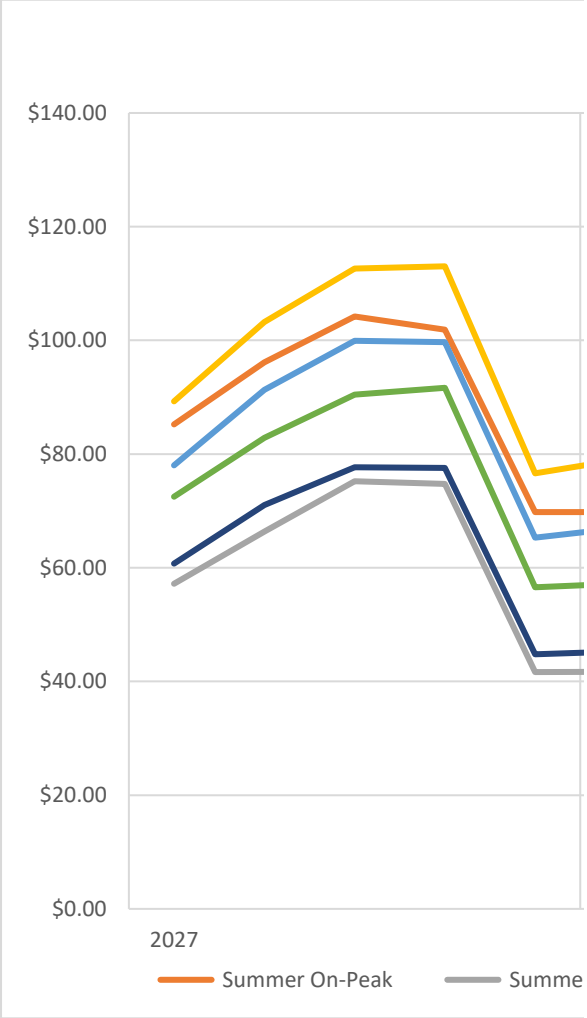
one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.24	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$74.05	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$81.05	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$80.28	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$46.99	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.39	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$74.01	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$83.78	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$83.24	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$49.25	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

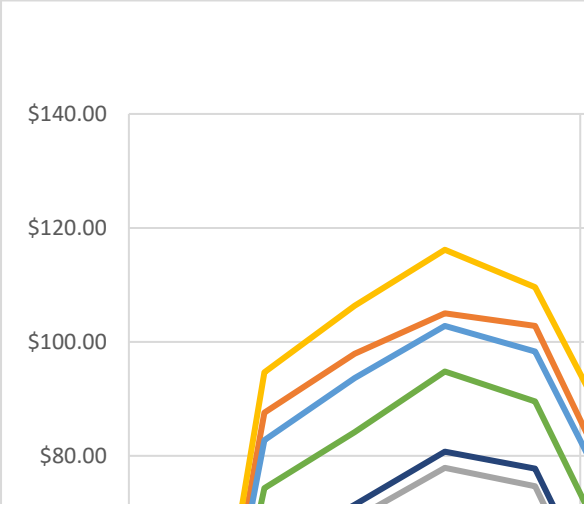
one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.81	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24

$76.31	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$86.87	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$86.83	$77.77	$77.77	$51.01	$17.00	$61.65	$7.69
$51.52	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$53.45	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$54.68	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$54.23	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$53.94	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$54.31	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$55.39	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$56.59	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$57.81	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$58.66	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$59.32	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$60.81	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.75	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Se
$3.43	



$3.68	Segment 2
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
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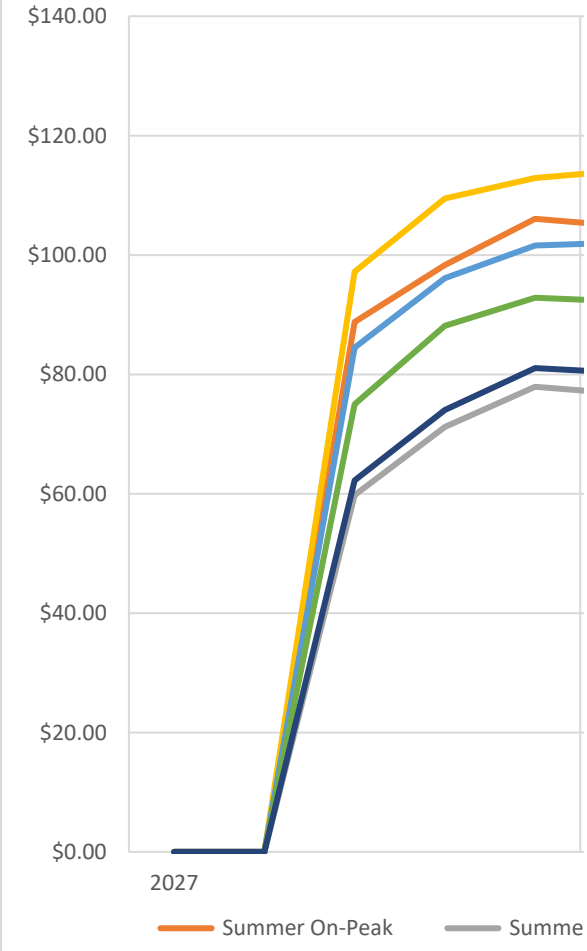
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
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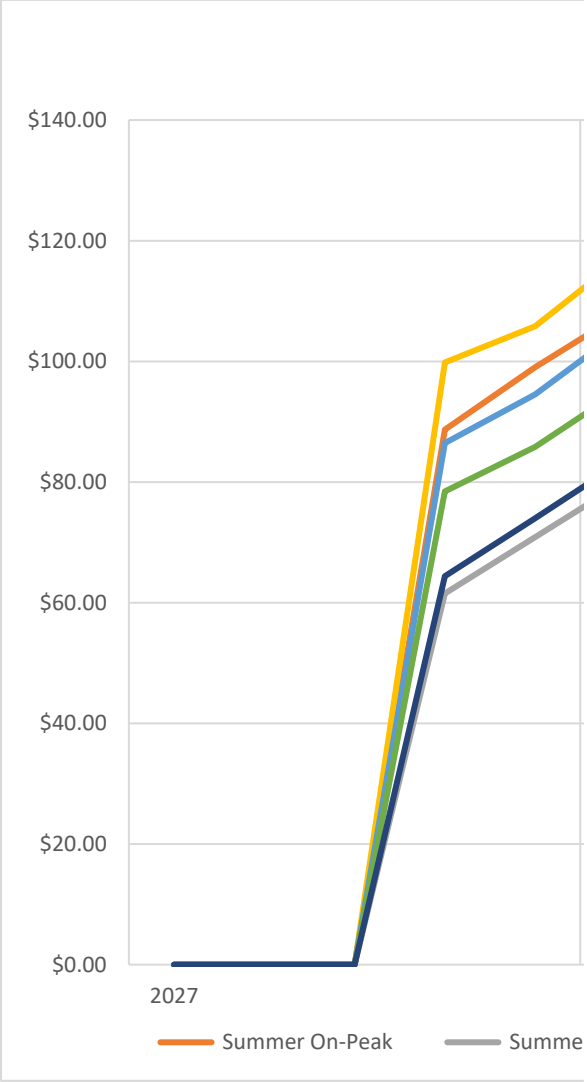
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
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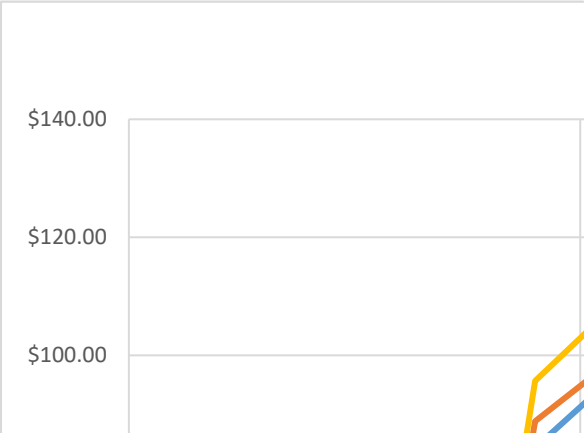
$3.37	



$3.43	Segment 2
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$4.73	Segment 3
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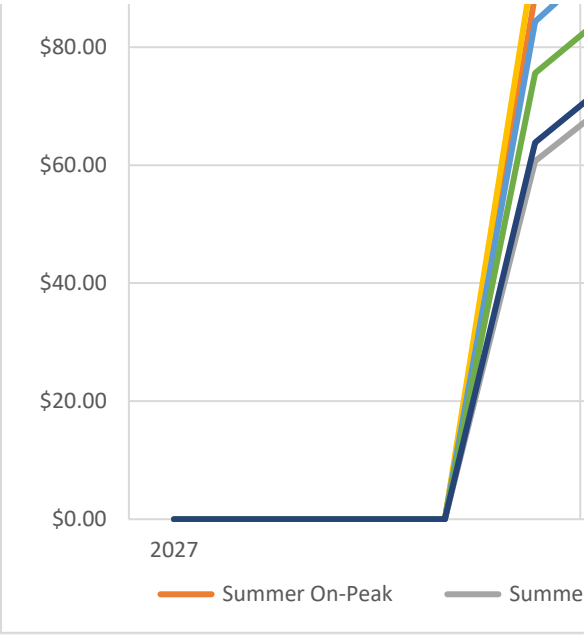
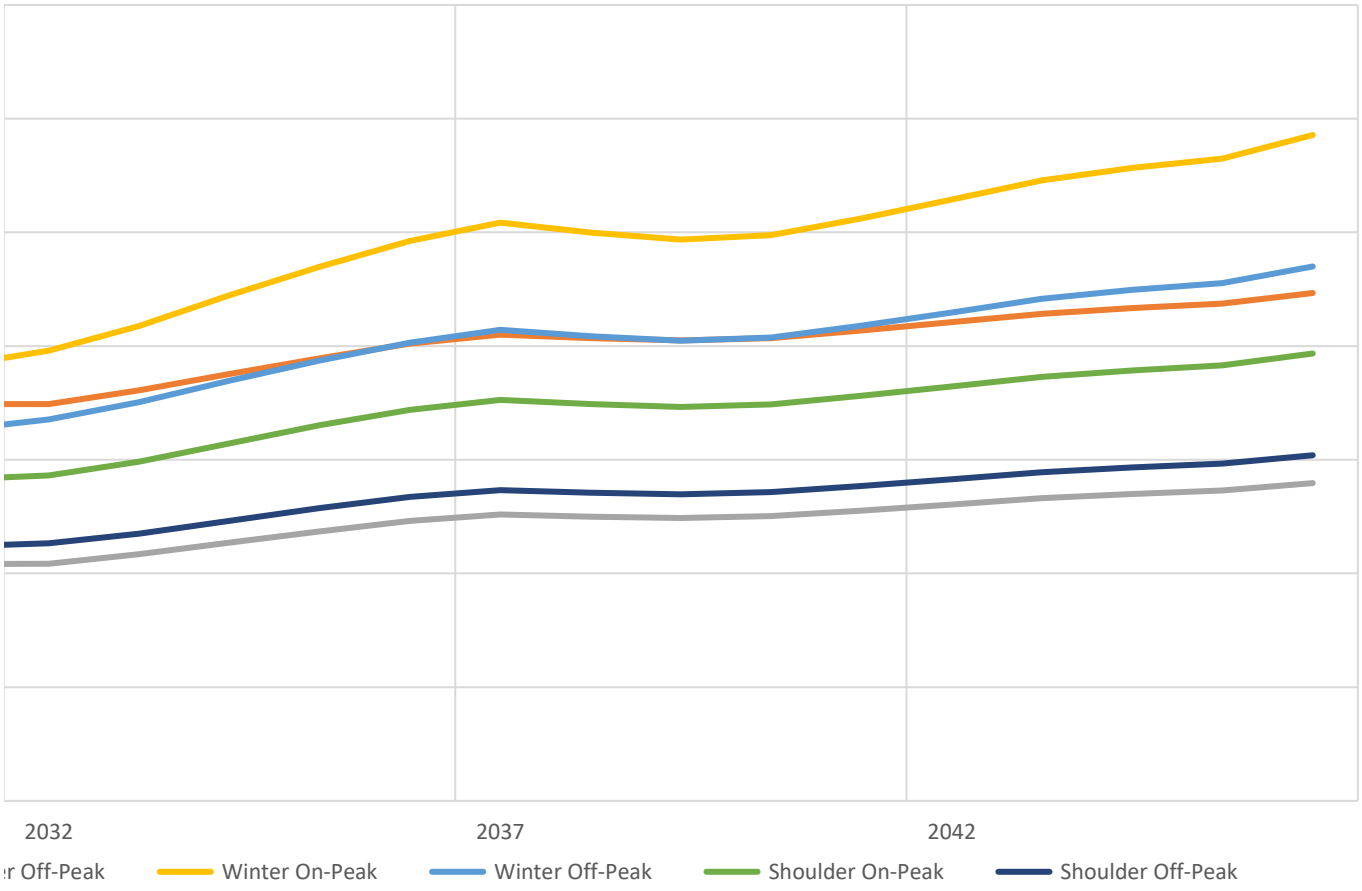
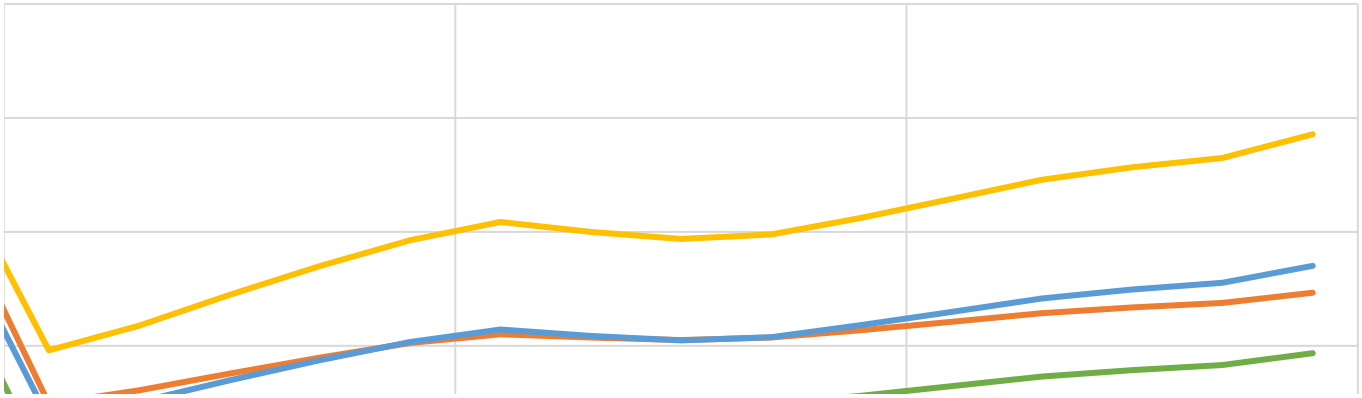
$5.17	
$5.25	
$5.46	

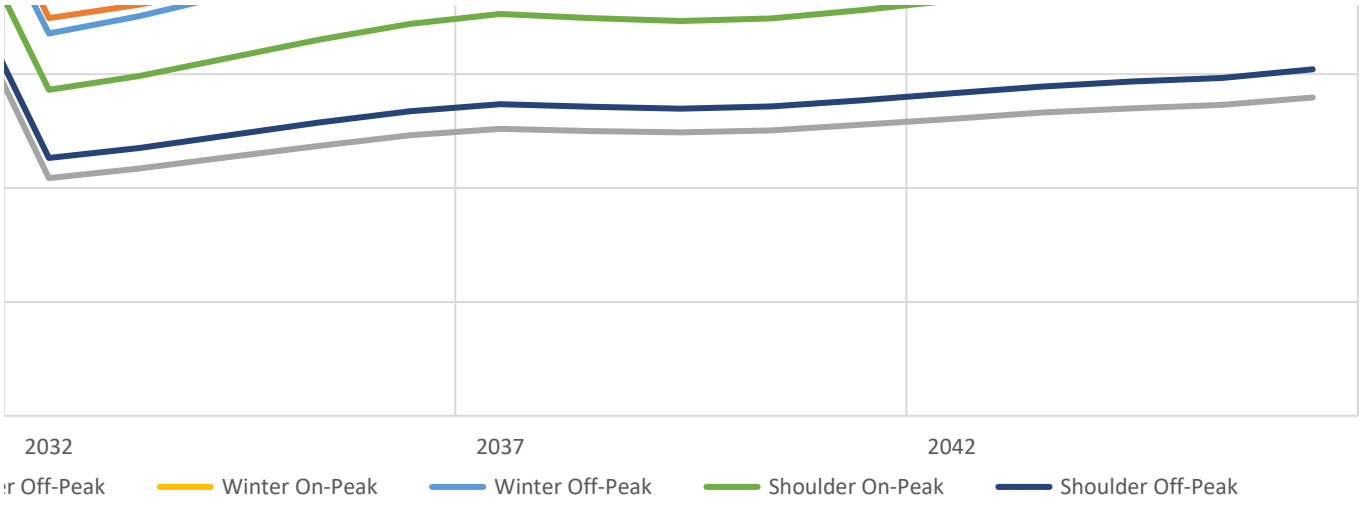


PY18 Avoided Energy Costs

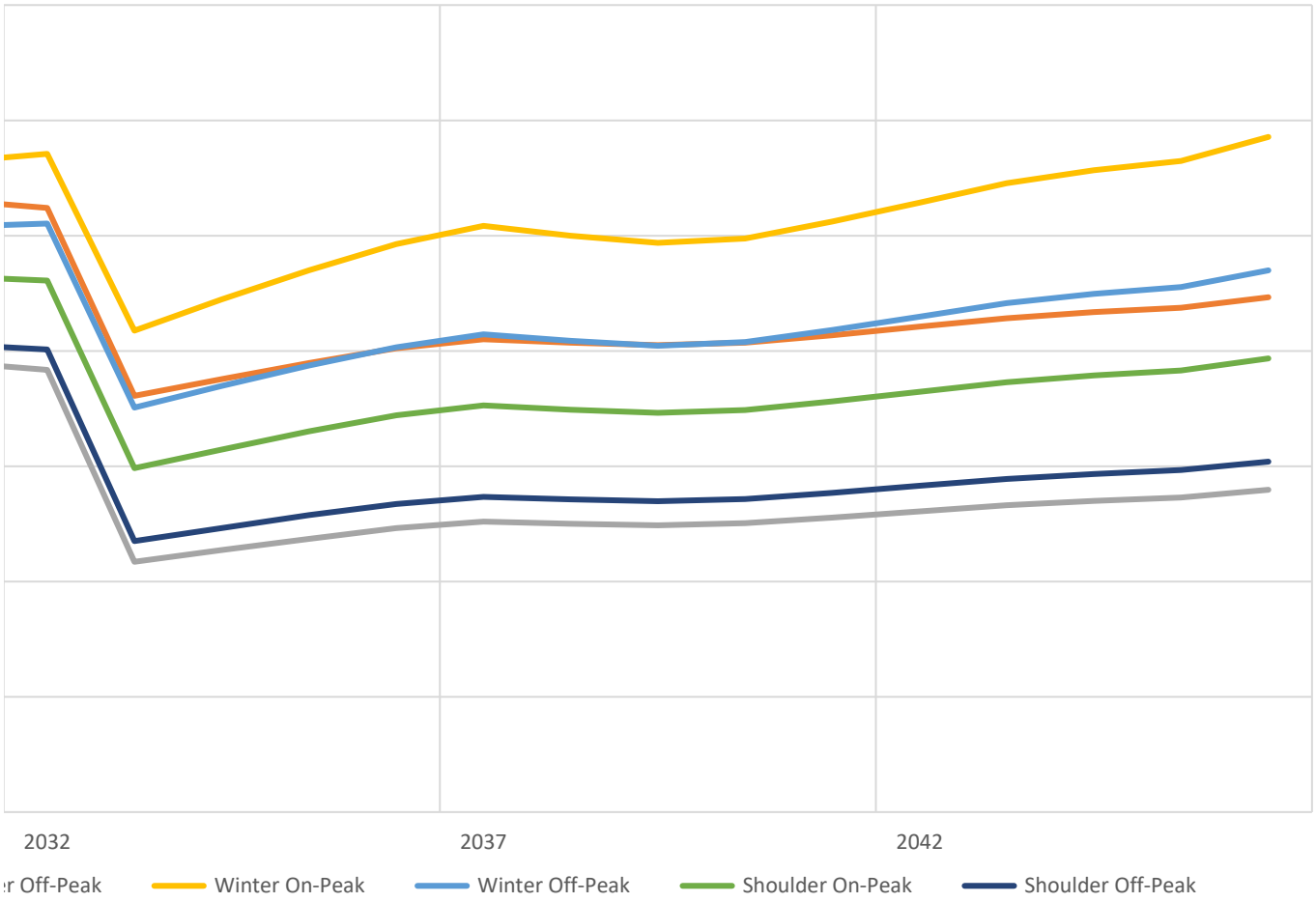


PY19 Avoided Energy Costs

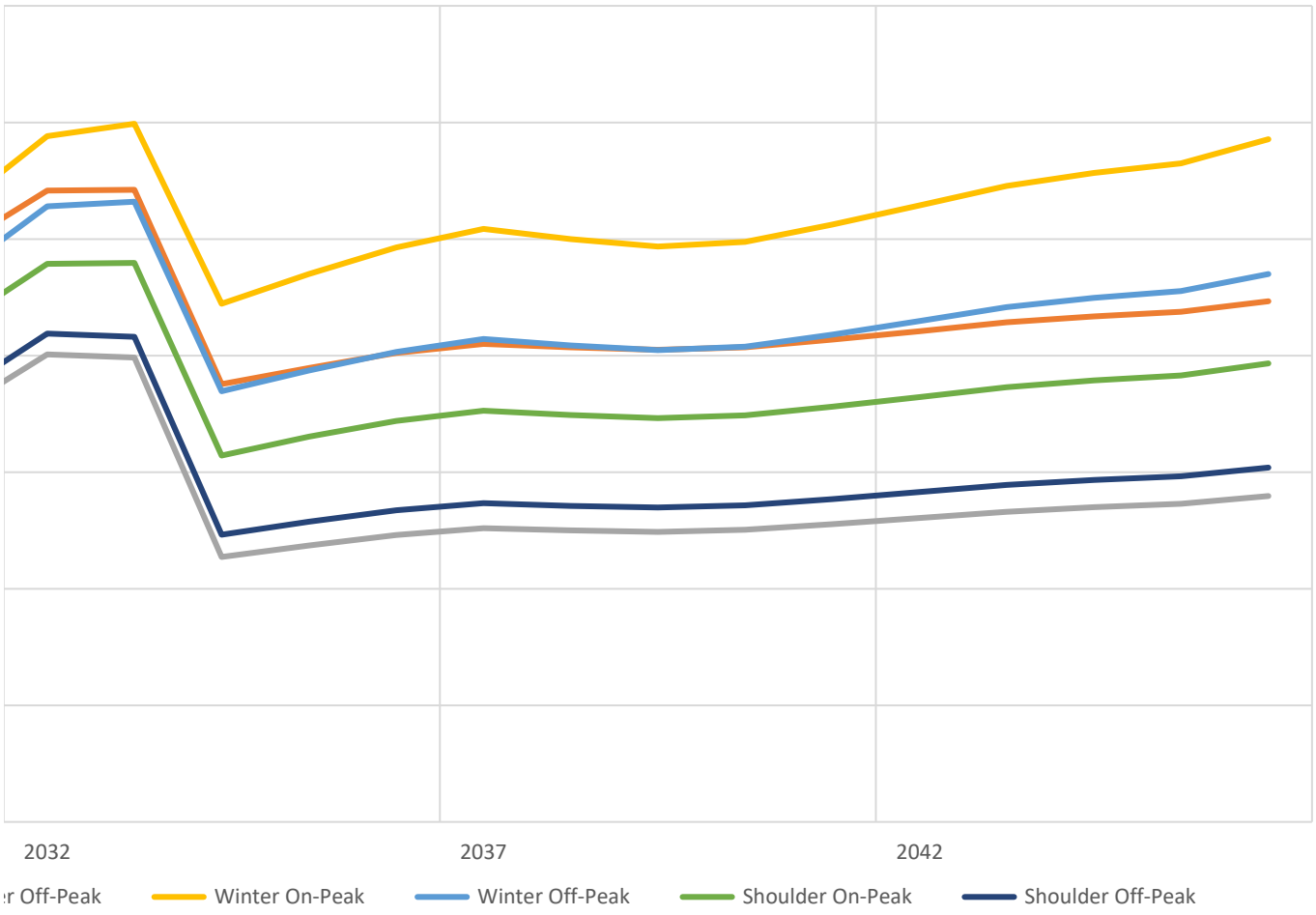




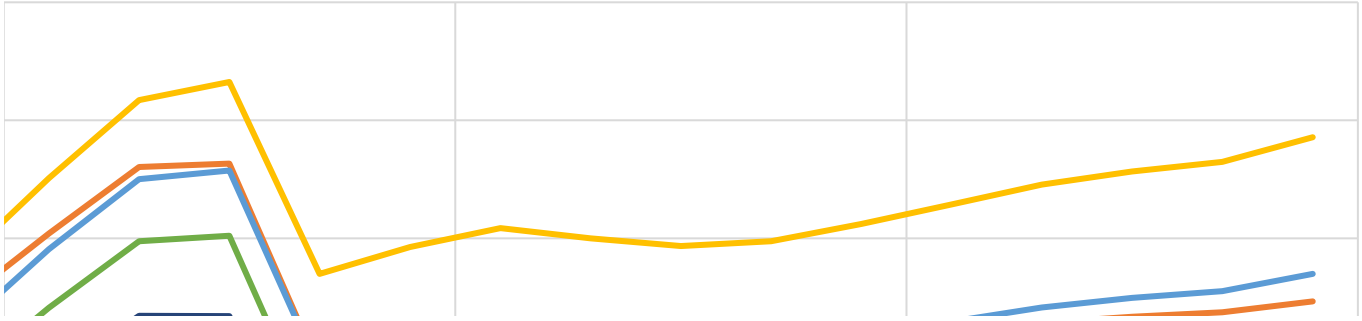
PY20 Avoided Energy Costs

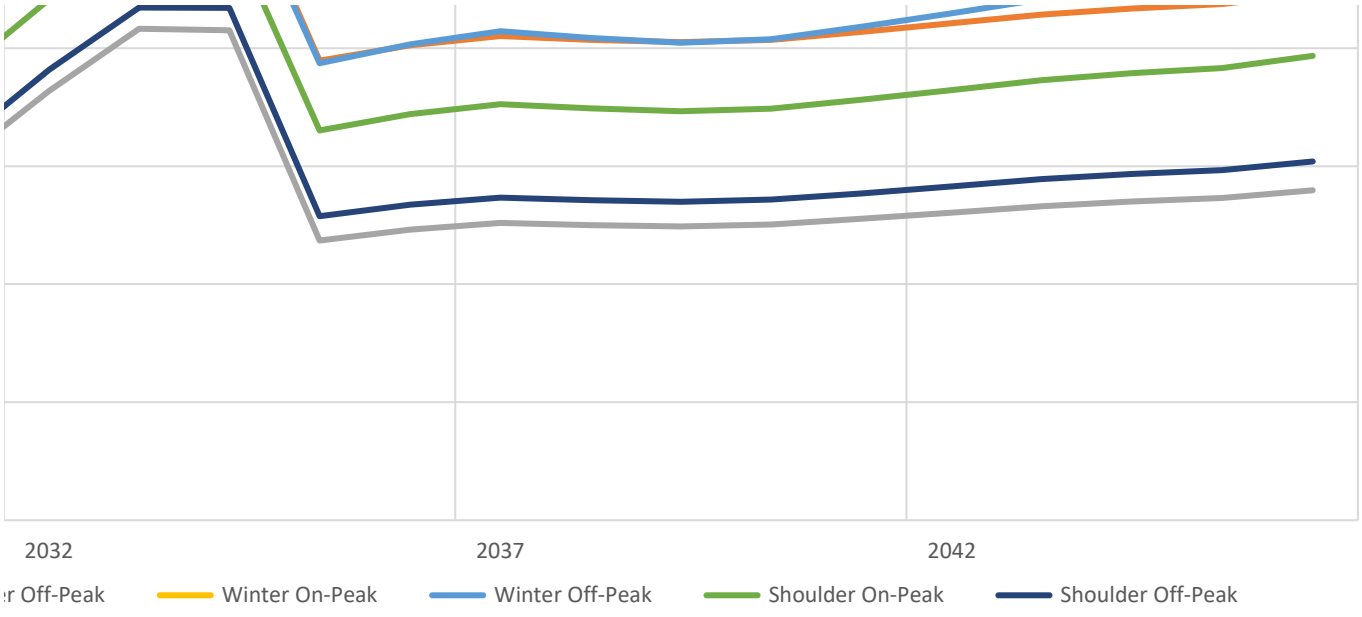


PY21 Avoided Energy Costs



PY22 Avoided Energy Costs




2032
2037
2042
r Off-Peak
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

PY Selection	PY18

SWE Note: This data includes avoided energy costs from the Arrearag

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$103.34	$75.30	$107.37	$96.09	$90.61
19	2028	$114.61	$84.81	$121.70	$109.75	$101.31
20	2029	$123.03	$94.05	$131.47	$118.76	$109.29
21	2030	$121.08	$93.96	$132.22	$118.87	$110.87
22	2031	$89.39	$61.25	$96.21	$84.89	$76.16
23	2032	$89.79	$61.70	$99.16	$87.09	$77.22
24	2033	$92.58	$63.78	$103.91	$90.53	$80.03
25	2034	$95.87	$66.23	$109.71	$94.70	$83.65
26	2035	$99.08	$68.62	$115.17	$98.65	$87.28
27	2036	$102.09	$70.87	$120.16	$102.26	$90.44
28	2037	$104.09	$72.43	$123.77	$104.94	$92.59
29	2038	$103.92	$72.51	$122.49	$104.24	$92.30
30	2039	$103.95	$72.72	$121.68	$103.88	$92.24
31	2040	$104.83	$73.53	$122.92	$104.93	$93.17
32	2041	$106.62	$74.96	$126.34	$107.49	$95.13
33	2042	$108.55	$76.50	$130.10	$110.28	$97.25
34	2043	$110.54	$78.07	$133.96	$113.15	$99.44
35	2044	$112.06	$79.33	$136.68	$115.23	$101.08
36	2045	$113.35	$80.44	$138.82	$116.92	$102.46
37	2046	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY19

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$106.04	$76.24	$113.13	$101.18	$92.74
20	2029	$116.73	$87.75	$125.17	$112.46	$102.99
21	2030	$124.20	$97.08	$135.34	$121.99	$113.99
22	2031	$122.36	$94.22	$129.18	$117.86	$109.13
23	2032	$89.79	$61.70	$99.16	$87.09	$77.22

24	**2033**	$92.58	$63.78	$103.91	$90.53	$80.03
25	**2034**	$95.87	$66.23	$109.71	$94.70	$83.65
26	**2035**	$99.08	$68.62	$115.17	$98.65	$87.28
27	**2036**	$102.09	$70.87	$120.16	$102.26	$90.44
28	**2037**	$104.09	$72.43	$123.77	$104.94	$92.59
29	**2038**	$103.92	$72.51	$122.49	$104.24	$92.30
30	**2039**	$103.95	$72.72	$121.68	$103.88	$92.24
31	**2040**	$104.83	$73.53	$122.92	$104.93	$93.17
32	**2041**	$106.62	$74.96	$126.34	$107.49	$95.13
33	**2042**	$108.55	$76.50	$130.10	$110.28	$97.25
34	**2043**	$110.54	$78.07	$133.96	$113.15	$99.44
35	**2044**	$112.06	$79.33	$136.68	$115.23	$101.08
36	**2045**	$113.35	$80.44	$138.82	$116.92	$102.46
37	**2046**	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY20

		Penelec Zone Summer ($/MWh)		**Penelec Zone Winter ($/MWh)**		**Penelec DLC Z ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$107.59	$78.61	$116.03	$103.32	$93.85
21	**2030**	$117.54	$90.42	$128.68	$115.33	$107.33
22	**2031**	$125.66	$97.52	$132.48	$121.16	$112.43
23	**2032**	$124.78	$96.69	$134.15	$122.08	$112.21
24	**2033**	$92.58	$63.78	$103.91	$90.53	$80.03
25	**2034**	$95.87	$66.23	$109.71	$94.70	$83.65
26	**2035**	$99.08	$68.62	$115.17	$98.65	$87.28
27	**2036**	$102.09	$70.87	$120.16	$102.26	$90.44
28	**2037**	$104.09	$72.43	$123.77	$104.94	$92.59
29	**2038**	$103.92	$72.51	$122.49	$104.24	$92.30
30	**2039**	$103.95	$72.72	$121.68	$103.88	$92.24
31	**2040**	$104.83	$73.53	$122.92	$104.93	$93.17
32	**2041**	$106.62	$74.96	$126.34	$107.49	$95.13
33	**2042**	$108.55	$76.50	$130.10	$110.28	$97.25
34	**2043**	$110.54	$78.07	$133.96	$113.15	$99.44
35	**2044**	$112.06	$79.33	$136.68	$115.23	$101.08
36	**2045**	$113.35	$80.44	$138.82	$116.92	$102.46
37	**2046**	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY21

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$107.88	$80.76	$119.02	$105.67	$97.67
22	2031	$118.62	$90.48	$125.44	$114.12	$105.39
23	2032	$128.28	$100.19	$137.65	$125.58	$115.71
24	2033	$128.83	$100.03	$140.16	$126.78	$116.28
25	2034	$95.87	$66.23	$109.71	$94.70	$83.65
26	2035	$99.08	$68.62	$115.17	$98.65	$87.28
27	2036	$102.09	$70.87	$120.16	$102.26	$90.44
28	2037	$104.09	$72.43	$123.77	$104.94	$92.59
29	2038	$103.92	$72.51	$122.49	$104.24	$92.30
30	2039	$103.95	$72.72	$121.68	$103.88	$92.24
31	2040	$104.83	$73.53	$122.92	$104.93	$93.17
32	2041	$106.62	$74.96	$126.34	$107.49	$95.13
33	2042	$108.55	$76.50	$130.10	$110.28	$97.25
34	2043	$110.54	$78.07	$133.96	$113.15	$99.44
35	2044	$112.06	$79.33	$136.68	$115.23	$101.08
36	2045	$113.35	$80.44	$138.82	$116.92	$102.46
37	2046	$115.69	$82.27	$143.49	$120.37	$105.05

PY Selection	PY22

		Penelec Zone Summer ($/MWh)		Penelec Zone Winter ($/MWh)		Penelec DLC Z ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$108.42	$80.28	$115.24	$103.92	$95.19

23	**2032**	$120.81	$92.72	$130.18	$118.11	$108.24
24	**2033**	$132.46	$103.66	$143.79	$130.41	$119.91
25	**2034**	$133.45	$103.81	$147.29	$132.28	$121.23
26	**2035**	$99.08	$68.62	$115.17	$98.65	$87.28
27	**2036**	$102.09	$70.87	$120.16	$102.26	$90.44
28	**2037**	$104.09	$72.43	$123.77	$104.94	$92.59
29	**2038**	$103.92	$72.51	$122.49	$104.24	$92.30
30	**2039**	$103.95	$72.72	$121.68	$103.88	$92.24
31	**2040**	$104.83	$73.53	$122.92	$104.93	$93.17
32	**2041**	$106.62	$74.96	$126.34	$107.49	$95.13
33	**2042**	$108.55	$76.50	$130.10	$110.28	$97.25
34	**2043**	$110.54	$78.07	$133.96	$113.15	$99.44
35	**2044**	$112.06	$79.33	$136.68	$115.23	$101.08
36	**2045**	$113.35	$80.44	$138.82	$116.92	$102.46
37	**2046**	$115.69	$82.27	$143.49	$120.37	$105.05

es Study and should only be applied for low income programs

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$78.82	$99.25	$99.25	$44.19	$14.73	$37.18	$5.79
$89.50	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$96.51	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$96.80	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$64.37	$30.81	$30.81	$47.97	$15.99	$57.97	$7.24
$65.27	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39
$67.38	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$80.93	$68.94	$68.94	$45.10	$15.03	$42.64	$5.97
$90.21	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$99.92	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$97.34	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$65.27	$31.45	$31.45	$48.96	$16.32	$59.17	$7.39

$67.38	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

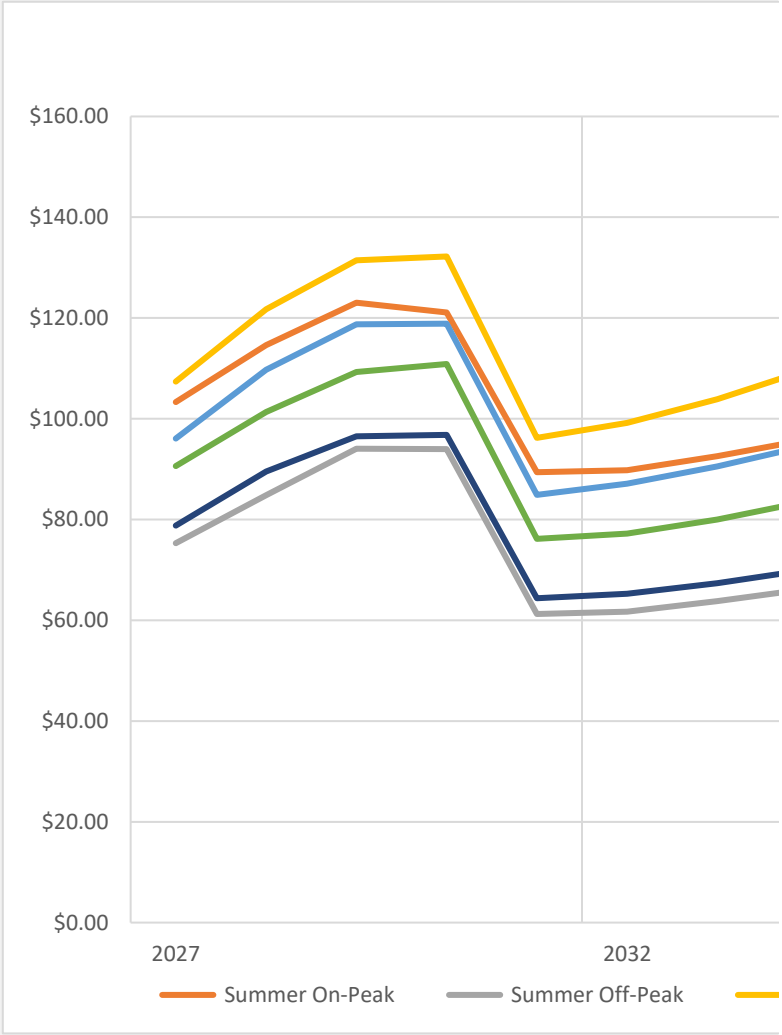
one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.07	$70.34	$70.34	$46.04	$15.35	$47.98	$6.24
$93.26	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$100.64	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$100.26	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$67.38	$32.10	$32.10	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.60	$71.76	$71.76	$46.99	$15.66	$53.05	$6.58
$93.60	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24
$103.76	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$103.63	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$70.05	$32.77	$32.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

one Shoulder Wh)	Penelec Generation Capacity ($/kW/year)		Penelec Transmission Capacity ($/kW/year)		Penelec Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.40	$73.22	$73.22	$47.97	$15.99	$57.97	$7.24

$96.29	$74.71	$74.71	$48.96	$16.32	$59.17	$7.39
$107.26	$76.22	$76.22	$49.97	$16.66	$60.39	$7.54
$107.63	$77.77	$77.77	$51.01	$17.00	$61.65	$7.69
$72.72	$33.45	$33.45	$52.07	$17.36	$62.92	$7.85
$75.08	$34.14	$34.14	$53.14	$17.71	$64.23	$8.02
$76.75	$34.85	$34.85	$54.24	$18.08	$65.56	$8.18
$76.74	$35.57	$35.57	$55.37	$18.46	$66.91	$8.35
$76.89	$36.31	$36.31	$56.52	$18.84	$68.30	$8.53
$77.73	$37.06	$37.06	$57.69	$19.23	$69.72	$8.70
$79.28	$37.83	$37.83	$58.88	$19.63	$71.16	$8.88
$80.95	$38.61	$38.61	$60.10	$20.03	$72.63	$9.07
$82.66	$39.41	$39.41	$61.35	$20.45	$74.14	$9.25
$84.01	$40.23	$40.23	$62.62	$20.87	$75.67	$9.45
$85.17	$41.06	$41.06	$63.91	$21.30	$77.24	$9.64
$87.18	$41.91	$41.91	$65.24	$21.75	$78.84	$9.84

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.75	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
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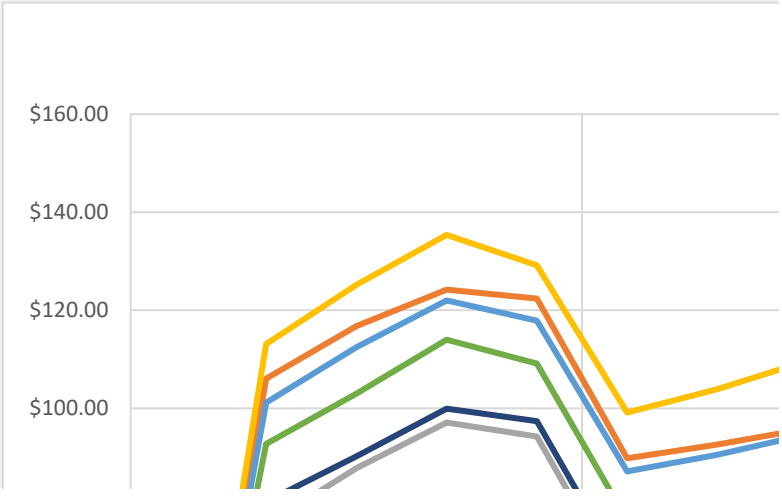
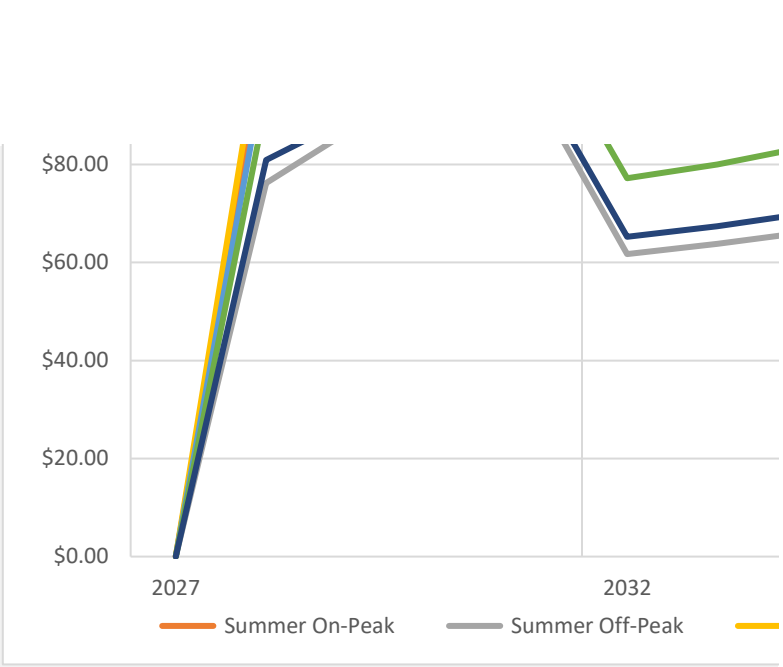
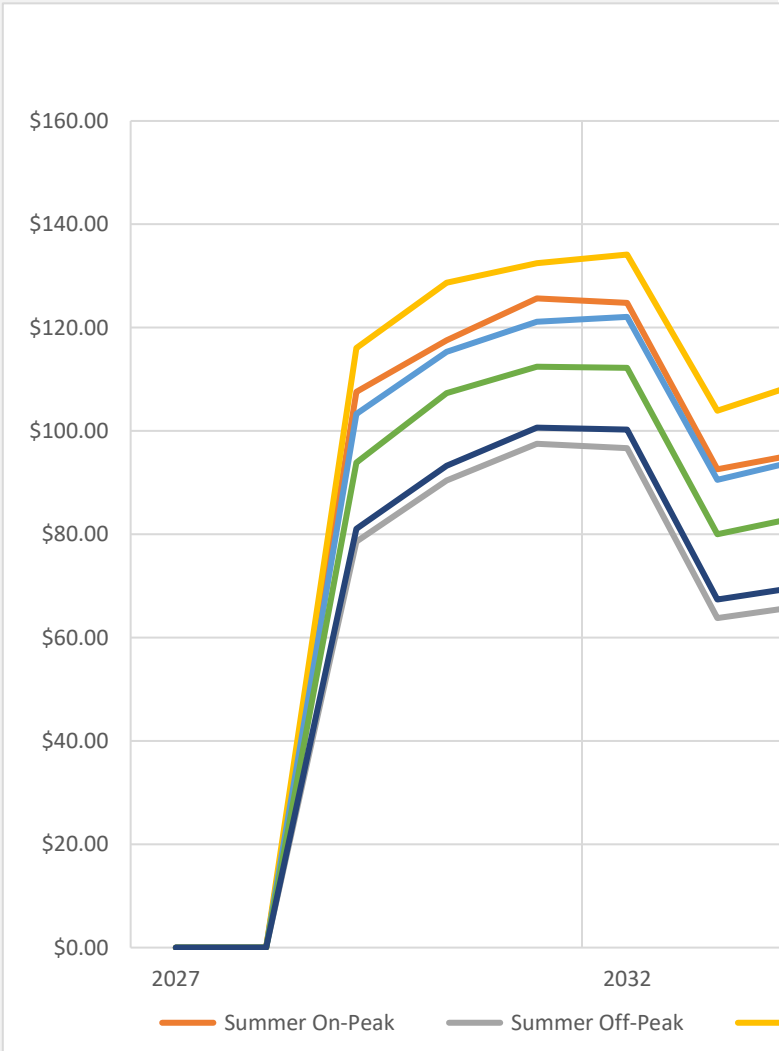
$3.42	
$3.37	Se
$3.43	



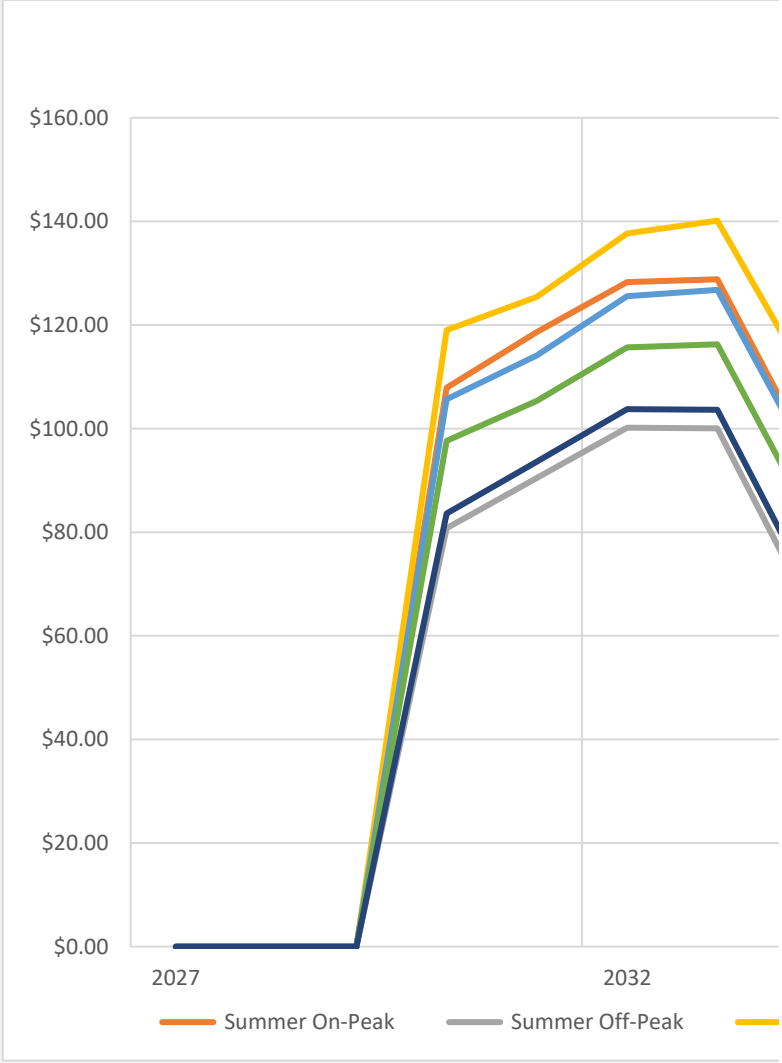
$3.68	Segment 2
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



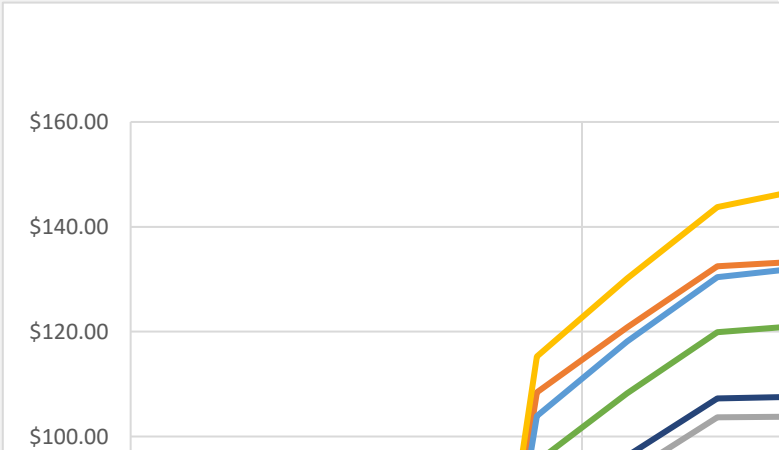
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



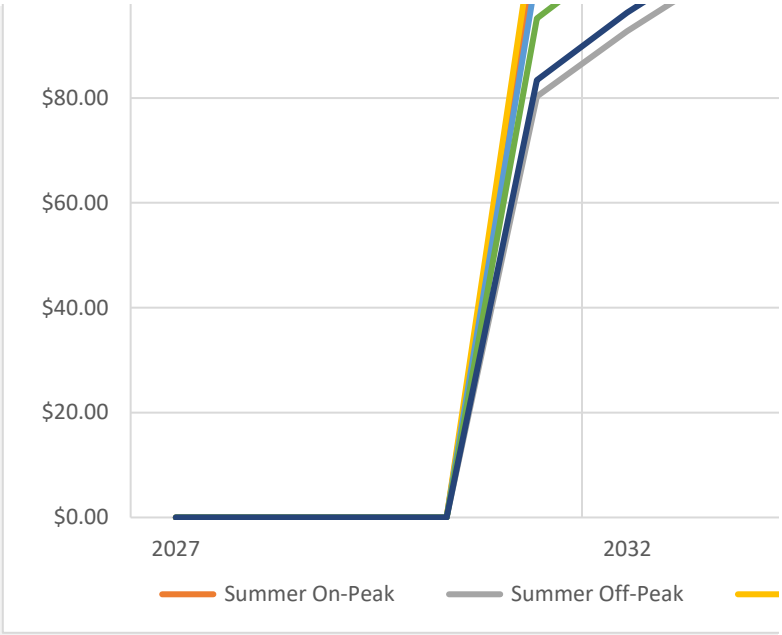
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



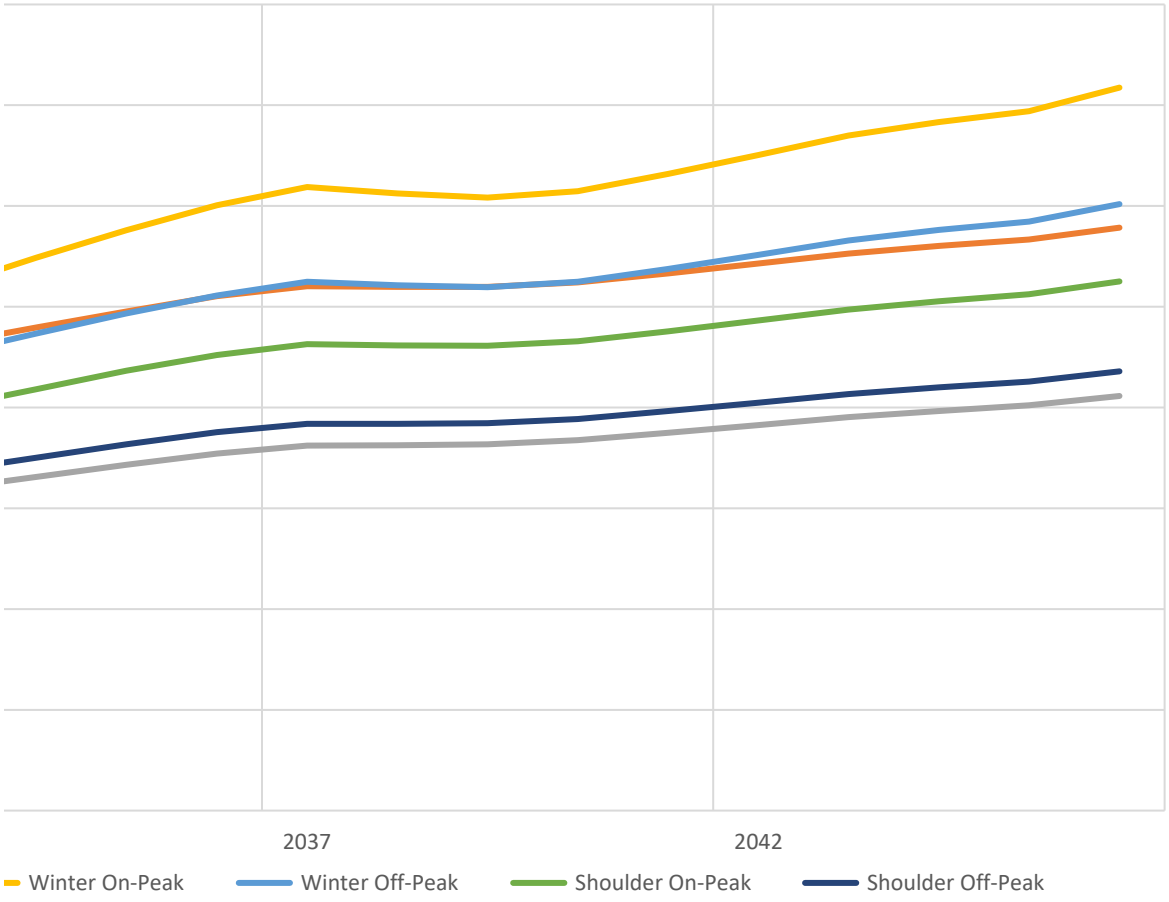
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.37	



$3.43	Segment 2
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



PY18 Avoided Energy Costs



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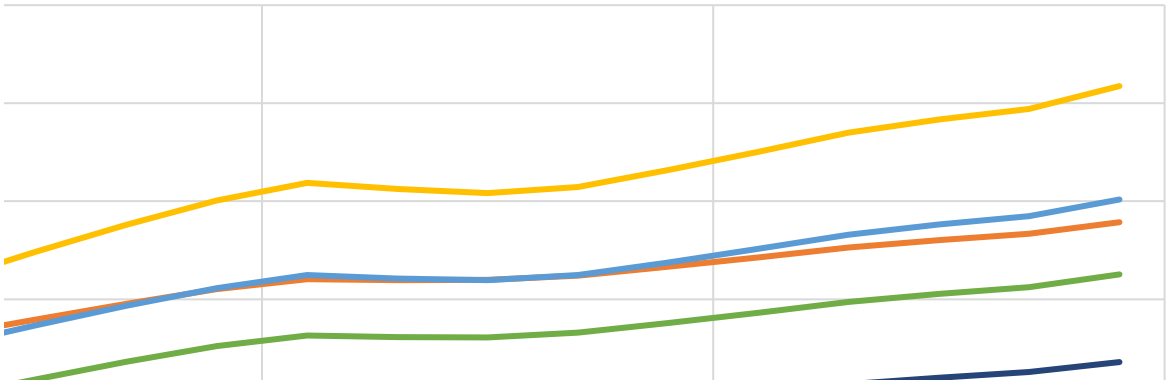

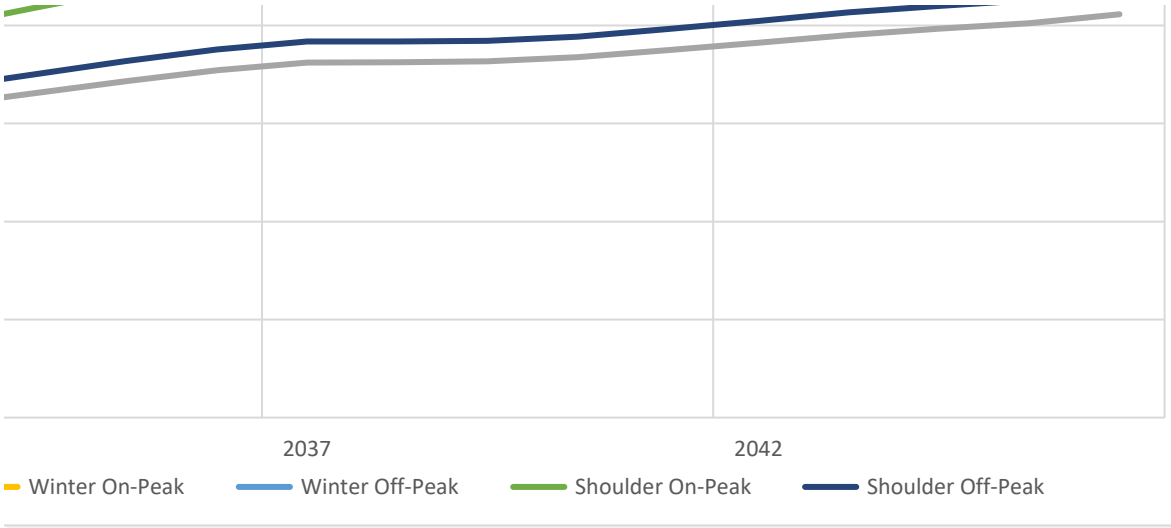

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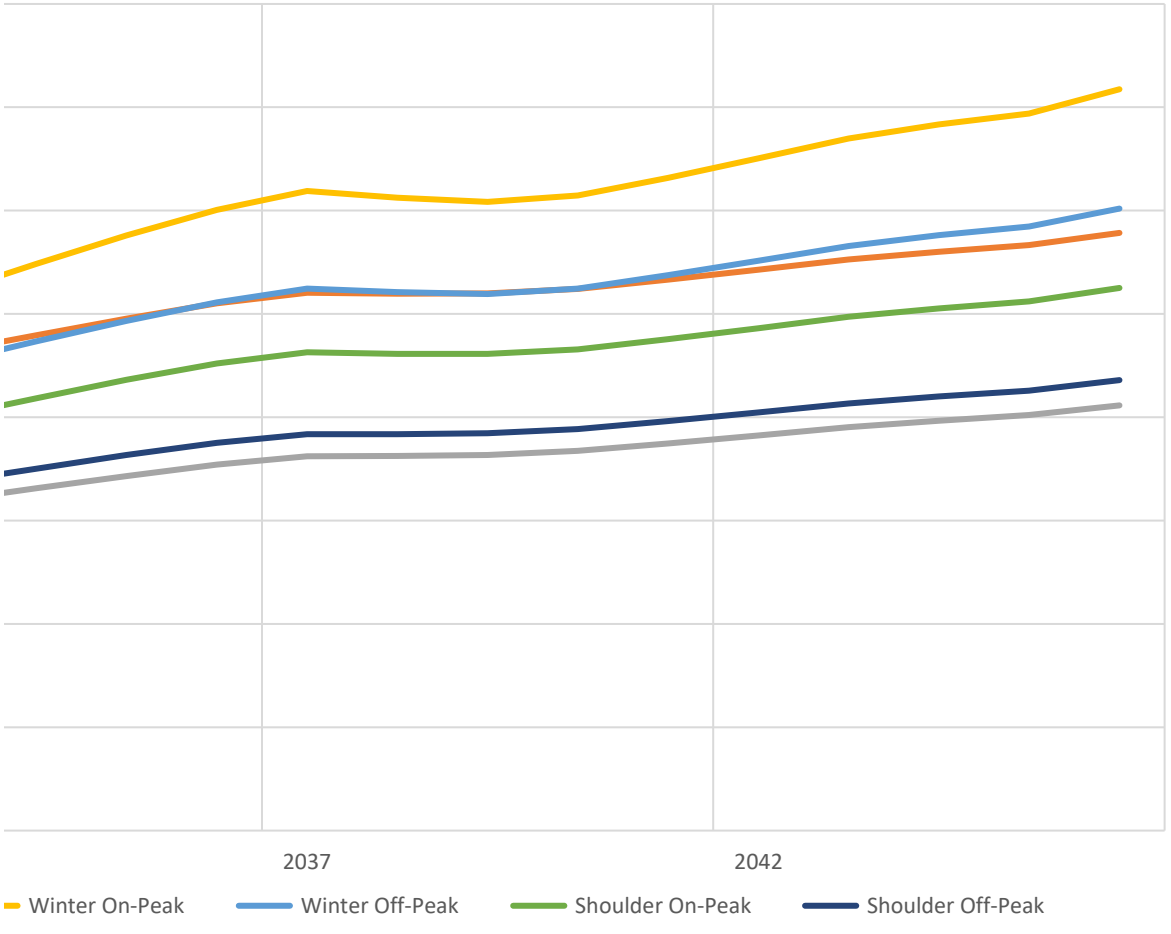

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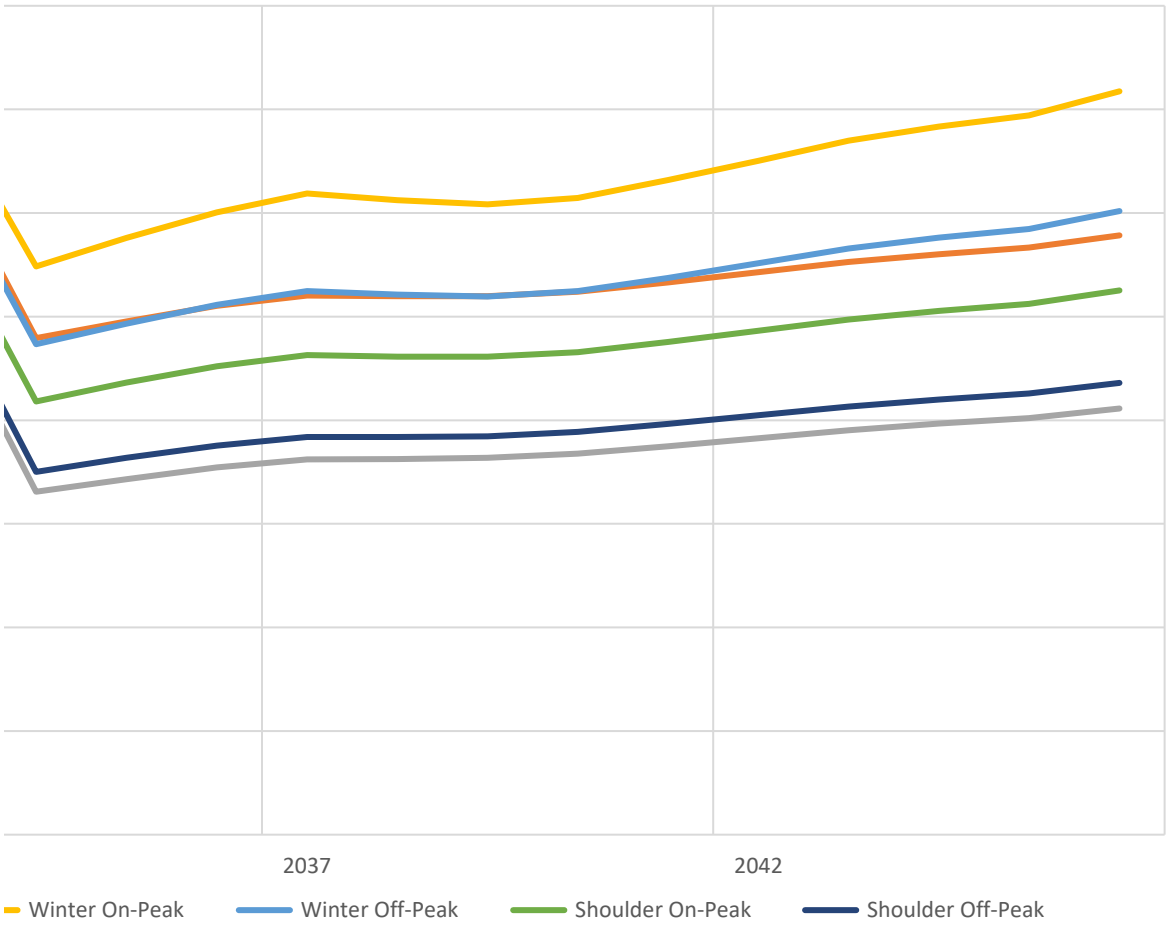
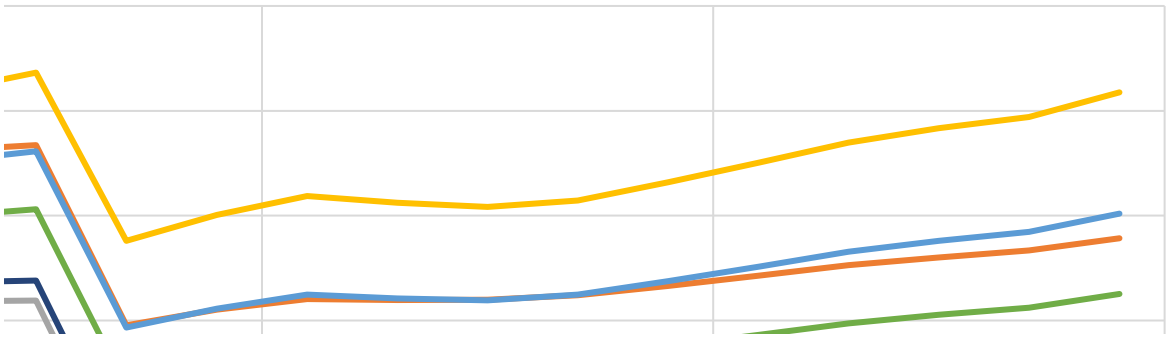
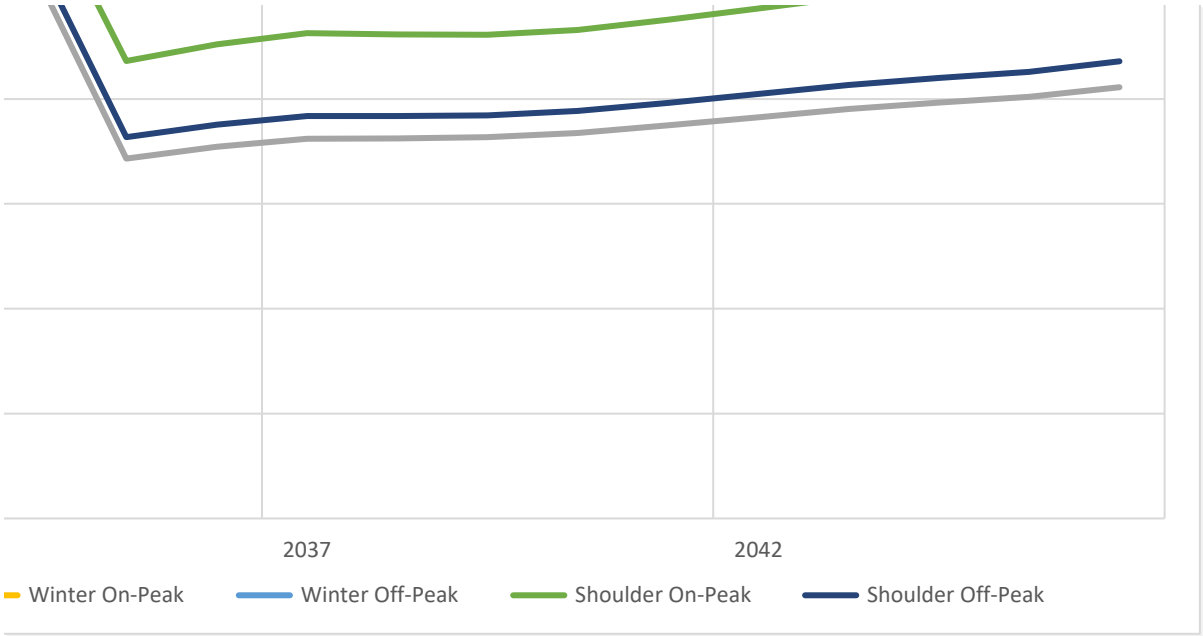


PY22 Avoided Energy Costs




2037
2042
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal $/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal S/MWh)	Penelec Zone Adjusted On-Peak (Nominal $/MWh)	Penelec Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	$71.02	$56.19	$69.44	$54.94
2	Feb-26	$55.25	$45.15	$54.02	$44.15
3	Mar-26	$48.43	$41.64	$47.35	$40.72
4	Apr-26	$48.50	$41.09	$47.42	$40.17
5	May-26	$45.09	$26.67	$44.08	$26.08
6	Jun-26	$81.13	$33.97	$79.33	$33.22
7	Jul-26	$76.91	$37.46	$75.20	$36.63
8	Aug-26	$51.05	$30.44	$49.92	$29.76
9	Sep-26	$48.05	$29.10	$46.98	$28.45
10	Oct-26	$47.70	$32.60	$46.64	$31.87
11	Nov-26	$47.70	$37.00	$46.64	$36.18
12	Dec-26	$56.15	$46.20	$54.90	$45.17
13	Jan-27	$78.95	$65.15	$77.19	$63.70
14	Feb-27	$66.75	$55.85	$65.26	$54.61
15	Mar-27	$50.55	$41.60	$49.43	$40.67
16	Apr-27	$51.00	$38.70	$49.87	$37.84
17	May-27	$51.50	$33.55	$50.35	$32.80
18	Jun-27	$57.90	$34.00	$56.61	$33.24
19	Jul-27	$85.00	$43.00	$83.11	$42.04
20	Aug-27	$74.35	$37.05	$72.70	$36.23
21	Sep-27	$56.30	$34.05	$55.05	$33.29
22	Oct-27	$53.90	$37.45	$52.70	$36.62
23	Nov-27	$52.50	$42.00	$51.33	$41.07
24	Dec-27	$61.70	$51.80	$60.33	$50.65
25	Jan-28	$85.55	$70.45	$83.65	$68.88
26	Feb-28	$72.95	$61.75	$71.33	$60.38
27	Mar-28	$51.95	$43.00	$50.79	$42.04
28	Apr-28	$51.25	$39.30	$50.11	$38.43
29	May-28	$51.65	$33.35	$50.50	$32.61
30	Jun-28	$58.20	$33.55	$56.90	$32.80
31	Jul-28	$87.45	$41.70	$85.50	$40.77
32	Aug-28	$76.30	$38.30	$74.60	$37.45
33	Sep-28	$56.75	$31.05	$55.49	$30.36
34	Oct-28	$53.85	$36.80	$52.65	$35.98
35	Nov-28	$52.80	$42.45	$51.63	$41.51
36	Dec-28	$61.45	$51.10	$60.08	$49.96
37	Jan-29	$82.50	$70.65	$80.66	$69.08
38	Feb-29	$76.50	$64.05	$74.80	$62.62
39	Mar-29	$51.95	$42.40	$50.79	$41.46
40	Apr-29	$50.70	$37.35	$49.57	$36.52
41	May-29	$51.45	$34.90	$50.31	$34.12
42	Jun-29	$57.15	$34.15	$55.88	$33.39
43	Jul-29	$88.20	$40.90	$86.24	$39.99
44	Aug-29	$77.45	$37.60	$75.73	$36.76
45	Sep-29	$55.95	$34.45	$54.70	$33.68
46	Oct-29	$51.05	$35.35	$49.91	$34.56
47	Nov-29	$54.25	$40.55	$53.04	$39.65
48	Dec-29	$65.00	$50.30	$63.55	$49.18
49	Jan-30	$83.20	$69.15	$81.35	$67.61

50	Feb-30	$76.75	$62.70	$75.04	$61.30
51	Mar-30	$55.80	$46.20	$54.56	$45.17
52	Apr-30	$52.90	$37.15	$51.72	$36.32
53	May-30	$54.80	$35.60	$53.58	$34.81
54	Jun-30	$59.00	$34.75	$57.69	$33.98
55	Jul-30	$82.15	$41.75	$80.32	$40.82
56	Aug-30	$70.85	$38.40	$69.27	$37.55
57	Sep-30	$57.25	$34.85	$55.98	$34.07
58	Oct-30	$52.50	$35.55	$51.33	$34.76
59	Nov-30	$56.25	$41.00	$55.00	$40.09
60	Dec-30	$68.65	$55.80	$67.12	$54.56
End of Segment I					

Real-Time, Load-Weighted LMPs ($/MWh)

Zone	EDC	2020	2021	2022	2023	2024
	Western Hub	$ 20.92	$ 38.88	$ 74.25	$ 31.78	$ 33.24
#REF!	Penelec	$ 20.84	$ 37.73	$ 73.26	$ 31.01	$ 31.80

Source: PJM State of the Market Report, Tables in chapter 11

Basis Factor
98%

Natural Gas Futures

Status	*Data Needed: TRC Order Section*
Complete	NYMEX Natural Gas Futures at Henry Hub: B.2.b.i Page 15
Complete	EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars: B.2.b.iii Page 16

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal $/MMBTU)	NYMEX: Penelec Natural Gas Price (Nominal $/MMBTU)	EIA AEO Gas Prices (Nominal $/MMBTU)
1	Jan-26	Jan	2026	$4.15	$6.73	$6.06
2	Feb-26	Feb	2026	$3.92	$5.97	$5.33
3	Mar-26	Mar	2026	$3.54	$3.33	$2.91
4	Apr-26	Apr	2026	$3.41	$3.03	$2.39
5	May-26	May	2026	$3.44	$2.76	$2.11
6	Jun-26	Jun	2026	$3.61	$2.81	$2.13
7	Jul-26	Jul	2026	$3.81	$2.96	$2.23
8	Aug-26	Aug	2026	$3.88	$3.00	$2.27
9	Sep-26	Sep	2026	$3.84	$2.59	$1.94
10	Oct-26	Oct	2026	$3.88	$2.61	$1.97
11	Nov-26	Nov	2026	$4.10	$3.33	$2.57
12	Dec-26	Dec	2026	$4.50	$5.24	$4.20
13	Jan-27	Jan	2027	$4.75	$7.32	$5.86
14	Feb-27	Feb	2027	$4.38	$6.42	$5.16
15	Mar-27	Mar	2027	$3.80	$3.59	$2.81
16	Apr-27	Apr	2027	$3.42	$3.04	$2.31
17	May-27	May	2027	$3.39	$2.72	$2.05
18	Jun-27	Jun	2027	$3.54	$2.74	$2.06
19	Jul-27	Jul	2027	$3.72	$2.87	$2.16
20	Aug-27	Aug	2027	$3.78	$2.90	$2.19
21	Sep-27	Sep	2027	$3.75	$2.50	$1.87
22	Oct-27	Oct	2027	$3.80	$2.53	$1.91
23	Nov-27	Nov	2027	$4.01	$3.25	$2.49
24	Dec-27	Dec	2027	$4.44	$5.17	$4.06
25	Jan-28	Jan	2028	$4.73	$7.31	$5.84
26	Feb-28	Feb	2028	$4.39	$6.44	$5.14
27	Mar-28	Mar	2028	$3.77	$3.56	$2.80
28	Apr-28	Apr	2028	$3.30	$2.92	$2.30
29	May-28	May	2028	$3.27	$2.59	$2.04
30	Jun-28	Jun	2028	$3.42	$2.62	$2.06
31	Jul-28	Jul	2028	$3.60	$2.74	$2.15
32	Aug-28	Aug	2028	$3.66	$2.79	$2.18
33	Sep-28	Sep	2028	$3.65	$2.40	$1.87
34	Oct-28	Oct	2028	$3.72	$2.44	$1.90
35	Nov-28	Nov	2028	$3.96	$3.19	$2.48
36	Dec-28	Dec	2028	$4.41	$5.15	$4.05
37	Jan-29	Jan	2029	$4.68	$7.25	$6.11
38	Feb-29	Feb	2029	$4.33	$6.38	$5.38
39	Mar-29	Mar	2029	$3.64	$3.43	$2.93
40	Apr-29	Apr	2029	$3.18	$2.80	$2.41
41	May-29	May	2029	$3.15	$2.48	$2.13
42	Jun-29	Jun	2029	$3.30	$2.50	$2.15

43	Jul-29	Jul	2029	$3.47	$2.62	$2.25
44	Aug-29	Aug	2029	$3.54	$2.67	$2.29
45	Sep-29	Sep	2029	$3.54	$2.29	$1.95
46	Oct-29	Oct	2029	$3.61	$2.34	$1.99
47	Nov-29	Nov	2029	$3.80	$3.03	$2.60
48	Dec-29	Dec	2029	$4.24	$4.98	$4.24
49	Jan-30	Jan	2030	$4.51	$7.13	$6.54
50	Feb-30	Feb	2030	$4.22	$6.31	$5.76
51	Mar-30	Mar	2030	$3.57	$3.35	$3.14
52	Apr-30	Apr	2030	$3.07	$2.68	$2.58
53	May-30	May	2030	$3.04	$2.34	$2.28
54	Jun-30	Jun	2030	$3.17	$2.35	$2.30
55	Jul-30	Jul	2030	$3.32	$2.45	$2.41
56	Aug-30	Aug	2030	$3.39	$2.49	$2.45
57	Sep-30	Sep	2030	$3.37	$2.09	$2.09
58	Oct-30	Oct	2030	$3.44	$2.14	$2.13
59	Nov-30	Nov	2030	$3.63	$2.85	$2.78
60	Dec-30	Dec	2030	$4.06	$4.82	$4.54
61	Jan-31	Jan	2031	$4.33	$7.01	$6.89
62	Feb-31	Feb	2031	$4.06	$6.19	$6.07
63	Mar-31	Mar	2031	$3.43	$3.21	$3.31
64	Apr-31	Apr	2031	$3.03	$2.64	$2.72
65	May-31	May	2031	$3.05	$2.34	$2.41
66	Jun-31	Jun	2031	$3.19	$2.35	$2.43
67	Jul-31	Jul	2031	$3.33	$2.44	$2.54
68	Aug-31	Aug	2031	$3.36	$2.45	$2.58
69	Sep-31	Sep	2031	$3.33	$2.02	$2.20
70	Oct-31	Oct	2031	$3.39	$2.06	$2.25
71	Nov-31	Nov	2031	$3.58	$2.79	$2.93
72	Dec-31	Dec	2031	$4.03	$4.80	$4.78
73	Jan-32	Jan	2032	$4.30	$7.03	$7.91
74	Feb-32	Feb	2032	$4.03	$6.20	$6.96
75	Mar-32	Mar	2032	$3.36	$3.14	$3.80
76	Apr-32	Apr	2032	$2.88	$2.48	$3.12
77	May-32	May	2032	$2.86	$2.14	$2.76
78	Jun-32	Jun	2032	$3.01	$2.16	$2.78
79	Jul-32	Jul	2032	$3.17	$2.27	$2.91
80	Aug-32	Aug	2032	$3.21	$2.27	$2.96
81	Sep-32	Sep	2032	$3.18	$1.85	$2.53
82	Oct-32	Oct	2032	$3.26	$1.90	$2.58
83	Nov-32	Nov	2032	$3.49	$2.67	$3.36
84	Dec-32	Dec	2032	$3.92	$4.70	$5.48
85	Jan-33	Jan	2033	$4.17	$6.95	$8.72
86	Feb-33	Feb	2033	$3.90	$6.11	$7.68
87	Mar-33	Mar	2033	$3.28	$3.05	$4.18
88	Apr-33	Apr	2033	$2.83	$2.42	$3.43
89	May-33	May	2033	$2.86	$2.13	$3.04
90	Jun-33	Jun	2033	$3.00	$2.13	$3.07
91	Jul-33	Jul	2033	$3.17	$2.24	$3.21
92	Aug-33	Aug	2033	$3.21	$2.26	$3.26
93	Sep-33	Sep	2033	$3.18	$1.83	$2.79
94	Oct-33	Oct	2033	$3.23	$1.85	$2.84
95	Nov-33	Nov	2033	$3.49	$2.66	$3.71
96	Dec-33	Dec	2033	$3.89	$4.69	$6.05
97	Jan-34	Jan	2034	$4.14	$6.98	$9.18

98	Feb-34	Feb	2034	$3.90	$6.16	$8.09
99	Mar-34	Mar	2034	$3.30	$3.07	$4.41
100	Apr-34	Apr	2034	$2.90	$2.48	$3.62
101	May-34	May	2034	$2.93	$2.18	$3.21
102	Jun-34	Jun	2034	$3.06	$2.18	$3.23
103	Jul-34	Jul	2034	$3.21	$2.27	$3.38
104	Aug-34	Aug	2034	$3.25	$2.28	$3.43
105	Sep-34	Sep	2034	$3.26	$1.88	$2.94
106	Oct-34	Oct	2034	$3.31	$1.90	$2.99
107	Nov-34	Nov	2034	$3.55	$2.71	$3.90
108	Dec-34	Dec	2034	$3.95	$4.76	$6.37
109	Jan-35	Jan	2035	$4.17	$7.07	$9.45
110	Feb-35	Feb	2035	$3.93	$6.23	$8.33
111	Mar-35	Mar	2035	$3.50	$3.26	$4.54
112	Apr-35	Apr	2035	$3.17	$2.74	$3.73
113	May-35	May	2035	$3.15	$2.38	$3.30
114	Jun-35	Jun	2035	$3.18	$2.28	$3.33
115	Jul-35	Jul	2035	$3.22	$2.26	$3.48
116	Aug-35	Aug	2035	$3.26	$2.27	$3.54
117	Sep-35	Sep	2035	$3.28	$1.87	$3.02
118	Oct-35	Oct	2035	$3.32	$1.89	$3.08
119	Nov-35	Nov	2035	$3.52	$2.66	$4.02
120	Dec-35	Dec	2035	$3.82	$4.65	$6.56
121	Jan-36	Jan	2036	$4.09	$7.05	$9.59
122	Feb-36	Feb	2036	$3.92	$6.27	$8.45
123	Mar-36	Mar	2036	$3.65	$3.41	$4.60
124	Apr-36	Apr	2036	$3.32	$2.89	$3.78
125	May-36	May	2036	$3.30	$2.52	$3.35
126	Jun-36	Jun	2036	$3.34	$2.42	$3.38
127	Jul-36	Jul	2036	$3.38	$2.40	$3.53
128	Aug-36	Aug	2036	$3.42	$2.41	$3.59
129	Sep-36	Sep	2036	$3.43	$2.00	$3.07
130	Oct-36	Oct	2036	$3.48	$2.01	$3.12
131	Nov-36	Nov	2036	$3.55	$2.67	$4.08
132	Dec-36	Dec	2036	$3.70	$4.55	$6.65
133	Jan-37	Jan	2037	$3.93	$6.94	$9.53
134	Feb-37	Feb	2037	$3.78	$6.18	$8.39
135	Mar-37	Mar	2037	$3.58	$3.33	$4.57
136	Apr-37	Apr	2037	$3.25	$2.80	$3.76
137	May-37	May	2037	$3.23	$2.43	$3.33
138	Jun-37	Jun	2037	$3.26	$2.32	$3.36
139	Jul-37	Jul	2037	$3.30	$2.30	$3.51
140	Aug-37	Aug	2037	$3.34	$2.31	$3.56
141	Sep-37	Sep	2037	$3.36	$1.89	$3.05
142	Oct-37	Oct	2037	$3.40	$1.91	$3.10
143	Nov-37	Nov	2037	$3.48	$2.58	$4.05
144	Dec-37	Dec	2037	$3.52	$4.38	$6.61
145	Jan-38	Jan	2038			$9.33
146	Feb-38	Feb	2038			$8.22
147	Mar-38	Mar	2038			$4.48
148	Apr-38	Apr	2038			$3.68
149	May-38	May	2038			$3.26
150	Jun-38	Jun	2038			$3.29
151	Jul-38	Jul	2038			$3.44
152	Aug-38	Aug	2038			$3.49

153	Sep-38	Sep	2038		$2.98
154	Oct-38	Oct	2038		$3.04
155	Nov-38	Nov	2038		$3.97
156	Dec-38	Dec	2038		$6.47
157	Jan-39	Jan	2039		$9.18
158	Feb-39	Feb	2039		$8.08
159	Mar-39	Mar	2039		$4.41
160	Apr-39	Apr	2039		$3.62
161	May-39	May	2039		$3.20
162	Jun-39	Jun	2039		$3.23
163	Jul-39	Jul	2039		$3.38
164	Aug-39	Aug	2039		$3.43
165	Sep-39	Sep	2039		$2.93
166	Oct-39	Oct	2039		$2.99
167	Nov-39	Nov	2039		$3.90
168	Dec-39	Dec	2039		$6.37
169	Jan-40	Jan	2040		$9.24
170	Feb-40	Feb	2040		$8.14
171	Mar-40	Mar	2040		$4.44
172	Apr-40	Apr	2040		$3.64
173	May-40	May	2040		$3.23
174	Jun-40	Jun	2040		$3.26
175	Jul-40	Jul	2040		$3.40
176	Aug-40	Aug	2040		$3.46
177	Sep-40	Sep	2040		$2.96
178	Oct-40	Oct	2040		$3.01
179	Nov-40	Nov	2040		$3.93
180	Dec-40	Dec	2040		$6.41
181	Jan-41	Jan	2041		$9.54
182	Feb-41	Feb	2041		$8.40
183	Mar-41	Mar	2041		$4.58
184	Apr-41	Apr	2041		$3.76
185	May-41	May	2041		$3.33
186	Jun-41	Jun	2041		$3.36
187	Jul-41	Jul	2041		$3.51
188	Aug-41	Aug	2041		$3.57
189	Sep-41	Sep	2041		$3.05
190	Oct-41	Oct	2041		$3.11
191	Nov-41	Nov	2041		$4.05
192	Dec-41	Dec	2041		$6.61
193	Jan-42	Jan	2042		$9.86
194	Feb-42	Feb	2042		$8.69
195	Mar-42	Mar	2042		$4.73
196	Apr-42	Apr	2042		$3.89
197	May-42	May	2042		$3.44
198	Jun-42	Jun	2042		$3.47
199	Jul-42	Jul	2042		$3.63
200	Aug-42	Aug	2042		$3.69
201	Sep-42	Sep	2042		$3.15
202	Oct-42	Oct	2042		$3.21
203	Nov-42	Nov	2042		$4.19
204	Dec-42	Dec	2042		$6.84
205	Jan-43	Jan	2043		$10.20
206	Feb-43	Feb	2043		$8.98
207	Mar-43	Mar	2043		$4.90

208	Apr-43	Apr	2043		$4.02
209	May-43	May	2043		$3.56
210	Jun-43	Jun	2043		$3.59
211	Jul-43	Jul	2043		$3.76
212	Aug-43	Aug	2043		$3.81
213	Sep-43	Sep	2043		$3.26
214	Oct-43	Oct	2043		$3.32
215	Nov-43	Nov	2043		$4.34
216	Dec-43	Dec	2043		$7.07
217	Jan-44	Jan	2044		$10.41
218	Feb-44	Feb	2044		$9.17
219	Mar-44	Mar	2044		$5.00
220	Apr-44	Apr	2044		$4.10
221	May-44	May	2044		$3.64
222	Jun-44	Jun	2044		$3.67
223	Jul-44	Jul	2044		$3.84
224	Aug-44	Aug	2044		$3.89
225	Sep-44	Sep	2044		$3.33
226	Oct-44	Oct	2044		$3.39
227	Nov-44	Nov	2044		$4.43
228	Dec-44	Dec	2044		$7.22
229	Jan-45	Jan	2045		$10.57
230	Feb-45	Feb	2045		$9.31
231	Mar-45	Mar	2045		$5.07
232	Apr-45	Apr	2045		$4.16
233	May-45	May	2045		$3.69
234	Jun-45	Jun	2045		$3.72
235	Jul-45	Jul	2045		$3.89
236	Aug-45	Aug	2045		$3.95
237	Sep-45	Sep	2045		$3.38
238	Oct-45	Oct	2045		$3.44
239	Nov-45	Nov	2045		$4.49
240	Dec-45	Dec	2045		$7.33
241	Jan-46	Jan	2046		$10.98
242	Feb-46	Feb	2046		$9.68
243	Mar-46	Mar	2046		$5.27
244	Apr-46	Apr	2046		$4.33
245	May-46	May	2046		$3.84
246	Jun-46	Jun	2046		$3.87
247	Jul-46	Jul	2046		$4.05
248	Aug-46	Aug	2046		$4.11
249	Sep-46	Sep	2046		$3.51
250	Oct-46	Oct	2046		$3.58
251	Nov-46	Nov	2046		$4.67
252	Dec-46	Dec	2046		$7.62
253	Jan-47	Jan	2047		$0.00
254	Feb-47	Feb	2047		$0.00
255	Mar-47	Mar	2047		$0.00
256	Apr-47	Apr	2047		$0.00
257	May-47	May	2047		$0.00
258	Jun-47	Jun	2047		$0.00
259	Jul-47	Jul	2047		$0.00
260	Aug-47	Aug	2047		$0.00
261	Sep-47	Sep	2047		$0.00
262	Oct-47	Oct	2047		$0.00

263	Nov-47	Nov	2047	$0.00
264	Dec-47	Dec	2047	$0.00

Penelec Natural Gas Price (Nominal $/MMBTU)
$6.73
$5.97
$3.33
$3.03
$2.76
$2.81
$2.96
$3.00
$2.59
$2.61
$3.33
$5.24
$7.32
$6.42
$3.59
$3.04
$2.72
$2.74
$2.87
$2.90
$2.50
$2.53
$3.25
$5.17
$7.31
$6.44
$3.56
$2.92
$2.59
$2.62
$2.74
$2.79
$2.40
$2.44
$3.19
$5.15
$7.25
$6.38
$3.43
$2.80
$2.48
$2.50

EIA AEO Mid-Atlantic Data
(Electric Power, Natural Gas 2024 Dollars)
[$/MMBTU]

	3	4	5	6	7
Year	**2025**	**2026**	**2027**	**2028**	**2029**
Real	$2.7247	$2.7802	$2.6369	$2.5768	$2.6437
Nominal	$2.89	$3.01	$2.91	$2.90	$3.04

$2.62
$2.67
$2.29
$2.34
$3.03
$4.98
$7.13
$6.31
$3.35
$2.68
$2.34
$2.35
$2.45
$2.49
$2.09
$2.14
$2.85
$4.82
$6.99
$6.18
$3.22
$2.65
$2.35
$2.36
$2.46
$2.46
$2.05
$2.09
$2.81
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$7.28
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$3.33
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$2.34
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$2.47
$2.05
$2.10
$2.87
$4.92
$7.71
$6.78
$3.54
$2.85
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$2.54
$2.66
$2.69
$2.24
$2.27
$3.11
$5.27
$8.24

$7.26
$3.83
$3.13
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$2.78
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$2.52
$3.39
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$3.04
$3.03
$3.13
$3.18
$2.69
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$6.01
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$3.24
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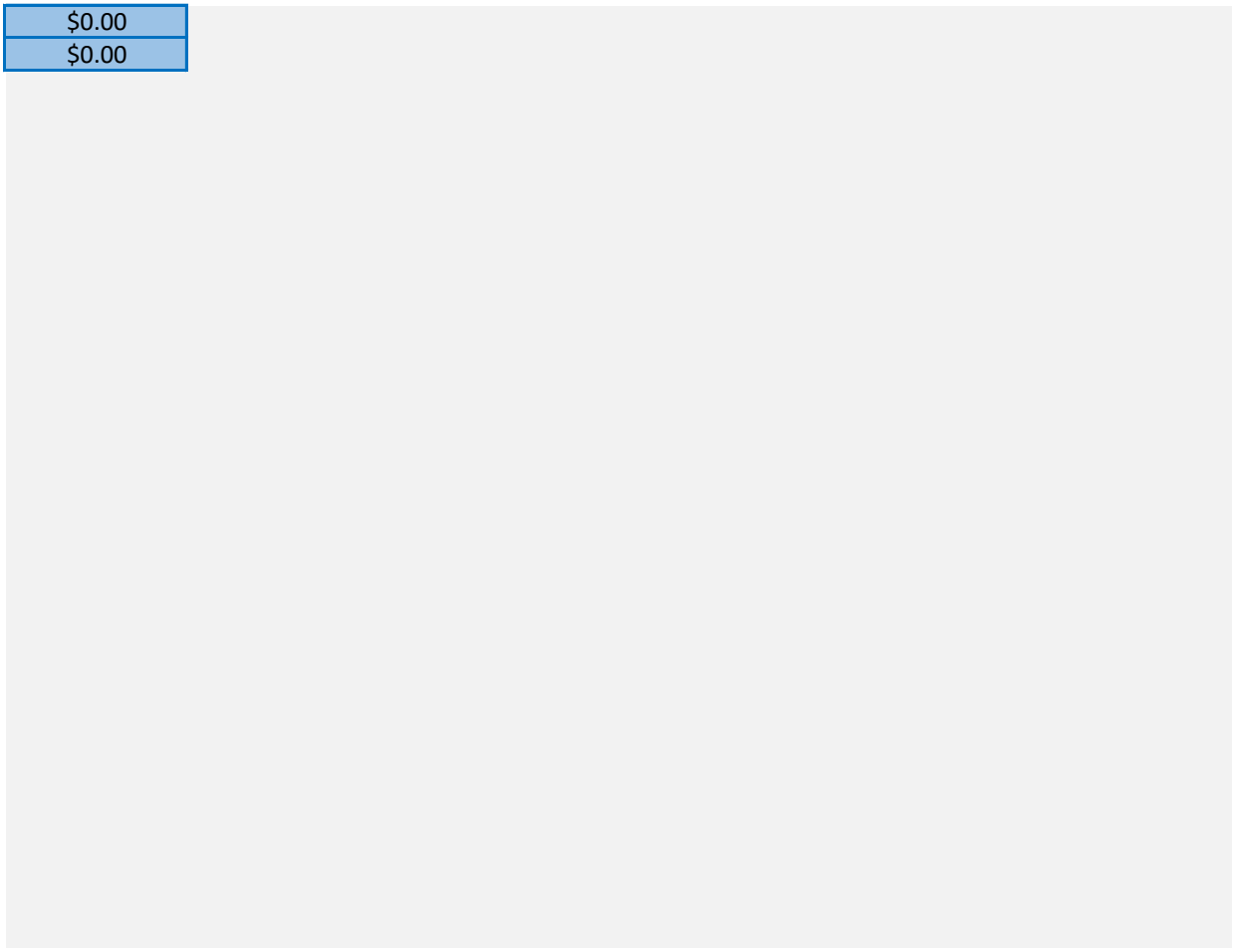

8	9	10	11	12	13	14	15	16
2030	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**
$2.7737	$2.8665	$3.2230	$3.4834	$3.5980	$3.6316	$3.6108	$3.5182	$3.3769
$3.25	$3.43	$3.93	$4.33	$4.56	$4.70	$4.76	$4.73	$4.64

17	18	19	20	21	22	23	24
2039	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**	**2046**
$3.2569	$3.2155	$3.2524	$3.2982	$3.3440	$3.3472	$3.3295	$3.3936
$4.56	$4.59	$4.74	$4.90	$5.07	$5.17	$5.25	$5.46

Record Field	Period	Month	Year	Season	Penelec Zone Adjusted On-Peak (Nominal $/MWh)	Penelec Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	Jan	2026	Winter	$69.44	$54.94
2	Feb-26	Feb	2026	Winter	$54.02	$44.15
3	Mar-26	Mar	2026	Shoulder	$47.35	$40.72
4	Apr-26	Apr	2026	Shoulder	$47.42	$40.17
5	May-26	May	2026	Summer	$44.08	$26.08
6	Jun-26	Jun	2026	Summer	$79.33	$33.22
7	Jul-26	Jul	2026	Summer	$75.20	$36.63
8	Aug-26	Aug	2026	Summer	$49.92	$29.76
9	Sep-26	Sep	2026	Summer	$46.98	$28.45
10	Oct-26	Oct	2026	Shoulder	$46.64	$31.87
11	Nov-26	Nov	2026	Shoulder	$46.64	$36.18
12	Dec-26	Dec	2026	Winter	$54.90	$45.17
13	Jan-27	Jan	2027	Winter	$77.19	$63.70
14	Feb-27	Feb	2027	Winter	$65.26	$54.61
15	Mar-27	Mar	2027	Shoulder	$49.43	$40.67
16	Apr-27	Apr	2027	Shoulder	$49.87	$37.84
17	May-27	May	2027	Summer	$50.35	$32.80
18	Jun-27	Jun	2027	Summer	$56.61	$33.24
19	Jul-27	Jul	2027	Summer	$83.11	$42.04
20	Aug-27	Aug	2027	Summer	$72.70	$36.23
21	Sep-27	Sep	2027	Summer	$55.05	$33.29
22	Oct-27	Oct	2027	Shoulder	$52.70	$36.62
23	Nov-27	Nov	2027	Shoulder	$51.33	$41.07
24	Dec-27	Dec	2027	Winter	$60.33	$50.65
25	Jan-28	Jan	2028	Winter	$83.65	$68.88
26	Feb-28	Feb	2028	Winter	$71.33	$60.38
27	Mar-28	Mar	2028	Shoulder	$50.79	$42.04
28	Apr-28	Apr	2028	Shoulder	$50.11	$38.43
29	May-28	May	2028	Summer	$50.50	$32.61
30	Jun-28	Jun	2028	Summer	$56.90	$32.80
31	Jul-28	Jul	2028	Summer	$85.50	$40.77
32	Aug-28	Aug	2028	Summer	$74.60	$37.45
33	Sep-28	Sep	2028	Summer	$55.49	$30.36
34	Oct-28	Oct	2028	Shoulder	$52.65	$35.98
35	Nov-28	Nov	2028	Shoulder	$51.63	$41.51
36	Dec-28	Dec	2028	Winter	$60.08	$49.96
37	Jan-29	Jan	2029	Winter	$80.66	$69.08
38	Feb-29	Feb	2029	Winter	$74.80	$62.62
39	Mar-29	Mar	2029	Shoulder	$50.79	$41.46
40	Apr-29	Apr	2029	Shoulder	$49.57	$36.52
41	May-29	May	2029	Summer	$50.31	$34.12

42	Jun-29	Jun	2029	Summer	$55.88	$33.39
43	Jul-29	Jul	2029	Summer	$86.24	$39.99
44	Aug-29	Aug	2029	Summer	$75.73	$36.76
45	Sep-29	Sep	2029	Summer	$54.70	$33.68
46	Oct-29	Oct	2029	Shoulder	$49.91	$34.56
47	Nov-29	Nov	2029	Shoulder	$53.04	$39.65
48	Dec-29	Dec	2029	Winter	$63.55	$49.18
49	Jan-30	Jan	2030	Winter	$81.35	$67.61
50	Feb-30	Feb	2030	Winter	$75.04	$61.30
51	Mar-30	Mar	2030	Shoulder	$54.56	$45.17
52	Apr-30	Apr	2030	Shoulder	$51.72	$36.32
53	May-30	May	2030	Summer	$53.58	$34.81
54	Jun-30	Jun	2030	Summer	$57.69	$33.98
55	Jul-30	Jul	2030	Summer	$80.32	$40.82
56	Aug-30	Aug	2030	Summer	$69.27	$37.55
57	Sep-30	Sep	2030	Summer	$55.98	$34.07
58	Oct-30	Oct	2030	Shoulder	$51.33	$34.76
59	Nov-30	Nov	2030	Shoulder	$55.00	$40.09
60	Dec-30	Dec	2030	Winter	$67.12	$54.56
61	Jan-31	Jan	2031	Winter	$0.00	$0.00
62	Feb-31	Feb	2031	Winter	$0.00	$0.00
63	Mar-31	Mar	2031	Shoulder	$0.00	$0.00
64	Apr-31	Apr	2031	Shoulder	$0.00	$0.00
65	May-31	May	2031	Summer	$0.00	$0.00
66	Jun-31	Jun	2031	Summer	$0.00	$0.00
67	Jul-31	Jul	2031	Summer	$0.00	$0.00
68	Aug-31	Aug	2031	Summer	$0.00	$0.00
69	Sep-31	Sep	2031	Summer	$0.00	$0.00
70	Oct-31	Oct	2031	Shoulder	$0.00	$0.00
71	Nov-31	Nov	2031	Shoulder	$0.00	$0.00
72	Dec-31	Dec	2031	Winter	$0.00	$0.00
73	Jan-32	Jan	2032	Winter	$0.00	$0.00
74	Feb-32	Feb	2032	Winter	$0.00	$0.00
75	Mar-32	Mar	2032	Shoulder	$0.00	$0.00
76	Apr-32	Apr	2032	Shoulder	$0.00	$0.00
77	May-32	May	2032	Summer	$0.00	$0.00
78	Jun-32	Jun	2032	Summer	$0.00	$0.00
79	Jul-32	Jul	2032	Summer	$0.00	$0.00
80	Aug-32	Aug	2032	Summer	$0.00	$0.00
81	Sep-32	Sep	2032	Summer	$0.00	$0.00
82	Oct-32	Oct	2032	Shoulder	$0.00	$0.00
83	Nov-32	Nov	2032	Shoulder	$0.00	$0.00
84	Dec-32	Dec	2032	Winter	$0.00	$0.00
85	Jan-33	Jan	2033	Winter	$0.00	$0.00
86	Feb-33	Feb	2033	Winter	$0.00	$0.00
87	Mar-33	Mar	2033	Shoulder	$0.00	$0.00
88	Apr-33	Apr	2033	Shoulder	$0.00	$0.00

89	May-33	May	2033	Summer	$0.00	$0.00
90	Jun-33	Jun	2033	Summer	$0.00	$0.00
91	Jul-33	Jul	2033	Summer	$0.00	$0.00
92	Aug-33	Aug	2033	Summer	$0.00	$0.00
93	Sep-33	Sep	2033	Summer	$0.00	$0.00
94	Oct-33	Oct	2033	Shoulder	$0.00	$0.00
95	Nov-33	Nov	2033	Shoulder	$0.00	$0.00
96	Dec-33	Dec	2033	Winter	$0.00	$0.00
97	Jan-34	Jan	2034	Winter	$0.00	$0.00
98	Feb-34	Feb	2034	Winter	$0.00	$0.00
99	Mar-34	Mar	2034	Shoulder	$0.00	$0.00
100	Apr-34	Apr	2034	Shoulder	$0.00	$0.00
101	May-34	May	2034	Summer	$0.00	$0.00
102	Jun-34	Jun	2034	Summer	$0.00	$0.00
103	Jul-34	Jul	2034	Summer	$0.00	$0.00
104	Aug-34	Aug	2034	Summer	$0.00	$0.00
105	Sep-34	Sep	2034	Summer	$0.00	$0.00
106	Oct-34	Oct	2034	Shoulder	$0.00	$0.00
107	Nov-34	Nov	2034	Shoulder	$0.00	$0.00
108	Dec-34	Dec	2034	Winter	$0.00	$0.00
109	Jan-35	Jan	2035	Winter	$0.00	$0.00
110	Feb-35	Feb	2035	Winter	$0.00	$0.00
111	Mar-35	Mar	2035	Shoulder	$0.00	$0.00
112	Apr-35	Apr	2035	Shoulder	$0.00	$0.00
113	May-35	May	2035	Summer	$0.00	$0.00
114	Jun-35	Jun	2035	Summer	$0.00	$0.00
115	Jul-35	Jul	2035	Summer	$0.00	$0.00
116	Aug-35	Aug	2035	Summer	$0.00	$0.00
117	Sep-35	Sep	2035	Summer	$0.00	$0.00
118	Oct-35	Oct	2035	Shoulder	$0.00	$0.00
119	Nov-35	Nov	2035	Shoulder	$0.00	$0.00
120	Dec-35	Dec	2035	Winter	$0.00	$0.00
121	Jan-36	Jan	2036	Winter	$0.00	$0.00
122	Feb-36	Feb	2036	Winter	$0.00	$0.00
123	Mar-36	Mar	2036	Shoulder	$0.00	$0.00
124	Apr-36	Apr	2036	Shoulder	$0.00	$0.00
125	May-36	May	2036	Summer	$0.00	$0.00
126	Jun-36	Jun	2036	Summer	$0.00	$0.00
127	Jul-36	Jul	2036	Summer	$0.00	$0.00
128	Aug-36	Aug	2036	Summer	$0.00	$0.00
129	Sep-36	Sep	2036	Summer	$0.00	$0.00
130	Oct-36	Oct	2036	Shoulder	$0.00	$0.00
131	Nov-36	Nov	2036	Shoulder	$0.00	$0.00
132	Dec-36	Dec	2036	Winter	$0.00	$0.00
133	Jan-37	Jan	2037	Winter	$0.00	$0.00
134	Feb-37	Feb	2037	Winter	$0.00	$0.00
135	Mar-37	Mar	2037	Shoulder	$0.00	$0.00

136	Apr-37	Apr	2037	Shoulder	$0.00	$0.00
137	May-37	May	2037	Summer	$0.00	$0.00
138	Jun-37	Jun	2037	Summer	$0.00	$0.00
139	Jul-37	Jul	2037	Summer	$0.00	$0.00
140	Aug-37	Aug	2037	Summer	$0.00	$0.00
141	Sep-37	Sep	2037	Summer	$0.00	$0.00
142	Oct-37	Oct	2037	Shoulder	$0.00	$0.00
143	Nov-37	Nov	2037	Shoulder	$0.00	$0.00
144	Dec-37	Dec	2037	Winter	$0.00	$0.00
145	Jan-38	Jan	2038	Winter	$0.00	$0.00
146	Feb-38	Feb	2038	Winter	$0.00	$0.00
147	Mar-38	Mar	2038	Shoulder	$0.00	$0.00
148	Apr-38	Apr	2038	Shoulder	$0.00	$0.00
149	May-38	May	2038	Summer	$0.00	$0.00
150	Jun-38	Jun	2038	Summer	$0.00	$0.00
151	Jul-38	Jul	2038	Summer	$0.00	$0.00
152	Aug-38	Aug	2038	Summer	$0.00	$0.00
153	Sep-38	Sep	2038	Summer	$0.00	$0.00
154	Oct-38	Oct	2038	Shoulder	$0.00	$0.00
155	Nov-38	Nov	2038	Shoulder	$0.00	$0.00
156	Dec-38	Dec	2038	Winter	$0.00	$0.00
157	Jan-39	Jan	2039	Winter	$0.00	$0.00
158	Feb-39	Feb	2039	Winter	$0.00	$0.00
159	Mar-39	Mar	2039	Shoulder	$0.00	$0.00
160	Apr-39	Apr	2039	Shoulder	$0.00	$0.00
161	May-39	May	2039	Summer	$0.00	$0.00
162	Jun-39	Jun	2039	Summer	$0.00	$0.00
163	Jul-39	Jul	2039	Summer	$0.00	$0.00
164	Aug-39	Aug	2039	Summer	$0.00	$0.00
165	Sep-39	Sep	2039	Summer	$0.00	$0.00
166	Oct-39	Oct	2039	Shoulder	$0.00	$0.00
167	Nov-39	Nov	2039	Shoulder	$0.00	$0.00
168	Dec-39	Dec	2039	Winter	$0.00	$0.00
169	Jan-40	Jan	2040	Winter	$0.00	$0.00
170	Feb-40	Feb	2040	Winter	$0.00	$0.00
171	Mar-40	Mar	2040	Shoulder	$0.00	$0.00
172	Apr-40	Apr	2040	Shoulder	$0.00	$0.00
173	May-40	May	2040	Summer	$0.00	$0.00
174	Jun-40	Jun	2040	Summer	$0.00	$0.00
175	Jul-40	Jul	2040	Summer	$0.00	$0.00
176	Aug-40	Aug	2040	Summer	$0.00	$0.00
177	Sep-40	Sep	2040	Summer	$0.00	$0.00
178	Oct-40	Oct	2040	Shoulder	$0.00	$0.00
179	Nov-40	Nov	2040	Shoulder	$0.00	$0.00
180	Dec-40	Dec	2040	Winter	$0.00	$0.00
181	Jan-41	Jan	2041	Winter	$0.00	$0.00
182	Feb-41	Feb	2041	Winter	$0.00	$0.00

183	Mar-41	Mar	2041	Shoulder	$0.00	$0.00
184	Apr-41	Apr	2041	Shoulder	$0.00	$0.00
185	May-41	May	2041	Summer	$0.00	$0.00
186	Jun-41	Jun	2041	Summer	$0.00	$0.00
187	Jul-41	Jul	2041	Summer	$0.00	$0.00
188	Aug-41	Aug	2041	Summer	$0.00	$0.00
189	Sep-41	Sep	2041	Summer	$0.00	$0.00
190	Oct-41	Oct	2041	Shoulder	$0.00	$0.00
191	Nov-41	Nov	2041	Shoulder	$0.00	$0.00
192	Dec-41	Dec	2041	Winter	$0.00	$0.00
193	Jan-42	Jan	2042	Winter	$0.00	$0.00
194	Feb-42	Feb	2042	Winter	$0.00	$0.00
195	Mar-42	Mar	2042	Shoulder	$0.00	$0.00
196	Apr-42	Apr	2042	Shoulder	$0.00	$0.00
197	May-42	May	2042	Summer	$0.00	$0.00
198	Jun-42	Jun	2042	Summer	$0.00	$0.00
199	Jul-42	Jul	2042	Summer	$0.00	$0.00
200	Aug-42	Aug	2042	Summer	$0.00	$0.00
201	Sep-42	Sep	2042	Summer	$0.00	$0.00
202	Oct-42	Oct	2042	Shoulder	$0.00	$0.00
203	Nov-42	Nov	2042	Shoulder	$0.00	$0.00
204	Dec-42	Dec	2042	Winter	$0.00	$0.00
205	Jan-43	Jan	2043	Winter	$0.00	$0.00
206	Feb-43	Feb	2043	Winter	$0.00	$0.00
207	Mar-43	Mar	2043	Shoulder	$0.00	$0.00
208	Apr-43	Apr	2043	Shoulder	$0.00	$0.00
209	May-43	May	2043	Summer	$0.00	$0.00
210	Jun-43	Jun	2043	Summer	$0.00	$0.00
211	Jul-43	Jul	2043	Summer	$0.00	$0.00
212	Aug-43	Aug	2043	Summer	$0.00	$0.00
213	Sep-43	Sep	2043	Summer	$0.00	$0.00
214	Oct-43	Oct	2043	Shoulder	$0.00	$0.00
215	Nov-43	Nov	2043	Shoulder	$0.00	$0.00
216	Dec-43	Dec	2043	Winter	$0.00	$0.00
217	Jan-44	Jan	2044	Winter	$0.00	$0.00
218	Feb-44	Feb	2044	Winter	$0.00	$0.00
219	Mar-44	Mar	2044	Shoulder	$0.00	$0.00
220	Apr-44	Apr	2044	Shoulder	$0.00	$0.00
221	May-44	May	2044	Summer	$0.00	$0.00
222	Jun-44	Jun	2044	Summer	$0.00	$0.00
223	Jul-44	Jul	2044	Summer	$0.00	$0.00
224	Aug-44	Aug	2044	Summer	$0.00	$0.00
225	Sep-44	Sep	2044	Summer	$0.00	$0.00
226	Oct-44	Oct	2044	Shoulder	$0.00	$0.00
227	Nov-44	Nov	2044	Shoulder	$0.00	$0.00
228	Dec-44	Dec	2044	Winter	$0.00	$0.00
229	Jan-45	Jan	2045	Winter	$0.00	$0.00

230	Feb-45	Feb	2045	Winter	$0.00	$0.00
231	Mar-45	Mar	2045	Shoulder	$0.00	$0.00
232	Apr-45	Apr	2045	Shoulder	$0.00	$0.00
233	May-45	May	2045	Summer	$0.00	$0.00
234	Jun-45	Jun	2045	Summer	$0.00	$0.00
235	Jul-45	Jul	2045	Summer	$0.00	$0.00
236	Aug-45	Aug	2045	Summer	$0.00	$0.00
237	Sep-45	Sep	2045	Summer	$0.00	$0.00
238	Oct-45	Oct	2045	Shoulder	$0.00	$0.00
239	Nov-45	Nov	2045	Shoulder	$0.00	$0.00
240	Dec-45	Dec	2045	Winter	$0.00	$0.00
241	Jan-46	Jan	2046	Winter	$0.00	$0.00
242	Feb-46	Feb	2046	Winter	$0.00	$0.00
243	Mar-46	Mar	2046	Shoulder	$0.00	$0.00
244	Apr-46	Apr	2046	Shoulder	$0.00	$0.00
245	May-46	May	2046	Summer	$0.00	$0.00
246	Jun-46	Jun	2046	Summer	$0.00	$0.00
247	Jul-46	Jul	2046	Summer	$0.00	$0.00
248	Aug-46	Aug	2046	Summer	$0.00	$0.00
249	Sep-46	Sep	2046	Summer	$0.00	$0.00
250	Oct-46	Oct	2046	Shoulder	$0.00	$0.00
251	Nov-46	Nov	2046	Shoulder	$0.00	$0.00
252	Dec-46	Dec	2046	Winter	$0.00	$0.00
253	Jan-47	Jan	2047	Winter	$0.00	$0.00
254	Feb-47	Feb	2047	Winter	$0.00	$0.00
255	Mar-47	Mar	2047	Shoulder	$0.00	$0.00
256	Apr-47	Apr	2047	Shoulder	$0.00	$0.00
257	May-47	May	2047	Summer	$0.00	$0.00
258	Jun-47	Jun	2047	Summer	$0.00	$0.00
259	Jul-47	Jul	2047	Summer	$0.00	$0.00
260	Aug-47	Aug	2047	Summer	$0.00	$0.00
261	Sep-47	Sep	2047	Summer	$0.00	$0.00
262	Oct-47	Oct	2047	Shoulder	$0.00	$0.00
263	Nov-47	Nov	2047	Shoulder	$0.00	$0.00
264	Dec-47	Dec	2047	Winter	$0.00	$0.00

Penelec Zone NG Converted On-Peak (Nominal $/MWh)	Penelec Zone NG Converted Off-Peak (Nominal $/MWh)	Penelec Zone Spark Spread On-Peak (Nominal $/MWh)	Penelec Zone Spark Spread Off-Peak (Nominal $/MWh)	Penelec Zone On-Peak (Nominal $/MWh)	Penelec Zone Off-Peak (Nominal $/MWh)
$74.19	$51.09	-$4.75	$3.85	$69.44	$54.94
$65.84	$45.34	-$11.83	-$1.20	$54.02	$44.15
$36.72	$25.29	$10.64	$15.43	$47.35	$40.72
$33.40	$23.00	$14.02	$17.17	$47.42	$40.17
$30.43	$20.96	$13.65	$5.12	$44.08	$26.08
$31.01	$21.35	$48.32	$11.86	$79.33	$33.22
$32.64	$22.48	$42.56	$14.15	$75.20	$36.63
$33.05	$22.76	$16.86	$7.00	$49.92	$29.76
$28.54	$19.65	$18.44	$8.80	$46.98	$28.45
$28.78	$19.82	$17.86	$12.06	$46.64	$31.87
$36.77	$25.32	$9.87	$10.86	$46.64	$36.18
$57.74	$39.77	-$2.84	$5.40	$54.90	$45.17
$80.75	$55.61	-$3.56	$8.09	$77.19	$63.70
$70.86	$48.80	-$5.60	$5.81	$65.26	$54.61
$39.60	$27.27	$9.83	$13.40	$49.43	$40.67
$33.51	$23.08	$16.36	$14.76	$49.87	$37.84
$29.96	$20.63	$20.40	$12.17	$50.35	$32.80
$30.22	$20.81	$26.39	$12.43	$56.61	$33.24
$31.62	$21.77	$51.49	$20.27	$83.11	$42.04
$32.01	$22.04	$40.69	$14.18	$72.70	$36.23
$27.53	$18.96	$27.51	$14.33	$55.05	$33.29
$27.89	$19.21	$24.81	$17.41	$52.70	$36.62
$35.82	$24.67	$15.51	$16.40	$51.33	$41.07
$57.07	$39.30	$3.25	$11.34	$60.33	$50.65
$80.59	$55.50	$3.06	$13.38	$83.65	$68.88
$71.02	$48.91	$0.31	$11.47	$71.33	$60.38
$39.21	$27.00	$11.58	$15.04	$50.79	$42.04
$32.19	$22.17	$17.92	$16.26	$50.11	$38.43
$28.58	$19.68	$21.92	$12.93	$50.50	$32.61
$28.88	$19.89	$28.03	$12.92	$56.90	$32.80
$30.24	$20.82	$55.27	$19.95	$85.50	$40.77
$30.73	$21.16	$43.88	$16.29	$74.60	$37.45
$26.45	$18.22	$29.03	$12.14	$55.49	$30.36
$26.92	$18.54	$25.73	$17.44	$52.65	$35.98
$35.23	$24.26	$16.39	$17.24	$51.63	$41.51
$56.79	$39.11	$3.30	$10.86	$60.08	$49.96
$79.94	$55.05	$0.73	$14.03	$80.66	$69.08
$70.35	$48.45	$4.44	$14.17	$74.80	$62.62
$37.79	$26.02	$13.01	$15.43	$50.79	$41.46
$30.83	$21.23	$18.74	$15.29	$49.57	$36.52
$27.31	$18.81	$22.99	$15.32	$50.31	$34.12

$27.60	$19.01	$28.28	$14.38	$55.88	$33.39
$28.90	$19.91	$57.33	$20.08	$86.24	$39.99
$29.40	$20.25	$46.32	$16.51	$75.73	$36.76
$25.24	$17.38	$29.47	$16.30	$54.70	$33.68
$25.78	$17.75	$24.14	$16.81	$49.91	$34.56
$33.47	$23.05	$19.57	$16.60	$53.04	$39.65
$54.90	$37.81	$8.65	$11.37	$63.55	$49.18
$78.63	$54.15	$2.72	$13.46	$81.35	$67.61
$69.56	$47.90	$5.48	$13.40	$75.04	$61.30
$36.97	$25.46	$17.59	$19.71	$54.56	$45.17
$29.54	$20.35	$22.18	$15.98	$51.72	$36.32
$25.86	$17.81	$27.72	$17.00	$53.58	$34.81
$25.97	$17.88	$31.72	$16.09	$57.69	$33.98
$27.05	$18.63	$53.27	$22.19	$80.32	$40.82
$27.51	$18.95	$41.76	$18.60	$69.27	$37.55
$23.07	$15.89	$32.91	$18.19	$55.98	$34.07
$23.62	$16.27	$27.71	$18.49	$51.33	$34.76
$31.47	$21.67	$23.53	$18.42	$55.00	$40.09
$53.13	$36.59	$13.99	$17.97	$67.12	$54.56
$77.14	$53.12	$0.72	$12.49	$77.86	$65.62
$68.11	$46.91	$1.18	$11.44	$69.29	$58.35
$35.54	$24.47	$13.27	$16.23	$48.81	$40.70
$29.21	$20.11	$19.19	$15.89	$48.40	$36.01
$25.96	$17.88	$23.74	$14.65	$49.70	$32.53
$26.05	$17.94	$29.20	$14.24	$55.25	$32.19
$27.10	$18.66	$55.47	$21.05	$82.56	$39.71
$27.18	$18.72	$44.06	$16.74	$71.24	$35.45
$22.62	$15.58	$30.35	$15.56	$52.96	$31.13
$23.04	$15.87	$26.13	$17.90	$49.16	$33.77
$30.96	$21.32	$19.14	$17.52	$50.10	$38.84
$52.88	$36.42	$7.45	$13.15	$60.33	$49.57
$80.29	$55.29	$0.72	$12.49	$81.01	$67.78
$70.79	$48.75	$1.18	$11.44	$71.97	$60.19
$36.68	$25.26	$13.27	$16.23	$49.95	$41.48
$29.36	$20.22	$19.19	$15.89	$48.55	$36.11
$25.59	$17.62	$23.74	$14.65	$49.33	$32.27
$25.81	$17.77	$29.20	$14.24	$55.01	$32.02
$27.04	$18.62	$55.47	$21.05	$82.50	$39.67
$27.23	$18.75	$44.06	$16.74	$71.28	$35.49
$22.57	$15.54	$30.35	$15.56	$52.92	$31.10
$23.11	$15.92	$26.13	$17.90	$49.24	$33.82
$31.66	$21.81	$19.14	$17.52	$50.80	$39.33
$54.30	$37.39	$7.45	$13.15	$61.75	$50.55
$85.00	$58.54	$0.72	$12.49	$85.72	$71.03
$74.83	$51.53	$1.18	$11.44	$76.01	$62.98
$39.00	$26.86	$13.27	$16.23	$52.27	$43.08
$31.48	$21.68	$19.19	$15.89	$50.67	$37.58

$27.79	$19.14	$23.74	$14.65	$51.53	$33.79
$27.96	$19.26	$29.20	$14.24	$57.16	$33.50
$29.31	$20.19	$55.47	$21.05	$84.78	$41.24
$29.63	$20.41	$44.06	$16.74	$73.69	$37.14
$24.70	$17.01	$30.35	$15.56	$55.05	$32.57
$25.08	$17.27	$26.13	$17.90	$51.20	$35.17
$34.29	$23.61	$19.14	$17.52	$53.43	$41.13
$58.12	$40.03	$7.45	$13.15	$65.57	$53.18
$90.89	$62.59	$0.72	$12.49	$91.61	$75.09
$80.11	$55.17	$1.18	$11.44	$81.29	$66.61
$42.29	$29.12	$13.27	$16.23	$55.56	$45.35
$34.55	$23.79	$19.19	$15.89	$53.74	$39.69
$30.54	$21.03	$23.74	$14.65	$54.28	$35.68
$30.68	$21.13	$29.20	$14.24	$59.88	$35.37
$32.03	$22.05	$55.47	$21.05	$87.49	$43.11
$32.42	$22.32	$44.06	$16.74	$76.47	$39.06
$27.41	$18.88	$30.35	$15.56	$57.76	$34.43
$27.85	$19.18	$26.13	$17.90	$53.97	$37.08
$37.39	$25.75	$19.14	$17.52	$56.54	$43.27
$62.67	$43.16	$7.45	$13.15	$70.12	$56.31
$96.75	$66.63	$0.72	$12.49	$97.47	$79.13
$85.25	$58.71	$1.18	$11.44	$86.44	$70.16
$46.03	$31.70	$13.27	$16.23	$59.30	$47.92
$37.99	$26.16	$19.19	$15.89	$57.18	$42.06
$33.52	$23.08	$23.74	$14.65	$57.26	$37.74
$33.42	$23.01	$29.20	$14.24	$62.61	$37.26
$34.56	$23.80	$55.47	$21.05	$90.02	$44.85
$35.02	$24.12	$44.06	$16.74	$79.08	$40.85
$29.71	$20.46	$30.35	$15.56	$60.06	$36.02
$30.22	$20.81	$26.13	$17.90	$56.34	$38.71
$40.05	$27.58	$19.14	$17.52	$59.20	$45.10
$66.33	$45.68	$7.45	$13.15	$73.78	$58.83
$101.75	$70.08	$0.72	$12.49	$102.48	$82.57
$89.73	$61.80	$1.18	$11.44	$90.92	$73.24
$48.89	$33.67	$13.27	$16.23	$62.16	$49.89
$40.27	$27.73	$19.19	$15.89	$59.46	$43.63
$35.63	$24.54	$23.74	$14.65	$59.37	$39.19
$35.73	$24.61	$29.20	$14.24	$64.93	$38.85
$37.16	$25.59	$55.47	$21.05	$92.62	$46.64
$37.70	$25.96	$44.06	$16.74	$81.75	$42.70
$32.13	$22.13	$30.35	$15.56	$62.48	$37.68
$32.70	$22.52	$26.13	$17.90	$58.83	$40.42
$42.74	$29.44	$19.14	$17.52	$61.88	$46.96
$70.05	$48.24	$7.45	$13.15	$77.50	$61.39
$105.10	$72.38	$0.72	$12.49	$105.83	$84.88
$92.58	$63.76	$1.18	$11.44	$93.77	$75.20
$50.45	$34.75	$13.27	$16.23	$63.72	$50.97

$41.42	$28.52	$19.19	$15.89	$60.61	$44.42
$36.70	$25.27	$23.74	$14.65	$60.44	$39.93
$37.02	$25.49	$29.20	$14.24	$66.21	$39.74
$38.71	$26.66	$55.47	$21.05	$94.17	$47.71
$39.31	$27.07	$44.06	$16.74	$83.37	$43.81
$33.61	$23.14	$30.35	$15.56	$63.95	$38.70
$34.24	$23.58	$26.13	$17.90	$60.37	$41.48
$44.68	$30.77	$19.14	$17.52	$63.82	$48.29
$72.90	$50.20	$7.45	$13.15	$80.35	$63.36
$102.90	$70.86	$0.72	$12.49	$103.62	$83.36
$90.64	$62.42	$1.18	$11.44	$91.82	$73.87
$49.40	$34.02	$13.27	$16.23	$62.67	$50.24
$40.55	$27.93	$19.19	$15.89	$59.74	$43.82
$35.93	$24.74	$23.74	$14.65	$59.67	$39.40
$36.24	$24.96	$29.20	$14.24	$65.44	$39.20
$37.89	$26.10	$55.47	$21.05	$93.36	$47.15
$38.49	$26.50	$44.06	$16.74	$82.54	$43.24
$32.90	$22.66	$30.35	$15.56	$63.25	$38.22
$33.52	$23.09	$26.13	$17.90	$59.65	$40.99
$43.74	$30.12	$19.14	$17.52	$62.88	$47.64
$71.37	$49.15	$7.45	$13.15	$78.82	$62.30
$101.23	$69.71	$0.72	$12.49	$101.95	$82.21
$89.17	$61.41	$1.18	$11.44	$90.35	$72.85
$48.59	$33.47	$13.27	$16.23	$61.87	$49.69
$39.89	$27.47	$19.19	$15.89	$59.08	$43.37
$35.35	$24.34	$23.74	$14.65	$59.09	$38.99
$35.65	$24.55	$29.20	$14.24	$64.85	$38.80
$37.28	$25.67	$55.47	$21.05	$92.75	$46.72
$37.86	$26.07	$44.06	$16.74	$81.92	$42.81
$32.37	$22.29	$30.35	$15.56	$62.72	$37.85
$32.98	$22.71	$26.13	$17.90	$59.10	$40.61
$43.03	$29.63	$19.14	$17.52	$62.17	$47.15
$70.21	$48.35	$7.45	$13.15	$77.66	$61.51
$101.94	$70.20	$0.72	$12.49	$102.66	$82.70
$89.80	$61.84	$1.18	$11.44	$90.98	$73.29
$48.94	$33.70	$13.27	$16.23	$62.21	$49.93
$40.17	$27.67	$19.19	$15.89	$59.36	$43.56
$35.60	$24.51	$23.74	$14.65	$59.34	$39.17
$35.90	$24.73	$29.20	$14.24	$65.10	$38.97
$37.54	$25.85	$55.47	$21.05	$93.01	$46.90
$38.13	$26.26	$44.06	$16.74	$82.18	$42.99
$32.60	$22.45	$30.35	$15.56	$62.94	$38.01
$33.21	$22.87	$26.13	$17.90	$59.34	$40.77
$43.33	$29.84	$19.14	$17.52	$62.48	$47.36
$70.71	$48.69	$7.45	$13.15	$78.16	$61.85
$105.18	$72.43	$0.72	$12.49	$105.90	$84.92
$92.64	$63.80	$1.18	$11.44	$93.83	$75.25

$50.49	$34.77	$13.27	$16.23	$63.76	$51.00
$41.45	$28.54	$19.19	$15.89	$60.64	$44.44
$36.73	$25.29	$23.74	$14.65	$60.47	$39.94
$37.04	$25.51	$29.20	$14.24	$66.24	$39.75
$38.73	$26.67	$55.47	$21.05	$94.20	$47.72
$39.34	$27.09	$44.06	$16.74	$83.39	$43.83
$33.63	$23.16	$30.35	$15.56	$63.98	$38.72
$34.26	$23.60	$26.13	$17.90	$60.39	$41.50
$44.71	$30.79	$19.14	$17.52	$63.85	$48.31
$72.95	$50.24	$7.45	$13.15	$80.40	$63.39
$108.79	$74.92	$0.72	$12.49	$109.51	$87.41
$95.83	$65.99	$1.18	$11.44	$97.01	$77.44
$52.22	$35.96	$13.27	$16.23	$65.49	$52.19
$42.87	$29.52	$19.19	$15.89	$62.06	$45.42
$37.99	$26.16	$23.74	$14.65	$61.73	$40.81
$38.31	$26.39	$29.20	$14.24	$67.51	$40.63
$40.06	$27.59	$55.47	$21.05	$95.53	$48.64
$40.69	$28.02	$44.06	$16.74	$84.74	$44.76
$34.79	$23.96	$30.35	$15.56	$65.13	$39.51
$35.44	$24.41	$26.13	$17.90	$61.57	$42.31
$46.24	$31.85	$19.14	$17.52	$65.38	$49.37
$75.45	$51.96	$7.45	$13.15	$82.91	$65.12
$112.51	$77.48	$0.72	$12.49	$113.23	$89.97
$99.10	$68.25	$1.18	$11.44	$100.29	$79.69
$54.01	$37.19	$13.27	$16.23	$67.28	$53.42
$44.34	$30.53	$19.19	$15.89	$63.53	$46.43
$39.29	$27.05	$23.74	$14.65	$63.03	$41.71
$39.62	$27.29	$29.20	$14.24	$68.82	$41.53
$41.43	$28.53	$55.47	$21.05	$96.90	$49.58
$42.08	$28.98	$44.06	$16.74	$86.13	$45.71
$35.97	$24.77	$30.35	$15.56	$66.32	$40.33
$36.65	$25.24	$26.13	$17.90	$62.78	$43.14
$47.82	$32.93	$19.14	$17.52	$66.97	$50.45
$78.03	$53.74	$7.45	$13.15	$85.49	$66.89
$114.87	$79.10	$0.72	$12.49	$115.59	$91.60
$101.18	$69.68	$1.18	$11.44	$102.36	$81.12
$55.14	$37.97	$13.27	$16.23	$68.41	$54.20
$45.27	$31.17	$19.19	$15.89	$64.46	$47.07
$40.11	$27.62	$23.74	$14.65	$63.85	$42.27
$40.46	$27.86	$29.20	$14.24	$69.65	$42.10
$42.30	$29.13	$55.47	$21.05	$97.77	$50.18
$42.96	$29.59	$44.06	$16.74	$87.02	$46.32
$36.73	$25.29	$30.35	$15.56	$67.08	$40.85
$37.42	$25.77	$26.13	$17.90	$63.55	$43.67
$48.83	$33.63	$19.14	$17.52	$67.97	$51.15
$79.67	$54.87	$7.45	$13.15	$87.12	$68.02
$116.54	$80.26	$0.72	$12.49	$117.27	$92.75

$102.66	$70.70	$1.18	$11.44	$103.84	$82.14
$55.95	$38.53	$13.27	$16.23	$69.22	$54.75
$45.93	$31.63	$19.19	$15.89	$65.12	$47.52
$40.70	$28.03	$23.74	$14.65	$64.44	$42.68
$41.05	$28.27	$29.20	$14.24	$70.24	$42.51
$42.92	$29.56	$55.47	$21.05	$98.38	$50.61
$43.59	$30.02	$44.06	$16.74	$87.64	$46.75
$37.27	$25.66	$30.35	$15.56	$67.61	$41.22
$37.97	$26.15	$26.13	$17.90	$64.09	$44.05
$49.54	$34.12	$19.14	$17.52	$68.68	$51.64
$80.84	$55.67	$7.45	$13.15	$88.29	$68.82
$121.16	$83.44	$0.72	$12.49	$121.88	$95.93
$106.73	$73.50	$1.18	$11.44	$107.91	$84.94
$58.16	$40.05	$13.27	$16.23	$71.43	$56.28
$47.75	$32.88	$19.19	$15.89	$66.94	$48.78
$42.31	$29.14	$23.74	$14.65	$66.05	$43.79
$42.67	$29.39	$29.20	$14.24	$71.87	$43.63
$44.62	$30.73	$55.47	$21.05	$100.09	$51.78
$45.31	$31.21	$44.06	$16.74	$89.37	$47.94
$38.74	$26.68	$30.35	$15.56	$69.09	$42.24
$39.47	$27.18	$26.13	$17.90	$65.60	$45.08
$51.50	$35.47	$19.14	$17.52	$70.64	$52.99
$84.04	$57.87	$7.45	$13.15	$91.49	$71.03
$0.00	$0.00	$0.72	$12.49	$0.72	$12.49
$0.00	$0.00	$1.18	$11.44	$1.18	$11.44
$0.00	$0.00	$13.27	$16.23	$13.27	$16.23
$0.00	$0.00	$19.19	$15.89	$19.19	$15.89
$0.00	$0.00	$23.74	$14.65	$23.74	$14.65
$0.00	$0.00	$29.20	$14.24	$29.20	$14.24
$0.00	$0.00	$55.47	$21.05	$55.47	$21.05
$0.00	$0.00	$44.06	$16.74	$44.06	$16.74
$0.00	$0.00	$30.35	$15.56	$30.35	$15.56
$0.00	$0.00	$26.13	$17.90	$26.13	$17.90
$0.00	$0.00	$19.14	$17.52	$19.14	$17.52
$0.00	$0.00	$7.45	$13.15	$7.45	$13.15

Record Field	Period	Month	Year	Tetco M-3	Locational Gas Adjustment ($/MMBtu)
1	Jan-26	Jan	2026	$5.87	$1.720
2	Feb-26	Feb	2026	$4.50	$0.576
3	Mar-26	Mar	2026	$3.69	$0.148
4	Apr-26	Apr	2026	$3.22	-$0.188
5	May-26	May	2026	$2.40	-$1.037
6	Jun-26	Jun	2026	$2.17	-$1.443
7	Jul-26	Jul	2026	$2.17	-$1.643
8	Aug-26	Aug	2026	$2.50	-$1.375
9	Sep-26	Sep	2026	$1.93	-$1.903
10	Oct-26	Oct	2026	$1.86	-$2.024
11	Nov-26	Nov	2026	$2.62	-$1.482
12	Dec-26	Dec	2026	$4.54	$0.047
13	Jan-27	Jan	2027	$7.30	$2.547
14	Feb-27	Feb	2027	$6.34	$1.960
15	Mar-27	Mar	2027	$3.15	-$0.656
16	Apr-27	Apr	2027	$2.85	-$0.570
17	May-27	May	2027	$2.71	-$0.685
18	Jun-27	Jun	2027	$2.81	-$0.737
19	Jul-27	Jul	2027	$3.12	-$0.602
20	Aug-27	Aug	2027	$3.07	-$0.710
21	Sep-27	Sep	2027	$2.62	-$1.129
22	Oct-27	Oct	2027	$2.57	-$1.230
23	Nov-27	Nov	2027	$3.20	-$0.809
24	Dec-27	Dec	2027	$5.25	$0.809
25	Jan-28	Jan	2028	$7.57	$2.835
26	Feb-28	Feb	2028	$7.07	$2.676
27	Mar-28	Mar	2028	$3.41	-$0.355
28	Apr-28	Apr	2028	$2.87	-$0.425
29	May-28	May	2028	$2.74	-$0.533
30	Jun-28	Jun	2028	$2.87	-$0.553
31	Jul-28	Jul	2028	$3.05	-$0.550
32	Aug-28	Aug	2028	$2.97	-$0.696
33	Sep-28	Sep	2028	$2.61	-$1.042
34	Oct-28	Oct	2028	$2.73	-$0.984
35	Nov-28	Nov	2028	$3.36	-$0.602
36	Dec-28	Dec	2028	$5.47	$1.056
37	Jan-29	Jan	2029	$7.86	$3.187
38	Feb-29	Feb	2029	$7.30	$2.970
39	Mar-29	Mar	2029	$3.65	$0.011
40	Apr-29	Apr	2029	$2.84	-$0.337
41	May-29	May	2029	$2.70	-$0.457
42	Jun-29	Jun	2029	$2.83	-$0.474
43	Jul-29	Jul	2029	$2.86	-$0.619
44	Aug-29	Aug	2029	$2.81	-$0.732
45	Sep-29	Sep	2029	$2.61	-$0.925
46	Oct-29	Oct	2029	$2.75	-$0.858
47	Nov-29	Nov	2029	$3.64	-$0.162

Month	Locational Adjustment ($/MMBtu)
Jan	$2.57
Feb	$2.05
Mar	-$0.21
Apr	-$0.38
May	-$0.68
Jun	-$0.80
Jul	-$0.85
Aug	-$0.88
Sep	-$1.25
Oct	-$1.27
Nov	-$0.76
Dec	$0.74

48	Dec-29	Dec	2029	$5.28	$1.041

Load Shape	Spark Spread On-Peak ($/MWh)	Spark Spread Off-Peak ($/MWh)
201.2%	$0.74	$12.24
177.3%	$1.16	$11.21
96.6%	$13.00	$15.90
79.3%	$18.80	$15.57
70.3%	$23.26	$14.35
70.9%	$28.60	$13.96
74.1%	$54.34	$20.62
75.3%	$43.16	$16.40
64.3%	$29.73	$15.24
65.6%	$25.60	$17.54
85.5%	$18.75	$17.16
139.6%	$7.30	$12.89

Commentary:	In some cases, the spark spread may be a negative monetary value. In the marketplace, this may occur for a short period, but usually for an entire month. However, this factor accounts for differences in the heat rate assumptions and the real market values. Escalation is later applied in a positive manner as not to over devalue future spark spreads.

	Henry,H,F	Panhandle	TCO,TCO,F	TETCO-M3	Transco-Z6
				Tetco M-3	Transco 6 (N
1/1/2025	3.514	3.946	3.174	5.874	4.762
2/1/2025	3.535	3.57	3.3	4.5	3.98
3/1/2025	3.906	3.35	3.51	3.69	3.62
4/1/2025	3.95	3.09	3.23	3.22	3.17
5/1/2025	3.17	2.49	2.54	2.4	2.33
6/1/2025	3.204	2.6	2.45	2.17	2.13
7/1/2025	3.261	2.51	2.2	2.17	2.13
8/1/2025	3.081	2.61	2.53	2.5	2.48
Sep-25	2.83	2.361	2.076	1.934	1.836
Oct-25	2.91	2.369	1.946	1.859	1.764
Nov-25	3.25	2.805	2.542	2.615	2.519
Dec-25	3.82	3.732	3.37	4.544	4.234
Jan-26	4.15	4.429	3.782	7.296	6.756
Feb-26	3.92	4.199	3.594	6.339	5.699
Mar-26	3.54	3.142	3.124	3.147	3.11
Apr-26	3.41	2.863	2.913	2.848	2.743
May-26	3.44	2.825	2.809	2.709	2.562
Jun-26	3.61	2.905	2.873	2.805	2.805
Jul-26	3.81	3.241	3.103	3.118	3.118
Aug-26	3.88	3.33	3.015	3.07	3.08
Sep-26	3.84	3.197	2.799	2.617	2.605
Oct-26	3.88	3.183	2.688	2.573	2.578
Nov-26	4.10	3.552	3.077	3.202	3.225
Dec-26	4.50	4.369	3.837	5.245	5.095
Jan-27	4.75	5.011	4.331	7.569	7.237
Feb-27	4.38	4.674	3.964	7.069	6.231
Mar-27	3.80	3.323	3.345	3.413	3.275
Apr-27	3.42	2.89	2.983	2.873	2.953
May-27	3.39	2.789	2.782	2.736	2.629
Jun-27	3.54	2.944	2.83	2.867	2.85
Jul-27	3.72	3.188	2.888	3.045	3.07
Aug-27	3.78	3.238	2.888	2.968	3.022
Sep-27	3.75	3.196	2.816	2.606	2.698
Oct-27	3.80	3.171	2.753	2.731	2.578
Nov-27	4.01	3.556	3.063	3.356	3.313
Dec-27	4.44	4.281	3.748	5.466	5.088
Jan-28	4.73	4.932	4.366	7.862	7.566
Feb-28	4.39	4.581	4.038	7.303	6.655
Mar-28	3.77	3.476	3.386	3.65	3.443
Apr-28	3.30	2.808	2.676	2.838	2.928
May-28	3.27	2.739	2.629	2.697	2.747
Jun-28	3.42	2.895	2.742	2.83	2.838
Jul-28	3.60	3.13	2.895	2.855	2.935
Aug-28	3.66	3.194	2.924	2.812	2.894
Sep-28	3.65	3.128	2.87	2.613	2.723
Oct-28	3.72	3.14	2.993	2.753	2.613
Nov-28	3.96	3.366	3.403	3.636	3.138

Dec-28	4.41	4.18	3.832	5.28	5.122
Jan-29	4.68	4.865	4.185	7.967	7.827
Feb-29	4.33	4.508	3.871	6.875	6.601
Mar-29	3.64	3.727	3.141	3.767	3.574
Apr-29	3.18	2.705	2.603	2.653	2.755
May-29	3.15	2.636	2.564	2.516	2.454
Jun-29	3.30	2.792	2.676	2.652	2.672
Jul-29	3.47	3.026	2.872	2.746	2.784
Aug-29	3.54	3.092	2.899	2.792	2.864
Sep-29	3.54	3.076	2.85	2.596	2.706
Oct-29	3.61	3.116	2.953	2.749	2.799
Nov-29	3.80	3.388	3.308	3.773	3.198
Dec-29	4.24	3.847	3.727	4.994	4.797
Jan-30	4.51	4.65	4.087	6.953	7.135
Feb-30	4.22	4.35	3.825	6.42	6.618
Mar-30	3.57	3.947	3.144	3.501	3.471
Apr-30	3.07	2.628	2.501	2.541	2.588
May-30	3.04	2.551	2.454	2.396	2.264
Jun-30	3.17	2.692	2.552	2.517	2.472
Jul-30	3.32	2.908	2.698	2.548	2.541
Aug-30	3.39	2.97	2.725	2.59	2.618
Sep-30	3.37	2.936	2.658	2.378	2.448
Oct-30	3.44	3.013	2.793	2.531	2.536
Nov-30	3.63	3.19	3.077	3.54	2.857
Dec-30	4.06	3.382	3.489	4.752	4.559
Jan-31	4.33	4.479	3.929	6.716	6.926
Feb-31	4.06	4.194	3.682	6.122	6.412
Mar-31	3.43	3.807	3.017	3.227	3.294
Apr-31	3.03	2.597	2.467	2.534	2.584
May-31	3.05	2.568	2.468	2.442	2.32
Jun-31	3.19	2.707	2.565	2.557	2.515
Jul-31	3.33	2.919	2.706	2.561	2.556
Aug-31	3.36	2.941	2.694	2.564	2.594
Sep-31	3.33	2.897	2.617	2.345	2.407
Oct-31	3.39	2.963	2.74	2.483	2.49
Nov-31	3.58	3.221	3.269	3.511	2.886
Dec-31	4.03	3.428	3.696	4.75	4.59
Jan-32	4.30	4.298	4.298	6.718	6.96
Feb-32	4.03	4.028	4.028	6.046	6.443
Mar-32	3.36	3.363	3.363	3.128	3.298
Apr-32	2.88	2.883	2.883	2.371	2.345
May-32	2.86	2.863	2.863	2.235	2.033
Jun-32	3.01	3.013	3.013	2.371	2.253
Jul-32	3.17	3.173	3.173	2.423	2.348
Aug-32	3.21	3.205	3.205	2.43	2.39
Sep-32	3.18	3.18	3.18	2.218	2.218
Oct-32	3.26	3.255	3.255	2.37	2.307
Nov-32	3.49	3.485	3.485	3.117	2.47
Dec-32	3.92	3.915	3.915	4.327	4.145

Jan-33	4.17	4.165	4.165	6.625	6.493
Feb-33	3.90	3.9	3.9	5.88	6.002
Mar-33	3.28	3.28	3.28	3.015	2.878
Apr-33	2.83	2.83	2.83	2.258	2.22
May-33	2.86	2.86	2.86	2.172	1.955
Jun-33	3.00	3.002	3.002	2.3	2.17
Jul-33	3.17	3.167	3.167	2.469	2.379
Aug-33	3.21	3.207	3.207	2.485	2.429
Sep-33	3.18	3.182	3.182	2.27	2.257
Oct-33	3.23	3.228	3.228	2.396	2.318
Nov-33	3.49	3.488	3.488	4.186	2.53
Dec-33	3.89	3.888	3.888	5.366	4.176
Jan-34	4.14	4.143	4.143	6.675	6.531
Feb-34	3.90	3.903	3.903	5.878	6.063
Mar-34	3.30	3.303	3.303	3.041	2.963
Apr-34	2.90	2.903	2.903	2.348	2.435
May-34	2.93	2.933	2.933	2.263	2.165
Jun-34	3.06	3.063	3.063	2.378	2.373
Jul-34	3.21	3.208	3.208	2.528	2.558
Aug-34	3.25	3.248	3.248	2.543	2.608
Sep-34	3.26	3.263	3.263	2.368	2.481
Oct-34	3.31	3.309	3.309	2.494	2.537
Nov-34	3.55	3.549	3.549	5.394	2.579
Dec-34	3.95	3.949	3.949	6.574	4.219
Jan-35	4.17	4.169	4.169	6.701	6.401
Feb-35	3.93	3.929	3.929	5.904	5.949
Mar-35	3.50	3.499	3.499	3.237	3.004
Apr-35	3.17	3.169	3.169	2.614	2.631
May-35	3.15	3.147	3.147	2.477	2.312
Jun-35	3.18	3.182	3.182	2.497	2.422
Jul-35	3.22	3.222	3.222	2.542	2.504
Aug-35	3.26	3.262	3.262	2.557	2.554
Sep-35	3.28	3.277	3.277	2.382	2.425
Oct-35	3.32	3.323	3.323	2.508	2.483
Nov-35	3.52	3.523	3.523	5.341	2.325
Dec-35	3.82	3.823	3.823	6.421	3.865
Jan-36	4.09	4.093	4.093	4.093	6.233
Feb-36	3.92	3.923	3.923	3.923	5.851
Mar-36	3.65	3.653	3.653	3.653	3.063
Apr-36	3.32	3.323	3.323	3.323	2.721
May-36	3.30	3.301	3.301	3.301	2.401
Jun-36	3.34	3.336	3.336	3.336	2.511
Jul-36	3.38	3.376	3.376	3.376	2.594
Aug-36	3.42	3.416	3.416	3.416	2.644
Sep-36	3.43	3.431	3.431	3.431	2.513
Oct-36	3.48	3.477	3.477	3.477	2.572
Nov-36	3.55	3.549	3.549	3.549	2.287

	Dec-36	3.70	3.704	3.704	3.704	3.682
	Jan-37	3.93	3.929	3.929	3.929	3.929
	Feb-37	3.78	3.779	3.779	3.779	3.779
	Mar-37	3.58	3.579	3.579	3.579	3.579
	Apr-37	3.25	3.249	3.249	3.249	3.249
	May-37	3.23	3.227	3.227	3.227	3.227
	Jun-37	3.26	3.262	3.262	3.262	3.262
	Jul-37	3.30	3.302	3.302	3.302	3.302
	Aug-37	3.34	3.342	3.342	3.342	3.342
	Sep-37	3.36	3.357	3.357	3.357	3.357
	Oct-37	3.40	3.403	3.403	3.403	3.403
	Nov-37	3.48	3.475	3.475	3.475	3.475
		3.515	3.493	2.835	6.063	3.493

Transco-Z6 (NY),TZS,F

Ion-NY)

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2.861		-0.555	2.61	-0.5375	2.63 checks
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2.577	note: NG values beyond May 2035 are not used				
2.61					
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PPI Industry Data
Original Data Value

Source:	https://data.bls.gov/timeseries/PCU221110221110
Series ID:	PCU221110221110
Series Title:	PPI industry data for Electric power generation, not seasonally
Industry:	Electric power generation
Product:	Electric power generation
Base Date:	200312
Years:	2015 to 2025

Years in Escalation Rate	5

Year	Jan	Feb	Mar	Apr	May	Jun	Jul
2019	134.3	150.9	152.9	132.0	129.9	136.1	137.4
2020	126.7	124.0	122.6	120.6	118.5	124.9	134.0
2021	133.3	744.7	154.3	139.2	141.7	172.2	175.8
2022	167.9	168.5	169.4	193.2	277.7	234.3	296.1
2023	265.8	165.2	175.3	153.9	136.2	150.9	178.8
2024	194.3	147.4	142.8	136.6	155.6	146.8	171.1
2025	160.2	166.0	153.0	149.5	153.1	158.0	

Aug	Sep	Oct	Nov	Dec	Annual Avg.	Full Year Flag
170.1	169.5	140.4	140.2	131.5	143.8	1
153.0	139.4	140.8	141.6	136.5	131.9	1
181.2	187.2	191.0	180.4	163.1	213.7	1
274.9	286.9	207.8	194.1	310.7	231.8	1
280.5	201.8	159.5	167.5	155.5	182.6	1
170.3	165.8	160.9	141.6	159.1	157.7	1
					Data Missing	0

PPI Inflation Rate	**3.64%**
CPI Inflation Rate	**3.57%**
BLS Escalation Rate	**0.07%**

Commentary:

CPI-U, All Items Less Food and Ene

The BLS escalation rate is based on the latest five full years of available data. It is important to have a full year of data as the historical trend is that months early in the year have a higher value than the annual average.

Year	Jan	Feb
2019	260.1	261.1
2020	266.0	267.3
2021	269.8	270.7
2022	286.0	288.1
2023	302.0	304.0
2024	313.6	315.4
2025	323.8	325.3

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Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
261.8	262.3	262.6	263.2	263.6	264.2	264.5	265.1	265.1
267.3	266.1	265.8	266.3	267.7	268.8	269.1	269.3	269.5
271.7	274.0	275.9	278.2	279.1	279.5	279.9	281.6	282.8
289.3	290.8	292.5	294.7	295.6	297.2	298.4	299.3	299.6
305.5	306.9	308.1	308.9	309.4	310.1	310.8	311.4	311.6
317.1	318.0	318.6	319.0	319.2	320.0	321.1	321.8	321.9
325.9	326.8	327.5	328.4					
								CPI Infl

Dec	Annual Avg.	Flag
264.9	263.2	1
269.2	267.7	1
283.9	277.3	1
300.1	294.3	1
311.9	308.4	1
322.0	319.0	1
	Data Missing	0
ation Rate	**3.56811%**	

Generation Capacity

Status | *Data Needed: TRC Order Section*

Complete | PJM Base Residual Auction Results: B.6 Page 17

		Seasor			
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$25.00	$17.07	$14.46	$134.96
Met-Ed	METED	$47.90	$24.75	$24.75	$134.96
PECO	PECO	$48.93	$24.75	$27.48	$134.96
Penelec	PENLC	$47.90	$24.75	$24.75	$134.96
Penn Power	ATSI	$25.00	$17.07	$14.46	$134.96
PPL	PL	$47.90	$24.75	$24.75	$134.96
West Penn	APS	$25.00	$17.07	$14.46	$134.96

Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$60.07	$60.07	$60.07
19	2027	2028	$25.99	$28.98	$29.25
20	2028	2029	$26.53	$29.58	$29.86
21	2029	2030	$27.08	$30.19	$30.48
22	2030	2031	$27.64	$30.81	$31.11
23	2031	2032	$28.21	$31.45	$31.75
24	2032	2033	$28.80	$32.10	$32.41
25	2033	2034	$29.40	$32.77	$33.08
26	2034	2035	$30.00	$33.45	$33.77
27	2035	2036	$30.63	$34.14	$34.46
28	2036	2037	$31.26	$34.85	$35.18
29	2037	2038	$31.91	$35.57	$35.91
30	2038	2039	$32.57	$36.31	$36.65
31	2039	2040	$33.24	$37.06	$37.41
32	2040	2041	$33.93	$37.83	$38.19
33	2041	2042	$34.64	$38.61	$38.98
34	2042	2043	$35.35	$39.41	$39.78
35	2043	2044	$36.09	$40.23	$40.61
36	2044	2045	$36.83	$41.06	$41.45
37	2045	2046	$37.60	$41.91	$42.31
38	2046	2047	$38.37	$42.78	$43.18
39	2047	2048	$39.17	$43.66	$44.08

ıally Adjusted BRA Results (Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$48.93	$24.75	$27.48	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal $/kW-year)					
Summer					
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$60.07	$60.07	$60.07	$60.07	$60.07	$60.07
$28.98	$25.99	$28.98	$25.99	$25.99	$28.98
$29.58	$26.53	$29.58	$26.53	$26.53	$29.58
$30.19	$27.08	$30.19	$27.08	$27.08	$30.19
$30.81	$27.64	$30.81	$27.64	$27.64	$30.81
$31.45	$28.21	$31.45	$28.21	$28.21	$31.45
$32.10	$28.80	$32.10	$28.80	$28.80	$32.10
$32.77	$29.40	$32.77	$29.40	$29.40	$32.77
$33.45	$30.00	$33.45	$30.00	$30.00	$33.45
$34.14	$30.63	$34.14	$30.63	$30.63	$34.14
$34.85	$31.26	$34.85	$31.26	$31.26	$34.85
$35.57	$31.91	$35.57	$31.91	$31.91	$35.57
$36.31	$32.57	$36.31	$32.57	$32.57	$36.31
$37.06	$33.24	$37.06	$33.24	$33.24	$37.06
$37.83	$33.93	$37.83	$33.93	$33.93	$37.83
$38.61	$34.64	$38.61	$34.64	$34.64	$38.61
$39.41	$35.35	$39.41	$35.35	$35.35	$39.41
$40.23	$36.09	$40.23	$36.09	$36.09	$40.23
$41.06	$36.83	$41.06	$36.83	$36.83	$41.06
$41.91	$37.60	$41.91	$37.60	$37.60	$41.91
$42.78	$38.37	$42.78	$38.37	$38.37	$42.78
$43.66	$39.17	$43.66	$39.17	$39.17	$43.66

Seasonally Adjusted PJM BRA Res					
Summer					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

Winter					
PECO	Penelec	Penn Power	PPL	West Penn	Inflation Flag
$60.07	$60.07	$60.07	$60.07	$60.07	0
$29.25	$28.98	$25.99	$28.98	$25.99	0
$29.86	$29.58	$26.53	$29.58	$26.53	1
$30.48	$30.19	$27.08	$30.19	$27.08	1
$31.11	$30.81	$27.64	$30.81	$27.64	1
$31.75	$31.45	$28.21	$31.45	$28.21	1
$32.41	$32.10	$28.80	$32.10	$28.80	1
$33.08	$32.77	$29.40	$32.77	$29.40	1
$33.77	$33.45	$30.00	$33.45	$30.00	1
$34.46	$34.14	$30.63	$34.14	$30.63	1
$35.18	$34.85	$31.26	$34.85	$31.26	1
$35.91	$35.57	$31.91	$35.57	$31.91	1
$36.65	$36.31	$32.57	$36.31	$32.57	1
$37.41	$37.06	$33.24	$37.06	$33.24	1
$38.19	$37.83	$33.93	$37.83	$33.93	1
$38.98	$38.61	$34.64	$38.61	$34.64	1
$39.78	$39.41	$35.35	$39.41	$35.35	1
$40.61	$40.23	$36.09	$40.23	$36.09	1
$41.45	$41.06	$36.83	$41.06	$36.83	1
$42.31	$41.91	$37.60	$41.91	$37.60	1
$43.18	$42.78	$38.37	$42.78	$38.37	1
$44.08	$43.66	$39.17	$43.66	$39.17	1

sults (Real $/kW-year)					
Winter					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

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Years Averaged	5

Demand Split	
Summer	50%
Winter	50%

PJM BRA Results (					
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$50.00	$34.13	$28.92	$269.92
Met-Ed	METED	$95.79	$49.49	$49.49	$269.92
PECO	PECO	$97.86	$49.49	$54.95	$269.92
Penelec	PENLC	$95.79	$49.49	$49.49	$269.92
Penn Power	ATSI	$50.00	$34.13	$28.92	$269.92
PPL	PL	$95.79	$49.49	$49.49	$269.92
West Penn	APS	$50.00	$34.13	$28.92	$269.92

Note: Data through 2024-25 BRA auction does not include winter peak values. Assumed BRA results encompa

Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$97.86	$49.49	$54.95	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17

ass value for both summer and winter peak. This may change for future auctions

Avoided Transmission Capacity Forecast in Nominal Dollars					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$61.07	$58.92	$22.48
19	2027	2028	$62.33	$60.14	$22.94
20	2028	2029	$63.62	$61.38	$23.42
21	2029	2030	$64.94	$62.66	$23.90
22	2030	2031	$66.29	$63.95	$24.40
23	2031	2032	$67.66	$65.28	$24.90
24	2032	2033	$69.06	$66.63	$25.42
25	2033	2034	$70.49	$68.01	$25.95
26	2034	2035	$71.95	$69.42	$26.48
27	2035	2036	$73.44	$70.86	$27.03
28	2036	2037	$74.96	$72.33	$27.59
29	2037	2038	$76.52	$73.82	$28.16
30	2038	2039	$78.10	$75.35	$28.75
31	2039	2040	$79.72	$76.92	$29.34
32	2040	2041	$81.37	$78.51	$29.95
33	2041	2042	$83.06	$80.13	$30.57
34	2042	2043	$84.78	$81.79	$31.20
35	2043	2044	$86.53	$83.49	$31.85
36	2044	2045	$88.33	$85.22	$32.51
37	2045	2046	$90.16	$86.98	$33.18

Avoided Transmission Capacity Forecast in Nominal Dollar					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$0.00	$0.00	$0.00
19	2027	2028	$0.00	$0.00	$0.00
20	2028	2029	$0.00	$0.00	$0.00
21	2029	2030	$0.00	$0.00	$0.00
22	2030	2031	$0.00	$0.00	$0.00
23	2031	2032	$0.00	$0.00	$0.00
24	2032	2033	$0.00	$0.00	$0.00
25	2033	2034	$0.00	$0.00	$0.00
26	2034	2035	$0.00	$0.00	$0.00
27	2035	2036	$0.00	$0.00	$0.00
28	2036	2037	$0.00	$0.00	$0.00
29	2037	2038	$0.00	$0.00	$0.00
30	2038	2039	$0.00	$0.00	$0.00
31	2039	2040	$0.00	$0.00	$0.00
32	2040	2041	$0.00	$0.00	$0.00
33	2041	2042	$0.00	$0.00	$0.00
34	2042	2043	$0.00	$0.00	$0.00
35	2043	2044	$0.00	$0.00	$0.00
36	2044	2045	$0.00	$0.00	$0.00
37	2045	2046	$0.00	$0.00	$0.00

s ($/kW-year) - Summer				Avoided Distrl	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$44.19	$77.10	$48.00	$8.83	$59.28	$52.46
$45.10	$78.69	$48.99	$9.01	$64.43	$55.82
$46.04	$80.32	$50.00	$9.20	$69.93	$58.95
$46.99	$81.99	$51.04	$9.39	$76.21	$62.16
$47.97	$83.69	$52.10	$9.58	$81.30	$65.41
$48.96	$85.42	$53.18	$9.78	$82.99	$66.77
$49.97	$87.19	$54.28	$9.98	$84.71	$68.15
$51.01	$88.99	$55.40	$10.19	$86.46	$69.56
$52.07	$90.84	$56.55	$10.40	$88.25	$71.00
$53.14	$92.72	$57.72	$10.62	$90.08	$72.47
$54.24	$94.64	$58.92	$10.84	$91.95	$73.97
$55.37	$96.60	$60.14	$11.06	$93.85	$75.51
$56.52	$98.60	$61.38	$11.29	$95.80	$77.07
$57.69	$100.64	$62.66	$11.53	$97.78	$78.67
$58.88	$102.73	$63.95	$11.76	$99.81	$80.30
$60.10	$104.86	$65.28	$12.01	$101.87	$81.96
$61.35	$107.03	$66.63	$12.26	$103.98	$83.66
$62.62	$109.25	$68.01	$12.51	$106.14	$85.39
$63.91	$111.51	$69.42	$12.77	$108.34	$87.16
$65.24	$113.82	$70.86	$13.03	$110.58	$88.97

s ($/kW-year) - Winter				Avoided Distr	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$14.73	$0.00	$48.00	$8.83	$0.21	$6.70
$15.03	$0.00	$48.99	$9.01	$0.12	$7.21
$15.35	$0.00	$50.00	$9.20	$0.18	$8.16
$15.66	$0.00	$51.04	$9.39	$0.18	$8.64
$15.99	$0.00	$52.10	$9.58	$0.29	$9.68
$16.32	$0.00	$53.18	$9.78	$0.29	$9.88
$16.66	$0.00	$54.28	$9.98	$0.30	$10.09
$17.00	$0.00	$55.40	$10.19	$0.30	$10.30
$17.36	$0.00	$56.55	$10.40	$0.31	$10.51
$17.71	$0.00	$57.72	$10.62	$0.32	$10.73
$18.08	$0.00	$58.92	$10.84	$0.32	$10.95
$18.46	$0.00	$60.14	$11.06	$0.33	$11.18
$18.84	$0.00	$61.38	$11.29	$0.34	$11.41
$19.23	$0.00	$62.66	$11.53	$0.34	$11.65
$19.63	$0.00	$63.95	$11.76	$0.35	$11.89
$20.03	$0.00	$65.28	$12.01	$0.36	$12.13
$20.45	$0.00	$66.63	$12.26	$0.37	$12.39
$20.87	$0.00	$68.01	$12.51	$0.37	$12.64
$21.30	$0.00	$69.42	$12.77	$0.38	$12.90
$21.75	$0.00	$70.86	$13.03	$0.39	$13.17

ɔution Capacity Forecast in Nominal Dollars ($/kW-year) - Summer				
PECO	Penelec	Penn Power	PPL	West Penn
$39.61	$37.18	$43.52	$25.11	$41.25
$47.21	$42.64	$45.52	$26.68	$46.27
$49.64	$47.98	$45.17	$29.00	$51.89
$51.04	$53.05	$45.79	$31.55	$56.92
$50.53	$57.97	$45.98	$33.94	$62.19
$51.57	$59.17	$46.93	$34.64	$63.48
$52.64	$60.39	$47.91	$35.36	$64.80
$53.73	$61.65	$48.90	$36.09	$66.14
$54.85	$62.92	$49.91	$36.84	$67.51
$55.98	$64.23	$50.94	$37.60	$68.91
$57.14	$65.56	$52.00	$38.38	$70.34
$58.33	$66.91	$53.08	$39.17	$71.79
$59.53	$68.30	$54.18	$39.99	$73.28
$60.77	$69.72	$55.30	$40.81	$74.80
$62.03	$71.16	$56.44	$41.66	$76.35
$63.31	$72.63	$57.61	$42.52	$77.93
$64.62	$74.14	$58.81	$43.40	$79.54
$65.96	$75.67	$60.03	$44.30	$81.19
$67.33	$77.24	$61.27	$45.22	$82.87
$68.72	$78.84	$62.54	$46.16	$84.59

ɾbution Capacity Forecast in Nominal Dollars ($/kW-year) - Winter				
PECO	Penelec	Penn Power	PPL	West Penn
$10.26	$5.79	$16.27	$32.44	$5.05
$5.67	$5.97	$16.76	$36.48	$6.06
$5.54	$6.24	$19.33	$39.40	$7.01
$5.08	$6.58	$20.57	$41.88	$7.93
$7.16	$7.24	$22.70	$44.30	$9.02
$7.31	$7.39	$23.17	$45.22	$9.21
$7.46	$7.54	$23.65	$46.16	$9.40
$7.62	$7.69	$24.14	$47.12	$9.59
$7.78	$7.85	$24.64	$48.09	$9.79
$7.94	$8.02	$25.15	$49.09	$9.99
$8.10	$8.18	$25.67	$50.10	$10.20
$8.27	$8.35	$26.20	$51.14	$10.41
$8.44	$8.53	$26.74	$52.20	$10.63
$8.62	$8.70	$27.30	$53.28	$10.85
$8.80	$8.88	$27.86	$54.39	$11.07
$8.98	$9.07	$28.44	$55.51	$11.30
$9.16	$9.25	$29.03	$56.66	$11.53
$9.35	$9.45	$29.63	$57.84	$11.77
$9.55	$9.64	$30.25	$59.04	$12.02
$9.75	$9.84	$30.87	$60.26	$12.27

Summer Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$22.48	PECO
PPL	$48.00	PPL
Duquesne Light	$61.07	DLC
FE: Met-Ed	$58.92	Met-Ed
FE: Penelec	$44.19	Penelec
FE: Penn Power	$77.10	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Winter Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$0.00	PECO
PPL	$48.00	PPL
Duquesne Light	$0.00	DLC
FE: Met-Ed	$0.00	Met-Ed
FE: Penelec	$14.73	Penelec
FE: Penn Power	$0.00	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Summer Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$39.61	$47.21	$49.64	$51.04	$50.53	PECO
$25.11	$26.68	$29.00	$31.55	$33.94	PPL
$59.28	$64.43	$69.93	$76.21	$81.30	DLC
$52.46	$55.82	$58.95	$62.16	$65.41	Met-Ed
$37.18	$42.64	$47.98	$53.05	$57.97	Penelec
$43.52	$45.52	$45.17	$45.79	$45.98	Penn Power
$41.25	$46.27	$51.89	$56.92	$62.19	West Penn

Winter Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$10.26	$5.67	$5.54	$5.08	$7.16	PECO
$32.44	$36.48	$39.40	$41.88	$44.30	PPL
$0.21	$0.12	$0.18	$0.18	$0.29	DLC
$6.70	$7.21	$8.16	$8.64	$9.68	Met-Ed
$5.79	$5.97	$6.24	$6.58	$7.24	Penelec
$16.27	$16.76	$19.33	$20.57	$22.70	Penn Power
$5.05	$6.06	$7.01	$7.93	$9.02	West Penn

Alternative Energy Portfolio Standards (AEPS) Act

Year	2026
Load (MWh)	1,000

Credit	**Tier Req (weight)**	**Price**		**Required Credits**	**Cost**
Solar	0.5%	$37.25		5	$186
Tier I	8.0%	$34.20		80	$2,736
Tier II	10.0%	$39.63		100	$3,963
			Total	**185**	**$6,885**

Weighted Avg. Price (Per Credit)
$37.21

Weighted Avg. Price (Per MWh)
$6.88

Alternative Enery Credit Prices as of 05/01/24				
Tier	**Reporting Year**	**Marex (Bid price)**	**Marex (Offer price)**	**Avg Price**
Solar	2024	$34.50	$35.50	$35.00
	2025	$37.00	$38.00	$37.50
	2026	$36.75	$37.75	$37.25
	2027	$36.50	$37.50	$37.00
Tier I	2023	$34.55	$35.05	$34.80
	2024	$34.50	$35.00	$34.75
	2025	$34.55	$35.05	$34.80
	2026	$33.95	$34.45	$34.20
Tier II	2023	$33.50	$34.25	$33.88
	2024	$35.00	$35.75	$35.38
	2025	$38.50	$39.25	$38.88
	2026	$39.25	$40.00	$39.63

Program Year	PY Start	PY End.	AEPS Cost
18	2027	2028	$6.88
19	2028	2029	$7.02
20	2029	2030	$7.16
21	2030	2031	$7.31
22	2031	2032	$7.45
23	2032	2033	$7.60
24	2033	2034	$7.75
25	2034	2035	$7.91
26	2035	2036	$8.07
27	2036	2037	$8.23
28	2037	2038	$8.39
29	2038	2039	$8.56
30	2039	2040	$8.73
31	2040	2041	$8.91
32	2041	2042	$9.08
33	2042	2043	$9.27
34	2043	2044	$9.45
35	2044	2045	$9.64
36	2045	2046	$9.83
37	2046	2047	$10.03
38	2047	2048	$10.23
39	2048	2049	$10.43
40	2049	2050	$10.64
41	2050	2051	$10.86
42	2051	2052	$11.07
43	2052	2053	$11.30
44	2053	2054	$11.52
45	2054	2055	$11.75
46	2055	2056	$11.99
47	2056	2057	$12.23

	EDC Name:	Penelec
	Column Start:	16

Demand Split	
Summer	50%
Winter	50%

DY/PY Start	Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 78.36	$ -	$ -	$ -	$ -
2028	$ 79.92	$ 79.92	$ -	$ -	$ -
2029	$ 81.52	$ 81.52	$ 81.52	$ -	$ -
2030	$ 83.15	$ 83.15	$ 83.15	$ 83.15	$ -
2031	$ -	$ 84.82	$ 84.82	$ 84.82	$ 84.82
2032	$ -	$ -	$ 86.51	$ 86.51	$ 86.51
2033	$ -	$ -	$ -	$ 88.24	$ 88.24
2034	$ -	$ -	$ -	$ -	$ 90.01
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Summer Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 39.18	$ -	$ -	$ -	$ -
2028	$ 39.96	$ 39.96	$ -	$ -	$ -
2029	$ 40.76	$ 40.76	$ 40.76	$ -	$ -
2030	$ 41.58	$ 41.58	$ 41.58	$ 41.58	$ -
2031	$ -	$ 42.41	$ 42.41	$ 42.41	$ 42.41
2032	$ -	$ -	$ 43.26	$ 43.26	$ 43.26
2033	$ -	$ -	$ -	$ 44.12	$ 44.12
2034	$ -	$ -	$ -	$ -	$ 45.01
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

DRIPE

Status

Complete

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

To Output Table

DY/PY Start	Energy DRIPE ($/MWh)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 14.79	$ -	$ -	$ -	$ -
2028	$ 24.53	$ 15.96	$ -	$ -	$ -
2029	$ 32.47	$ 26.17	$ 17.03	$ -	$ -
2030	$ 31.20	$ 34.32	$ 27.66	$ 18.00	$ -
2031	$ -	$ 32.97	$ 36.27	$ 29.23	$ 19.03
2032	$ -	$ -	$ 34.99	$ 38.49	$ 31.02
2033	$ -	$ -	$ -	$ 36.25	$ 39.88
2034	$ -	$ -	$ -	$ -	$ 37.58
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Winter Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 39.18	$ -	$ -	$ -	$ -
2028	$ 39.96	$ 39.96	$ -	$ -	$ -
2029	$ 40.76	$ 40.76	$ 40.76	$ -	$ -
2030	$ 41.58	$ 41.58	$ 41.58	$ 41.58	$ -
2031	$ -	$ 42.41	$ 42.41	$ 42.41	$ 42.41
2032	$ -	$ -	$ 43.26	$ 43.26	$ 43.26
2033	$ -	$ -	$ -	$ 44.12	$ 44.12
2034	$ -	$ -	$ -	$ -	$ 45.01
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

***Data Source** : PA_DRIPE_Study_Report_05.03.2024*

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$67.54	$68.89	$70.26	$71.67	$78.36	$79.92	$81.52	$83.15	$25.04
$68.89	$70.26	$71.67	$73.10	$79.92	$81.52	$83.15	$84.82	$25.54
$70.26	$71.67	$73.10	$74.56	$81.52	$83.15	$84.82	$86.51	$26.05
$71.67	$73.10	$74.56	$76.06	$83.15	$84.82	$86.51	$88.24	$26.57
$73.10	$74.56	$76.06	$77.58	$84.82	$86.51	$88.24	$90.01	$27.10

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$14.65	$24.23	$31.97	$30.62	$14.72	$24.39	$32.25	$30.98	$14.69
$15.77	$25.77	$33.68	$32.26	$15.87	$25.99	$34.08	$32.75	$15.81
$16.77	$27.15	$35.49	$34.13	$16.92	$27.46	$36.02	$34.78	$16.78
$17.67	$28.60	$37.55	$35.25	$17.88	$29.03	$38.26	$36.06	$17.68
$18.61	$30.26	$38.77	$36.41	$18.90	$30.83	$39.67	$37.42	$18.61

Generation Capacity DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$25.54	$26.05	$26.57	$78.36	$79.92	$81.52	$83.15	$78.36	$79.92
$26.05	$26.57	$27.10	$79.92	$81.52	$83.15	$84.82	$79.92	$81.52
$26.57	$27.10	$27.64	$81.52	$83.15	$84.82	$86.51	$81.52	$83.15
$27.10	$27.64	$28.20	$83.15	$84.82	$86.51	$88.24	$83.15	$84.82
$27.64	$28.20	$28.76	$84.82	$86.51	$88.24	$90.01	$84.82	$86.51

Electric Energy DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$24.28	$32.00	$30.64	$13.86	$22.45	$29.02	$27.27	$14.79	$24.53
$25.79	$33.70	$32.26	$14.61	$23.39	$29.99	$28.16	$15.96	$26.17
$27.16	$35.48	$34.12	$15.22	$24.17	$30.98	$29.17	$17.03	$27.66
$28.60	$37.53	$35.17	$15.73	$24.96	$32.09	$29.48	$18.00	$29.23
$30.25	$38.69	$36.28	$16.25	$25.86	$32.43	$29.72	$19.03	$31.02

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$81.52	$83.15	$14.65	$14.94	$15.24	$15.54	$25.04	$25.54	$26.05
$83.15	$84.82	$14.94	$15.24	$15.54	$15.85	$25.54	$26.05	$26.57
$84.82	$86.51	$15.24	$15.54	$15.85	$16.17	$26.05	$26.57	$27.10
$86.51	$88.24	$15.54	$15.85	$16.17	$16.49	$26.57	$27.10	$27.64
$88.24	$90.01	$15.85	$16.17	$16.49	$16.82	$27.10	$27.64	$28.20

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$32.47	$31.20	$14.73	$24.38	$32.24	$30.98	$13.25	$21.65	$28.61
$34.32	$32.97	$15.87	$25.98	$34.08	$32.77	$14.09	$23.06	$30.21
$36.27	$34.99	$16.91	$27.46	$36.05	$34.83	$15.01	$24.35	$31.97
$38.49	$36.25	$17.87	$29.05	$38.31	$36.14	$15.85	$25.76	$34.00
$39.88	$37.58	$18.91	$30.88	$39.75	$37.50	$16.77	$27.40	$35.31

Year 4
$26.57
$27.10
$27.64
$28.20
$28.76

Year 4
$27.47
$29.06
$30.90
$32.09
$33.36

To LI Output Table

PA ACT 129 Program Year	DY/PY Start	PECO	PPL	DLC	Met-Ed	Penelec	Penn Power
18	2027	$58.14	$44.87	$18.67	$18.10	$18.10	$18.10
19	2028	$59.30	$45.77	$19.04	$18.46	$18.46	$18.46
20	2029	$60.49	$46.68	$19.42	$18.83	$18.83	$18.83
21	2030	$61.70	$47.62	$19.81	$19.21	$19.21	$19.21
22	2031	$62.93	$48.57	$20.21	$19.59	$19.59	$19.59
23	2032	$64.19	$49.54	$20.61	$19.98	$19.98	$19.98
24	2033	$65.48	$50.53	$21.03	$20.38	$20.38	$20.38
25	2034	$66.78	$51.54	$21.45	$20.79	$20.79	$20.79
26	2035	$68.12	$52.57	$21.87	$21.21	$21.21	$21.21
27	2036	$69.48	$53.62	$22.31	$21.63	$21.63	$21.63
28	2037	$70.87	$54.70	$22.76	$22.06	$22.06	$22.06
29	2038	$72.29	$55.79	$23.21	$22.51	$22.51	$22.51
30	2039	$73.74	$56.91	$23.68	$22.96	$22.96	$22.96
31	2040	$75.21	$58.04	$24.15	$23.41	$23.41	$23.41
32	2041	$76.71	$59.21	$24.63	$23.88	$23.88	$23.88
33	2042	$78.25	$60.39	$25.13	$24.36	$24.36	$24.36
34	2043	$79.81	$61.60	$25.63	$24.85	$24.85	$24.85
35	2044	$81.41	$62.83	$26.14	$25.34	$25.34	$25.34
36	2045	$83.04	$64.09	$26.67	$25.85	$25.85	$25.85
37	2046	$84.70	$65.37	$27.20	$26.37	$26.37	$26.37

West Penn
$18.10
$18.46
$18.83
$19.21
$19.59
$19.98
$20.38
$20.79
$21.21
$21.63
$22.06
$22.51
$22.96
$23.41
$23.88
$24.36
$24.85
$25.34
$25.85
$26.37

Arrearages 2026 Data

EDC	Average kWh savings per participant (System Level)	Total Annual Impact Per MWh, $2026
PECO	288	$58.14
PPL	382	$44.87
DLC	556	$18.67
Met-Ed	350	$18.10
Penelec	325	$18.10
Penn Power	358	$18.10
West Penn	372	$18.10

Source
EDC specific (per draft memo)
EDC specific (per draft memo)
EDC specific (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)

Sector	Building Type	End Use	Summer Peak
Commercial	Composite	cooling	57.6%
Commercial	Composite	exterior_lighting	9.2%
Commercial	Composite	fans	25.9%
Commercial	Composite	heat_recovery	23.5%
Commercial	Composite	heat_rejection	57.2%
Commercial	Composite	heating	0.5%
Commercial	Composite	interior_equipment	24.1%
Commercial	Composite	interior_lighting	29.8%
Commercial	Composite	pumps	15.2%
Commercial	Composite	refrigeration	22.9%
Commercial	Composite	water_heating	25.0%
Commercial	Composite	whole_building	25.2%
Commercial	Education	cooling	64.2%
Commercial	Education	exterior_lighting	9.1%
Commercial	Education	fans	26.8%
Commercial	Education	heat_recovery	22.9%
Commercial	Education	heat_rejection	53.7%
Commercial	Education	heating	1.1%
Commercial	Education	interior_equipment	23.5%
Commercial	Education	interior_lighting	31.0%
Commercial	Education	pumps	25.7%
Commercial	Education	refrigeration	23.0%
Commercial	Education	water_heating	26.8%
Commercial	Education	whole_building	23.5%
Commercial	Grocery	cooling	56.4%
Commercial	Grocery	exterior_lighting	9.2%
Commercial	Grocery	fans	24.1%
Commercial	Grocery	heat_recovery	22.2%
Commercial	Grocery	heating	0.1%
Commercial	Grocery	interior_equipment	23.9%
Commercial	Grocery	interior_lighting	22.5%
Commercial	Grocery	pumps	8.4%
Commercial	Grocery	whole_building	24.0%
Commercial	Health	cooling	50.6%
Commercial	Health	exterior_lighting	9.1%
Commercial	Health	fans	23.2%
Commercial	Health	heat_recovery	20.5%
Commercial	Health	heat_rejection	50.1%
Commercial	Health	heating	1.4%
Commercial	Health	interior_equipment	23.3%
Commercial	Health	interior_lighting	27.8%
Commercial	Health	pumps	33.2%
Commercial	Health	refrigeration	23.7%
Commercial	Health	water_heating	22.2%
Commercial	Health	whole_building	25.8%
Commercial	Lodging	cooling	38.6%
Commercial	Lodging	exterior_lighting	9.2%
Commercial	Lodging	fans	27.9%
Commercial	Lodging	heat_recovery	19.6%
Commercial	Lodging	heat_rejection	47.6%
Commercial	Lodging	heating	0.2%
Commercial	Lodging	interior_equipment	19.6%
Commercial	Lodging	interior_lighting	21.7%
Commercial	Lodging	pumps	19.4%

Commercial	Lodging	refrigeration	21.5%
Commercial	Lodging	water_heating	18.8%
Commercial	Lodging	whole_building	22.0%
Commercial	Office	cooling	54.2%
Commercial	Office	exterior_lighting	9.2%
Commercial	Office	fans	25.0%
Commercial	Office	heat_recovery	25.9%
Commercial	Office	heat_rejection	56.6%
Commercial	Office	heating	0.2%
Commercial	Office	interior_equipment	21.8%
Commercial	Office	interior_lighting	32.8%
Commercial	Office	pumps	24.5%
Commercial	Office	water_heating	25.8%
Commercial	Office	whole_building	25.4%
Commercial	Restaurant	cooling	49.7%
Commercial	Restaurant	exterior_lighting	9.1%
Commercial	Restaurant	fans	24.4%
Commercial	Restaurant	heat_recovery	19.7%
Commercial	Restaurant	heating	0.7%
Commercial	Restaurant	interior_equipment	24.7%
Commercial	Restaurant	interior_lighting	25.0%
Commercial	Restaurant	pumps	8.4%
Commercial	Restaurant	refrigeration	22.0%
Commercial	Restaurant	water_heating	24.7%
Commercial	Restaurant	whole_building	24.3%
Commercial	Retail	cooling	56.0%
Commercial	Retail	exterior_lighting	9.2%
Commercial	Retail	fans	26.6%
Commercial	Retail	heat_recovery	22.7%
Commercial	Retail	heat_rejection	54.5%
Commercial	Retail	heating	0.9%
Commercial	Retail	interior_equipment	23.0%
Commercial	Retail	interior_lighting	30.6%
Commercial	Retail	pumps	4.3%
Commercial	Retail	water_heating	24.3%
Commercial	Retail	whole_building	26.4%
Commercial	Warehouse	cooling	64.1%
Commercial	Warehouse	exterior_lighting	9.3%
Commercial	Warehouse	fans	27.3%
Commercial	Warehouse	heat_recovery	23.7%
Commercial	Warehouse	heat_rejection	64.5%
Commercial	Warehouse	heating	0.0%
Commercial	Warehouse	interior_equipment	28.2%
Commercial	Warehouse	interior_lighting	30.0%
Commercial	Warehouse	pumps	2.5%
Commercial	Warehouse	whole_building	26.2%
Residential	Composite	ceiling_fan	19.3%
Residential	Composite	clothes_dryer	23.9%
Residential	Composite	clothes_washer	25.3%
Residential	Composite	cooling	48.8%
Residential	Composite	cooling_fans_pumps	52.2%
Residential	Composite	dishwasher	26.0%
Residential	Composite	freezer	22.3%
Residential	Composite	heating	0.7%
Residential	Composite	heating_fans_pumps	0.8%

Residential	Composite	heating_hp_bkup	0.0%
Residential	Composite	hot_tub_heater	22.2%
Residential	Composite	hot_tub_pump	22.5%
Residential	Composite	interior_lighting	20.8%
Residential	Composite	lighting_exterior	17.2%
Residential	Composite	lighting_garage	16.6%
Residential	Composite	mech_vent	21.4%
Residential	Composite	net	18.6%
Residential	Composite	plug_loads	18.8%
Residential	Composite	pool_heater	23.9%
Residential	Composite	pool_pump	24.0%
Residential	Composite	pv	34.8%
Residential	Composite	range_oven	22.7%
Residential	Composite	refrigerator	22.1%
Residential	Composite	water_heating	19.8%
Residential	Composite	well_pump	21.2%
Residential	Composite	whole_home	18.6%
Residential	Multi Family	ceiling_fan	19.3%
Residential	Multi Family	clothes_dryer	24.0%
Residential	Multi Family	clothes_washer	25.1%
Residential	Multi Family	cooling	47.9%
Residential	Multi Family	cooling_fans_pumps	49.5%
Residential	Multi Family	dishwasher	25.7%
Residential	Multi Family	freezer	22.3%
Residential	Multi Family	heating	0.5%
Residential	Multi Family	heating_fans_pumps	0.6%
Residential	Multi Family	heating_hp_bkup	0.0%
Residential	Multi Family	hot_tub_heater	22.2%
Residential	Multi Family	hot_tub_pump	22.6%
Residential	Multi Family	interior_lighting	20.8%
Residential	Multi Family	lighting_exterior	17.0%
Residential	Multi Family	mech_vent	22.1%
Residential	Multi Family	net	16.1%
Residential	Multi Family	plug_loads	18.8%
Residential	Multi Family	range_oven	22.8%
Residential	Multi Family	refrigerator	22.1%
Residential	Multi Family	water_heating	19.6%
Residential	Multi Family	well_pump	21.2%
Residential	Multi Family	whole_home	16.1%
Residential	Single Family	ceiling_fan	19.3%
Residential	Single Family	clothes_dryer	23.9%
Residential	Single Family	clothes_washer	25.3%
Residential	Single Family	cooling	49.1%
Residential	Single Family	cooling_fans_pumps	52.9%
Residential	Single Family	dishwasher	26.0%
Residential	Single Family	freezer	22.3%
Residential	Single Family	heating	0.8%
Residential	Single Family	heating_fans_pumps	0.8%
Residential	Single Family	heating_hp_bkup	0.0%
Residential	Single Family	hot_tub_heater	22.2%
Residential	Single Family	hot_tub_pump	22.5%
Residential	Single Family	interior_lighting	20.8%
Residential	Single Family	lighting_exterior	17.2%
Residential	Single Family	lighting_garage	16.6%
Residential	Single Family	mech_vent	21.2%

Residential	Single Family	net	19.3%
Residential	Single Family	plug_loads	18.8%
Residential	Single Family	pool_heater	23.9%
Residential	Single Family	pool_pump	24.0%
Residential	Single Family	pv	34.8%
Residential	Single Family	range_oven	22.7%
Residential	Single Family	refrigerator	22.1%
Residential	Single Family	water_heating	19.8%
Residential	Single Family	well_pump	21.2%
Residential	Single Family	whole_home	19.3%

Summer Off Peak	Winter Peak	Winter Off Peak	Shoulder Peak
29.0%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.8%	11.4%	17.6%
16.5%	14.2%	12.1%	19.3%
31.8%	1.3%	0.5%	6.0%
1.0%	24.6%	36.5%	16.0%
17.1%	14.3%	10.6%	20.3%
11.8%	17.2%	7.5%	23.8%
13.3%	15.4%	21.8%	15.5%
22.3%	11.0%	12.0%	15.9%
12.7%	18.7%	8.5%	24.7%
16.3%	14.3%	12.9%	17.9%
24.9%	1.2%	0.2%	7.0%
26.2%	8.7%	20.9%	10.1%
14.4%	15.6%	10.2%	21.0%
15.2%	14.6%	12.5%	20.0%
35.2%	1.2%	0.4%	5.9%
1.9%	27.5%	27.6%	20.9%
13.8%	16.8%	9.7%	23.7%
8.1%	19.9%	5.6%	27.6%
18.6%	12.3%	14.0%	15.4%
22.2%	11.1%	11.9%	16.0%
4.9%	26.5%	3.3%	34.7%
12.4%	17.2%	14.2%	19.0%
32.3%	1.2%	0.6%	6.1%
26.0%	8.8%	20.8%	10.2%
18.4%	13.8%	11.0%	18.9%
18.0%	13.5%	12.7%	18.2%
0.8%	24.7%	31.9%	18.5%
18.0%	13.4%	11.2%	19.4%
19.4%	12.8%	11.8%	17.7%
7.8%	16.4%	29.0%	14.3%
16.7%	14.0%	14.1%	16.7%
35.2%	1.9%	0.7%	7.4%
26.2%	8.7%	20.9%	10.1%
21.1%	11.7%	11.7%	16.9%
21.2%	11.6%	13.2%	16.5%
39.0%	1.1%	0.3%	5.6%
2.2%	21.6%	34.8%	15.2%
18.6%	13.6%	11.1%	19.1%
14.1%	15.8%	8.9%	21.8%
34.4%	5.4%	5.4%	11.5%
22.1%	11.1%	11.6%	16.1%
17.0%	14.9%	11.7%	19.9%
20.0%	12.2%	12.0%	16.2%
30.8%	5.3%	5.1%	10.8%
26.1%	8.8%	20.8%	10.2%
23.8%	10.2%	11.6%	13.8%
14.9%	15.3%	13.2%	21.0%
42.8%	0.9%	0.2%	4.9%
0.4%	26.4%	38.9%	15.1%
22.3%	11.1%	13.5%	15.9%
20.2%	12.4%	12.3%	17.0%
22.5%	11.1%	13.5%	15.8%

22.7%	10.8%	12.7%	15.6%
19.7%	12.6%	14.5%	17.0%
22.4%	11.1%	14.0%	14.5%
28.7%	2.4%	1.7%	8.2%
26.1%	8.7%	20.8%	10.2%
19.3%	12.3%	11.8%	17.2%
15.4%	15.6%	9.3%	21.6%
30.5%	1.5%	0.7%	7.1%
0.9%	24.3%	34.8%	16.8%
20.1%	12.5%	12.2%	17.8%
9.2%	18.6%	6.0%	25.7%
21.7%	10.7%	13.3%	14.7%
14.0%	17.4%	8.7%	23.0%
18.1%	13.0%	12.6%	16.9%
26.8%	4.6%	2.6%	10.5%
26.1%	8.8%	20.8%	10.2%
18.5%	13.4%	10.8%	19.1%
17.8%	12.8%	15.0%	17.0%
1.8%	25.2%	30.2%	19.9%
17.2%	14.5%	10.1%	20.3%
17.3%	13.9%	10.4%	19.4%
7.3%	16.6%	28.5%	15.0%
22.9%	10.6%	12.6%	15.4%
13.9%	17.1%	9.9%	22.5%
17.0%	14.2%	12.3%	18.4%
30.3%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.7%	10.7%	18.0%
18.4%	13.0%	12.3%	18.4%
27.7%	2.9%	1.5%	8.8%
1.6%	27.6%	30.8%	19.5%
18.9%	13.2%	11.5%	18.7%
11.3%	17.4%	7.3%	24.0%
3.5%	22.6%	25.4%	21.0%
14.5%	16.4%	10.4%	21.9%
17.5%	13.7%	12.3%	17.2%
28.5%	0.8%	0.1%	5.1%
26.0%	8.8%	20.8%	10.3%
19.8%	12.2%	12.1%	16.1%
15.7%	14.0%	13.7%	17.8%
30.0%	0.3%	0.0%	3.7%
0.1%	22.2%	48.6%	9.7%
13.6%	16.3%	8.3%	23.0%
12.1%	16.8%	7.4%	23.5%
2.2%	21.2%	36.0%	14.8%
14.0%	15.5%	12.7%	19.7%
19.4%	14.1%	14.2%	16.8%
15.6%	15.6%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.3%	2.0%	2.5%	5.1%
40.4%	0.1%	0.1%	4.5%
13.6%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.3%	37.3%	12.7%
1.9%	28.2%	37.5%	12.7%

0.2%	34.0%	50.3%	5.6%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.6%	12.3%	12.4%	17.4%
16.5%	16.5%	18.6%	14.8%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.3%	15.5%	10.7%	20.0%
23.7%	9.5%	11.0%	16.5%
16.1%	15.5%	13.5%	19.8%
17.1%	14.5%	14.0%	18.5%
16.5%	16.5%	18.6%	14.8%
19.4%	14.1%	14.2%	16.9%
15.7%	15.4%	11.2%	20.7%
17.8%	14.2%	10.0%	19.9%
38.0%	1.7%	2.0%	5.9%
39.9%	0.3%	0.3%	6.2%
13.7%	16.9%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.5%	28.7%	38.8%	11.8%
1.5%	29.1%	39.3%	11.5%
0.1%	36.3%	53.0%	3.7%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	14.0%	16.7%	16.0%
19.8%	12.7%	11.9%	18.1%
14.7%	18.0%	21.4%	14.3%
20.4%	13.3%	14.3%	16.5%
17.3%	15.5%	10.6%	20.2%
23.8%	9.5%	11.0%	16.5%
16.2%	15.5%	13.6%	19.6%
17.1%	14.5%	14.0%	18.5%
14.7%	18.0%	21.4%	14.3%
19.4%	14.1%	14.2%	16.8%
15.6%	15.7%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.2%	2.1%	2.7%	4.8%
40.5%	0.1%	0.1%	4.1%
13.5%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.2%	36.9%	13.0%
2.0%	28.0%	37.0%	13.0%
0.2%	33.4%	49.6%	6.1%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
19.0%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.8%	12.1%	12.5%	17.2%

17.0%	16.1%	17.9%	14.9%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.4%	15.5%	10.7%	19.9%
23.7%	9.5%	11.0%	16.5%
16.1%	15.6%	13.4%	19.8%
17.1%	14.5%	14.0%	18.5%
17.0%	16.1%	17.8%	14.9%

Shoulder Off Peak
3.6%
25.0%
13.4%
14.5%
3.2%
21.4%
13.6%
9.9%
18.8%
15.9%
10.4%
13.3%
2.5%
25.0%
12.0%
14.7%
3.6%
20.9%
12.5%
7.8%
14.1%
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13.8%
15.4%
24.0%
14.1%
15.8%
24.2%
14.6%
4.2%
25.0%
15.4%
17.0%
3.8%
24.8%
14.4%
11.7%
10.1%
15.3%
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13.8%
9.4%
25.0%
12.7%
15.9%
3.6%
19.0%
17.5%
16.4%
17.5%

16.7%
17.3%
16.0%
4.7%
25.0%
14.5%
12.2%
3.6%
22.9%
15.7%
7.8%
15.2%
11.1%
14.0%
5.7%
25.0%
13.7%
17.7%
22.2%
13.2%
14.0%
24.1%
16.5%
11.8%
13.9%
3.9%
25.0%
13.2%
15.2%
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14.7%
9.4%
23.2%
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19.4%
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23.3%
11.8%
16.1%
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17.2%
15.3%
14.8%
15.0%
16.1%
13.0%
13.0%
4.5%
3.8%
11.4%
17.0%
18.6%
18.1%
6.8%
17.0%
15.5%
15.6%
17.3%
15.4%
15.4%
16.8%
13.6%
17.2%
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14.8%
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			LW - LMP 2018	LW - LMP 2019	LW - LMP 2020	LW - LMP 2021	LW - LMP 2022
Duqu	DLC	DLCO/DUQ	39.98	27.69	22.79	39.17	74.76
Metr	Met-Ed	Met-Ed/MEC	37.06	26.34	21.16	39.97	82.2
PECO	PECO	PECO	36.36	24.75	19.29	33.55	71.67
Penn	Penelec	PENELEC/PE	37.9	26.17	20.84	37.73	73.26
Penn	Penn Power	ATSI	40.19	28.06	22.55	39.47	74.96
PPL U	PPL	PPL	35.95	24.85	19.42	35.92	75.74
West	West Penn	APS	39.78	27.83	22.4	40.44	79.01
	Western Hub	Western Hub	36.95	26.7	20.92	38.88	74.25

LW - LMP	LMP
2023	2024
31.31	
27.93	29.05
23.63	
31.01	31.8
31.05	31.96
25.73	
32.49	32.39
31.78	31.48

Table 11-6 Zonal and PJM real-time, load-weighted averag

	2018				
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP
AECO	$37.06	$37.68	($1.45)	$0.83	$25.07
AEP	$37.79	$38.16	$0.08	($0.44)	$28.21
APS	$39.78	$38.40	$1.12	$0.25	$27.83
ATSI	$40.19	$37.60	$1.99	$0.60	$28.06
BGE	$44.03	$38.86	$3.81	$1.36	$30.82
ComEd	$30.05	$37.42	($5.52)	($1.84)	$24.72
DAY	$38.96	$38.12	$0.17	$0.66	$29.52
DEOK	$39.16	$38.10	$1.99	($0.93)	$28.49
DLCO	$39.98	$37.68	$2.16	$0.14	$27.69
Dominion	$43.16	$39.04	$3.61	$0.52	$29.08
DPL	$43.76	$39.07	$3.15	$1.54	$27.71
EKPC	$36.20	$39.71	($2.30)	($1.21)	$28.18
JCPL	$37.08	$38.08	($1.65)	$0.65	$25.40
Met-Ed	$37.06	$38.09	($1.36)	$0.33	$26.34
OVEC	$30.89	$32.12	($0.25)	($0.97)	$26.23
PECO	$36.36	$38.11	($2.11)	$0.37	$24.75
PENELEC	$37.90	$37.69	($0.19)	$0.40	$26.17
Pepco	$42.60	$38.72	$2.97	$0.91	$29.68
PPL	$35.95	$38.34	($2.37)	($0.02)	$24.85
PSEG	$36.68	$37.57	($1.48)	$0.59	$25.28
RECO	$37.40	$37.81	($0.97)	$0.56	$25.72
PJM	$38.24	$38.19	$0.04	$0.02	$27.32

Table 11-8 Hub real-time, average LMP component

	2018			
	Real-Time LMP	Energy Component	Congestion Component	Compon
AEP Gen Hub	$33.29	$36.04	($1.34)	($1
AEP-DAY Hub	$34.74	$36.04	($0.71)	($0
ATSI Gen Hub	$36.94	$36.04	$1.01	($0
Chicago Gen Hub	$28.08	$36.04	($5.73)	($2
Chicago Hub	$28.61	$36.04	($5.71)	($1
Dominion Hub	$39.55	$36.04	$3.31	$0
Eastern Hub	$38.35	$36.04	$1.12	$
N Illinois Hub	$28.40	$36.04	($5.73)	($1
New Jersey Hub	$34.57	$36.04	($1.97)	$0
Ohio Hub	$34.56	$36.04	($0.89)	($0
West Interface Hub	$38.13	$36.04	$2.37	($0
Western Hub	$36.95	$36.04	$0.77	$0

The day-ahead components of LMP for each hub a

Table 11-5 Zonal real-time load-weig per MWh): January through June, 20

	2024 (Jan - Jun)			
	Real-Time LMP	Energy Component	Congestion Component	Com
ACEC	$27.72	$31.95	($4.66)	
AEP	$31.64	$31.46	$0.54	
APS	$32.39	$31.68	$0.56	
ATSI	$31.96	$31.30	$0.59	
BGE	$38.82	$32.06	$5.57	
COMED	$26.08	$31.50	($3.98)	
DAY	$33.44	$31.74	$1.08	
DOM	$37.66	$31.54	$5.46	
DPL	$29.31	$32.10	($3.71)	
DUKE	$32.24	$31.84	$0.66	
DUQ	$32.17	$31.37	$1.06	
EKPC	$32.74	$32.60	$0.55	
JCPLC	$28.17	$32.20	($4.49)	
MEC	$29.05	$31.56	($2.66)	
OVEC	$28.80	$30.05	($0.35)	
PE	$31.80	$31.08	$0.40	
PECO	$26.86	$31.66	($4.84)	
PEPCO	$38.06	$32.06	$5.00	
PPL	$26.71	$31.49	($4.53)	
PSEG	$28.53	$31.60	($3.48)	
REC	$30.70	$31.97	($1.67)	
PJM	$31.70	$31.61	$0.06	

Hub Components

The real-time components of LMP

Table 11-7 Hub real-time average L

		2024 (Ja
	Real-Time LMP	Energy Component
AEP Gen Hub	$28.50	$29.64
AEP-DAY Hub	$29.21	$29.64
ATSI Gen Hub	$29.87	$29.64
Chicago Gen Hub	$23.17	$29.64
Chicago Hub	$24.31	$29.64
Dominion Hub	$32.98	$29.64

Dominion Hub	$32.96	$29.64
Eastern Hub	$26.61	$29.64
N Illinois Hub	$23.93	$29.64
New Jersey Hub	$26.28	$29.64
Ohio Hub	$29.16	$29.64
West Interface Hub	$30.72	$29.64
Western Hub	$31.48	$29.64

ge LMP components (Dollars per MWh): 2018 and 2019

2019		
Energy Component	Congestion Component	Loss Component
$27.28	($2.39)	$0.17
$27.24	$1.00	($0.03)
$27.28	$0.52	$0.03
$27.16	$0.50	$0.41
$27.49	$2.47	$0.86
$27.12	($1.54)	($0.86)
$27.38	$1.12	$1.02
$27.33	$1.17	($0.00)
$27.18	$0.56	($0.05)
$27.39	$1.42	$0.28
$27.54	($0.39)	$0.56
$27.69	$0.65	($0.16)
$27.49	($2.18)	$0.09
$27.26	($0.74)	($0.18)
$26.39	$0.52	($0.68)
$27.25	($2.33)	($0.17)
$27.03	($0.76)	($0.10)
$27.46	$1.69	$0.53
$27.25	($1.97)	($0.42)
$27.14	($1.84)	($0.02)
$27.39	($1.64)	($0.03)
$27.28	$0.02	$0.02

s (Dollars per MWh): 2018 and 2019

		2019		
Loss nent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.41)	$26.03	$26.25	$0.48	($0.71)
.58)	$27.16	$26.25	$0.97	($0.06)
.11)	$26.77	$26.25	$0.57	($0.05)
.22)	$23.53	$26.25	($1.59)	($1.14)
.72)	$23.91	$26.25	($1.59)	($0.76)
0.20	$27.53	$26.25	$1.22	$0.06
1.19	$25.28	$26.25	($1.37)	$0.40
.91)	$23.74	$26.25	($1.61)	($0.90)
0.51	$24.03	$26.25	($2.19)	($0.03)
.58)	$27.29	$26.25	$1.05	($0.02)
.28)	$26.79	$26.25	$0.73	($0.19)
0.14	$26.70	$26.25	$0.53	($0.09)

ıre presented in Table 11-9 for 2018 and 2019.

Table 11-6 Zonal real-time loa

		2020	
	Real-Time LMP	Energy Component	Co Co
ACEC	$19.72	$22.04	
AEP	$22.14	$21.60	
APS	$22.40	$21.64	
ATSI	$22.55	$21.67	
BGE	$25.78	$21.89	
COMED	$20.18	$21.70	
DAY	$23.23	$21.76	
DOM	$23.05	$21.77	
DPL	$22.90	$21.94	
DUKE	$22.37	$21.72	
DUQ	$22.79	$21.75	
EKPC	$22.14	$21.79	
JCPLC	$20.05	$22.13	
MEC	$21.16	$21.74	
OVEC	$20.75	$20.78	
PE	$20.84	$21.50	
PECO	$19.29	$21.78	
PEPCO	$23.59	$21.85	
PPL	$19.42	$21.65	
PSEG	$19.69	$21.77	
REC	$20.74	$22.16	
PJM	$21.77	$21.73	

Hub Component

The real-time compone

Table 11-8 Hub real-ti

	Real-Ti LM
AEP Gen Hub	$20.
AEP-DAY Hub	$21.
ATSI Gen Hub	$20.
Chicago Gen Hub	$18.
Chicago Hub	$19.
Dominion Hub	$21.
Eastern Hub	$20.
N Illinois Hub	$19.
New Jersey Hub	$18.
Ohio Hub	$21.
West Interface Hub	$20.
Western Hub	$20.

The day-ahead compor

ghted average LMP components (Dollars
024 and 2025

		2025 (Jan - Jun)		
Loss ponent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
$0.44	$49.28	$53.87	($5.89)	$1.30
($0.36)	$49.50	$50.64	($0.36)	($0.78)
$0.16	$52.22	$51.49	$0.31	$0.43
$0.06	$48.29	$50.68	($2.29)	($0.09)
$1.19	$63.19	$53.06	$7.93	$2.20
($1.44)	$37.31	$51.32	($11.20)	($2.82)
$0.63	$48.80	$51.37	($3.01)	$0.45
$0.66	$67.75	$51.43	$15.08	$1.23
$0.92	$51.34	$53.44	($4.12)	$2.02
($0.26)	$47.20	$51.60	($3.33)	($1.07)
($0.26)	$47.46	$51.12	($2.93)	($0.72)
($0.40)	$49.88	$52.77	($1.62)	($1.27)
$0.46	$49.91	$53.98	($5.30)	$1.22
$0.15	$49.53	$51.73	($2.55)	$0.34
($0.91)	$42.51	$48.11	($3.80)	($1.81)
$0.32	$51.49	$50.41	$0.49	$0.60
$0.04	$46.19	$52.16	($6.42)	$0.46
$1.00	$63.40	$52.95	$8.60	$1.85
($0.25)	$45.37	$51.48	($5.95)	($0.16)
$0.40	$49.25	$52.46	($4.35)	$1.13
$0.40	$53.26	$53.36	($1.23)	$1.12
$0.02	$51.75	$51.58	$0.12	$0.04

for each hub are presented in Table 11-7 for the first six months of 2

.MP components (Dollars per MWh): January through June, 2024 and

n - Jun)		2025 (Jan - Jun)			
Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($0.10)	($1.04)	$42.04	$46.93	($3.04)	($1.85)
$0.05	($0.48)	$44.12	$46.93	($1.78)	($1.03)
$0.65	($0.41)	$44.00	$46.93	($1.89)	($1.05)
($4.78)	($1.69)	$32.37	$46.93	($11.46)	($3.09)
($4.03)	($1.29)	$33.31	$46.93	($11.17)	($2.45)
$3.26	$0.09	$52.14	$46.93	$5.06	$0.15

($3.75)	$0.72	$43.46	$46.93	($4.94)	$1.48
($4.25)	($1.45)	$33.23	$46.93	($10.98)	($2.72)
($3.69)	$0.34	$42.85	$46.93	($4.95)	$0.87
($0.00)	($0.47)	$44.28	$46.93	($1.57)	($1.08)
$1.46	($0.37)	$47.30	$46.93	$0.98	($0.61)
$1.50	$0.34	$48.89	$46.93	$1.43	$0.54

ıd-weighted average LMP components (Dollars per MWh): 2020 and 2021

			2021		
ıngestion mponent	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($2.36)	$0.05	$34.13	$40.20	($6.35)	$0.28
$0.45	$0.09	$40.31	$39.50	$0.83	($0.02)
$0.82	($0.06)	$40.44	$39.52	$0.94	($0.03)
$0.58	$0.30	$39.47	$39.66	($0.36)	$0.17
$3.30	$0.59	$45.77	$39.92	$4.79	$1.07
($1.08)	($0.44)	$37.00	$39.81	($1.69)	($1.13)
$0.49	$0.98	$42.92	$39.89	$1.51	$1.51
$1.23	$0.05	$44.67	$39.78	$4.34	$0.55
$0.65	$0.30	$40.24	$39.88	($0.31)	$0.67
$0.51	$0.14	$41.49	$39.84	$1.61	$0.04
$1.18	($0.15)	$39.17	$39.70	($0.04)	($0.49)
$0.31	$0.04	$41.20	$39.93	$1.35	($0.07)
($2.12)	$0.04	$34.52	$40.27	($5.96)	$0.21
($0.40)	($0.18)	$39.97	$39.69	$0.44	($0.16)
$0.32	($0.34)	$37.98	$38.08	$0.74	($0.84)
($0.52)	($0.14)	$37.73	$39.39	($1.38)	($0.27)
($2.25)	($0.23)	$33.55	$39.73	($5.92)	($0.25)
$1.47	$0.28	$44.62	$39.95	$3.96	$0.72
($1.85)	($0.39)	$35.92	$39.47	($3.00)	($0.55)
($2.03)	($0.04)	$35.78	$39.81	($4.17)	$0.14
($1.45)	$0.03	$38.80	$40.28	($1.71)	$0.23
$0.02	$0.01	$39.78	$39.72	$0.04	$0.02

S

ents of LMP for each hub are presented in Table 11-8 for 2020 and 2021.[15]

me average LMP components (Dollars per MWh): 2020 and 2021

	2020			2021			
me MP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.38	$20.63	$0.19	($0.44)	$37.44	$38.12	$0.36	($1.04)
.17	$20.63	$0.47	$0.07	$38.63	$38.12	$0.63	($0.12)
.91	$20.63	$0.33	($0.04)	$37.20	$38.12	($0.41)	($0.51)
.72	$20.63	($1.23)	($0.67)	$34.31	$38.12	($2.25)	($1.57)
.12	$20.63	($1.12)	($0.38)	$35.21	$38.12	($1.90)	($1.02)
.39	$20.62	$0.89	($0.13)	$41.47	$38.12	$3.17	$0.18
.40	$20.63	($0.42)	$0.20	$37.20	$38.12	($1.45)	$0.52
.02	$20.63	($1.11)	($0.49)	$34.96	$38.12	($1.94)	($1.23)
.63	$20.63	($1.93)	($0.07)	$33.20	$38.12	($4.98)	$0.06
.22	$20.63	$0.47	$0.13	$38.60	$38.12	$0.54	($0.06)
.93	$20.63	$0.48	($0.18)	$38.61	$38.12	$0.94	($0.46)
.92	$20.63	$0.41	($0.11)	$38.88	$38.12	$0.89	($0.14)

nents of LMP for each hub are presented in Table 11-9 for 2020 and 2021.

2024 and 2025.[1]

2025

Table 11-5 Zonal real-time load-weighted average LMP components (Dollars per M

	2022				2023			
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	L Compon
ACEC	$74.27	$82.01	($9.07)	$1.33	$24.94	$31.51	($6.80)	$(
AEP	$77.54	$79.32	($1.11)	($0.67)	$31.19	$30.83	$0.55	($0.
APS	$79.01	$79.61	($0.60)	$0.00	$32.49	$30.97	$1.47	$(
ATSI	$74.96	$78.32	($3.02)	($0.34)	$31.05	$30.80	$0.25	($0
BGE	$95.44	$81.87	$10.24	$3.33	$38.80	$31.29	$6.43	$1
COMED	$66.25	$78.91	($9.02)	($3.63)	$27.47	$30.88	($2.35)	($1
DAY	$80.43	$79.74	($1.06)	$1.74	$32.70	$31.03	$0.83	$(
DOM	$99.52	$81.08	$16.57	$1.88	$37.50	$31.00	$5.88	$(
DPL	$83.32	$82.21	($1.48)	$2.58	$31.06	$31.41	($0.94)	$(
DUKE	$79.54	$80.61	($0.37)	($0.70)	$32.10	$31.02	$1.02	$(
DUQ	$74.76	$79.27	($3.09)	($1.42)	$31.31	$30.86	$0.83	($0
EKPC	$83.16	$83.66	$0.05	($0.56)	$31.93	$31.17	$0.84	($0
JCPLC	$76.02	$82.22	($7.28)	$1.07	$25.89	$31.63	($5.93)	$(
MEC	$82.20	$79.14	$2.43	$0.63	$27.93	$31.08	($3.10)	($0
OVEC	$71.39	$74.99	($1.39)	($2.21)	$29.80	$29.81	$0.70	($0
PE	$73.26	$77.37	($3.65)	($0.46)	$31.01	$30.73	$0.23	$(
PECO	$71.67	$80.53	($9.11)	$0.25	$23.63	$31.14	($7.32)	($0
PEPCO	$91.68	$81.50	$7.61	$2.56	$36.59	$31.30	$4.46	$(
PPL	$75.74	$78.97	($2.95)	($0.28)	$25.73	$30.93	($4.78)	($0
PSEG	$74.74	$79.97	($6.06)	$0.83	$25.66	$31.11	($5.59)	$(
REC	$77.95	$81.82	($4.56)	$0.69	$27.90	$31.51	($3.75)	$(
PJM	$80.14	$79.98	$0.10	$0.06	$31.08	$31.00	$0.06	$(

Hub Components

The real-time components of LMP for each hub are presented in Table

Table 11-7 Hub real-time average LMP components (Dollars per MWh):

	2022					
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Ener Compone
AEP Gen Hub	$69.25	$73.38	($1.60)	($2.53)	$29.20	$29.
AEP-DAY Hub	$70.68	$73.38	($1.72)	($0.98)	$29.77	$29.
ATSI Gen Hub	$68.74	$73.38	($2.89)	($1.75)	$29.17	$29.
Chicago Gen Hub	$59.80	$73.38	($9.27)	($4.32)	$25.32	$29.
Chicago Hub	$61.15	$73.38	($8.97)	($3.27)	$25.83	$29.
Dominion Hub	$79.56	$73.38	$5.44	$0.74	$32.56	$29.
Eastern Hub	$70.80	$73.38	($4.41)	$1.83	$27.32	$29.
N Illinois Hub	$60.71	$73.38	($9.00)	($3.67)	$25.85	$29.
New Jersey Hub	$67.42	$73.38	($6.61)	$0.64	$24.06	$29.
Ohio Hub	$70.51	$73.38	($1.92)	($0.95)	$29.72	$29.
West Interface Hub	$72.66	$73.38	$0.33	($1.06)	$30.68	$29.
Western Hub	$74.25	$73.38	$0.65	$0.22	$31.78	$29.

(Wh): 2022 and 2023

Loss ient
0.22
(.19)
0.05
(.00)
1.08
(.06)
0.84
0.62
0.59
0.07
(.38)
(.08)
0.19
(.05)
(.70)
0.04
(.19)
0.83
(.43)
0.14
0.15
0.02

Table 3-34 Day-ahead and real-time zonal average l

	2024				
	Day-Ahead				
Zone	Average DLMP	Average PLMP	Difference	Percent Difference	Average DLMP
ACEC	$27.49	$27.54	$0.05	0.2%	$25.90
AEP	$31.12	$31.18	$0.06	0.2%	$29.05
APS	$32.27	$32.33	$0.06	0.2%	$29.80
ATSI	$31.46	$31.47	$0.01	0.0%	$29.08
BGE	$40.03	$40.11	$0.08	0.2%	$36.60
COMED	$25.48	$25.55	$0.07	0.3%	$23.28
DAY	$32.62	$32.69	$0.06	0.2%	$30.30
DUKE	$31.22	$31.28	$0.06	0.2%	$28.90
DOM	$36.96	$37.02	$0.06	0.2%	$33.54
DPL	$31.27	$31.36	$0.09	0.3%	$28.44
DUQ	$30.93	$30.97	$0.04	0.1%	$29.02
EKPC	$30.58	$30.64	$0.06	0.2%	$28.57
JCPLC	$27.52	$27.57	$0.06	0.2%	$26.00
MEC	$28.66	$28.71	$0.06	0.2%	$26.28
OVEC	$29.88	$29.93	$0.06	0.2%	$27.73
PECO	$27.11	$27.17	$0.05	0.2%	$25.56
PE	$32.06	$32.10	$0.04	0.1%	$29.46
PEPCO	$38.11	$38.18	$0.07	0.2%	$34.85
PPL	$26.76	$26.82	$0.06	0.2%	$24.86
PSEG	$27.78	$27.83	$0.06	0.2%	$26.33
REC	$30.13	$30.18	$0.05	0.2%	$28.14

11-7 for 2022 and 2023.[11]

2022 and 2023

2023		
rgy ent	Congestion Component	Loss Component
.61	$0.45	($0.86)
.61	$0.43	($0.27)
.61	$0.04	($0.48)
.61	($2.93)	($1.36)
.61	($2.80)	($0.98)
.61	$2.78	$0.17
.61	($2.73)	$0.44
.61	($2.62)	($1.13)
.61	($5.63)	$0.07
.61	$0.34	($0.23)
.61	$1.43	($0.35)
.61	$1.96	$0.20

Table 3-35 Day-ahead and real-time ave

	Day-Ahead		
Hub	Average DLMP	Average PLMP	Differen
AEP GEN HUB	$29.76	$29.79	$0.
AEP-DAYTON HUB	$30.70	$30.73	$0.
ATSI GEN HUB	$30.99	$31.01	$0.
CHICAGO GEN HUB	$24.78	$24.88	$0.
CHICAGO HUB	$25.75	$25.77	$0.
DOMINION HUB	$34.03	$34.07	$0.
EASTERN HUB	$31.23	$31.28	$0.
N ILLINOIS HUB	$25.36	$25.46	$0.
NEW JERSEY HUB	$27.65	$27.68	$0.
OHIO HUB	$30.66	$30.69	$0.
WEST INT HUB	$32.17	$32.19	$0.
WESTERN HUB	$33.80	$33.83	$0.

DLMP and PLMP (Dollars per

Real-Time		
Average PLMP	Difference	Percent Difference
$27.52	$1.62	6.3%
$31.35	$2.31	7.9%
$32.18	$2.38	8.0%
$31.32	$2.24	7.7%
$39.53	$2.93	8.0%
$25.22	$1.94	8.3%
$32.75	$2.46	8.1%
$31.21	$2.31	8.0%
$36.15	$2.61	7.8%
$30.94	$2.50	8.8%
$31.23	$2.21	7.6%
$30.84	$2.27	8.0%
$27.67	$1.67	6.4%
$28.15	$1.87	7.1%
$29.94	$2.20	7.9%
$27.12	$1.56	6.1%
$31.61	$2.15	7.3%
$37.61	$2.76	7.9%
$26.58	$1.72	6.9%
$28.02	$1.69	6.4%
$29.93	$1.79	6.4%

Zonal LMP

Table 3-54 sho

Table 3-54 Real

	Real-T
Zone	2023
ACEC	$23.30
AEP	$30.05
APS	$31.07
ATSI	$29.88
BGE	$36.40
COMED	$25.82
DAY	$31.28
DUKE	$30.69
DOM	$35.75
DPL	$27.03
DUQ	$30.14
EKPC	$30.41
JCPLC	$24.15
MEC	$26.59
OVEC	$29.67
PECO	$22.34
PE	$29.81
PEPCO	$34.36
PPL	$24.60
PSEG	$24.32
REC	$26.04
PJM	$29.69

erage DLMP and PLMP for PJM hubs (Dollars per MWh): 2024

2024					
		Real-Time			
ice	Percent Difference	Average DLMP	Average PLMP	Difference	Percent Difference
04	0.1%	$27.69	$29.92	$2.23	8.1%
03	0.1%	$28.42	$30.69	$2.27	8.0%
02	0.1%	$28.32	$30.50	$2.18	7.7%
09	0.4%	$22.31	$24.29	$1.98	8.9%
02	0.1%	$23.49	$25.44	$1.95	8.3%
04	0.1%	$31.26	$33.76	$2.50	8.0%
05	0.2%	$28.30	$30.79	$2.48	8.8%
.11	0.4%	$23.30	$25.23	$1.94	8.3%
03	0.1%	$26.11	$27.79	$1.67	6.4%
03	0.1%	$28.36	$30.62	$2.26	8.0%
02	0.1%	$29.80	$32.15	$2.35	7.9%
03	0.1%	$30.84	$33.24	$2.40	7.8%

' and Dispatch

ws real-time zonal average and load-weighted average LMP for 2023 and 2024.

l-time zonal average and load-weighted average LMP (Dollars per MWh): 2023 and 2024

Time Average LMP		Real-Time Load-Weighted Average LMP		
2024	Percent Change	2023	2024	Percent Change
$27.52	18.1%	$24.94	$30.60	22.7%
$31.35	4.3%	$31.19	$33.22	6.5%
$32.18	3.6%	$32.49	$34.49	6.2%
$31.32	4.8%	$31.05	$33.32	7.3%
$39.53	8.6%	$38.80	$44.87	15.7%
$25.22	(2.4%)	$27.47	$27.69	0.8%
$32.75	4.7%	$32.70	$35.23	7.7%
$31.21	1.7%	$32.10	$33.49	4.3%
$36.15	1.1%	$37.50	$39.07	4.2%
$30.94	14.5%	$31.06	$35.67	14.9%
$31.23	3.6%	$31.31	$33.42	6.8%
$30.84	1.4%	$31.93	$33.49	4.9%
$27.67	14.6%	$25.89	$30.79	18.9%
$28.15	5.9%	$27.93	$30.46	9.1%
$29.94	0.9%	$29.80	$30.14	1.1%
$27.12	21.4%	$23.63	$29.87	26.4%
$31.61	6.0%	$31.01	$33.24	7.2%
$37.61	9.4%	$36.59	$42.06	15.0%
$26.58	8.0%	$25.73	$28.53	10.9%
$28.02	15.2%	$25.66	$30.35	18.3%
$29.93	14.9%	$27.90	$32.65	17.0%
$31.32	5.5%	$31.08	$33.74	8.5%

DRIPE EDC-Column Lookup

EDC	DRIPE Column Ref
PECO	0
PPL	4
DLC	8
Met-Ed	12
Penelec	16
Penn Power	20
West Penn	24

Stacked Bars Offset Row Lookup

EDC	2026	2021
DLC	0	0
MetEd	4	5
PECO	8	10
Penelec	12	15
Penn Power	16	20
PPL	20	25
West Penn	24	30

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator
This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references. For Phase V, the start year shall be set to Program Year 18 (6/1/2026/5/31/2027). The user shall gather publicly available data sets as inputs. This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

Data Needed	TRC Test Order Section
EDC Name	
Start Year	
Inflation Rate	A.7 Page 8
Plant Heat Rates	B.2.b.v Page 18
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18
PJM Base Residual Auction Results	B.7 Page 21
Transmission and Distribution Capacity Costs	B.8 Page 22
AEPS Avoided Costs	B.9 Page 24
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25
Benefits Incurreced Through Reduced Arrearages Activity	B.12 Page 29

Monetary Issues:	All output dollars are nominal

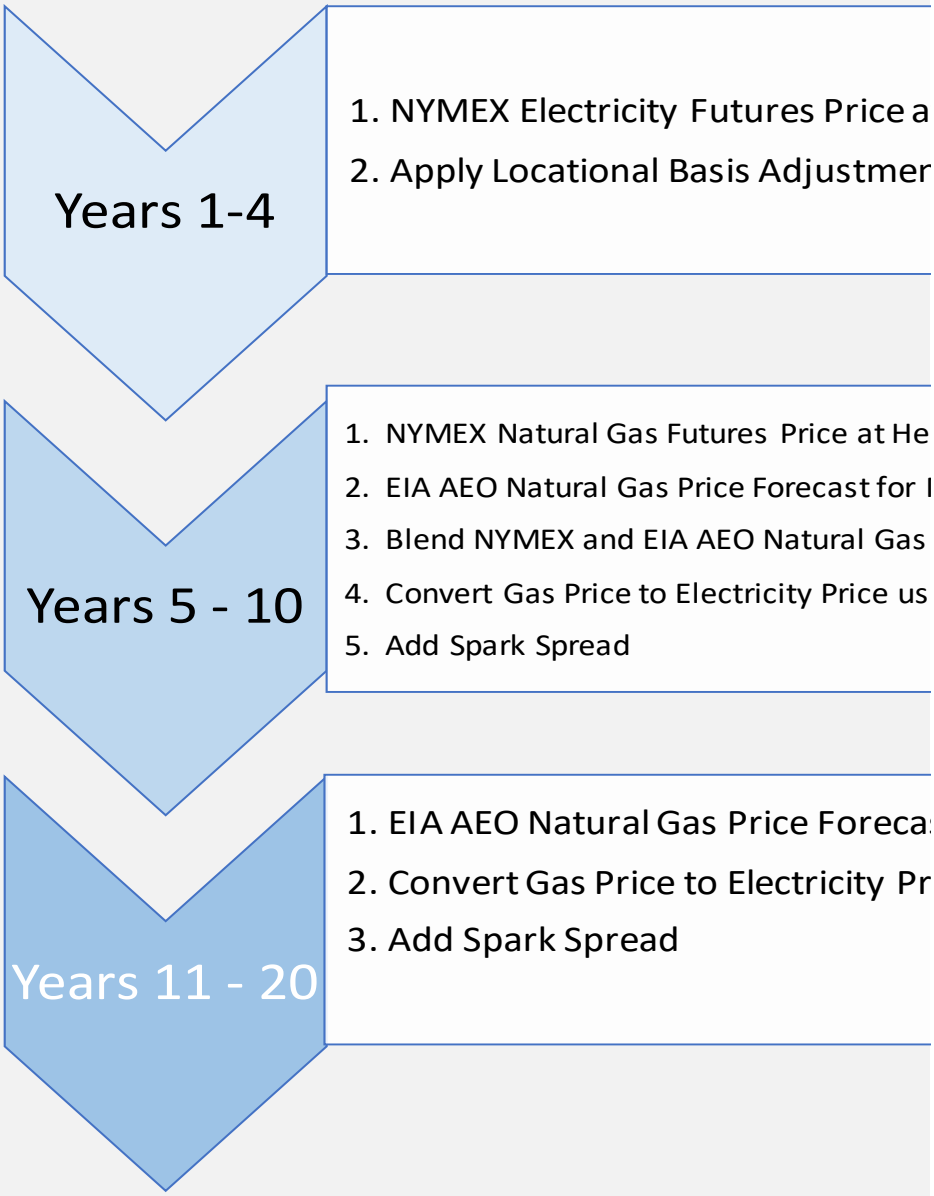
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

1. Included latest PJM Capacity Auction Results (2026/2027) per 2026 TRC Order, at page 38 ""EDC inclusion of the upco
of generation capacity calculation wil be an important mechanism to capture any market shifts."
Note that on Generation Capacity Tab, annual labels on Row 14 required correction.
3. Updated BLS data for CPI and PPI to add 2024 data.
2. Updated data with ICE August 21 values for PJM Western Hub, HH NG, Transco, and Tetco
4. Per SWE August 29, 2025 Guidance Memo:

* Correction Steps 1 and 2. Fixed calendarization issue, per steps outlined in the SWE memo. Please note that EIA Natu
* Additional issue 1: Not Applicable
* Additional Issue 2: Used 2025 PJM SOM Report for 2024 values, Tables 11-5 and 11-7 (See also SWE follow up email t
* Additional Issue 3: Switched from using NYMEX to ICE data (see 2. above)

5. EIA AEO data was updated to 2025 report for Mid Atlantic Region, Table 3, line 39, Natural Gas $/mmbtu in real dolla

Summary of Avoided Energy C



Input Tab
General Inputs
General Inputs
General Inputs
General Inputs
Elec Futures
Elec Futures
NG Futures
NG Futures
Adjustments
BLS Input
Generation Capacity
T&D Capacity
AEPS
DRIPE
Arrearages

ming auction results [2026/2027] within the PH V avoided cost

ıral Gas information had to be extended to 2046.

o Ed Miller from Patrick Burns dated: Sept 17, 2025.)

rs

ost Methodology

t PJM West Hub

nt from PJM West Hub to Operating Company Zone

nry Hub with Locational Adjustment

Mid-Atlantic Region

Price Forecast over 6 Year Period

ing On-Peak and Off-Peak Plant Heat Rates

st for Mid-Atlantic Region

ice using On-Peak and Off-Peak Plant Heat Rates

General			
Company Name	Penn Power		**Act 129 PY**
Start Year (Program)	18	2027	18
Discount Rate	5%	TRC Test Order A.4 page 10	19
Inflation Rate	2%	TRC Test Order B.4 page 18	20
Plant Specifications			21
	Heat Rate (Btu/kWh)		22
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24
EDC Natural Gas Futures Source			25
Electric Distribution Companies	**EDC Abbreviation**	**NYMEX NG Futures Source**	26
Duquesne Light Co	DLC	Tetco M-3	27
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28
PECO Energy Co	PECO	Transco 6 (Non-NY)	29
Pennsylvania Electric Co	Penelec	Tetco M-3	30
Pennsylvania Power Co	Penn Power	Tetco M-3	31
PPL Utilities	PPL	Transco 6 (Non-NY)	32
West Penn Power Co	West Penn	Tetco M-3	33
Seasonal Definitions			34
Jan	Winter		35
Feb	Winter		36
Mar	Shoulder		37
Apr	Shoulder		38
May	Summer		39
Jun	Summer		40
Jul	Summer		41
Aug	Summer		42
Sep	Summer		43
Oct	Shoulder		44
Nov	Shoulder		45
Dec	Winter		46
			47

Calendar		
PY Start	**PY End**	**Avoided Energy YR**
2026	2027	2027
2027	2028	2028
2028	2029	2029
2029	2030	2030
2030	2031	2031
2031	2032	2032
2032	2033	2033
2033	2034	2034
2034	2035	2035
2035	2036	2036
2036	2037	2037
2037	2038	2038
2038	2039	2039
2039	2040	2040
2040	2041	2041
2041	2042	2042
2042	2043	2043
2043	2044	2044
2044	2045	2045
2045	2046	2046
2046	2047	2047
2047	2048	2048
2048	2049	2049
2049	2050	2050
2050	2051	2051
2051	2052	2052
2052	2053	2053
2053	2054	2054
2054	2055	2055
2055	2056	2056

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arrearag

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$86.93	$58.11	$91.07	$79.48	$73.84
19	2028	$97.78	$67.16	$105.06	$92.78	$84.11
20	2029	$105.75	$75.97	$114.41	$101.35	$91.63
21	2030	$103.40	$75.53	$114.84	$101.13	$92.90
22	2031	$71.59	$42.65	$78.64	$66.96	$58.02
23	2032	$71.61	$42.71	$81.20	$68.77	$58.68
24	2033	$73.99	$44.40	$85.54	$71.82	$61.09
25	2034	$76.88	$46.44	$90.94	$75.58	$64.31
26	2035	$79.67	$48.41	$95.99	$79.10	$67.52
27	2036	$82.25	$50.24	$100.55	$82.29	$70.26
28	2037	$83.82	$51.37	$103.73	$84.54	$71.97
29	2038	$83.21	$51.00	$102.01	$83.40	$71.24
30	2039	$82.79	$50.76	$100.74	$82.59	$70.73
31	2040	$83.22	$51.11	$101.53	$83.18	$71.20
32	2041	$84.53	$52.07	$104.48	$85.27	$72.69
33	2042	$85.99	$53.13	$107.76	$87.59	$74.34
34	2043	$87.49	$54.22	$111.14	$89.97	$76.03
35	2044	$88.51	$54.98	$113.35	$91.55	$77.18
36	2045	$89.29	$55.58	$114.99	$92.74	$78.06
37	2046	$91.12	$56.90	$119.14	$95.66	$80.13

PY Selection	PY19

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$89.27	$58.65	$96.55	$84.27	$75.60
20	2029	$99.49	$69.71	$108.15	$95.09	$85.37
21	2030	$106.50	$78.63	$117.94	$104.23	$96.00
22	2031	$104.36	$75.42	$111.41	$99.73	$90.79
23	2032	$71.61	$42.71	$81.20	$68.77	$58.68

24	**2033**	$73.99	$44.40	$85.54	$71.82	$61.09
25	**2034**	$76.88	$46.44	$90.94	$75.58	$64.31
26	**2035**	$79.67	$48.41	$95.99	$79.10	$67.52
27	**2036**	$82.25	$50.24	$100.55	$82.29	$70.26
28	**2037**	$83.82	$51.37	$103.73	$84.54	$71.97
29	**2038**	$83.21	$51.00	$102.01	$83.40	$71.24
30	**2039**	$82.79	$50.76	$100.74	$82.59	$70.73
31	**2040**	$83.22	$51.11	$101.53	$83.18	$71.20
32	**2041**	$84.53	$52.07	$104.48	$85.27	$72.69
33	**2042**	$85.99	$53.13	$107.76	$87.59	$74.34
34	**2043**	$87.49	$54.22	$111.14	$89.97	$76.03
35	**2044**	$88.51	$54.98	$113.35	$91.55	$77.18
36	**2045**	$89.29	$55.58	$114.99	$92.74	$78.06
37	**2046**	$91.12	$56.90	$119.14	$95.66	$80.13

PY Selection	PY20

		Penn Power Zone Summer ($/MWh)		**Penn Power Zone Winter ($/MWh)**		**Penn Power DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$90.42	$60.64	$99.08	$86.02	$76.30
21	**2030**	$99.88	$72.01	$111.32	$97.61	$89.38
22	**2031**	$107.64	$78.70	$114.69	$103.01	$94.07
23	**2032**	$106.44	$77.54	$116.03	$103.60	$93.51
24	**2033**	$73.99	$44.40	$85.54	$71.82	$61.09
25	**2034**	$76.88	$46.44	$90.94	$75.58	$64.31
26	**2035**	$79.67	$48.41	$95.99	$79.10	$67.52
27	**2036**	$82.25	$50.24	$100.55	$82.29	$70.26
28	**2037**	$83.82	$51.37	$103.73	$84.54	$71.97
29	**2038**	$83.21	$51.00	$102.01	$83.40	$71.24
30	**2039**	$82.79	$50.76	$100.74	$82.59	$70.73
31	**2040**	$83.22	$51.11	$101.53	$83.18	$71.20
32	**2041**	$84.53	$52.07	$104.48	$85.27	$72.69
33	**2042**	$85.99	$53.13	$107.76	$87.59	$74.34
34	**2043**	$87.49	$54.22	$111.14	$89.97	$76.03
35	**2044**	$88.51	$54.98	$113.35	$91.55	$77.18
36	**2045**	$89.29	$55.58	$114.99	$92.74	$78.06
37	**2046**	$91.12	$56.90	$119.14	$95.66	$80.13

PY Selection	PY21

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$90.29	$62.42	$101.73	$88.02	$79.79
22	2031	$100.64	$71.70	$107.69	$96.01	$87.07
23	2032	$109.92	$81.02	$119.51	$107.08	$96.99
24	2033	$110.13	$80.54	$121.68	$107.96	$97.23
25	2034	$76.88	$46.44	$90.94	$75.58	$64.31
26	2035	$79.67	$48.41	$95.99	$79.10	$67.52
27	2036	$82.25	$50.24	$100.55	$82.29	$70.26
28	2037	$83.82	$51.37	$103.73	$84.54	$71.97
29	2038	$83.21	$51.00	$102.01	$83.40	$71.24
30	2039	$82.79	$50.76	$100.74	$82.59	$70.73
31	2040	$83.22	$51.11	$101.53	$83.18	$71.20
32	2041	$84.53	$52.07	$104.48	$85.27	$72.69
33	2042	$85.99	$53.13	$107.76	$87.59	$74.34
34	2043	$87.49	$54.22	$111.14	$89.97	$76.03
35	2044	$88.51	$54.98	$113.35	$91.55	$77.18
36	2045	$89.29	$55.58	$114.99	$92.74	$78.06
37	2046	$91.12	$56.90	$119.14	$95.66	$80.13

PY Selection	PY22

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$90.50	$61.56	$97.55	$85.87	$76.93

23	**2032**	$102.49	$73.59	$112.08	$99.65	$89.56
24	**2033**	$113.74	$84.15	$125.29	$111.57	$100.84
25	**2034**	$114.38	$83.94	$128.44	$113.08	$101.81
26	**2035**	$79.67	$48.41	$95.99	$79.10	$67.52
27	**2036**	$82.25	$50.24	$100.55	$82.29	$70.26
28	**2037**	$83.82	$51.37	$103.73	$84.54	$71.97
29	**2038**	$83.21	$51.00	$102.01	$83.40	$71.24
30	**2039**	$82.79	$50.76	$100.74	$82.59	$70.73
31	**2040**	$83.22	$51.11	$101.53	$83.18	$71.20
32	**2041**	$84.53	$52.07	$104.48	$85.27	$72.69
33	**2042**	$85.99	$53.13	$107.76	$87.59	$74.34
34	**2043**	$87.49	$54.22	$111.14	$89.97	$76.03
35	**2044**	$88.51	$54.98	$113.35	$91.55	$77.18
36	**2045**	$89.29	$55.58	$114.99	$92.74	$78.06
37	**2046**	$91.12	$56.90	$119.14	$95.66	$80.13

es study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$61.74	$67.40	$67.40	$77.10	$0.00	$43.52	$16.27
$71.98	$33.46	$33.46	$78.69	$0.00	$45.52	$16.76
$78.50	$34.15	$34.15	$80.32	$0.00	$45.17	$19.33
$78.45	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$45.87	$27.64	$27.64	$83.69	$0.00	$45.98	$22.70
$46.38	$28.21	$28.21	$85.42	$0.00	$46.93	$23.17
$48.09	$28.80	$28.80	$87.19	$0.00	$47.91	$23.65
$50.35	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$52.61	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$54.54	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$55.77	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$55.33	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$55.03	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$55.40	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$56.49	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$57.68	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$58.90	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$59.75	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$60.42	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$61.90	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.47	$33.46	$33.46	$78.69	$0.00	$45.52	$16.76
$72.24	$34.15	$34.15	$80.32	$0.00	$45.17	$19.33
$81.55	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$78.64	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70
$46.38	$28.21	$28.21	$85.42	$0.00	$46.93	$23.17

$48.09	$28.80	$28.80	$87.19	$0.00	$47.91	$23.65
$50.35	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$52.61	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$54.54	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$55.77	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$55.33	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$55.03	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$55.40	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$56.49	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$57.68	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$58.90	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$59.75	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$60.42	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$61.90	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

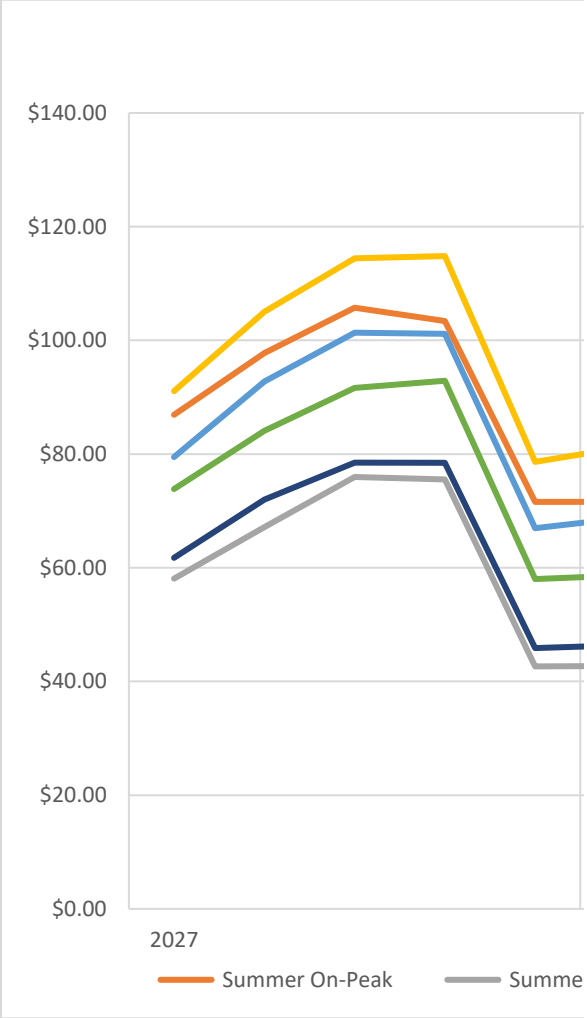
: Zone Shoulder Wh)	**Penn Power Generation Capacity ($/kW/year)**		**Penn Power Transmission Capacity ($/kW/year)**		**Penn Power Distribution Capacity ($/kW/year)**	
Shoulder Off-Peak	**Summer**	**Winter**	**Summer**	**Winter**	**Summer**	**Winter**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.17	$34.15	$34.15	$80.32	$0.00	$45.17	$19.33
$74.93	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$81.92	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70
$81.21	$36.30	$36.30	$85.42	$0.00	$46.93	$23.17
$48.09	$28.80	$28.80	$87.19	$0.00	$47.91	$23.65
$50.35	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$52.61	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$54.54	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$55.77	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$55.33	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$55.03	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$55.40	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$56.49	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$57.68	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$58.90	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$59.75	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$60.42	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$61.90	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$65.34	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$74.92	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70
$84.69	$36.30	$36.30	$85.42	$0.00	$46.93	$23.17
$84.23	$37.04	$37.04	$87.19	$0.00	$47.91	$23.65
$50.35	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$52.61	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$54.54	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$55.77	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$55.33	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$55.03	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$55.40	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$56.49	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$57.68	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$58.90	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$59.75	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$60.42	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$61.90	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

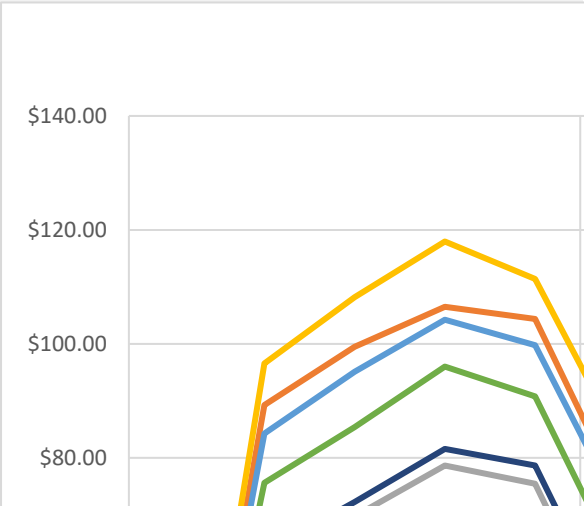
: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.78	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70

$77.26	$36.30	$36.30	$85.42	$0.00	$46.93	$23.17
$87.84	$37.04	$37.04	$87.19	$0.00	$47.91	$23.65
$87.85	$37.81	$37.81	$88.99	$0.00	$48.90	$24.14
$52.61	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$54.54	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$55.77	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$55.33	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$55.03	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$55.40	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$56.49	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$57.68	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$58.90	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$59.75	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$60.42	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$61.90	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.75	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

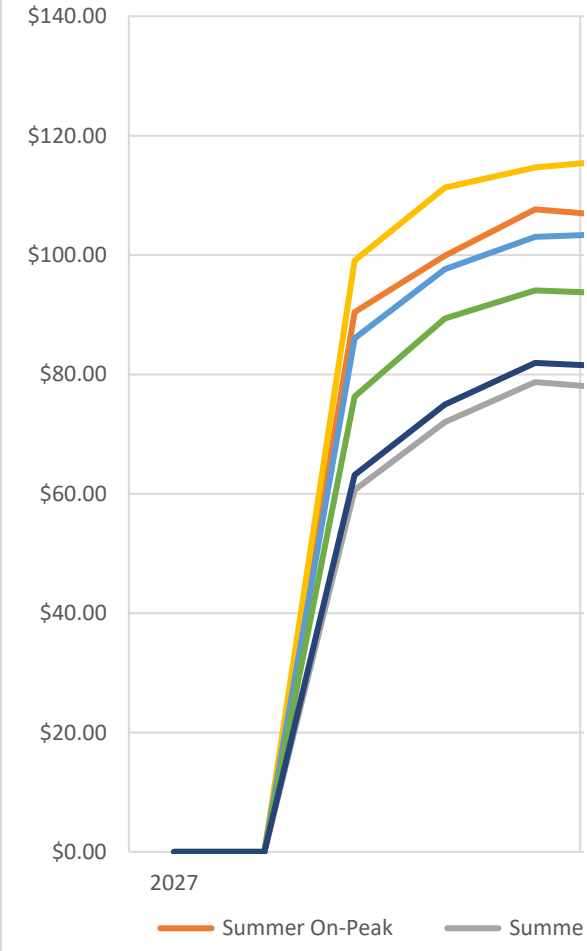


Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Se
$3.43	

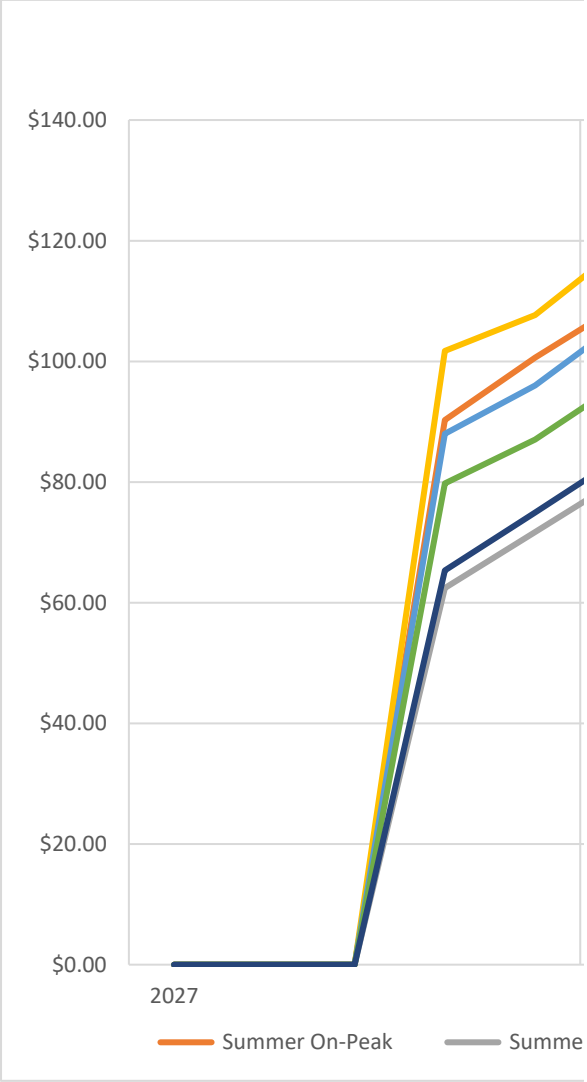


$3.68	Segment 2
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

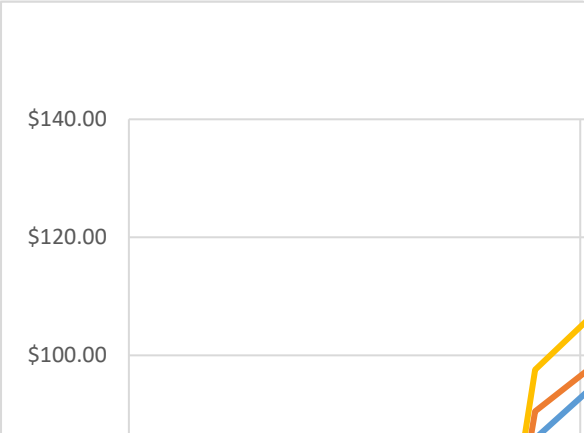
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



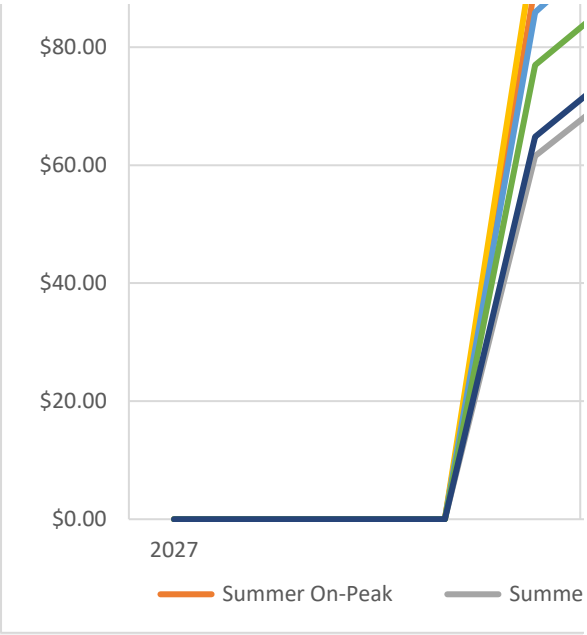
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



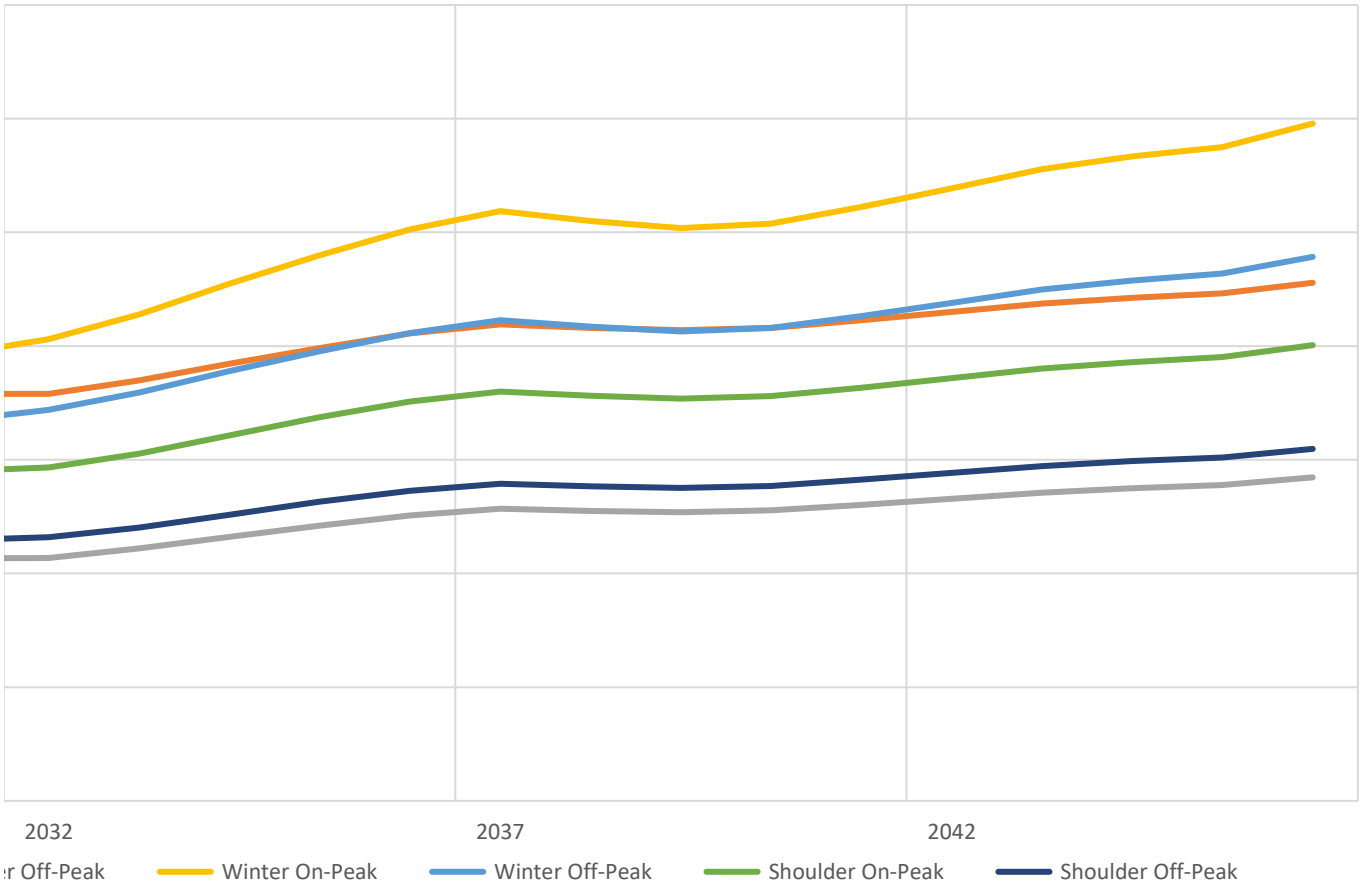
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.37	



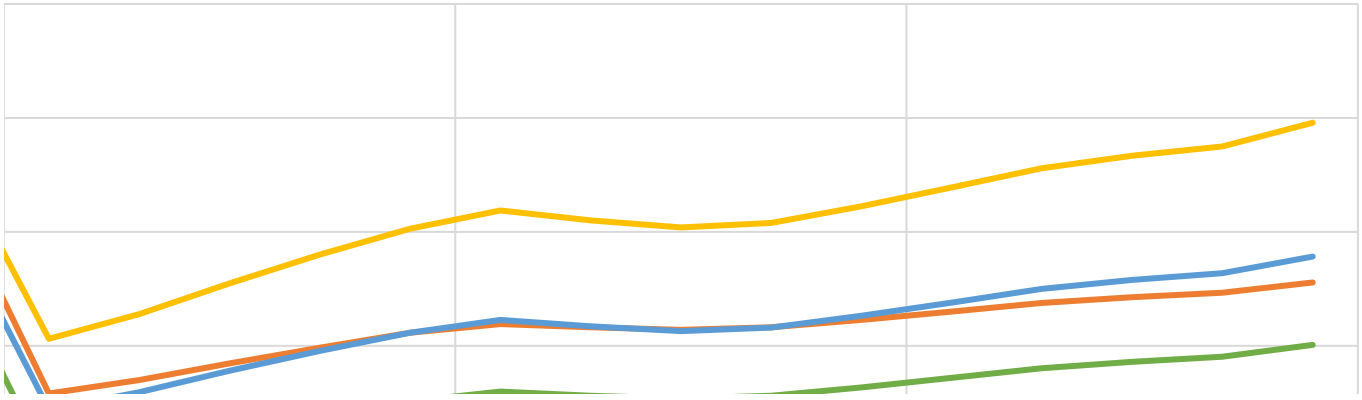
$3.43	Segment 2
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

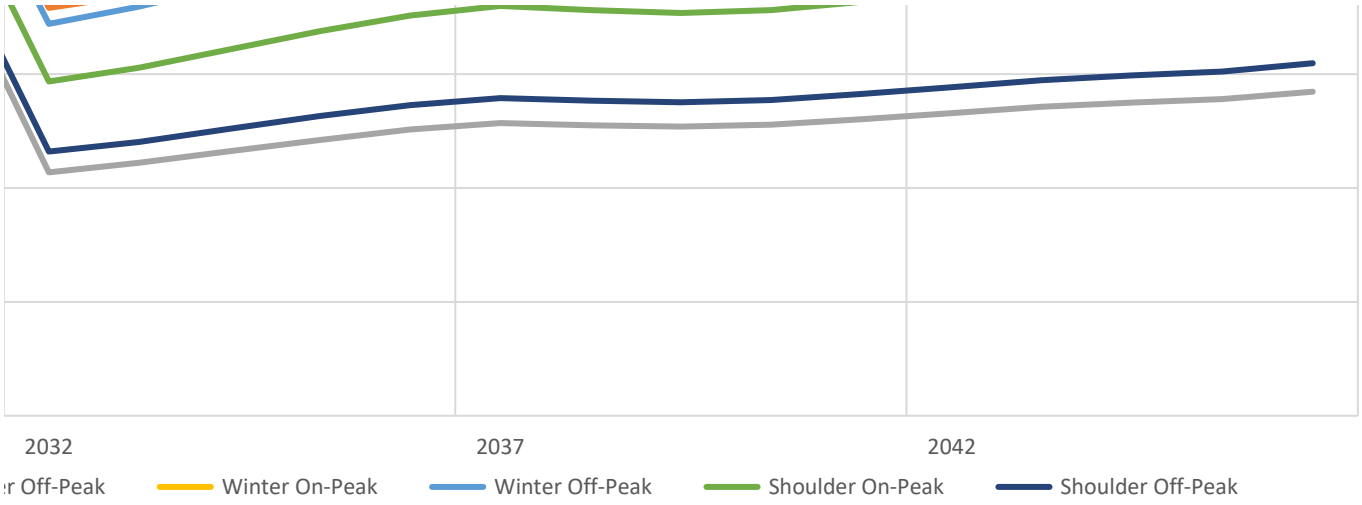


PY18 Avoided Energy Costs

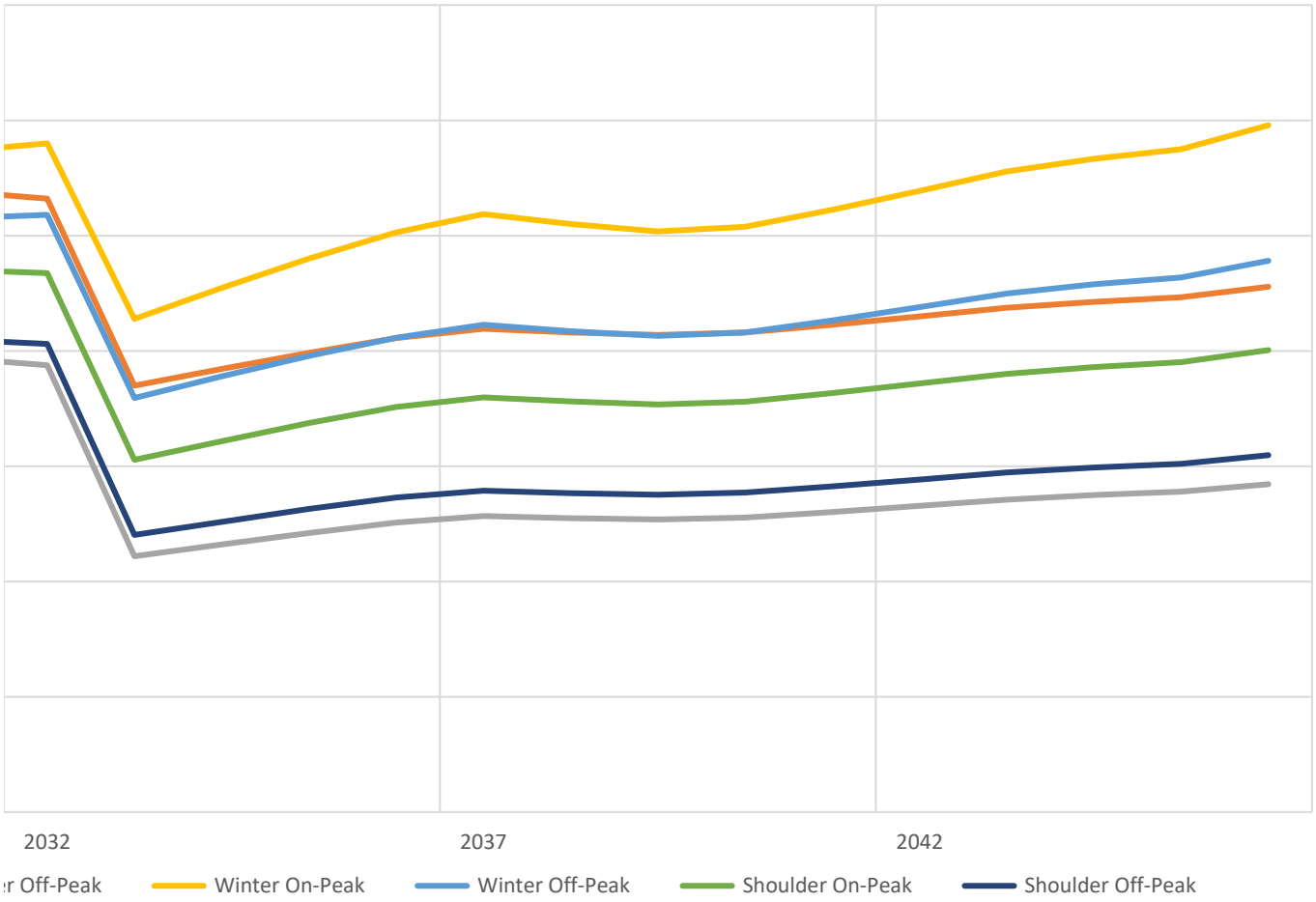


PY19 Avoided Energy Costs

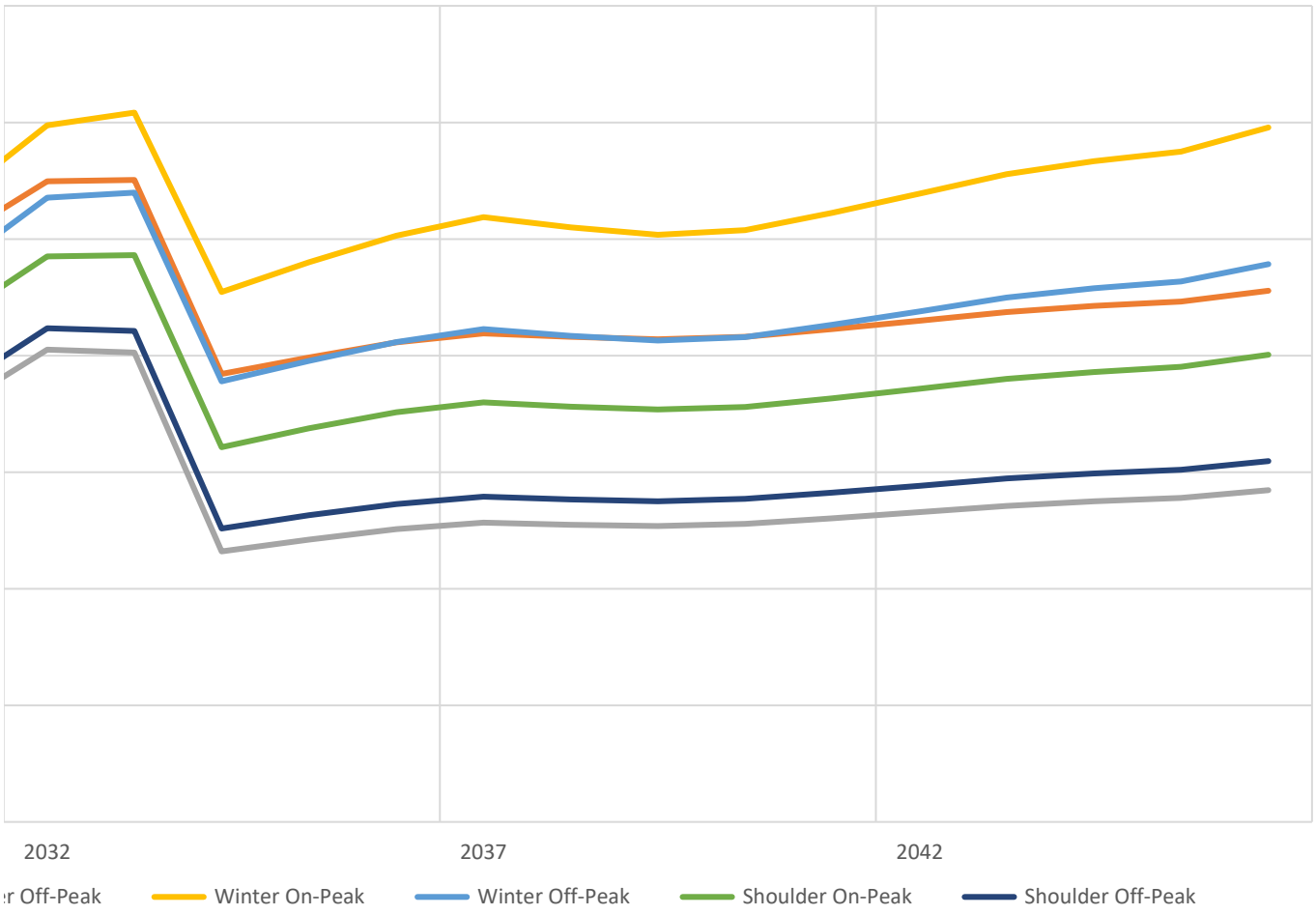




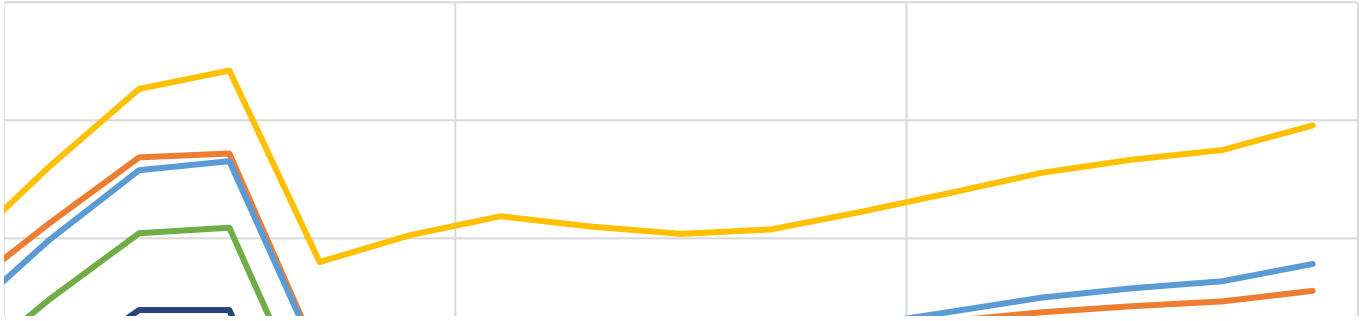
PY20 Avoided Energy Costs

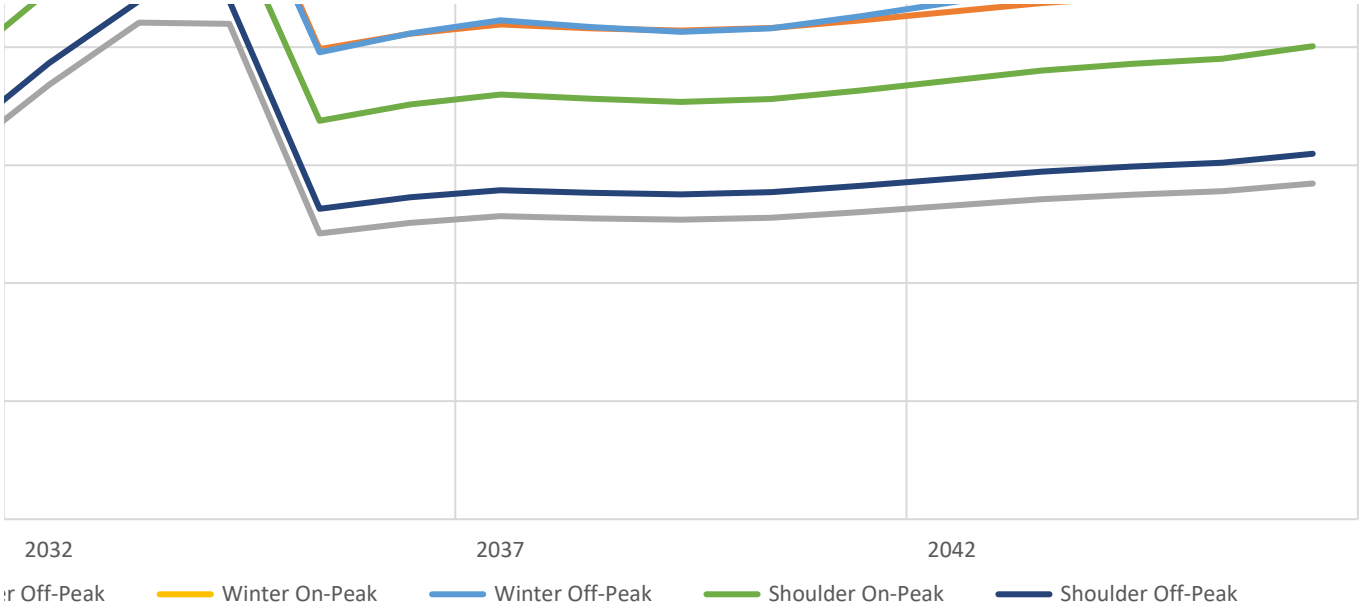


PY21 Avoided Energy Costs



PY22 Avoided Energy Costs




2032
2037
2042
r Off-Peak
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

PY Selection	PY18

SWE Note: This data includes avoided energy costs from the Arrearag

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$105.03	$76.21	$109.17	$97.58	$91.94
19	2028	$116.24	$85.62	$123.52	$111.25	$102.57
20	2029	$124.58	$94.80	$133.25	$120.19	$110.46
21	2030	$122.60	$94.74	$134.05	$120.33	$112.11
22	2031	$91.18	$62.24	$98.23	$86.56	$77.61
23	2032	$91.59	$62.69	$101.18	$88.76	$78.66
24	2033	$94.37	$64.78	$105.93	$92.20	$81.48
25	2034	$97.67	$67.23	$111.73	$96.37	$85.10
26	2035	$100.88	$69.61	$117.19	$100.31	$88.72
27	2036	$103.89	$71.87	$122.18	$103.93	$91.89
28	2037	$105.88	$73.43	$125.79	$106.60	$94.03
29	2038	$105.71	$73.50	$124.51	$105.91	$93.75
30	2039	$105.75	$73.72	$123.70	$105.54	$93.69
31	2040	$106.63	$74.53	$124.94	$106.60	$94.61
32	2041	$108.42	$75.96	$128.36	$109.15	$96.57
33	2042	$110.35	$77.49	$132.12	$111.95	$98.70
34	2043	$112.33	$79.07	$135.99	$114.82	$100.88
35	2044	$113.85	$80.33	$138.70	$116.90	$102.53
36	2045	$115.14	$81.44	$140.84	$118.59	$103.91
37	2046	$117.49	$83.27	$145.51	$122.03	$106.50

PY Selection	PY19

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$107.73	$77.11	$115.01	$102.74	$94.06
20	2029	$118.32	$88.54	$126.99	$113.93	$104.20
21	2030	$125.70	$97.84	$137.15	$123.43	$115.21
22	2031	$123.95	$95.01	$131.00	$119.33	$110.38
23	2032	$91.59	$62.69	$101.18	$88.76	$78.66

24	**2033**	$94.37	$64.78	$105.93	$92.20	$81.48
25	**2034**	$97.67	$67.23	$111.73	$96.37	$85.10
26	**2035**	$100.88	$69.61	$117.19	$100.31	$88.72
27	**2036**	$103.89	$71.87	$122.18	$103.93	$91.89
28	**2037**	$105.88	$73.43	$125.79	$106.60	$94.03
29	**2038**	$105.71	$73.50	$124.51	$105.91	$93.75
30	**2039**	$105.75	$73.72	$123.70	$105.54	$93.69
31	**2040**	$106.63	$74.53	$124.94	$106.60	$94.61
32	**2041**	$108.42	$75.96	$128.36	$109.15	$96.57
33	**2042**	$110.35	$77.49	$132.12	$111.95	$98.70
34	**2043**	$112.33	$79.07	$135.99	$114.82	$100.88
35	**2044**	$113.85	$80.33	$138.70	$116.90	$102.53
36	**2045**	$115.14	$81.44	$140.84	$118.59	$103.91
37	**2046**	$117.49	$83.27	$145.51	$122.03	$106.50

PY Selection	PY20

		Penn Power Zone Summer ($/MWh)		**Penn Power Zone Winter ($/MWh)**		**Penn Power DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$109.25	$79.47	$117.92	$104.86	$95.13
21	**2030**	$119.08	$91.22	$130.53	$116.81	$108.59
22	**2031**	$127.23	$98.29	$134.28	$122.61	$113.66
23	**2032**	$126.42	$97.52	$136.01	$123.59	$113.49
24	**2033**	$94.37	$64.78	$105.93	$92.20	$81.48
25	**2034**	$97.67	$67.23	$111.73	$96.37	$85.10
26	**2035**	$100.88	$69.61	$117.19	$100.31	$88.72
27	**2036**	$103.89	$71.87	$122.18	$103.93	$91.89
28	**2037**	$105.88	$73.43	$125.79	$106.60	$94.03
29	**2038**	$105.71	$73.50	$124.51	$105.91	$93.75
30	**2039**	$105.75	$73.72	$123.70	$105.54	$93.69
31	**2040**	$106.63	$74.53	$124.94	$106.60	$94.61
32	**2041**	$108.42	$75.96	$128.36	$109.15	$96.57
33	**2042**	$110.35	$77.49	$132.12	$111.95	$98.70
34	**2043**	$112.33	$79.07	$135.99	$114.82	$100.88
35	**2044**	$113.85	$80.33	$138.70	$116.90	$102.53
36	**2045**	$115.14	$81.44	$140.84	$118.59	$103.91
37	**2046**	$117.49	$83.27	$145.51	$122.03	$106.50

PY Selection	PY21

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$109.49	$81.63	$120.94	$107.22	$99.00
22	2031	$120.23	$91.29	$127.28	$115.61	$106.66
23	2032	$129.90	$101.00	$139.49	$127.07	$116.97
24	2033	$130.51	$100.92	$142.07	$128.34	$117.62
25	2034	$97.67	$67.23	$111.73	$96.37	$85.10
26	2035	$100.88	$69.61	$117.19	$100.31	$88.72
27	2036	$103.89	$71.87	$122.18	$103.93	$91.89
28	2037	$105.88	$73.43	$125.79	$106.60	$94.03
29	2038	$105.71	$73.50	$124.51	$105.91	$93.75
30	2039	$105.75	$73.72	$123.70	$105.54	$93.69
31	2040	$106.63	$74.53	$124.94	$106.60	$94.61
32	2041	$108.42	$75.96	$128.36	$109.15	$96.57
33	2042	$110.35	$77.49	$132.12	$111.95	$98.70
34	2043	$112.33	$79.07	$135.99	$114.82	$100.88
35	2044	$113.85	$80.33	$138.70	$116.90	$102.53
36	2045	$115.14	$81.44	$140.84	$118.59	$103.91
37	2046	$117.49	$83.27	$145.51	$122.03	$106.50

PY Selection	PY22

		Penn Power Zone Summer ($/MWh)		Penn Power Zone Winter ($/MWh)		Penn Power DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$110.09	$81.15	$117.14	$105.47	$96.52

23	**2032**	$122.47	$93.57	$132.06	$119.64	$109.54
24	**2033**	$134.12	$104.53	$145.68	$131.95	$121.23
25	**2034**	$135.17	$104.73	$149.23	$133.87	$122.60
26	**2035**	$100.88	$69.61	$117.19	$100.31	$88.72
27	**2036**	$103.89	$71.87	$122.18	$103.93	$91.89
28	**2037**	$105.88	$73.43	$125.79	$106.60	$94.03
29	**2038**	$105.71	$73.50	$124.51	$105.91	$93.75
30	**2039**	$105.75	$73.72	$123.70	$105.54	$93.69
31	**2040**	$106.63	$74.53	$124.94	$106.60	$94.61
32	**2041**	$108.42	$75.96	$128.36	$109.15	$96.57
33	**2042**	$110.35	$77.49	$132.12	$111.95	$98.70
34	**2043**	$112.33	$79.07	$135.99	$114.82	$100.88
35	**2044**	$113.85	$80.33	$138.70	$116.90	$102.53
36	**2045**	$115.14	$81.44	$140.84	$118.59	$103.91
37	**2046**	$117.49	$83.27	$145.51	$122.03	$106.50

es Study and should only be applied for low income programs

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$79.84	$67.40	$67.40	$77.10	$0.00	$43.52	$16.27
$90.44	$33.46	$33.46	$78.69	$0.00	$45.52	$16.76
$97.33	$34.15	$34.15	$80.32	$0.00	$45.17	$19.33
$97.65	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$65.47	$27.64	$27.64	$83.69	$0.00	$45.98	$22.70
$66.36	$28.21	$28.21	$85.42	$0.00	$46.93	$23.17
$68.47	$28.80	$28.80	$87.19	$0.00	$47.91	$23.65
$71.14	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$73.81	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$76.18	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$77.84	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$77.83	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$77.98	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$78.82	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$80.37	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$82.04	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$83.75	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$85.10	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$86.27	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$88.27	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.93	$33.46	$33.46	$78.69	$0.00	$45.52	$16.76
$91.07	$34.15	$34.15	$80.32	$0.00	$45.17	$19.33
$100.75	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$98.24	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70
$66.36	$28.21	$28.21	$85.42	$0.00	$46.93	$23.17

$68.47	$28.80	$28.80	$87.19	$0.00	$47.91	$23.65
$71.14	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$73.81	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$76.18	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$77.84	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$77.83	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$77.98	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$78.82	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$80.37	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$82.04	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$83.75	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$85.10	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$86.27	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$88.27	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

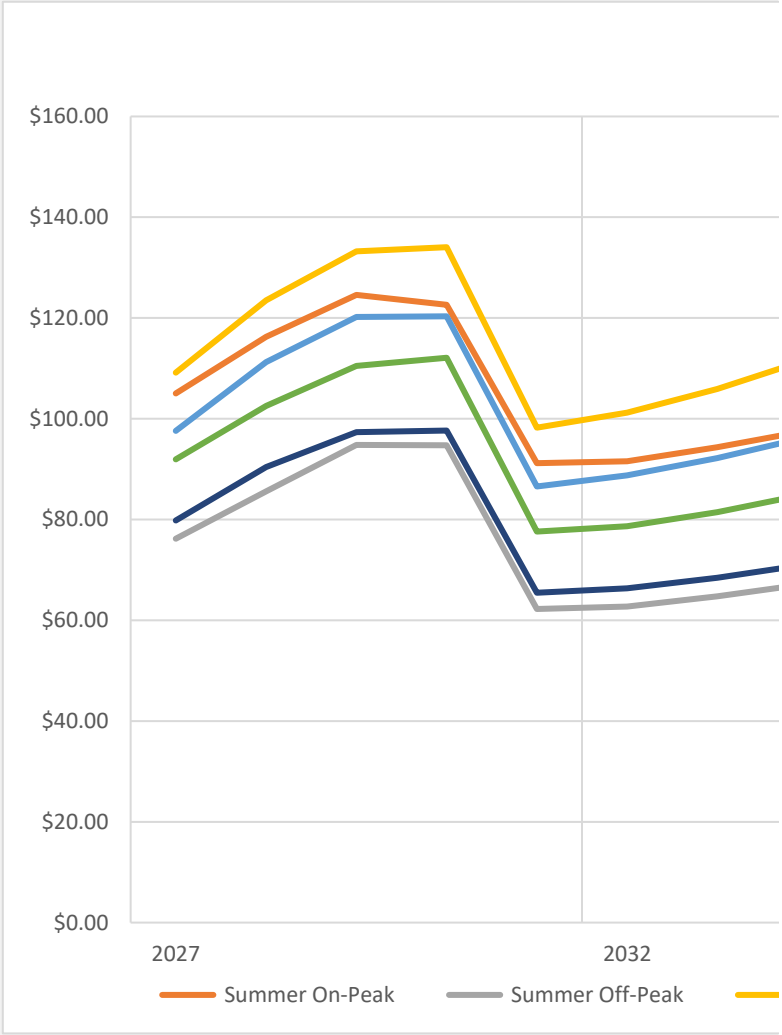
: Zone Shoulder Wh)	**Penn Power Generation Capacity ($/kW/year)**		**Penn Power Transmission Capacity ($/kW/year)**		**Penn Power Distribution Capacity ($/kW/year)**	
Shoulder Off-Peak	**Summer**	**Winter**	**Summer**	**Winter**	**Summer**	**Winter**
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$82.00	$34.15	$34.15	$80.32	$0.00	$45.17	$19.33
$94.13	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$101.52	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70
$101.19	$36.30	$36.30	$85.42	$0.00	$46.93	$23.17
$68.47	$28.80	$28.80	$87.19	$0.00	$47.91	$23.65
$71.14	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$73.81	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$76.18	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$77.84	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$77.83	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$77.98	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$78.82	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$80.37	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$82.04	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$83.75	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$85.10	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$86.27	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$88.27	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$84.54	$34.85	$34.85	$81.99	$0.00	$45.79	$20.57
$94.52	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70
$104.67	$36.30	$36.30	$85.42	$0.00	$46.93	$23.17
$104.61	$37.04	$37.04	$87.19	$0.00	$47.91	$23.65
$71.14	$29.40	$29.40	$88.99	$0.00	$48.90	$24.14
$73.81	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$76.18	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$77.84	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$77.83	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$77.98	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$78.82	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$80.37	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$82.04	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$83.75	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$85.10	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$86.27	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$88.27	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

: Zone Shoulder Wh)	Penn Power Generation Capacity ($/kW/year)		Penn Power Transmission Capacity ($/kW/year)		Penn Power Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$84.38	$35.57	$35.57	$83.69	$0.00	$45.98	$22.70

$97.24	$36.30	$36.30	$85.42	$0.00	$46.93	$23.17
$108.22	$37.04	$37.04	$87.19	$0.00	$47.91	$23.65
$108.64	$37.81	$37.81	$88.99	$0.00	$48.90	$24.14
$73.81	$30.00	$30.00	$90.84	$0.00	$49.91	$24.64
$76.18	$30.63	$30.63	$92.72	$0.00	$50.94	$25.15
$77.84	$31.26	$31.26	$94.64	$0.00	$52.00	$25.67
$77.83	$31.91	$31.91	$96.60	$0.00	$53.08	$26.20
$77.98	$32.57	$32.57	$98.60	$0.00	$54.18	$26.74
$78.82	$33.24	$33.24	$100.64	$0.00	$55.30	$27.30
$80.37	$33.93	$33.93	$102.73	$0.00	$56.44	$27.86
$82.04	$34.64	$34.64	$104.86	$0.00	$57.61	$28.44
$83.75	$35.35	$35.35	$107.03	$0.00	$58.81	$29.03
$85.10	$36.09	$36.09	$109.25	$0.00	$60.03	$29.63
$86.27	$36.83	$36.83	$111.51	$0.00	$61.27	$30.25
$88.27	$37.60	$37.60	$113.82	$0.00	$62.54	$30.87

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.75	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



Avoided Natural Gas Fuel Costs ($/MMBTU)	
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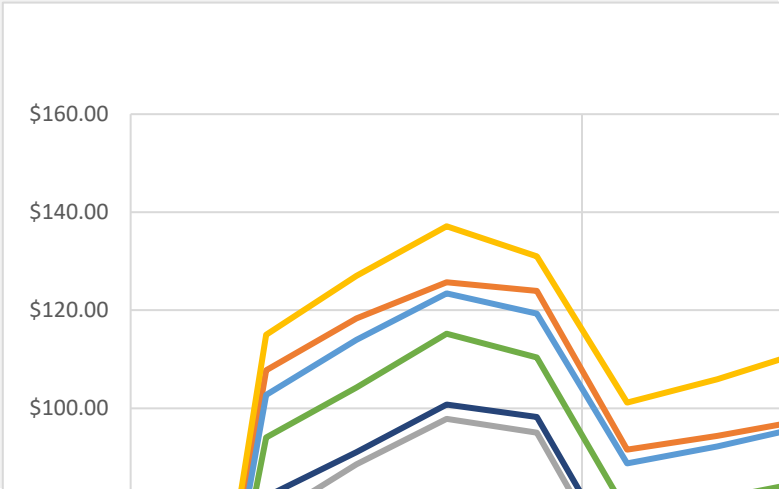
$3.56	
$3.42	
$3.37	Se
$3.43	



$3.68	Segment 2
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
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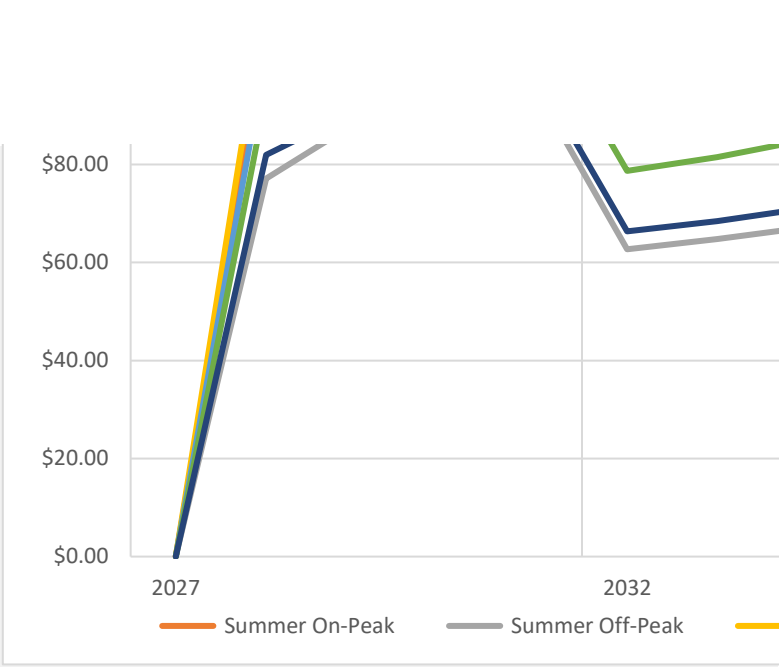
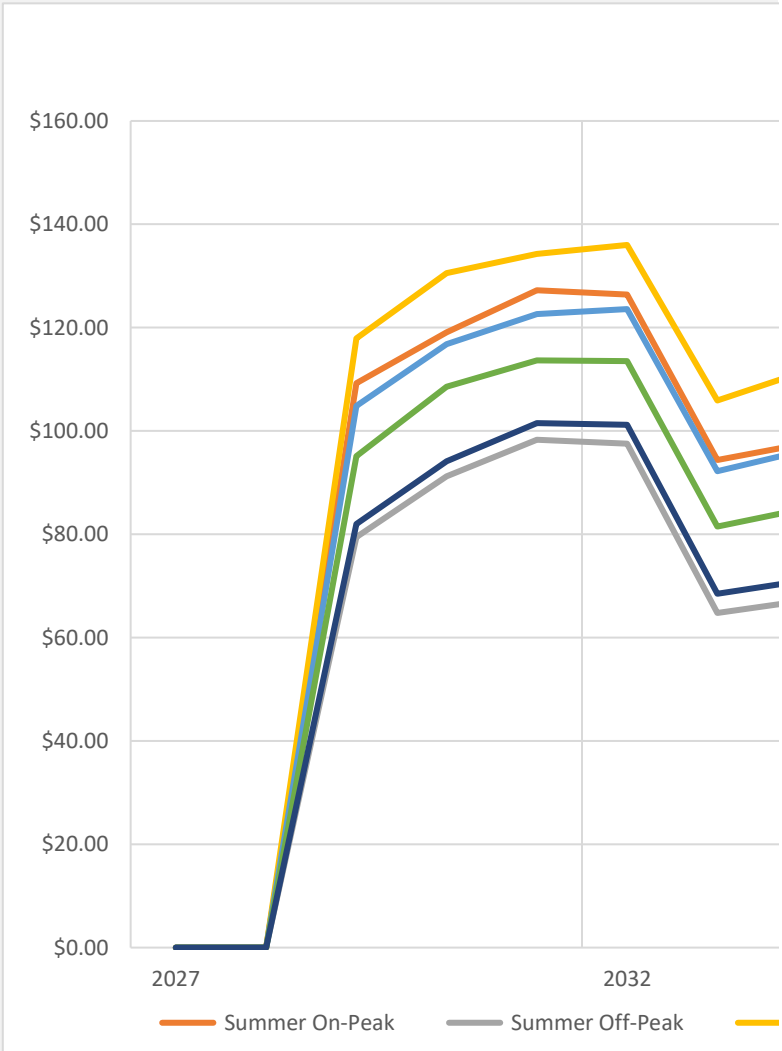
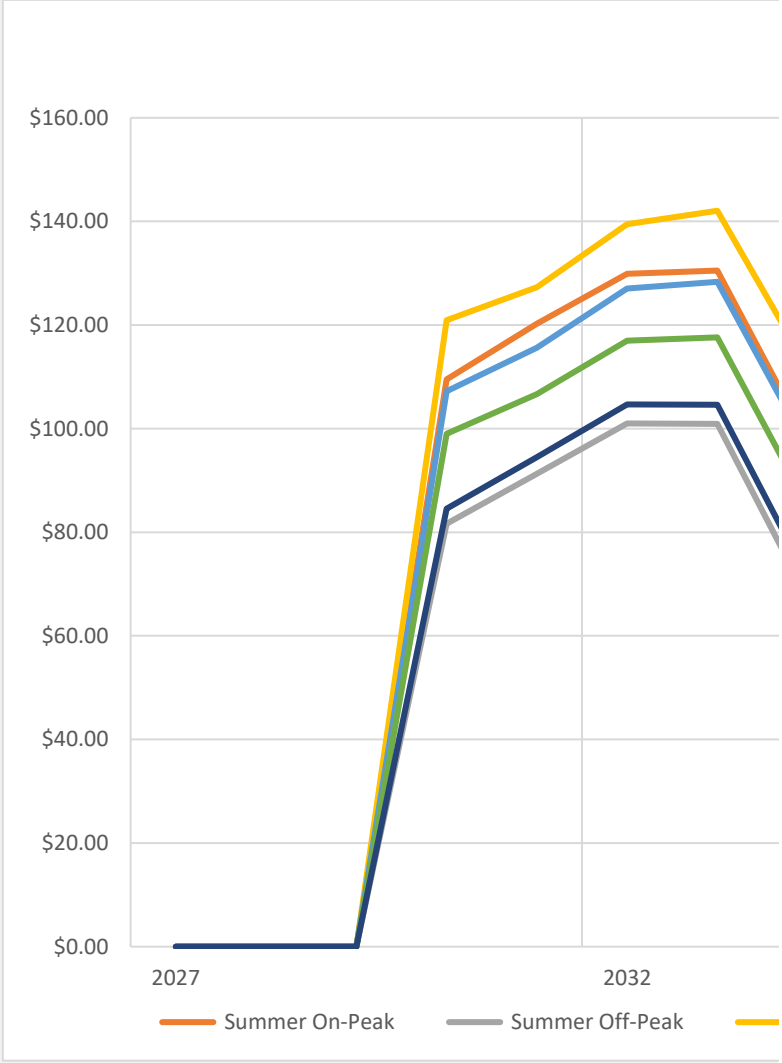
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



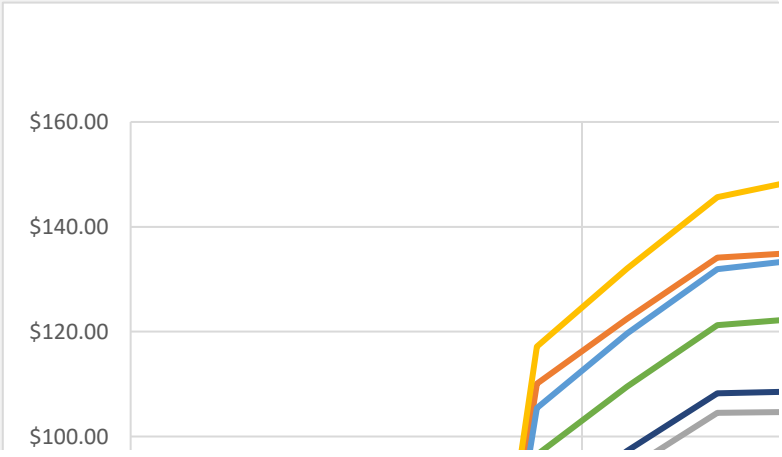
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



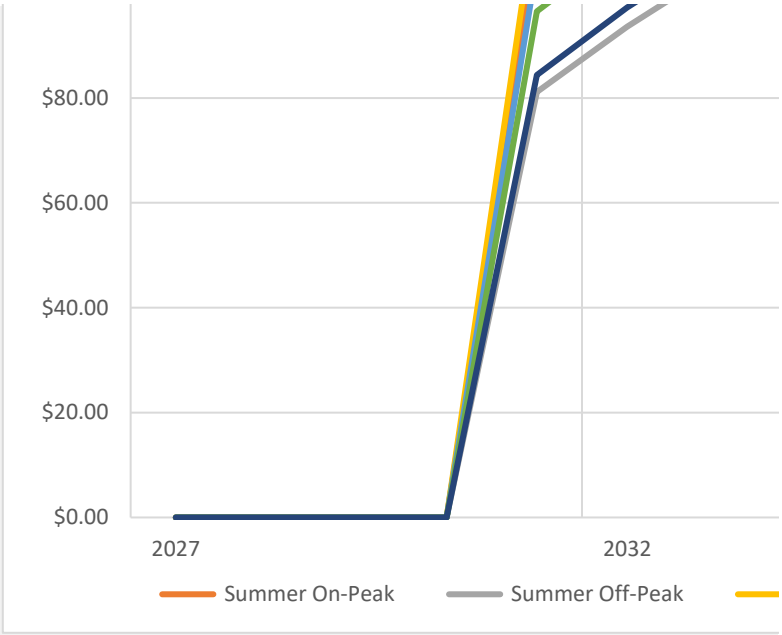
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



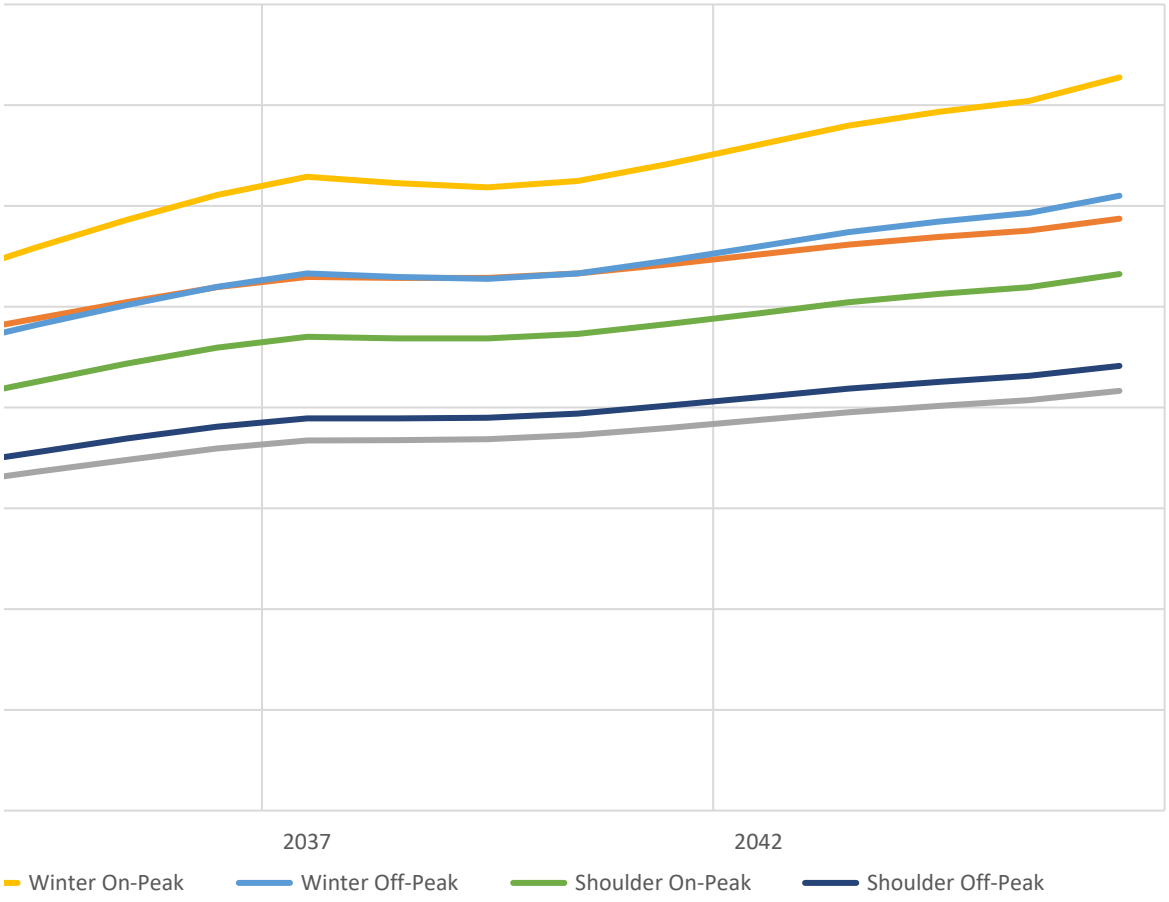
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.37	



$3.43	Segment 2
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



PY18 Avoided Energy Costs



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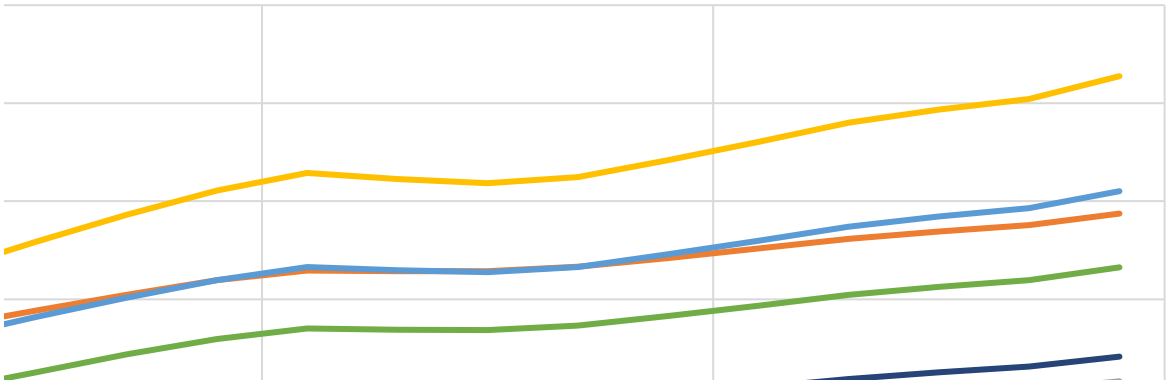

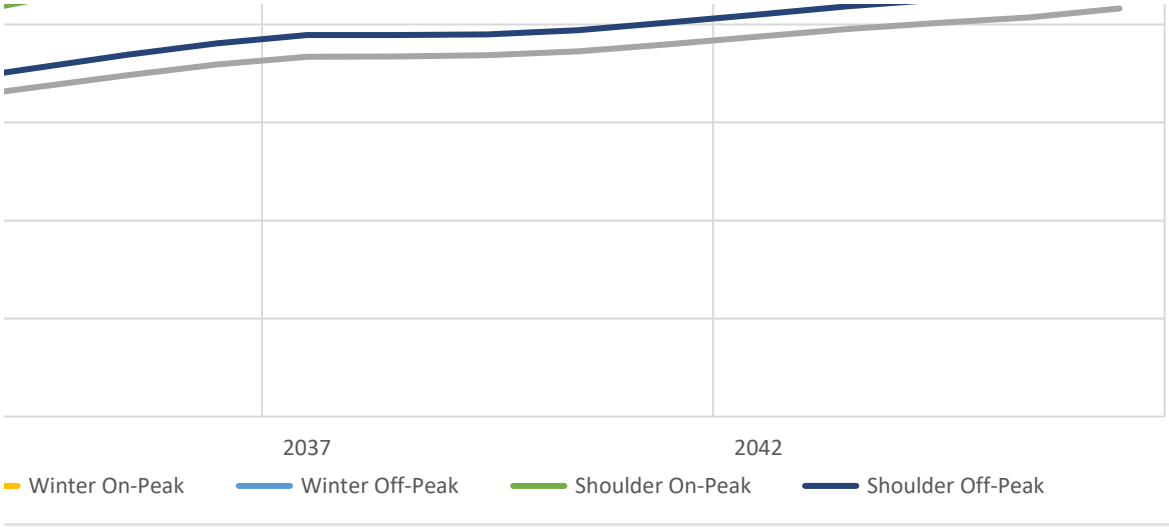

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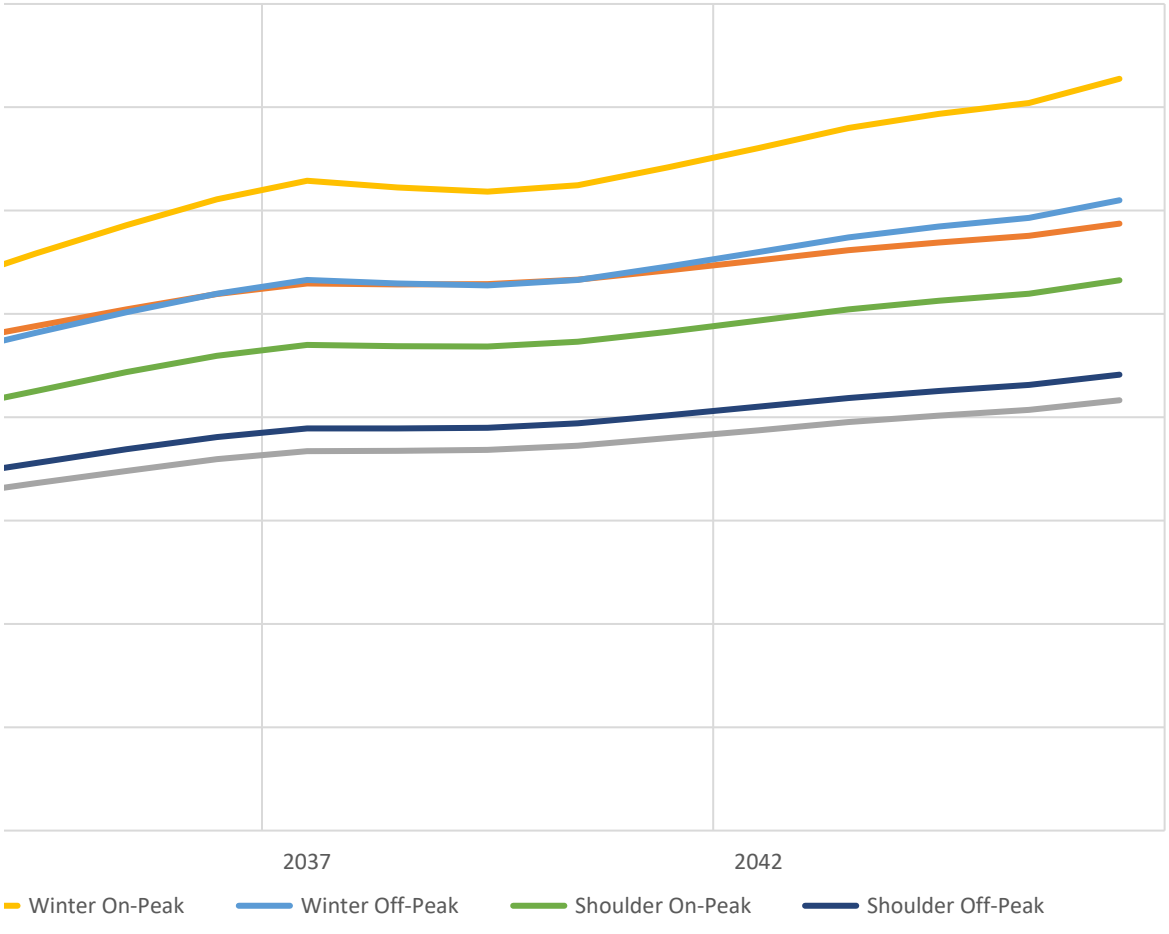

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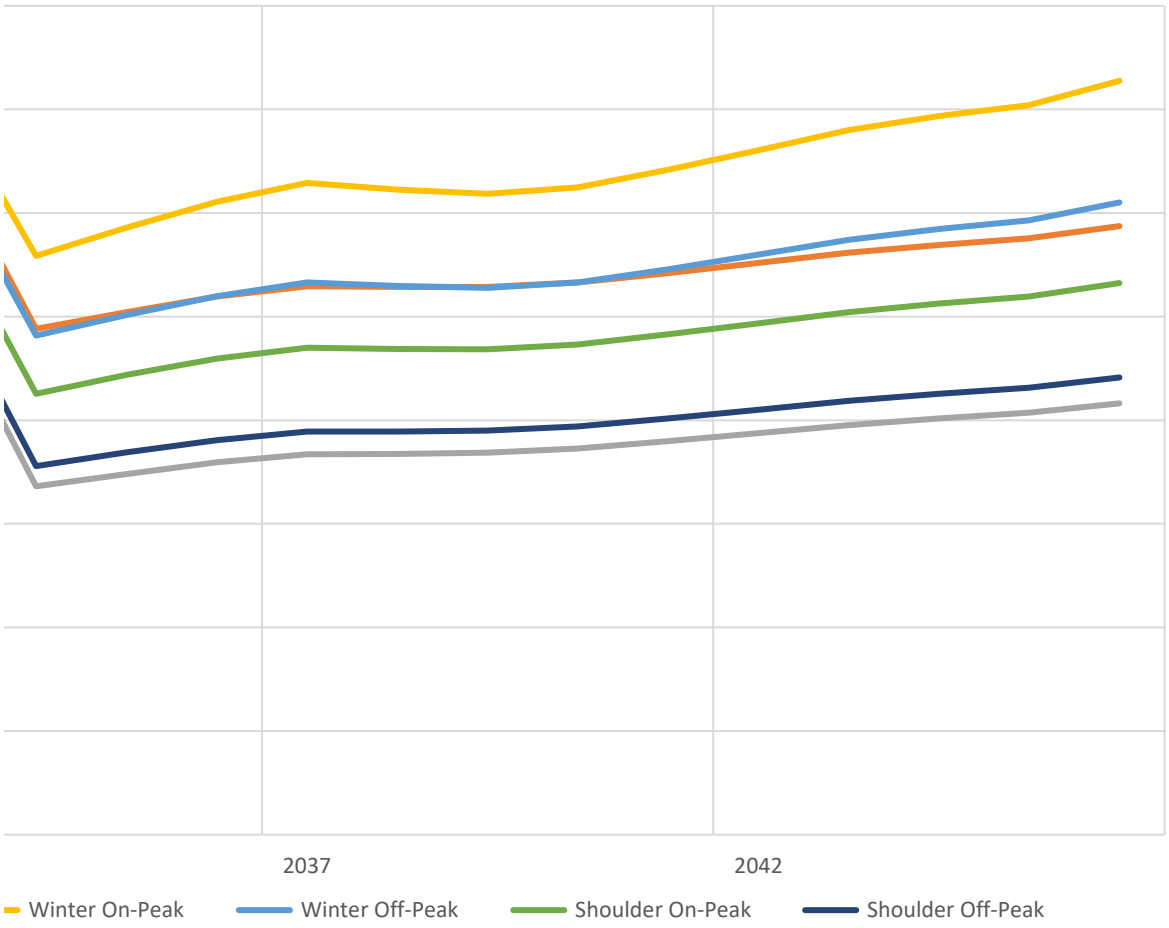
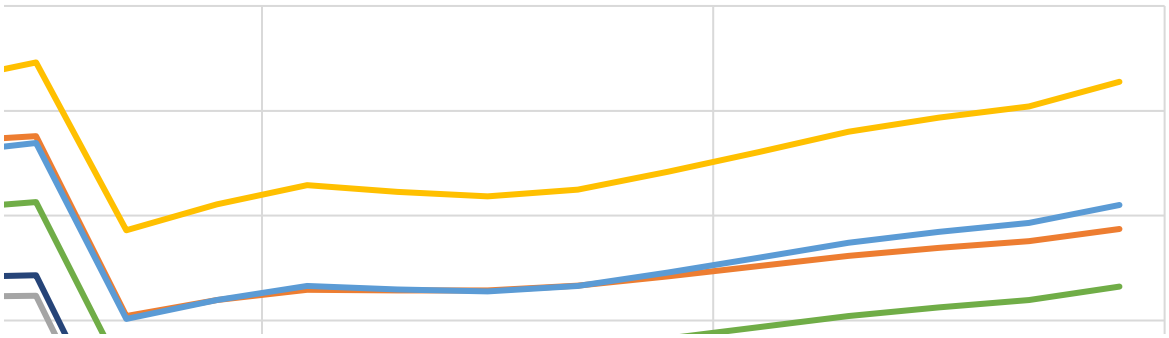
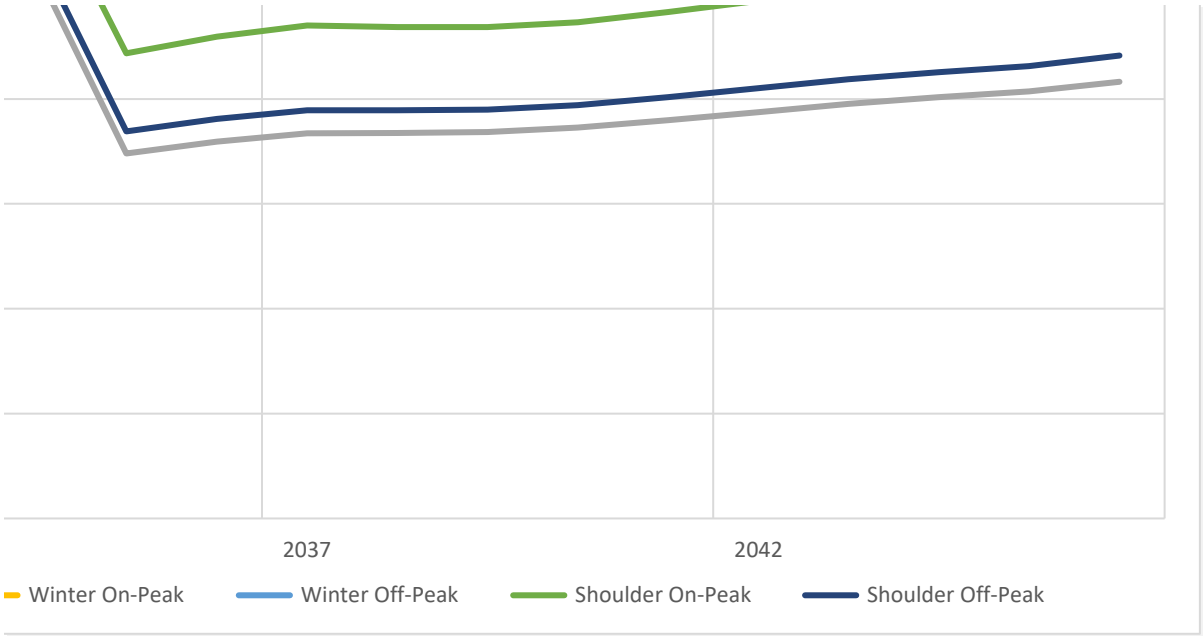


PY22 Avoided Energy Costs




2037
2042
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal $/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal S/MWh)	Penn Power Zone Adjusted On-Peak (Nominal $/MWh)	Penn Power Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	$71.02	$56.19	$71.35	$56.45
2	Feb-26	$55.25	$45.15	$55.50	$45.36
3	Mar-26	$48.43	$41.64	$48.66	$41.83
4	Apr-26	$48.50	$41.09	$48.73	$41.28
5	May-26	$45.09	$26.67	$45.29	$26.80
6	Jun-26	$81.13	$33.97	$81.51	$34.13
7	Jul-26	$76.91	$37.46	$77.27	$37.64
8	Aug-26	$51.05	$30.44	$51.29	$30.58
9	Sep-26	$48.05	$29.10	$48.27	$29.23
10	Oct-26	$47.70	$32.60	$47.92	$32.75
11	Nov-26	$47.70	$37.00	$47.92	$37.17
12	Dec-26	$56.15	$46.20	$56.41	$46.41
13	Jan-27	$78.95	$65.15	$79.31	$65.45
14	Feb-27	$66.75	$55.85	$67.06	$56.11
15	Mar-27	$50.55	$41.60	$50.78	$41.79
16	Apr-27	$51.00	$38.70	$51.24	$38.88
17	May-27	$51.50	$33.55	$51.74	$33.71
18	Jun-27	$57.90	$34.00	$58.17	$34.16
19	Jul-27	$85.00	$43.00	$85.39	$43.20
20	Aug-27	$74.35	$37.05	$74.69	$37.22
21	Sep-27	$56.30	$34.05	$56.56	$34.21
22	Oct-27	$53.90	$37.45	$54.15	$37.62
23	Nov-27	$52.50	$42.00	$52.74	$42.19
24	Dec-27	$61.70	$51.80	$61.99	$52.04
25	Jan-28	$85.55	$70.45	$85.95	$70.78
26	Feb-28	$72.95	$61.75	$73.29	$62.04
27	Mar-28	$51.95	$43.00	$52.19	$43.20
28	Apr-28	$51.25	$39.30	$51.49	$39.48
29	May-28	$51.65	$33.35	$51.89	$33.50
30	Jun-28	$58.20	$33.55	$58.47	$33.71
31	Jul-28	$87.45	$41.70	$87.85	$41.89
32	Aug-28	$76.30	$38.30	$76.65	$38.48
33	Sep-28	$56.75	$31.05	$57.01	$31.19
34	Oct-28	$53.85	$36.80	$54.10	$36.97
35	Nov-28	$52.80	$42.45	$53.04	$42.65
36	Dec-28	$61.45	$51.10	$61.73	$51.34
37	Jan-29	$82.50	$70.65	$82.88	$70.98
38	Feb-29	$76.50	$64.05	$76.85	$64.35
39	Mar-29	$51.95	$42.40	$52.19	$42.60
40	Apr-29	$50.70	$37.35	$50.93	$37.52
41	May-29	$51.45	$34.90	$51.69	$35.06
42	Jun-29	$57.15	$34.15	$57.41	$34.31
43	Jul-29	$88.20	$40.90	$88.61	$41.09
44	Aug-29	$77.45	$37.60	$77.81	$37.77
45	Sep-29	$55.95	$34.45	$56.21	$34.61
46	Oct-29	$51.05	$35.35	$51.29	$35.51
47	Nov-29	$54.25	$40.55	$54.50	$40.74
48	Dec-29	$65.00	$50.30	$65.30	$50.53
49	Jan-30	$83.20	$69.15	$83.58	$69.47

50	Feb-30	$76.75	$62.70	$77.10	$62.99
51	Mar-30	$55.80	$46.20	$56.06	$46.41
52	Apr-30	$52.90	$37.15	$53.14	$37.32
53	May-30	$54.80	$35.60	$55.05	$35.76
54	Jun-30	$59.00	$34.75	$59.27	$34.91
55	Jul-30	$82.15	$41.75	$82.53	$41.94
56	Aug-30	$70.85	$38.40	$71.18	$38.58
57	Sep-30	$57.25	$34.85	$57.51	$35.01
58	Oct-30	$52.50	$35.55	$52.74	$35.71
59	Nov-30	$56.25	$41.00	$56.51	$41.19
60	Dec-30	$68.65	$55.80	$68.97	$56.06
End of Segment I					

Real-Time, Load-Weighted LMPs ($/MWh)

Zone	EDC	2020	2021	2022	2023	2024
	Western Hub	$ 20.92	$ 38.88	$ 74.25	$ 31.78	$ 33.24
#REF!	Penn Power	$ 22.55	$ 39.47	$ 74.96	$ 31.05	$ 31.96

Source: PJM State of the Market Report, Tables in chapter 11

Basis Factor
100%

Natural Gas Futures

Status	*Data Needed: TRC Order Section*
Complete	NYMEX Natural Gas Futures at Henry Hub: B.2.b.i Page 15
Complete	EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars: B.2.b.iii Page 16

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal $/MMBTU)	NYMEX: Penn Power Natural Gas Price (Nominal $/MMBTU)	EIA AEO Gas Prices (Nominal $/MMBTU)
1	Jan-26	Jan	2026	$4.15	$6.73	$6.06
2	Feb-26	Feb	2026	$3.92	$5.97	$5.33
3	Mar-26	Mar	2026	$3.54	$3.33	$2.91
4	Apr-26	Apr	2026	$3.41	$3.03	$2.39
5	May-26	May	2026	$3.44	$2.76	$2.11
6	Jun-26	Jun	2026	$3.61	$2.81	$2.13
7	Jul-26	Jul	2026	$3.81	$2.96	$2.23
8	Aug-26	Aug	2026	$3.88	$3.00	$2.27
9	Sep-26	Sep	2026	$3.84	$2.59	$1.94
10	Oct-26	Oct	2026	$3.88	$2.61	$1.97
11	Nov-26	Nov	2026	$4.10	$3.33	$2.57
12	Dec-26	Dec	2026	$4.50	$5.24	$4.20
13	Jan-27	Jan	2027	$4.75	$7.32	$5.86
14	Feb-27	Feb	2027	$4.38	$6.42	$5.16
15	Mar-27	Mar	2027	$3.80	$3.59	$2.81
16	Apr-27	Apr	2027	$3.42	$3.04	$2.31
17	May-27	May	2027	$3.39	$2.72	$2.05
18	Jun-27	Jun	2027	$3.54	$2.74	$2.06
19	Jul-27	Jul	2027	$3.72	$2.87	$2.16
20	Aug-27	Aug	2027	$3.78	$2.90	$2.19
21	Sep-27	Sep	2027	$3.75	$2.50	$1.87
22	Oct-27	Oct	2027	$3.80	$2.53	$1.91
23	Nov-27	Nov	2027	$4.01	$3.25	$2.49
24	Dec-27	Dec	2027	$4.44	$5.17	$4.06
25	Jan-28	Jan	2028	$4.73	$7.31	$5.84
26	Feb-28	Feb	2028	$4.39	$6.44	$5.14
27	Mar-28	Mar	2028	$3.77	$3.56	$2.80
28	Apr-28	Apr	2028	$3.30	$2.92	$2.30
29	May-28	May	2028	$3.27	$2.59	$2.04
30	Jun-28	Jun	2028	$3.42	$2.62	$2.06
31	Jul-28	Jul	2028	$3.60	$2.74	$2.15
32	Aug-28	Aug	2028	$3.66	$2.79	$2.18
33	Sep-28	Sep	2028	$3.65	$2.40	$1.87
34	Oct-28	Oct	2028	$3.72	$2.44	$1.90
35	Nov-28	Nov	2028	$3.96	$3.19	$2.48
36	Dec-28	Dec	2028	$4.41	$5.15	$4.05
37	Jan-29	Jan	2029	$4.68	$7.25	$6.11
38	Feb-29	Feb	2029	$4.33	$6.38	$5.38
39	Mar-29	Mar	2029	$3.64	$3.43	$2.93
40	Apr-29	Apr	2029	$3.18	$2.80	$2.41
41	May-29	May	2029	$3.15	$2.48	$2.13
42	Jun-29	Jun	2029	$3.30	$2.50	$2.15

43	Jul-29	Jul	2029	$3.47	$2.62	$2.25
44	Aug-29	Aug	2029	$3.54	$2.67	$2.29
45	Sep-29	Sep	2029	$3.54	$2.29	$1.95
46	Oct-29	Oct	2029	$3.61	$2.34	$1.99
47	Nov-29	Nov	2029	$3.80	$3.03	$2.60
48	Dec-29	Dec	2029	$4.24	$4.98	$4.24
49	Jan-30	Jan	2030	$4.51	$7.13	$6.54
50	Feb-30	Feb	2030	$4.22	$6.31	$5.76
51	Mar-30	Mar	2030	$3.57	$3.35	$3.14
52	Apr-30	Apr	2030	$3.07	$2.68	$2.58
53	May-30	May	2030	$3.04	$2.34	$2.28
54	Jun-30	Jun	2030	$3.17	$2.35	$2.30
55	Jul-30	Jul	2030	$3.32	$2.45	$2.41
56	Aug-30	Aug	2030	$3.39	$2.49	$2.45
57	Sep-30	Sep	2030	$3.37	$2.09	$2.09
58	Oct-30	Oct	2030	$3.44	$2.14	$2.13
59	Nov-30	Nov	2030	$3.63	$2.85	$2.78
60	Dec-30	Dec	2030	$4.06	$4.82	$4.54
61	Jan-31	Jan	2031	$4.33	$7.01	$6.89
62	Feb-31	Feb	2031	$4.06	$6.19	$6.07
63	Mar-31	Mar	2031	$3.43	$3.21	$3.31
64	Apr-31	Apr	2031	$3.03	$2.64	$2.72
65	May-31	May	2031	$3.05	$2.34	$2.41
66	Jun-31	Jun	2031	$3.19	$2.35	$2.43
67	Jul-31	Jul	2031	$3.33	$2.44	$2.54
68	Aug-31	Aug	2031	$3.36	$2.45	$2.58
69	Sep-31	Sep	2031	$3.33	$2.02	$2.20
70	Oct-31	Oct	2031	$3.39	$2.06	$2.25
71	Nov-31	Nov	2031	$3.58	$2.79	$2.93
72	Dec-31	Dec	2031	$4.03	$4.80	$4.78
73	Jan-32	Jan	2032	$4.30	$7.03	$7.91
74	Feb-32	Feb	2032	$4.03	$6.20	$6.96
75	Mar-32	Mar	2032	$3.36	$3.14	$3.80
76	Apr-32	Apr	2032	$2.88	$2.48	$3.12
77	May-32	May	2032	$2.86	$2.14	$2.76
78	Jun-32	Jun	2032	$3.01	$2.16	$2.78
79	Jul-32	Jul	2032	$3.17	$2.27	$2.91
80	Aug-32	Aug	2032	$3.21	$2.27	$2.96
81	Sep-32	Sep	2032	$3.18	$1.85	$2.53
82	Oct-32	Oct	2032	$3.26	$1.90	$2.58
83	Nov-32	Nov	2032	$3.49	$2.67	$3.36
84	Dec-32	Dec	2032	$3.92	$4.70	$5.48
85	Jan-33	Jan	2033	$4.17	$6.95	$8.72
86	Feb-33	Feb	2033	$3.90	$6.11	$7.68
87	Mar-33	Mar	2033	$3.28	$3.05	$4.18
88	Apr-33	Apr	2033	$2.83	$2.42	$3.43
89	May-33	May	2033	$2.86	$2.13	$3.04
90	Jun-33	Jun	2033	$3.00	$2.13	$3.07
91	Jul-33	Jul	2033	$3.17	$2.24	$3.21
92	Aug-33	Aug	2033	$3.21	$2.26	$3.26
93	Sep-33	Sep	2033	$3.18	$1.83	$2.79
94	Oct-33	Oct	2033	$3.23	$1.85	$2.84
95	Nov-33	Nov	2033	$3.49	$2.66	$3.71
96	Dec-33	Dec	2033	$3.89	$4.69	$6.05
97	Jan-34	Jan	2034	$4.14	$6.98	$9.18

98	Feb-34	Feb	2034	$3.90	$6.16	$8.09
99	Mar-34	Mar	2034	$3.30	$3.07	$4.41
100	Apr-34	Apr	2034	$2.90	$2.48	$3.62
101	May-34	May	2034	$2.93	$2.18	$3.21
102	Jun-34	Jun	2034	$3.06	$2.18	$3.23
103	Jul-34	Jul	2034	$3.21	$2.27	$3.38
104	Aug-34	Aug	2034	$3.25	$2.28	$3.43
105	Sep-34	Sep	2034	$3.26	$1.88	$2.94
106	Oct-34	Oct	2034	$3.31	$1.90	$2.99
107	Nov-34	Nov	2034	$3.55	$2.71	$3.90
108	Dec-34	Dec	2034	$3.95	$4.76	$6.37
109	Jan-35	Jan	2035	$4.17	$7.07	$9.45
110	Feb-35	Feb	2035	$3.93	$6.23	$8.33
111	Mar-35	Mar	2035	$3.50	$3.26	$4.54
112	Apr-35	Apr	2035	$3.17	$2.74	$3.73
113	May-35	May	2035	$3.15	$2.38	$3.30
114	Jun-35	Jun	2035	$3.18	$2.28	$3.33
115	Jul-35	Jul	2035	$3.22	$2.26	$3.48
116	Aug-35	Aug	2035	$3.26	$2.27	$3.54
117	Sep-35	Sep	2035	$3.28	$1.87	$3.02
118	Oct-35	Oct	2035	$3.32	$1.89	$3.08
119	Nov-35	Nov	2035	$3.52	$2.66	$4.02
120	Dec-35	Dec	2035	$3.82	$4.65	$6.56
121	Jan-36	Jan	2036	$4.09	$7.05	$9.59
122	Feb-36	Feb	2036	$3.92	$6.27	$8.45
123	Mar-36	Mar	2036	$3.65	$3.41	$4.60
124	Apr-36	Apr	2036	$3.32	$2.89	$3.78
125	May-36	May	2036	$3.30	$2.52	$3.35
126	Jun-36	Jun	2036	$3.34	$2.42	$3.38
127	Jul-36	Jul	2036	$3.38	$2.40	$3.53
128	Aug-36	Aug	2036	$3.42	$2.41	$3.59
129	Sep-36	Sep	2036	$3.43	$2.00	$3.07
130	Oct-36	Oct	2036	$3.48	$2.01	$3.12
131	Nov-36	Nov	2036	$3.55	$2.67	$4.08
132	Dec-36	Dec	2036	$3.70	$4.55	$6.65
133	Jan-37	Jan	2037	$3.93	$6.94	$9.53
134	Feb-37	Feb	2037	$3.78	$6.18	$8.39
135	Mar-37	Mar	2037	$3.58	$3.33	$4.57
136	Apr-37	Apr	2037	$3.25	$2.80	$3.76
137	May-37	May	2037	$3.23	$2.43	$3.33
138	Jun-37	Jun	2037	$3.26	$2.32	$3.36
139	Jul-37	Jul	2037	$3.30	$2.30	$3.51
140	Aug-37	Aug	2037	$3.34	$2.31	$3.56
141	Sep-37	Sep	2037	$3.36	$1.89	$3.05
142	Oct-37	Oct	2037	$3.40	$1.91	$3.10
143	Nov-37	Nov	2037	$3.48	$2.58	$4.05
144	Dec-37	Dec	2037	$3.52	$4.38	$6.61
145	Jan-38	Jan	2038			$9.33
146	Feb-38	Feb	2038			$8.22
147	Mar-38	Mar	2038			$4.48
148	Apr-38	Apr	2038			$3.68
149	May-38	May	2038			$3.26
150	Jun-38	Jun	2038			$3.29
151	Jul-38	Jul	2038			$3.44
152	Aug-38	Aug	2038			$3.49

153	Sep-38	Sep	2038		$2.98
154	Oct-38	Oct	2038		$3.04
155	Nov-38	Nov	2038		$3.97
156	Dec-38	Dec	2038		$6.47
157	Jan-39	Jan	2039		$9.18
158	Feb-39	Feb	2039		$8.08
159	Mar-39	Mar	2039		$4.41
160	Apr-39	Apr	2039		$3.62
161	May-39	May	2039		$3.20
162	Jun-39	Jun	2039		$3.23
163	Jul-39	Jul	2039		$3.38
164	Aug-39	Aug	2039		$3.43
165	Sep-39	Sep	2039		$2.93
166	Oct-39	Oct	2039		$2.99
167	Nov-39	Nov	2039		$3.90
168	Dec-39	Dec	2039		$6.37
169	Jan-40	Jan	2040		$9.24
170	Feb-40	Feb	2040		$8.14
171	Mar-40	Mar	2040		$4.44
172	Apr-40	Apr	2040		$3.64
173	May-40	May	2040		$3.23
174	Jun-40	Jun	2040		$3.26
175	Jul-40	Jul	2040		$3.40
176	Aug-40	Aug	2040		$3.46
177	Sep-40	Sep	2040		$2.96
178	Oct-40	Oct	2040		$3.01
179	Nov-40	Nov	2040		$3.93
180	Dec-40	Dec	2040		$6.41
181	Jan-41	Jan	2041		$9.54
182	Feb-41	Feb	2041		$8.40
183	Mar-41	Mar	2041		$4.58
184	Apr-41	Apr	2041		$3.76
185	May-41	May	2041		$3.33
186	Jun-41	Jun	2041		$3.36
187	Jul-41	Jul	2041		$3.51
188	Aug-41	Aug	2041		$3.57
189	Sep-41	Sep	2041		$3.05
190	Oct-41	Oct	2041		$3.11
191	Nov-41	Nov	2041		$4.05
192	Dec-41	Dec	2041		$6.61
193	Jan-42	Jan	2042		$9.86
194	Feb-42	Feb	2042		$8.69
195	Mar-42	Mar	2042		$4.73
196	Apr-42	Apr	2042		$3.89
197	May-42	May	2042		$3.44
198	Jun-42	Jun	2042		$3.47
199	Jul-42	Jul	2042		$3.63
200	Aug-42	Aug	2042		$3.69
201	Sep-42	Sep	2042		$3.15
202	Oct-42	Oct	2042		$3.21
203	Nov-42	Nov	2042		$4.19
204	Dec-42	Dec	2042		$6.84
205	Jan-43	Jan	2043		$10.20
206	Feb-43	Feb	2043		$8.98
207	Mar-43	Mar	2043		$4.90

208	Apr-43	Apr	2043		$4.02
209	May-43	May	2043		$3.56
210	Jun-43	Jun	2043		$3.59
211	Jul-43	Jul	2043		$3.76
212	Aug-43	Aug	2043		$3.81
213	Sep-43	Sep	2043		$3.26
214	Oct-43	Oct	2043		$3.32
215	Nov-43	Nov	2043		$4.34
216	Dec-43	Dec	2043		$7.07
217	Jan-44	Jan	2044		$10.41
218	Feb-44	Feb	2044		$9.17
219	Mar-44	Mar	2044		$5.00
220	Apr-44	Apr	2044		$4.10
221	May-44	May	2044		$3.64
222	Jun-44	Jun	2044		$3.67
223	Jul-44	Jul	2044		$3.84
224	Aug-44	Aug	2044		$3.89
225	Sep-44	Sep	2044		$3.33
226	Oct-44	Oct	2044		$3.39
227	Nov-44	Nov	2044		$4.43
228	Dec-44	Dec	2044		$7.22
229	Jan-45	Jan	2045		$10.57
230	Feb-45	Feb	2045		$9.31
231	Mar-45	Mar	2045		$5.07
232	Apr-45	Apr	2045		$4.16
233	May-45	May	2045		$3.69
234	Jun-45	Jun	2045		$3.72
235	Jul-45	Jul	2045		$3.89
236	Aug-45	Aug	2045		$3.95
237	Sep-45	Sep	2045		$3.38
238	Oct-45	Oct	2045		$3.44
239	Nov-45	Nov	2045		$4.49
240	Dec-45	Dec	2045		$7.33
241	Jan-46	Jan	2046		$10.98
242	Feb-46	Feb	2046		$9.68
243	Mar-46	Mar	2046		$5.27
244	Apr-46	Apr	2046		$4.33
245	May-46	May	2046		$3.84
246	Jun-46	Jun	2046		$3.87
247	Jul-46	Jul	2046		$4.05
248	Aug-46	Aug	2046		$4.11
249	Sep-46	Sep	2046		$3.51
250	Oct-46	Oct	2046		$3.58
251	Nov-46	Nov	2046		$4.67
252	Dec-46	Dec	2046		$7.62
253	Jan-47	Jan	2047		$0.00
254	Feb-47	Feb	2047		$0.00
255	Mar-47	Mar	2047		$0.00
256	Apr-47	Apr	2047		$0.00
257	May-47	May	2047		$0.00
258	Jun-47	Jun	2047		$0.00
259	Jul-47	Jul	2047		$0.00
260	Aug-47	Aug	2047		$0.00
261	Sep-47	Sep	2047		$0.00
262	Oct-47	Oct	2047		$0.00

263	Nov-47	Nov	2047	$0.00
264	Dec-47	Dec	2047	$0.00

Penn Power Natural Gas Price (Nominal $/MMBTU)
$6.73
$5.97
$3.33
$3.03
$2.76
$2.81
$2.96
$3.00
$2.59
$2.61
$3.33
$5.24
$7.32
$6.42
$3.59
$3.04
$2.72
$2.74
$2.87
$2.90
$2.50
$2.53
$3.25
$5.17
$7.31
$6.44
$3.56
$2.92
$2.59
$2.62
$2.74
$2.79
$2.40
$2.44
$3.19
$5.15
$7.25
$6.38
$3.43
$2.80
$2.48
$2.50

EIA AEO Mid-Atlantic Data
(Electric Power, Natural Gas 2024 Dollars)
[$/MMBTU]

	3	4	5	6	7
Year	**2025**	**2026**	**2027**	**2028**	**2029**
Real	$2.7247	$2.7802	$2.6369	$2.5768	$2.6437
Nominal	$2.89	$3.01	$2.91	$2.90	$3.04

$2.62
$2.67
$2.29
$2.34
$3.03
$4.98
$7.13
$6.31
$3.35
$2.68
$2.34
$2.35
$2.45
$2.49
$2.09
$2.14
$2.85
$4.82
$6.99
$6.18
$3.22
$2.65
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$2.46
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$4.92
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$2.27
$3.11
$5.27
$8.24

$7.26
$3.83
$3.13
$2.77
$2.78
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$5.68
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$4.17
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$3.04
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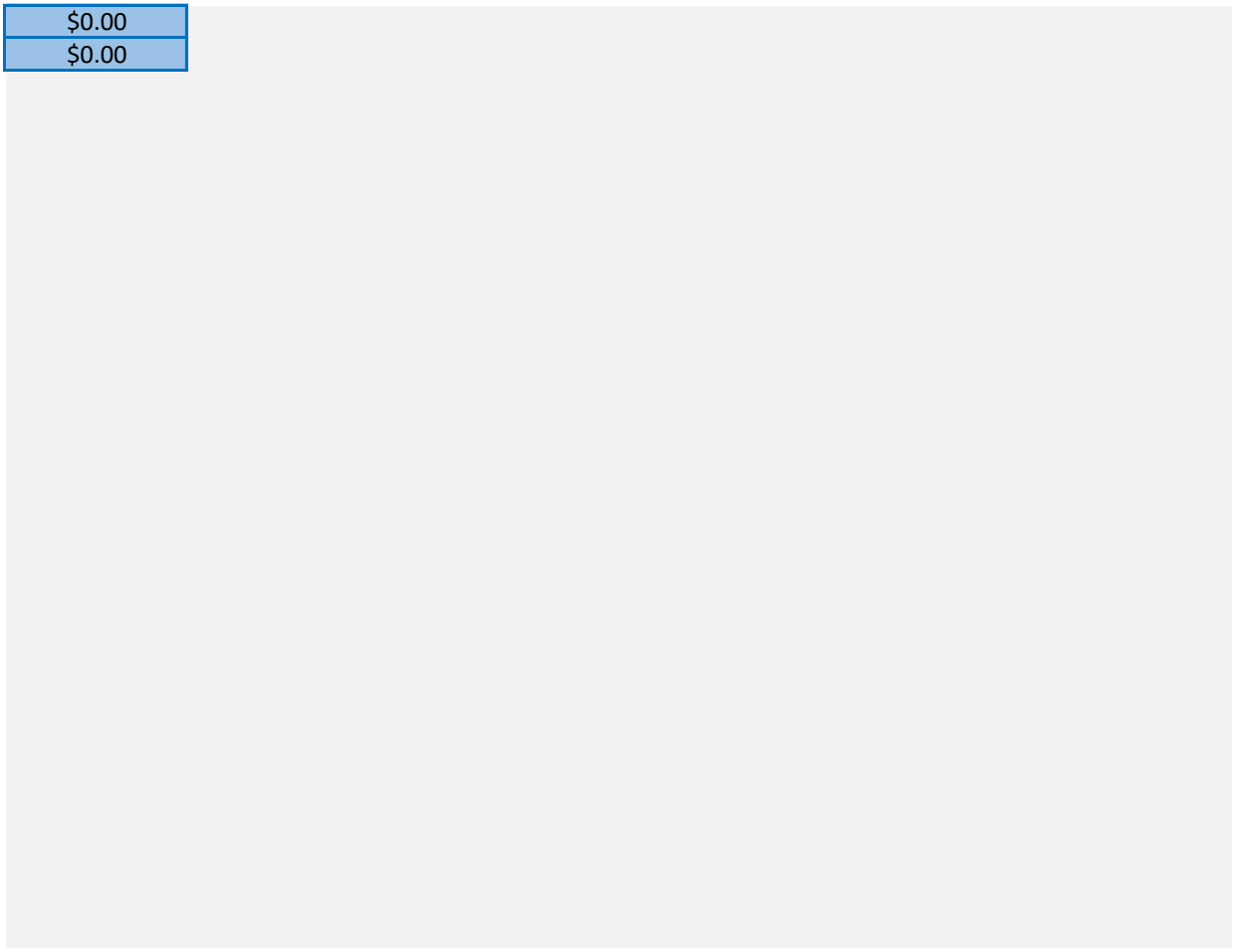

8	9	10	11	12	13	14	15	16
2030	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**
$2.7737	$2.8665	$3.2230	$3.4834	$3.5980	$3.6316	$3.6108	$3.5182	$3.3769
$3.25	$3.43	$3.93	$4.33	$4.56	$4.70	$4.76	$4.73	$4.64

17	18	19	20	21	22	23	24
2039	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**	**2046**
$3.2569	$3.2155	$3.2524	$3.2982	$3.3440	$3.3472	$3.3295	$3.3936
$4.56	$4.59	$4.74	$4.90	$5.07	$5.17	$5.25	$5.46

Record Field	Period	Month	Year	Season	Penn Power Zone Adjusted On-Peak (Nominal $/MWh)	Penn Power Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	Jan	2026	Winter	$71.35	$56.45
2	Feb-26	Feb	2026	Winter	$55.50	$45.36
3	Mar-26	Mar	2026	Shoulder	$48.66	$41.83
4	Apr-26	Apr	2026	Shoulder	$48.73	$41.28
5	May-26	May	2026	Summer	$45.29	$26.80
6	Jun-26	Jun	2026	Summer	$81.51	$34.13
7	Jul-26	Jul	2026	Summer	$77.27	$37.64
8	Aug-26	Aug	2026	Summer	$51.29	$30.58
9	Sep-26	Sep	2026	Summer	$48.27	$29.23
10	Oct-26	Oct	2026	Shoulder	$47.92	$32.75
11	Nov-26	Nov	2026	Shoulder	$47.92	$37.17
12	Dec-26	Dec	2026	Winter	$56.41	$46.41
13	Jan-27	Jan	2027	Winter	$79.31	$65.45
14	Feb-27	Feb	2027	Winter	$67.06	$56.11
15	Mar-27	Mar	2027	Shoulder	$50.78	$41.79
16	Apr-27	Apr	2027	Shoulder	$51.24	$38.88
17	May-27	May	2027	Summer	$51.74	$33.71
18	Jun-27	Jun	2027	Summer	$58.17	$34.16
19	Jul-27	Jul	2027	Summer	$85.39	$43.20
20	Aug-27	Aug	2027	Summer	$74.69	$37.22
21	Sep-27	Sep	2027	Summer	$56.56	$34.21
22	Oct-27	Oct	2027	Shoulder	$54.15	$37.62
23	Nov-27	Nov	2027	Shoulder	$52.74	$42.19
24	Dec-27	Dec	2027	Winter	$61.99	$52.04
25	Jan-28	Jan	2028	Winter	$85.95	$70.78
26	Feb-28	Feb	2028	Winter	$73.29	$62.04
27	Mar-28	Mar	2028	Shoulder	$52.19	$43.20
28	Apr-28	Apr	2028	Shoulder	$51.49	$39.48
29	May-28	May	2028	Summer	$51.89	$33.50
30	Jun-28	Jun	2028	Summer	$58.47	$33.71
31	Jul-28	Jul	2028	Summer	$87.85	$41.89
32	Aug-28	Aug	2028	Summer	$76.65	$38.48
33	Sep-28	Sep	2028	Summer	$57.01	$31.19
34	Oct-28	Oct	2028	Shoulder	$54.10	$36.97
35	Nov-28	Nov	2028	Shoulder	$53.04	$42.65
36	Dec-28	Dec	2028	Winter	$61.73	$51.34
37	Jan-29	Jan	2029	Winter	$82.88	$70.98
38	Feb-29	Feb	2029	Winter	$76.85	$64.35
39	Mar-29	Mar	2029	Shoulder	$52.19	$42.60
40	Apr-29	Apr	2029	Shoulder	$50.93	$37.52
41	May-29	May	2029	Summer	$51.69	$35.06

42	Jun-29	Jun	2029	Summer	$57.41	$34.31
43	Jul-29	Jul	2029	Summer	$88.61	$41.09
44	Aug-29	Aug	2029	Summer	$77.81	$37.77
45	Sep-29	Sep	2029	Summer	$56.21	$34.61
46	Oct-29	Oct	2029	Shoulder	$51.29	$35.51
47	Nov-29	Nov	2029	Shoulder	$54.50	$40.74
48	Dec-29	Dec	2029	Winter	$65.30	$50.53
49	Jan-30	Jan	2030	Winter	$83.58	$69.47
50	Feb-30	Feb	2030	Winter	$77.10	$62.99
51	Mar-30	Mar	2030	Shoulder	$56.06	$46.41
52	Apr-30	Apr	2030	Shoulder	$53.14	$37.32
53	May-30	May	2030	Summer	$55.05	$35.76
54	Jun-30	Jun	2030	Summer	$59.27	$34.91
55	Jul-30	Jul	2030	Summer	$82.53	$41.94
56	Aug-30	Aug	2030	Summer	$71.18	$38.58
57	Sep-30	Sep	2030	Summer	$57.51	$35.01
58	Oct-30	Oct	2030	Shoulder	$52.74	$35.71
59	Nov-30	Nov	2030	Shoulder	$56.51	$41.19
60	Dec-30	Dec	2030	Winter	$68.97	$56.06
61	Jan-31	Jan	2031	Winter	$0.00	$0.00
62	Feb-31	Feb	2031	Winter	$0.00	$0.00
63	Mar-31	Mar	2031	Shoulder	$0.00	$0.00
64	Apr-31	Apr	2031	Shoulder	$0.00	$0.00
65	May-31	May	2031	Summer	$0.00	$0.00
66	Jun-31	Jun	2031	Summer	$0.00	$0.00
67	Jul-31	Jul	2031	Summer	$0.00	$0.00
68	Aug-31	Aug	2031	Summer	$0.00	$0.00
69	Sep-31	Sep	2031	Summer	$0.00	$0.00
70	Oct-31	Oct	2031	Shoulder	$0.00	$0.00
71	Nov-31	Nov	2031	Shoulder	$0.00	$0.00
72	Dec-31	Dec	2031	Winter	$0.00	$0.00
73	Jan-32	Jan	2032	Winter	$0.00	$0.00
74	Feb-32	Feb	2032	Winter	$0.00	$0.00
75	Mar-32	Mar	2032	Shoulder	$0.00	$0.00
76	Apr-32	Apr	2032	Shoulder	$0.00	$0.00
77	May-32	May	2032	Summer	$0.00	$0.00
78	Jun-32	Jun	2032	Summer	$0.00	$0.00
79	Jul-32	Jul	2032	Summer	$0.00	$0.00
80	Aug-32	Aug	2032	Summer	$0.00	$0.00
81	Sep-32	Sep	2032	Summer	$0.00	$0.00
82	Oct-32	Oct	2032	Shoulder	$0.00	$0.00
83	Nov-32	Nov	2032	Shoulder	$0.00	$0.00
84	Dec-32	Dec	2032	Winter	$0.00	$0.00
85	Jan-33	Jan	2033	Winter	$0.00	$0.00
86	Feb-33	Feb	2033	Winter	$0.00	$0.00
87	Mar-33	Mar	2033	Shoulder	$0.00	$0.00
88	Apr-33	Apr	2033	Shoulder	$0.00	$0.00

89	May-33	May	2033	Summer	$0.00	$0.00
90	Jun-33	Jun	2033	Summer	$0.00	$0.00
91	Jul-33	Jul	2033	Summer	$0.00	$0.00
92	Aug-33	Aug	2033	Summer	$0.00	$0.00
93	Sep-33	Sep	2033	Summer	$0.00	$0.00
94	Oct-33	Oct	2033	Shoulder	$0.00	$0.00
95	Nov-33	Nov	2033	Shoulder	$0.00	$0.00
96	Dec-33	Dec	2033	Winter	$0.00	$0.00
97	Jan-34	Jan	2034	Winter	$0.00	$0.00
98	Feb-34	Feb	2034	Winter	$0.00	$0.00
99	Mar-34	Mar	2034	Shoulder	$0.00	$0.00
100	Apr-34	Apr	2034	Shoulder	$0.00	$0.00
101	May-34	May	2034	Summer	$0.00	$0.00
102	Jun-34	Jun	2034	Summer	$0.00	$0.00
103	Jul-34	Jul	2034	Summer	$0.00	$0.00
104	Aug-34	Aug	2034	Summer	$0.00	$0.00
105	Sep-34	Sep	2034	Summer	$0.00	$0.00
106	Oct-34	Oct	2034	Shoulder	$0.00	$0.00
107	Nov-34	Nov	2034	Shoulder	$0.00	$0.00
108	Dec-34	Dec	2034	Winter	$0.00	$0.00
109	Jan-35	Jan	2035	Winter	$0.00	$0.00
110	Feb-35	Feb	2035	Winter	$0.00	$0.00
111	Mar-35	Mar	2035	Shoulder	$0.00	$0.00
112	Apr-35	Apr	2035	Shoulder	$0.00	$0.00
113	May-35	May	2035	Summer	$0.00	$0.00
114	Jun-35	Jun	2035	Summer	$0.00	$0.00
115	Jul-35	Jul	2035	Summer	$0.00	$0.00
116	Aug-35	Aug	2035	Summer	$0.00	$0.00
117	Sep-35	Sep	2035	Summer	$0.00	$0.00
118	Oct-35	Oct	2035	Shoulder	$0.00	$0.00
119	Nov-35	Nov	2035	Shoulder	$0.00	$0.00
120	Dec-35	Dec	2035	Winter	$0.00	$0.00
121	Jan-36	Jan	2036	Winter	$0.00	$0.00
122	Feb-36	Feb	2036	Winter	$0.00	$0.00
123	Mar-36	Mar	2036	Shoulder	$0.00	$0.00
124	Apr-36	Apr	2036	Shoulder	$0.00	$0.00
125	May-36	May	2036	Summer	$0.00	$0.00
126	Jun-36	Jun	2036	Summer	$0.00	$0.00
127	Jul-36	Jul	2036	Summer	$0.00	$0.00
128	Aug-36	Aug	2036	Summer	$0.00	$0.00
129	Sep-36	Sep	2036	Summer	$0.00	$0.00
130	Oct-36	Oct	2036	Shoulder	$0.00	$0.00
131	Nov-36	Nov	2036	Shoulder	$0.00	$0.00
132	Dec-36	Dec	2036	Winter	$0.00	$0.00
133	Jan-37	Jan	2037	Winter	$0.00	$0.00
134	Feb-37	Feb	2037	Winter	$0.00	$0.00
135	Mar-37	Mar	2037	Shoulder	$0.00	$0.00

136	Apr-37	Apr	2037	Shoulder	$0.00	$0.00
137	May-37	May	2037	Summer	$0.00	$0.00
138	Jun-37	Jun	2037	Summer	$0.00	$0.00
139	Jul-37	Jul	2037	Summer	$0.00	$0.00
140	Aug-37	Aug	2037	Summer	$0.00	$0.00
141	Sep-37	Sep	2037	Summer	$0.00	$0.00
142	Oct-37	Oct	2037	Shoulder	$0.00	$0.00
143	Nov-37	Nov	2037	Shoulder	$0.00	$0.00
144	Dec-37	Dec	2037	Winter	$0.00	$0.00
145	Jan-38	Jan	2038	Winter	$0.00	$0.00
146	Feb-38	Feb	2038	Winter	$0.00	$0.00
147	Mar-38	Mar	2038	Shoulder	$0.00	$0.00
148	Apr-38	Apr	2038	Shoulder	$0.00	$0.00
149	May-38	May	2038	Summer	$0.00	$0.00
150	Jun-38	Jun	2038	Summer	$0.00	$0.00
151	Jul-38	Jul	2038	Summer	$0.00	$0.00
152	Aug-38	Aug	2038	Summer	$0.00	$0.00
153	Sep-38	Sep	2038	Summer	$0.00	$0.00
154	Oct-38	Oct	2038	Shoulder	$0.00	$0.00
155	Nov-38	Nov	2038	Shoulder	$0.00	$0.00
156	Dec-38	Dec	2038	Winter	$0.00	$0.00
157	Jan-39	Jan	2039	Winter	$0.00	$0.00
158	Feb-39	Feb	2039	Winter	$0.00	$0.00
159	Mar-39	Mar	2039	Shoulder	$0.00	$0.00
160	Apr-39	Apr	2039	Shoulder	$0.00	$0.00
161	May-39	May	2039	Summer	$0.00	$0.00
162	Jun-39	Jun	2039	Summer	$0.00	$0.00
163	Jul-39	Jul	2039	Summer	$0.00	$0.00
164	Aug-39	Aug	2039	Summer	$0.00	$0.00
165	Sep-39	Sep	2039	Summer	$0.00	$0.00
166	Oct-39	Oct	2039	Shoulder	$0.00	$0.00
167	Nov-39	Nov	2039	Shoulder	$0.00	$0.00
168	Dec-39	Dec	2039	Winter	$0.00	$0.00
169	Jan-40	Jan	2040	Winter	$0.00	$0.00
170	Feb-40	Feb	2040	Winter	$0.00	$0.00
171	Mar-40	Mar	2040	Shoulder	$0.00	$0.00
172	Apr-40	Apr	2040	Shoulder	$0.00	$0.00
173	May-40	May	2040	Summer	$0.00	$0.00
174	Jun-40	Jun	2040	Summer	$0.00	$0.00
175	Jul-40	Jul	2040	Summer	$0.00	$0.00
176	Aug-40	Aug	2040	Summer	$0.00	$0.00
177	Sep-40	Sep	2040	Summer	$0.00	$0.00
178	Oct-40	Oct	2040	Shoulder	$0.00	$0.00
179	Nov-40	Nov	2040	Shoulder	$0.00	$0.00
180	Dec-40	Dec	2040	Winter	$0.00	$0.00
181	Jan-41	Jan	2041	Winter	$0.00	$0.00
182	Feb-41	Feb	2041	Winter	$0.00	$0.00

183	Mar-41	Mar	2041	Shoulder	$0.00	$0.00
184	Apr-41	Apr	2041	Shoulder	$0.00	$0.00
185	May-41	May	2041	Summer	$0.00	$0.00
186	Jun-41	Jun	2041	Summer	$0.00	$0.00
187	Jul-41	Jul	2041	Summer	$0.00	$0.00
188	Aug-41	Aug	2041	Summer	$0.00	$0.00
189	Sep-41	Sep	2041	Summer	$0.00	$0.00
190	Oct-41	Oct	2041	Shoulder	$0.00	$0.00
191	Nov-41	Nov	2041	Shoulder	$0.00	$0.00
192	Dec-41	Dec	2041	Winter	$0.00	$0.00
193	Jan-42	Jan	2042	Winter	$0.00	$0.00
194	Feb-42	Feb	2042	Winter	$0.00	$0.00
195	Mar-42	Mar	2042	Shoulder	$0.00	$0.00
196	Apr-42	Apr	2042	Shoulder	$0.00	$0.00
197	May-42	May	2042	Summer	$0.00	$0.00
198	Jun-42	Jun	2042	Summer	$0.00	$0.00
199	Jul-42	Jul	2042	Summer	$0.00	$0.00
200	Aug-42	Aug	2042	Summer	$0.00	$0.00
201	Sep-42	Sep	2042	Summer	$0.00	$0.00
202	Oct-42	Oct	2042	Shoulder	$0.00	$0.00
203	Nov-42	Nov	2042	Shoulder	$0.00	$0.00
204	Dec-42	Dec	2042	Winter	$0.00	$0.00
205	Jan-43	Jan	2043	Winter	$0.00	$0.00
206	Feb-43	Feb	2043	Winter	$0.00	$0.00
207	Mar-43	Mar	2043	Shoulder	$0.00	$0.00
208	Apr-43	Apr	2043	Shoulder	$0.00	$0.00
209	May-43	May	2043	Summer	$0.00	$0.00
210	Jun-43	Jun	2043	Summer	$0.00	$0.00
211	Jul-43	Jul	2043	Summer	$0.00	$0.00
212	Aug-43	Aug	2043	Summer	$0.00	$0.00
213	Sep-43	Sep	2043	Summer	$0.00	$0.00
214	Oct-43	Oct	2043	Shoulder	$0.00	$0.00
215	Nov-43	Nov	2043	Shoulder	$0.00	$0.00
216	Dec-43	Dec	2043	Winter	$0.00	$0.00
217	Jan-44	Jan	2044	Winter	$0.00	$0.00
218	Feb-44	Feb	2044	Winter	$0.00	$0.00
219	Mar-44	Mar	2044	Shoulder	$0.00	$0.00
220	Apr-44	Apr	2044	Shoulder	$0.00	$0.00
221	May-44	May	2044	Summer	$0.00	$0.00
222	Jun-44	Jun	2044	Summer	$0.00	$0.00
223	Jul-44	Jul	2044	Summer	$0.00	$0.00
224	Aug-44	Aug	2044	Summer	$0.00	$0.00
225	Sep-44	Sep	2044	Summer	$0.00	$0.00
226	Oct-44	Oct	2044	Shoulder	$0.00	$0.00
227	Nov-44	Nov	2044	Shoulder	$0.00	$0.00
228	Dec-44	Dec	2044	Winter	$0.00	$0.00
229	Jan-45	Jan	2045	Winter	$0.00	$0.00

230	Feb-45	Feb	2045	Winter	$0.00	$0.00
231	Mar-45	Mar	2045	Shoulder	$0.00	$0.00
232	Apr-45	Apr	2045	Shoulder	$0.00	$0.00
233	May-45	May	2045	Summer	$0.00	$0.00
234	Jun-45	Jun	2045	Summer	$0.00	$0.00
235	Jul-45	Jul	2045	Summer	$0.00	$0.00
236	Aug-45	Aug	2045	Summer	$0.00	$0.00
237	Sep-45	Sep	2045	Summer	$0.00	$0.00
238	Oct-45	Oct	2045	Shoulder	$0.00	$0.00
239	Nov-45	Nov	2045	Shoulder	$0.00	$0.00
240	Dec-45	Dec	2045	Winter	$0.00	$0.00
241	Jan-46	Jan	2046	Winter	$0.00	$0.00
242	Feb-46	Feb	2046	Winter	$0.00	$0.00
243	Mar-46	Mar	2046	Shoulder	$0.00	$0.00
244	Apr-46	Apr	2046	Shoulder	$0.00	$0.00
245	May-46	May	2046	Summer	$0.00	$0.00
246	Jun-46	Jun	2046	Summer	$0.00	$0.00
247	Jul-46	Jul	2046	Summer	$0.00	$0.00
248	Aug-46	Aug	2046	Summer	$0.00	$0.00
249	Sep-46	Sep	2046	Summer	$0.00	$0.00
250	Oct-46	Oct	2046	Shoulder	$0.00	$0.00
251	Nov-46	Nov	2046	Shoulder	$0.00	$0.00
252	Dec-46	Dec	2046	Winter	$0.00	$0.00
253	Jan-47	Jan	2047	Winter	$0.00	$0.00
254	Feb-47	Feb	2047	Winter	$0.00	$0.00
255	Mar-47	Mar	2047	Shoulder	$0.00	$0.00
256	Apr-47	Apr	2047	Shoulder	$0.00	$0.00
257	May-47	May	2047	Summer	$0.00	$0.00
258	Jun-47	Jun	2047	Summer	$0.00	$0.00
259	Jul-47	Jul	2047	Summer	$0.00	$0.00
260	Aug-47	Aug	2047	Summer	$0.00	$0.00
261	Sep-47	Sep	2047	Summer	$0.00	$0.00
262	Oct-47	Oct	2047	Shoulder	$0.00	$0.00
263	Nov-47	Nov	2047	Shoulder	$0.00	$0.00
264	Dec-47	Dec	2047	Winter	$0.00	$0.00

Penn Power Zone NG Converted On-Peak (Nominal $/MWh)	Penn Power Zone NG Converted Off-Peak (Nominal $/MWh)	Penn Power Zone Spark Spread On-Peak (Nominal $/MWh)	Penn Power Zone Spark Spread Off-Peak (Nominal $/MWh)	Penn Power Zone On-Peak (Nominal $/MWh)	Penn Power Zone Off-Peak (Nominal $/MWh)
$74.19	$51.09	-$2.84	$5.36	$71.35	$56.45
$65.84	$45.34	-$10.34	$0.01	$55.50	$45.36
$36.72	$25.29	$11.94	$16.55	$48.66	$41.83
$33.40	$23.00	$15.33	$18.28	$48.73	$41.28
$30.43	$20.96	$14.86	$5.84	$45.29	$26.80
$31.01	$21.35	$50.50	$12.77	$81.51	$34.13
$32.64	$22.48	$44.63	$15.15	$77.27	$37.64
$33.05	$22.76	$18.23	$7.82	$51.29	$30.58
$28.54	$19.65	$19.73	$9.58	$48.27	$29.23
$28.78	$19.82	$19.14	$12.93	$47.92	$32.75
$36.77	$25.32	$11.15	$11.85	$47.92	$37.17
$57.74	$39.77	-$1.34	$6.65	$56.41	$46.41
$80.75	$55.61	-$1.44	$9.84	$79.31	$65.45
$70.86	$48.80	-$3.80	$7.31	$67.06	$56.11
$39.60	$27.27	$11.19	$14.52	$50.78	$41.79
$33.51	$23.08	$17.73	$15.80	$51.24	$38.88
$29.96	$20.63	$21.78	$13.07	$51.74	$33.71
$30.22	$20.81	$27.94	$13.34	$58.17	$34.16
$31.62	$21.77	$53.78	$21.42	$85.39	$43.20
$32.01	$22.04	$42.69	$15.18	$74.69	$37.22
$27.53	$18.96	$29.03	$15.25	$56.56	$34.21
$27.89	$19.21	$26.25	$18.41	$54.15	$37.62
$35.82	$24.67	$16.93	$17.53	$52.74	$42.19
$57.07	$39.30	$4.91	$12.74	$61.99	$52.04
$80.59	$55.50	$5.36	$15.28	$85.95	$70.78
$71.02	$48.91	$2.27	$13.13	$73.29	$62.04
$39.21	$27.00	$12.98	$16.19	$52.19	$43.20
$32.19	$22.17	$19.30	$17.32	$51.49	$39.48
$28.58	$19.68	$23.31	$13.82	$51.89	$33.50
$28.88	$19.89	$29.59	$13.82	$58.47	$33.71
$30.24	$20.82	$57.62	$21.07	$87.85	$41.89
$30.73	$21.16	$45.93	$17.32	$76.65	$38.48
$26.45	$18.22	$30.56	$12.98	$57.01	$31.19
$26.92	$18.54	$27.17	$18.43	$54.10	$36.97
$35.23	$24.26	$17.81	$18.38	$53.04	$42.65
$56.79	$39.11	$4.95	$12.23	$61.73	$51.34
$79.94	$55.05	$2.94	$15.93	$82.88	$70.98
$70.35	$48.45	$6.50	$15.89	$76.85	$64.35
$37.79	$26.02	$14.40	$16.57	$52.19	$42.60
$30.83	$21.23	$20.11	$16.29	$50.93	$37.52
$27.31	$18.81	$24.38	$16.25	$51.69	$35.06

$27.60	$19.01	$29.81	$15.30	$57.41	$34.31
$28.90	$19.91	$59.70	$21.18	$88.61	$41.09
$29.40	$20.25	$48.40	$17.52	$77.81	$37.77
$25.24	$17.38	$30.97	$17.23	$56.21	$34.61
$25.78	$17.75	$25.51	$17.76	$51.29	$35.51
$33.47	$23.05	$21.03	$17.69	$54.50	$40.74
$54.90	$37.81	$10.40	$12.73	$65.30	$50.53
$78.63	$54.15	$4.96	$15.32	$83.58	$69.47
$69.56	$47.90	$7.54	$15.09	$77.10	$62.99
$36.97	$25.46	$19.09	$20.95	$56.06	$46.41
$29.54	$20.35	$23.60	$16.98	$53.14	$37.32
$25.86	$17.81	$29.19	$17.96	$55.05	$35.76
$25.97	$17.88	$33.31	$17.03	$59.27	$34.91
$27.05	$18.63	$55.48	$23.31	$82.53	$41.94
$27.51	$18.95	$43.67	$19.63	$71.18	$38.58
$23.07	$15.89	$34.45	$19.13	$57.51	$35.01
$23.62	$16.27	$29.12	$19.45	$52.74	$35.71
$31.47	$21.67	$25.04	$19.52	$56.51	$41.19
$53.13	$36.59	$15.84	$19.47	$68.97	$56.06
$77.14	$53.12	$3.02	$14.38	$80.16	$67.51
$68.11	$46.91	$3.19	$13.12	$71.30	$60.03
$35.54	$24.47	$14.71	$17.41	$50.25	$41.89
$29.21	$20.11	$20.60	$16.94	$49.81	$37.06
$25.96	$17.88	$25.18	$15.59	$51.14	$33.47
$26.05	$17.94	$30.79	$15.18	$56.84	$33.12
$27.10	$18.66	$57.82	$22.20	$84.91	$40.86
$27.18	$18.72	$46.11	$17.77	$73.29	$36.49
$22.62	$15.58	$31.90	$16.48	$54.51	$32.05
$23.04	$15.87	$27.57	$18.90	$50.61	$34.76
$30.96	$21.32	$20.62	$18.66	$51.58	$39.98
$52.88	$36.42	$9.21	$14.59	$62.09	$51.00
$80.29	$55.29	$3.02	$14.38	$83.30	$69.67
$70.79	$48.75	$3.19	$13.12	$73.98	$61.87
$36.68	$25.26	$14.71	$17.41	$51.39	$42.67
$29.36	$20.22	$20.60	$16.94	$49.96	$37.16
$25.59	$17.62	$25.18	$15.59	$50.76	$33.22
$25.81	$17.77	$30.79	$15.18	$56.60	$32.95
$27.04	$18.62	$57.82	$22.20	$84.86	$40.82
$27.23	$18.75	$46.11	$17.77	$73.33	$36.52
$22.57	$15.54	$31.90	$16.48	$54.47	$32.02
$23.11	$15.92	$27.57	$18.90	$50.68	$34.81
$31.66	$21.81	$20.62	$18.66	$52.28	$40.46
$54.30	$37.39	$9.21	$14.59	$63.51	$51.98
$85.00	$58.54	$3.02	$14.38	$88.02	$72.92
$74.83	$51.53	$3.19	$13.12	$78.02	$64.65
$39.00	$26.86	$14.71	$17.41	$53.71	$44.27
$31.48	$21.68	$20.60	$16.94	$52.08	$38.62

$27.79	$19.14	$25.18	$15.59	$52.96	$34.73
$27.96	$19.26	$30.79	$15.18	$58.75	$34.44
$29.31	$20.19	$57.82	$22.20	$87.13	$42.38
$29.63	$20.41	$46.11	$17.77	$75.74	$38.18
$24.70	$17.01	$31.90	$16.48	$56.60	$33.49
$25.08	$17.27	$27.57	$18.90	$52.65	$36.17
$34.29	$23.61	$20.62	$18.66	$54.91	$42.27
$58.12	$40.03	$9.21	$14.59	$67.33	$54.61
$90.89	$62.59	$3.02	$14.38	$93.91	$76.98
$80.11	$55.17	$3.19	$13.12	$83.30	$68.29
$42.29	$29.12	$14.71	$17.41	$57.00	$46.54
$34.55	$23.79	$20.60	$16.94	$55.15	$40.73
$30.54	$21.03	$25.18	$15.59	$55.71	$36.62
$30.68	$21.13	$30.79	$15.18	$61.47	$36.31
$32.03	$22.05	$57.82	$22.20	$89.84	$44.25
$32.42	$22.32	$46.11	$17.77	$78.52	$40.10
$27.41	$18.88	$31.90	$16.48	$59.31	$35.35
$27.85	$19.18	$27.57	$18.90	$55.42	$38.07
$37.39	$25.75	$20.62	$18.66	$58.02	$44.41
$62.67	$43.16	$9.21	$14.59	$71.88	$57.74
$96.75	$66.63	$3.02	$14.38	$99.77	$81.01
$85.25	$58.71	$3.19	$13.12	$88.45	$71.83
$46.03	$31.70	$14.71	$17.41	$60.74	$49.11
$37.99	$26.16	$20.60	$16.94	$58.59	$43.10
$33.52	$23.08	$25.18	$15.59	$58.70	$38.68
$33.42	$23.01	$30.79	$15.18	$64.20	$38.19
$34.56	$23.80	$57.82	$22.20	$92.37	$46.00
$35.02	$24.12	$46.11	$17.77	$81.13	$41.89
$29.71	$20.46	$31.90	$16.48	$61.61	$36.94
$30.22	$20.81	$27.57	$18.90	$57.79	$39.71
$40.05	$27.58	$20.62	$18.66	$60.68	$46.24
$66.33	$45.68	$9.21	$14.59	$75.54	$60.27
$101.75	$70.08	$3.02	$14.38	$104.77	$84.46
$89.73	$61.80	$3.19	$13.12	$92.93	$74.92
$48.89	$33.67	$14.71	$17.41	$63.60	$51.08
$40.27	$27.73	$20.60	$16.94	$60.87	$44.67
$35.63	$24.54	$25.18	$15.59	$60.80	$40.13
$35.73	$24.61	$30.79	$15.18	$66.52	$39.79
$37.16	$25.59	$57.82	$22.20	$94.97	$47.79
$37.70	$25.96	$46.11	$17.77	$83.80	$43.73
$32.13	$22.13	$31.90	$16.48	$64.03	$38.61
$32.70	$22.52	$27.57	$18.90	$60.28	$41.42
$42.74	$29.44	$20.62	$18.66	$63.36	$48.09
$70.05	$48.24	$9.21	$14.59	$79.26	$62.82
$105.10	$72.38	$3.02	$14.38	$108.12	$86.76
$92.58	$63.76	$3.19	$13.12	$95.77	$76.88
$50.45	$34.75	$14.71	$17.41	$65.17	$52.16

$41.42	$28.52	$20.60	$16.94	$62.02	$45.46
$36.70	$25.27	$25.18	$15.59	$61.88	$40.87
$37.02	$25.49	$30.79	$15.18	$67.81	$40.67
$38.71	$26.66	$57.82	$22.20	$96.52	$48.85
$39.31	$27.07	$46.11	$17.77	$85.42	$44.85
$33.61	$23.14	$31.90	$16.48	$65.51	$39.62
$34.24	$23.58	$27.57	$18.90	$61.81	$42.48
$44.68	$30.77	$20.62	$18.66	$65.30	$49.43
$72.90	$50.20	$9.21	$14.59	$82.11	$64.79
$102.90	$70.86	$3.02	$14.38	$105.92	$85.25
$90.64	$62.42	$3.19	$13.12	$93.83	$75.54
$49.40	$34.02	$14.71	$17.41	$64.11	$51.43
$40.55	$27.93	$20.60	$16.94	$61.15	$44.87
$35.93	$24.74	$25.18	$15.59	$61.11	$40.34
$36.24	$24.96	$30.79	$15.18	$67.03	$40.14
$37.89	$26.10	$57.82	$22.20	$95.71	$48.30
$38.49	$26.50	$46.11	$17.77	$84.59	$44.28
$32.90	$22.66	$31.90	$16.48	$64.80	$39.14
$33.52	$23.09	$27.57	$18.90	$61.10	$41.98
$43.74	$30.12	$20.62	$18.66	$64.36	$48.78
$71.37	$49.15	$9.21	$14.59	$80.58	$63.74
$101.23	$69.71	$3.02	$14.38	$104.25	$84.10
$89.17	$61.41	$3.19	$13.12	$92.36	$74.53
$48.59	$33.47	$14.71	$17.41	$63.31	$50.88
$39.89	$27.47	$20.60	$16.94	$60.49	$44.41
$35.35	$24.34	$25.18	$15.59	$60.52	$39.94
$35.65	$24.55	$30.79	$15.18	$66.44	$39.73
$37.28	$25.67	$57.82	$22.20	$95.10	$47.87
$37.86	$26.07	$46.11	$17.77	$83.97	$43.85
$32.37	$22.29	$31.90	$16.48	$64.27	$38.77
$32.98	$22.71	$27.57	$18.90	$60.55	$41.61
$43.03	$29.63	$20.62	$18.66	$63.65	$48.29
$70.21	$48.35	$9.21	$14.59	$79.43	$62.94
$101.94	$70.20	$3.02	$14.38	$104.96	$84.59
$89.80	$61.84	$3.19	$13.12	$92.99	$74.96
$48.94	$33.70	$14.71	$17.41	$63.65	$51.12
$40.17	$27.67	$20.60	$16.94	$60.77	$44.61
$35.60	$24.51	$25.18	$15.59	$60.77	$40.11
$35.90	$24.73	$30.79	$15.18	$66.69	$39.91
$37.54	$25.85	$57.82	$22.20	$95.36	$48.05
$38.13	$26.26	$46.11	$17.77	$84.23	$44.03
$32.60	$22.45	$31.90	$16.48	$64.50	$38.93
$33.21	$22.87	$27.57	$18.90	$60.78	$41.77
$43.33	$29.84	$20.62	$18.66	$63.96	$48.50
$70.71	$48.69	$9.21	$14.59	$79.92	$63.28
$105.18	$72.43	$3.02	$14.38	$108.19	$86.81
$92.64	$63.80	$3.19	$13.12	$95.84	$76.92

$50.49	$34.77	$14.71	$17.41	$65.20	$52.18
$41.45	$28.54	$20.60	$16.94	$62.05	$45.48
$36.73	$25.29	$25.18	$15.59	$61.90	$40.88
$37.04	$25.51	$30.79	$15.18	$67.83	$40.69
$38.73	$26.67	$57.82	$22.20	$96.55	$48.87
$39.34	$27.09	$46.11	$17.77	$85.44	$44.86
$33.63	$23.16	$31.90	$16.48	$65.53	$39.64
$34.26	$23.60	$27.57	$18.90	$61.84	$42.49
$44.71	$30.79	$20.62	$18.66	$65.33	$49.45
$72.95	$50.24	$9.21	$14.59	$82.16	$64.82
$108.79	$74.92	$3.02	$14.38	$111.80	$89.30
$95.83	$65.99	$3.19	$13.12	$99.02	$79.11
$52.22	$35.96	$14.71	$17.41	$66.93	$53.38
$42.87	$29.52	$20.60	$16.94	$63.47	$46.46
$37.99	$26.16	$25.18	$15.59	$63.16	$41.75
$38.31	$26.39	$30.79	$15.18	$69.10	$41.57
$40.06	$27.59	$57.82	$22.20	$97.88	$49.79
$40.69	$28.02	$46.11	$17.77	$86.79	$45.79
$34.79	$23.96	$31.90	$16.48	$66.68	$40.43
$35.44	$24.41	$27.57	$18.90	$63.01	$43.30
$46.24	$31.85	$20.62	$18.66	$66.86	$50.50
$75.45	$51.96	$9.21	$14.59	$84.67	$66.55
$112.51	$77.48	$3.02	$14.38	$115.52	$91.86
$99.10	$68.25	$3.19	$13.12	$102.29	$81.37
$54.01	$37.19	$14.71	$17.41	$68.72	$54.61
$44.34	$30.53	$20.60	$16.94	$64.94	$47.47
$39.29	$27.05	$25.18	$15.59	$64.46	$42.65
$39.62	$27.29	$30.79	$15.18	$70.41	$42.47
$41.43	$28.53	$57.82	$22.20	$99.25	$50.73
$42.08	$28.98	$46.11	$17.77	$88.18	$46.75
$35.97	$24.77	$31.90	$16.48	$67.87	$41.25
$36.65	$25.24	$27.57	$18.90	$64.23	$44.14
$47.82	$32.93	$20.62	$18.66	$68.45	$51.59
$78.03	$53.74	$9.21	$14.59	$87.25	$68.33
$114.87	$79.10	$3.02	$14.38	$117.88	$93.49
$101.18	$69.68	$3.19	$13.12	$104.37	$82.80
$55.14	$37.97	$14.71	$17.41	$69.85	$55.39
$45.27	$31.17	$20.60	$16.94	$65.87	$48.11
$40.11	$27.62	$25.18	$15.59	$65.29	$43.22
$40.46	$27.86	$30.79	$15.18	$71.24	$43.04
$42.30	$29.13	$57.82	$22.20	$100.12	$51.33
$42.96	$29.59	$46.11	$17.77	$89.07	$47.36
$36.73	$25.29	$31.90	$16.48	$68.63	$41.77
$37.42	$25.77	$27.57	$18.90	$64.99	$44.67
$48.83	$33.63	$20.62	$18.66	$69.45	$52.28
$79.67	$54.87	$9.21	$14.59	$88.88	$69.45
$116.54	$80.26	$3.02	$14.38	$119.56	$94.64

$102.66	$70.70	$3.19	$13.12	$105.85	$83.82
$55.95	$38.53	$14.71	$17.41	$70.66	$55.94
$45.93	$31.63	$20.60	$16.94	$66.53	$48.57
$40.70	$28.03	$25.18	$15.59	$65.87	$43.62
$41.05	$28.27	$30.79	$15.18	$71.83	$43.45
$42.92	$29.56	$57.82	$22.20	$100.74	$51.76
$43.59	$30.02	$46.11	$17.77	$89.70	$47.79
$37.27	$25.66	$31.90	$16.48	$69.16	$42.14
$37.97	$26.15	$27.57	$18.90	$65.54	$45.04
$49.54	$34.12	$20.62	$18.66	$70.16	$52.78
$80.84	$55.67	$9.21	$14.59	$90.05	$70.25
$121.16	$83.44	$3.02	$14.38	$124.18	$97.82
$106.73	$73.50	$3.19	$13.12	$109.92	$86.62
$58.16	$40.05	$14.71	$17.41	$72.87	$57.47
$47.75	$32.88	$20.60	$16.94	$68.35	$49.82
$42.31	$29.14	$25.18	$15.59	$67.48	$44.73
$42.67	$29.39	$30.79	$15.18	$73.46	$44.57
$44.62	$30.73	$57.82	$22.20	$102.44	$52.93
$45.31	$31.21	$46.11	$17.77	$91.42	$48.98
$38.74	$26.68	$31.90	$16.48	$70.64	$43.16
$39.47	$27.18	$27.57	$18.90	$67.05	$46.08
$51.50	$35.47	$20.62	$18.66	$72.12	$54.13
$84.04	$57.87	$9.21	$14.59	$93.25	$72.46
$0.00	$0.00	$3.02	$14.38	$3.02	$14.38
$0.00	$0.00	$3.19	$13.12	$3.19	$13.12
$0.00	$0.00	$14.71	$17.41	$14.71	$17.41
$0.00	$0.00	$20.60	$16.94	$20.60	$16.94
$0.00	$0.00	$25.18	$15.59	$25.18	$15.59
$0.00	$0.00	$30.79	$15.18	$30.79	$15.18
$0.00	$0.00	$57.82	$22.20	$57.82	$22.20
$0.00	$0.00	$46.11	$17.77	$46.11	$17.77
$0.00	$0.00	$31.90	$16.48	$31.90	$16.48
$0.00	$0.00	$27.57	$18.90	$27.57	$18.90
$0.00	$0.00	$20.62	$18.66	$20.62	$18.66
$0.00	$0.00	$9.21	$14.59	$9.21	$14.59

Record Field	Period	Month	Year	Tetco M-3	Locational Gas Adjustment ($/MMBtu)
1	Jan-26	Jan	2026	$5.87	$1.720
2	Feb-26	Feb	2026	$4.50	$0.576
3	Mar-26	Mar	2026	$3.69	$0.148
4	Apr-26	Apr	2026	$3.22	-$0.188
5	May-26	May	2026	$2.40	-$1.037
6	Jun-26	Jun	2026	$2.17	-$1.443
7	Jul-26	Jul	2026	$2.17	-$1.643
8	Aug-26	Aug	2026	$2.50	-$1.375
9	Sep-26	Sep	2026	$1.93	-$1.903
10	Oct-26	Oct	2026	$1.86	-$2.024
11	Nov-26	Nov	2026	$2.62	-$1.482
12	Dec-26	Dec	2026	$4.54	$0.047
13	Jan-27	Jan	2027	$7.30	$2.547
14	Feb-27	Feb	2027	$6.34	$1.960
15	Mar-27	Mar	2027	$3.15	-$0.656
16	Apr-27	Apr	2027	$2.85	-$0.570
17	May-27	May	2027	$2.71	-$0.685
18	Jun-27	Jun	2027	$2.81	-$0.737
19	Jul-27	Jul	2027	$3.12	-$0.602
20	Aug-27	Aug	2027	$3.07	-$0.710
21	Sep-27	Sep	2027	$2.62	-$1.129
22	Oct-27	Oct	2027	$2.57	-$1.230
23	Nov-27	Nov	2027	$3.20	-$0.809
24	Dec-27	Dec	2027	$5.25	$0.809
25	Jan-28	Jan	2028	$7.57	$2.835
26	Feb-28	Feb	2028	$7.07	$2.676
27	Mar-28	Mar	2028	$3.41	-$0.355
28	Apr-28	Apr	2028	$2.87	-$0.425
29	May-28	May	2028	$2.74	-$0.533
30	Jun-28	Jun	2028	$2.87	-$0.553
31	Jul-28	Jul	2028	$3.05	-$0.550
32	Aug-28	Aug	2028	$2.97	-$0.696
33	Sep-28	Sep	2028	$2.61	-$1.042
34	Oct-28	Oct	2028	$2.73	-$0.984
35	Nov-28	Nov	2028	$3.36	-$0.602
36	Dec-28	Dec	2028	$5.47	$1.056
37	Jan-29	Jan	2029	$7.86	$3.187
38	Feb-29	Feb	2029	$7.30	$2.970
39	Mar-29	Mar	2029	$3.65	$0.011
40	Apr-29	Apr	2029	$2.84	-$0.337
41	May-29	May	2029	$2.70	-$0.457
42	Jun-29	Jun	2029	$2.83	-$0.474
43	Jul-29	Jul	2029	$2.86	-$0.619
44	Aug-29	Aug	2029	$2.81	-$0.732
45	Sep-29	Sep	2029	$2.61	-$0.925
46	Oct-29	Oct	2029	$2.75	-$0.858
47	Nov-29	Nov	2029	$3.64	-$0.162

Month	Locational Adjustment ($/MMBtu)
Jan	$2.57
Feb	$2.05
Mar	-$0.21
Apr	-$0.38
May	-$0.68
Jun	-$0.80
Jul	-$0.85
Aug	-$0.88
Sep	-$1.25
Oct	-$1.27
Nov	-$0.76
Dec	$0.74

48	Dec-29	Dec	2029	$5.28	$1.041

Load Shape	Spark Spread On-Peak ($/MWh)	Spark Spread Off-Peak ($/MWh)
201.2%	$2.95	$14.09
177.3%	$3.13	$12.85
96.6%	$14.41	$17.06
79.3%	$20.18	$16.60
70.3%	$24.67	$15.28
70.9%	$30.16	$14.87
74.1%	$56.64	$21.75
75.3%	$45.17	$17.41
64.3%	$31.25	$16.14
65.6%	$27.01	$18.51
85.5%	$20.20	$18.28
139.6%	$9.02	$14.29

Commentary:	In some cases, the spark spread may be a negative monetary value. In the marketplace, this may occur for a short period, but usually for an entire month. However, this factor accounts for differences in the heat rate assumptions and the real market values. Escalation is later applied in a positive manner as not to over devalue future spark spreads.

	Henry,H,F	Panhandle	TCO,TCO,F	TETCO-M3	Transco-Z6
				Tetco M-3	Transco 6 (N
1/1/2025	3.514	3.946	3.174	5.874	4.762
2/1/2025	3.535	3.57	3.3	4.5	3.98
3/1/2025	3.906	3.35	3.51	3.69	3.62
4/1/2025	3.95	3.09	3.23	3.22	3.17
5/1/2025	3.17	2.49	2.54	2.4	2.33
6/1/2025	3.204	2.6	2.45	2.17	2.13
7/1/2025	3.261	2.51	2.2	2.17	2.13
8/1/2025	3.081	2.61	2.53	2.5	2.48
Sep-25	2.83	2.361	2.076	1.934	1.836
Oct-25	2.91	2.369	1.946	1.859	1.764
Nov-25	3.25	2.805	2.542	2.615	2.519
Dec-25	3.82	3.732	3.37	4.544	4.234
Jan-26	4.15	4.429	3.782	7.296	6.756
Feb-26	3.92	4.199	3.594	6.339	5.699
Mar-26	3.54	3.142	3.124	3.147	3.11
Apr-26	3.41	2.863	2.913	2.848	2.743
May-26	3.44	2.825	2.809	2.709	2.562
Jun-26	3.61	2.905	2.873	2.805	2.805
Jul-26	3.81	3.241	3.103	3.118	3.118
Aug-26	3.88	3.33	3.015	3.07	3.08
Sep-26	3.84	3.197	2.799	2.617	2.605
Oct-26	3.88	3.183	2.688	2.573	2.578
Nov-26	4.10	3.552	3.077	3.202	3.225
Dec-26	4.50	4.369	3.837	5.245	5.095
Jan-27	4.75	5.011	4.331	7.569	7.237
Feb-27	4.38	4.674	3.964	7.069	6.231
Mar-27	3.80	3.323	3.345	3.413	3.275
Apr-27	3.42	2.89	2.983	2.873	2.953
May-27	3.39	2.789	2.782	2.736	2.629
Jun-27	3.54	2.944	2.83	2.867	2.85
Jul-27	3.72	3.188	2.888	3.045	3.07
Aug-27	3.78	3.238	2.888	2.968	3.022
Sep-27	3.75	3.196	2.816	2.606	2.698
Oct-27	3.80	3.171	2.753	2.731	2.578
Nov-27	4.01	3.556	3.063	3.356	3.313
Dec-27	4.44	4.281	3.748	5.466	5.088
Jan-28	4.73	4.932	4.366	7.862	7.566
Feb-28	4.39	4.581	4.038	7.303	6.655
Mar-28	3.77	3.476	3.386	3.65	3.443
Apr-28	3.30	2.808	2.676	2.838	2.928
May-28	3.27	2.739	2.629	2.697	2.747
Jun-28	3.42	2.895	2.742	2.83	2.838
Jul-28	3.60	3.13	2.895	2.855	2.935
Aug-28	3.66	3.194	2.924	2.812	2.894
Sep-28	3.65	3.128	2.87	2.613	2.723
Oct-28	3.72	3.14	2.993	2.753	2.613
Nov-28	3.96	3.366	3.403	3.636	3.138

Dec-28	4.41	4.18	3.832	5.28	5.122
Jan-29	4.68	4.865	4.185	7.967	7.827
Feb-29	4.33	4.508	3.871	6.875	6.601
Mar-29	3.64	3.727	3.141	3.767	3.574
Apr-29	3.18	2.705	2.603	2.653	2.755
May-29	3.15	2.636	2.564	2.516	2.454
Jun-29	3.30	2.792	2.676	2.652	2.672
Jul-29	3.47	3.026	2.872	2.746	2.784
Aug-29	3.54	3.092	2.899	2.792	2.864
Sep-29	3.54	3.076	2.85	2.596	2.706
Oct-29	3.61	3.116	2.953	2.749	2.799
Nov-29	3.80	3.388	3.308	3.773	3.198
Dec-29	4.24	3.847	3.727	4.994	4.797
Jan-30	4.51	4.65	4.087	6.953	7.135
Feb-30	4.22	4.35	3.825	6.42	6.618
Mar-30	3.57	3.947	3.144	3.501	3.471
Apr-30	3.07	2.628	2.501	2.541	2.588
May-30	3.04	2.551	2.454	2.396	2.264
Jun-30	3.17	2.692	2.552	2.517	2.472
Jul-30	3.32	2.908	2.698	2.548	2.541
Aug-30	3.39	2.97	2.725	2.59	2.618
Sep-30	3.37	2.936	2.658	2.378	2.448
Oct-30	3.44	3.013	2.793	2.531	2.536
Nov-30	3.63	3.19	3.077	3.54	2.857
Dec-30	4.06	3.382	3.489	4.752	4.559
Jan-31	4.33	4.479	3.929	6.716	6.926
Feb-31	4.06	4.194	3.682	6.122	6.412
Mar-31	3.43	3.807	3.017	3.227	3.294
Apr-31	3.03	2.597	2.467	2.534	2.584
May-31	3.05	2.568	2.468	2.442	2.32
Jun-31	3.19	2.707	2.565	2.557	2.515
Jul-31	3.33	2.919	2.706	2.561	2.556
Aug-31	3.36	2.941	2.694	2.564	2.594
Sep-31	3.33	2.897	2.617	2.345	2.407
Oct-31	3.39	2.963	2.74	2.483	2.49
Nov-31	3.58	3.221	3.269	3.511	2.886
Dec-31	4.03	3.428	3.696	4.75	4.59
Jan-32	4.30	4.298	4.298	6.718	6.96
Feb-32	4.03	4.028	4.028	6.046	6.443
Mar-32	3.36	3.363	3.363	3.128	3.298
Apr-32	2.88	2.883	2.883	2.371	2.345
May-32	2.86	2.863	2.863	2.235	2.033
Jun-32	3.01	3.013	3.013	2.371	2.253
Jul-32	3.17	3.173	3.173	2.423	2.348
Aug-32	3.21	3.205	3.205	2.43	2.39
Sep-32	3.18	3.18	3.18	2.218	2.218
Oct-32	3.26	3.255	3.255	2.37	2.307
Nov-32	3.49	3.485	3.485	3.117	2.47
Dec-32	3.92	3.915	3.915	4.327	4.145

Jan-33	4.17	4.165	4.165	6.625	6.493
Feb-33	3.90	3.9	3.9	5.88	6.002
Mar-33	3.28	3.28	3.28	3.015	2.878
Apr-33	2.83	2.83	2.83	2.258	2.22
May-33	2.86	2.86	2.86	2.172	1.955
Jun-33	3.00	3.002	3.002	2.3	2.17
Jul-33	3.17	3.167	3.167	2.469	2.379
Aug-33	3.21	3.207	3.207	2.485	2.429
Sep-33	3.18	3.182	3.182	2.27	2.257
Oct-33	3.23	3.228	3.228	2.396	2.318
Nov-33	3.49	3.488	3.488	4.186	2.53
Dec-33	3.89	3.888	3.888	5.366	4.176
Jan-34	4.14	4.143	4.143	6.675	6.531
Feb-34	3.90	3.903	3.903	5.878	6.063
Mar-34	3.30	3.303	3.303	3.041	2.963
Apr-34	2.90	2.903	2.903	2.348	2.435
May-34	2.93	2.933	2.933	2.263	2.165
Jun-34	3.06	3.063	3.063	2.378	2.373
Jul-34	3.21	3.208	3.208	2.528	2.558
Aug-34	3.25	3.248	3.248	2.543	2.608
Sep-34	3.26	3.263	3.263	2.368	2.481
Oct-34	3.31	3.309	3.309	2.494	2.537
Nov-34	3.55	3.549	3.549	5.394	2.579
Dec-34	3.95	3.949	3.949	6.574	4.219
Jan-35	4.17	4.169	4.169	6.701	6.401
Feb-35	3.93	3.929	3.929	5.904	5.949
Mar-35	3.50	3.499	3.499	3.237	3.004
Apr-35	3.17	3.169	3.169	2.614	2.631
May-35	3.15	3.147	3.147	2.477	2.312
Jun-35	3.18	3.182	3.182	2.497	2.422
Jul-35	3.22	3.222	3.222	2.542	2.504
Aug-35	3.26	3.262	3.262	2.557	2.554
Sep-35	3.28	3.277	3.277	2.382	2.425
Oct-35	3.32	3.323	3.323	2.508	2.483
Nov-35	3.52	3.523	3.523	5.341	2.325
Dec-35	3.82	3.823	3.823	6.421	3.865
Jan-36	4.09	4.093	4.093	4.093	6.233
Feb-36	3.92	3.923	3.923	3.923	5.851
Mar-36	3.65	3.653	3.653	3.653	3.063
Apr-36	3.32	3.323	3.323	3.323	2.721
May-36	3.30	3.301	3.301	3.301	2.401
Jun-36	3.34	3.336	3.336	3.336	2.511
Jul-36	3.38	3.376	3.376	3.376	2.594
Aug-36	3.42	3.416	3.416	3.416	2.644
Sep-36	3.43	3.431	3.431	3.431	2.513
Oct-36	3.48	3.477	3.477	3.477	2.572
Nov-36	3.55	3.549	3.549	3.549	2.287

	Dec-36	3.70	3.704	3.704	3.704	3.682
	Jan-37	3.93	3.929	3.929	3.929	3.929
	Feb-37	3.78	3.779	3.779	3.779	3.779
	Mar-37	3.58	3.579	3.579	3.579	3.579
	Apr-37	3.25	3.249	3.249	3.249	3.249
	May-37	3.23	3.227	3.227	3.227	3.227
	Jun-37	3.26	3.262	3.262	3.262	3.262
	Jul-37	3.30	3.302	3.302	3.302	3.302
	Aug-37	3.34	3.342	3.342	3.342	3.342
	Sep-37	3.36	3.357	3.357	3.357	3.357
	Oct-37	3.40	3.403	3.403	3.403	3.403
	Nov-37	3.48	3.475	3.475	3.475	3.475
		3.515	3.493	2.835	6.063	3.493

Transco-Z6 (NY),TZS,F

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2.861		-0.555	2.61	-0.5375	2.63 checks
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2.577	note: NG values beyond May 2035 are not used				
2.61					
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PPI Industry Data
Original Data Value

Source:	https://data.bls.gov/timeseries/PCU221110221110
Series ID:	PCU221110221110
Series Title:	PPI industry data for Electric power generation, not seasonally
Industry:	Electric power generation
Product:	Electric power generation
Base Date:	200312
Years:	2015 to 2025

Years in Escalation Rate	5

Year	Jan	Feb	Mar	Apr	May	Jun	Jul
2019	134.3	150.9	152.9	132.0	129.9	136.1	137.4
2020	126.7	124.0	122.6	120.6	118.5	124.9	134.0
2021	133.3	744.7	154.3	139.2	141.7	172.2	175.8
2022	167.9	168.5	169.4	193.2	277.7	234.3	296.1
2023	265.8	165.2	175.3	153.9	136.2	150.9	178.8
2024	194.3	147.4	142.8	136.6	155.6	146.8	171.1
2025	160.2	166.0	153.0	149.5	153.1	158.0	

Aug	Sep	Oct	Nov	Dec	Annual Avg.	Full Year Flag
170.1	169.5	140.4	140.2	131.5	143.8	1
153.0	139.4	140.8	141.6	136.5	131.9	1
181.2	187.2	191.0	180.4	163.1	213.7	1
274.9	286.9	207.8	194.1	310.7	231.8	1
280.5	201.8	159.5	167.5	155.5	182.6	1
170.3	165.8	160.9	141.6	159.1	157.7	1
					Data Missing	0

PPI Inflation Rate	**3.64%**
CPI Inflation Rate	**3.57%**
BLS Escalation Rate	**0.07%**

Commentary:

CPI-U, All Items Less Food and Ene

The BLS escalation rate is based on the latest five full years of available data. It is important to have a full year of data as the historical trend is that months early in the year have a higher value than the annual average.

Year	Jan	Feb
2019	260.1	261.1
2020	266.0	267.3
2021	269.8	270.7
2022	286.0	288.1
2023	302.0	304.0
2024	313.6	315.4
2025	323.8	325.3

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Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
261.8	262.3	262.6	263.2	263.6	264.2	264.5	265.1	265.1
267.3	266.1	265.8	266.3	267.7	268.8	269.1	269.3	269.5
271.7	274.0	275.9	278.2	279.1	279.5	279.9	281.6	282.8
289.3	290.8	292.5	294.7	295.6	297.2	298.4	299.3	299.6
305.5	306.9	308.1	308.9	309.4	310.1	310.8	311.4	311.6
317.1	318.0	318.6	319.0	319.2	320.0	321.1	321.8	321.9
325.9	326.8	327.5	328.4					
								CPI Infl

Dec	Annual Avg.	Flag
264.9	263.2	1
269.2	267.7	1
283.9	277.3	1
300.1	294.3	1
311.9	308.4	1
322.0	319.0	1
	Data Missing	0
ation Rate	**3.56811%**	

Generation Capacity

Status | *Data Needed: TRC Order Section*

Complete | PJM Base Residual Auction Results: B.6 Page 17

		Seasor			
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$25.00	$17.07	$14.46	$134.96
Met-Ed	METED	$47.90	$24.75	$24.75	$134.96
PECO	PECO	$48.93	$24.75	$27.48	$134.96
Penelec	PENLC	$47.90	$24.75	$24.75	$134.96
Penn Power	ATSI	$25.00	$17.07	$14.46	$134.96
PPL	PL	$47.90	$24.75	$24.75	$134.96
West Penn	APS	$25.00	$17.07	$14.46	$134.96

Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$60.07	$60.07	$60.07
19	2027	2028	$25.99	$28.98	$29.25
20	2028	2029	$26.53	$29.58	$29.86
21	2029	2030	$27.08	$30.19	$30.48
22	2030	2031	$27.64	$30.81	$31.11
23	2031	2032	$28.21	$31.45	$31.75
24	2032	2033	$28.80	$32.10	$32.41
25	2033	2034	$29.40	$32.77	$33.08
26	2034	2035	$30.00	$33.45	$33.77
27	2035	2036	$30.63	$34.14	$34.46
28	2036	2037	$31.26	$34.85	$35.18
29	2037	2038	$31.91	$35.57	$35.91
30	2038	2039	$32.57	$36.31	$36.65
31	2039	2040	$33.24	$37.06	$37.41
32	2040	2041	$33.93	$37.83	$38.19
33	2041	2042	$34.64	$38.61	$38.98
34	2042	2043	$35.35	$39.41	$39.78
35	2043	2044	$36.09	$40.23	$40.61
36	2044	2045	$36.83	$41.06	$41.45
37	2045	2046	$37.60	$41.91	$42.31
38	2046	2047	$38.37	$42.78	$43.18
39	2047	2048	$39.17	$43.66	$44.08

ıally Adjusted BRA Results (Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$48.93	$24.75	$27.48	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal $/kW-year)					
Summer					
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$60.07	$60.07	$60.07	$60.07	$60.07	$60.07
$28.98	$25.99	$28.98	$25.99	$25.99	$28.98
$29.58	$26.53	$29.58	$26.53	$26.53	$29.58
$30.19	$27.08	$30.19	$27.08	$27.08	$30.19
$30.81	$27.64	$30.81	$27.64	$27.64	$30.81
$31.45	$28.21	$31.45	$28.21	$28.21	$31.45
$32.10	$28.80	$32.10	$28.80	$28.80	$32.10
$32.77	$29.40	$32.77	$29.40	$29.40	$32.77
$33.45	$30.00	$33.45	$30.00	$30.00	$33.45
$34.14	$30.63	$34.14	$30.63	$30.63	$34.14
$34.85	$31.26	$34.85	$31.26	$31.26	$34.85
$35.57	$31.91	$35.57	$31.91	$31.91	$35.57
$36.31	$32.57	$36.31	$32.57	$32.57	$36.31
$37.06	$33.24	$37.06	$33.24	$33.24	$37.06
$37.83	$33.93	$37.83	$33.93	$33.93	$37.83
$38.61	$34.64	$38.61	$34.64	$34.64	$38.61
$39.41	$35.35	$39.41	$35.35	$35.35	$39.41
$40.23	$36.09	$40.23	$36.09	$36.09	$40.23
$41.06	$36.83	$41.06	$36.83	$36.83	$41.06
$41.91	$37.60	$41.91	$37.60	$37.60	$41.91
$42.78	$38.37	$42.78	$38.37	$38.37	$42.78
$43.66	$39.17	$43.66	$39.17	$39.17	$43.66

Seasonally Adjusted PJM BRA Res					
Summer					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

Winter					
PECO	Penelec	Penn Power	PPL	West Penn	Inflation Flag
$60.07	$60.07	$60.07	$60.07	$60.07	0
$29.25	$28.98	$25.99	$28.98	$25.99	0
$29.86	$29.58	$26.53	$29.58	$26.53	1
$30.48	$30.19	$27.08	$30.19	$27.08	1
$31.11	$30.81	$27.64	$30.81	$27.64	1
$31.75	$31.45	$28.21	$31.45	$28.21	1
$32.41	$32.10	$28.80	$32.10	$28.80	1
$33.08	$32.77	$29.40	$32.77	$29.40	1
$33.77	$33.45	$30.00	$33.45	$30.00	1
$34.46	$34.14	$30.63	$34.14	$30.63	1
$35.18	$34.85	$31.26	$34.85	$31.26	1
$35.91	$35.57	$31.91	$35.57	$31.91	1
$36.65	$36.31	$32.57	$36.31	$32.57	1
$37.41	$37.06	$33.24	$37.06	$33.24	1
$38.19	$37.83	$33.93	$37.83	$33.93	1
$38.98	$38.61	$34.64	$38.61	$34.64	1
$39.78	$39.41	$35.35	$39.41	$35.35	1
$40.61	$40.23	$36.09	$40.23	$36.09	1
$41.45	$41.06	$36.83	$41.06	$36.83	1
$42.31	$41.91	$37.60	$41.91	$37.60	1
$43.18	$42.78	$38.37	$42.78	$38.37	1
$44.08	$43.66	$39.17	$43.66	$39.17	1

sults (Real $/kW-year)					
Winter					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

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Years Averaged	5

Demand Split	
Summer	50%
Winter	50%

PJM BRA Results (					
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$50.00	$34.13	$28.92	$269.92
Met-Ed	METED	$95.79	$49.49	$49.49	$269.92
PECO	PECO	$97.86	$49.49	$54.95	$269.92
Penelec	PENLC	$95.79	$49.49	$49.49	$269.92
Penn Power	ATSI	$50.00	$34.13	$28.92	$269.92
PPL	PL	$95.79	$49.49	$49.49	$269.92
West Penn	APS	$50.00	$34.13	$28.92	$269.92

Note: Data through 2024-25 BRA auction does not include winter peak values. Assumed BRA results encompa

Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$97.86	$49.49	$54.95	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17

ass value for both summer and winter peak. This may change for future auctions

Avoided Transmission Capacity Forecast in Nominal Dollars					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$61.07	$58.92	$22.48
19	2027	2028	$62.33	$60.14	$22.94
20	2028	2029	$63.62	$61.38	$23.42
21	2029	2030	$64.94	$62.66	$23.90
22	2030	2031	$66.29	$63.95	$24.40
23	2031	2032	$67.66	$65.28	$24.90
24	2032	2033	$69.06	$66.63	$25.42
25	2033	2034	$70.49	$68.01	$25.95
26	2034	2035	$71.95	$69.42	$26.48
27	2035	2036	$73.44	$70.86	$27.03
28	2036	2037	$74.96	$72.33	$27.59
29	2037	2038	$76.52	$73.82	$28.16
30	2038	2039	$78.10	$75.35	$28.75
31	2039	2040	$79.72	$76.92	$29.34
32	2040	2041	$81.37	$78.51	$29.95
33	2041	2042	$83.06	$80.13	$30.57
34	2042	2043	$84.78	$81.79	$31.20
35	2043	2044	$86.53	$83.49	$31.85
36	2044	2045	$88.33	$85.22	$32.51
37	2045	2046	$90.16	$86.98	$33.18

Avoided Transmission Capacity Forecast in Nominal Dollar					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$0.00	$0.00	$0.00
19	2027	2028	$0.00	$0.00	$0.00
20	2028	2029	$0.00	$0.00	$0.00
21	2029	2030	$0.00	$0.00	$0.00
22	2030	2031	$0.00	$0.00	$0.00
23	2031	2032	$0.00	$0.00	$0.00
24	2032	2033	$0.00	$0.00	$0.00
25	2033	2034	$0.00	$0.00	$0.00
26	2034	2035	$0.00	$0.00	$0.00
27	2035	2036	$0.00	$0.00	$0.00
28	2036	2037	$0.00	$0.00	$0.00
29	2037	2038	$0.00	$0.00	$0.00
30	2038	2039	$0.00	$0.00	$0.00
31	2039	2040	$0.00	$0.00	$0.00
32	2040	2041	$0.00	$0.00	$0.00
33	2041	2042	$0.00	$0.00	$0.00
34	2042	2043	$0.00	$0.00	$0.00
35	2043	2044	$0.00	$0.00	$0.00
36	2044	2045	$0.00	$0.00	$0.00
37	2045	2046	$0.00	$0.00	$0.00

s ($/kW-year) - Summer				Avoided Distrl	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$44.19	$77.10	$48.00	$8.83	$59.28	$52.46
$45.10	$78.69	$48.99	$9.01	$64.43	$55.82
$46.04	$80.32	$50.00	$9.20	$69.93	$58.95
$46.99	$81.99	$51.04	$9.39	$76.21	$62.16
$47.97	$83.69	$52.10	$9.58	$81.30	$65.41
$48.96	$85.42	$53.18	$9.78	$82.99	$66.77
$49.97	$87.19	$54.28	$9.98	$84.71	$68.15
$51.01	$88.99	$55.40	$10.19	$86.46	$69.56
$52.07	$90.84	$56.55	$10.40	$88.25	$71.00
$53.14	$92.72	$57.72	$10.62	$90.08	$72.47
$54.24	$94.64	$58.92	$10.84	$91.95	$73.97
$55.37	$96.60	$60.14	$11.06	$93.85	$75.51
$56.52	$98.60	$61.38	$11.29	$95.80	$77.07
$57.69	$100.64	$62.66	$11.53	$97.78	$78.67
$58.88	$102.73	$63.95	$11.76	$99.81	$80.30
$60.10	$104.86	$65.28	$12.01	$101.87	$81.96
$61.35	$107.03	$66.63	$12.26	$103.98	$83.66
$62.62	$109.25	$68.01	$12.51	$106.14	$85.39
$63.91	$111.51	$69.42	$12.77	$108.34	$87.16
$65.24	$113.82	$70.86	$13.03	$110.58	$88.97

s ($/kW-year) - Winter				Avoided Distr	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$14.73	$0.00	$48.00	$8.83	$0.21	$6.70
$15.03	$0.00	$48.99	$9.01	$0.12	$7.21
$15.35	$0.00	$50.00	$9.20	$0.18	$8.16
$15.66	$0.00	$51.04	$9.39	$0.18	$8.64
$15.99	$0.00	$52.10	$9.58	$0.29	$9.68
$16.32	$0.00	$53.18	$9.78	$0.29	$9.88
$16.66	$0.00	$54.28	$9.98	$0.30	$10.09
$17.00	$0.00	$55.40	$10.19	$0.30	$10.30
$17.36	$0.00	$56.55	$10.40	$0.31	$10.51
$17.71	$0.00	$57.72	$10.62	$0.32	$10.73
$18.08	$0.00	$58.92	$10.84	$0.32	$10.95
$18.46	$0.00	$60.14	$11.06	$0.33	$11.18
$18.84	$0.00	$61.38	$11.29	$0.34	$11.41
$19.23	$0.00	$62.66	$11.53	$0.34	$11.65
$19.63	$0.00	$63.95	$11.76	$0.35	$11.89
$20.03	$0.00	$65.28	$12.01	$0.36	$12.13
$20.45	$0.00	$66.63	$12.26	$0.37	$12.39
$20.87	$0.00	$68.01	$12.51	$0.37	$12.64
$21.30	$0.00	$69.42	$12.77	$0.38	$12.90
$21.75	$0.00	$70.86	$13.03	$0.39	$13.17

ɔution Capacity Forecast in Nominal Dollars ($/kW-year) - Summer				
PECO	Penelec	Penn Power	PPL	West Penn
$39.61	$37.18	$43.52	$25.11	$41.25
$47.21	$42.64	$45.52	$26.68	$46.27
$49.64	$47.98	$45.17	$29.00	$51.89
$51.04	$53.05	$45.79	$31.55	$56.92
$50.53	$57.97	$45.98	$33.94	$62.19
$51.57	$59.17	$46.93	$34.64	$63.48
$52.64	$60.39	$47.91	$35.36	$64.80
$53.73	$61.65	$48.90	$36.09	$66.14
$54.85	$62.92	$49.91	$36.84	$67.51
$55.98	$64.23	$50.94	$37.60	$68.91
$57.14	$65.56	$52.00	$38.38	$70.34
$58.33	$66.91	$53.08	$39.17	$71.79
$59.53	$68.30	$54.18	$39.99	$73.28
$60.77	$69.72	$55.30	$40.81	$74.80
$62.03	$71.16	$56.44	$41.66	$76.35
$63.31	$72.63	$57.61	$42.52	$77.93
$64.62	$74.14	$58.81	$43.40	$79.54
$65.96	$75.67	$60.03	$44.30	$81.19
$67.33	$77.24	$61.27	$45.22	$82.87
$68.72	$78.84	$62.54	$46.16	$84.59

ɾbution Capacity Forecast in Nominal Dollars ($/kW-year) - Winter				
PECO	Penelec	Penn Power	PPL	West Penn
$10.26	$5.79	$16.27	$32.44	$5.05
$5.67	$5.97	$16.76	$36.48	$6.06
$5.54	$6.24	$19.33	$39.40	$7.01
$5.08	$6.58	$20.57	$41.88	$7.93
$7.16	$7.24	$22.70	$44.30	$9.02
$7.31	$7.39	$23.17	$45.22	$9.21
$7.46	$7.54	$23.65	$46.16	$9.40
$7.62	$7.69	$24.14	$47.12	$9.59
$7.78	$7.85	$24.64	$48.09	$9.79
$7.94	$8.02	$25.15	$49.09	$9.99
$8.10	$8.18	$25.67	$50.10	$10.20
$8.27	$8.35	$26.20	$51.14	$10.41
$8.44	$8.53	$26.74	$52.20	$10.63
$8.62	$8.70	$27.30	$53.28	$10.85
$8.80	$8.88	$27.86	$54.39	$11.07
$8.98	$9.07	$28.44	$55.51	$11.30
$9.16	$9.25	$29.03	$56.66	$11.53
$9.35	$9.45	$29.63	$57.84	$11.77
$9.55	$9.64	$30.25	$59.04	$12.02
$9.75	$9.84	$30.87	$60.26	$12.27

Summer Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$22.48	PECO
PPL	$48.00	PPL
Duquesne Light	$61.07	DLC
FE: Met-Ed	$58.92	Met-Ed
FE: Penelec	$44.19	Penelec
FE: Penn Power	$77.10	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Winter Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$0.00	PECO
PPL	$48.00	PPL
Duquesne Light	$0.00	DLC
FE: Met-Ed	$0.00	Met-Ed
FE: Penelec	$14.73	Penelec
FE: Penn Power	$0.00	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Summer Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$39.61	$47.21	$49.64	$51.04	$50.53	PECO
$25.11	$26.68	$29.00	$31.55	$33.94	PPL
$59.28	$64.43	$69.93	$76.21	$81.30	DLC
$52.46	$55.82	$58.95	$62.16	$65.41	Met-Ed
$37.18	$42.64	$47.98	$53.05	$57.97	Penelec
$43.52	$45.52	$45.17	$45.79	$45.98	Penn Power
$41.25	$46.27	$51.89	$56.92	$62.19	West Penn

Winter Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$10.26	$5.67	$5.54	$5.08	$7.16	PECO
$32.44	$36.48	$39.40	$41.88	$44.30	PPL
$0.21	$0.12	$0.18	$0.18	$0.29	DLC
$6.70	$7.21	$8.16	$8.64	$9.68	Met-Ed
$5.79	$5.97	$6.24	$6.58	$7.24	Penelec
$16.27	$16.76	$19.33	$20.57	$22.70	Penn Power
$5.05	$6.06	$7.01	$7.93	$9.02	West Penn

Alternative Energy Portfolio Standards (AEPS) Act

Year	2026
Load (MWh)	1,000

Credit	**Tier Req (weight)**	**Price**		**Required Credits**	**Cost**
Solar	0.5%	$37.25		5	$186
Tier I	8.0%	$34.20		80	$2,736
Tier II	10.0%	$39.63		100	$3,963
			Total	**185**	**$6,885**

Weighted Avg. Price (Per Credit)
$37.21

Weighted Avg. Price (Per MWh)
$6.88

Alternative Enery Credit Prices as of 05/01/24				
Tier	**Reporting Year**	**Marex (Bid price)**	**Marex (Offer price)**	**Avg Price**
Solar	2024	$34.50	$35.50	$35.00
	2025	$37.00	$38.00	$37.50
	2026	$36.75	$37.75	$37.25
	2027	$36.50	$37.50	$37.00
Tier I	2023	$34.55	$35.05	$34.80
	2024	$34.50	$35.00	$34.75
	2025	$34.55	$35.05	$34.80
	2026	$33.95	$34.45	$34.20
Tier II	2023	$33.50	$34.25	$33.88
	2024	$35.00	$35.75	$35.38
	2025	$38.50	$39.25	$38.88
	2026	$39.25	$40.00	$39.63

Program Year	PY Start	PY End.	AEPS Cost
18	2027	2028	$6.88
19	2028	2029	$7.02
20	2029	2030	$7.16
21	2030	2031	$7.31
22	2031	2032	$7.45
23	2032	2033	$7.60
24	2033	2034	$7.75
25	2034	2035	$7.91
26	2035	2036	$8.07
27	2036	2037	$8.23
28	2037	2038	$8.39
29	2038	2039	$8.56
30	2039	2040	$8.73
31	2040	2041	$8.91
32	2041	2042	$9.08
33	2042	2043	$9.27
34	2043	2044	$9.45
35	2044	2045	$9.64
36	2045	2046	$9.83
37	2046	2047	$10.03
38	2047	2048	$10.23
39	2048	2049	$10.43
40	2049	2050	$10.64
41	2050	2051	$10.86
42	2051	2052	$11.07
43	2052	2053	$11.30
44	2053	2054	$11.52
45	2054	2055	$11.75
46	2055	2056	$11.99
47	2056	2057	$12.23

	EDC Name:	Penn Power
	Column Start:	20

Demand Split	
Summer	50%
Winter	50%

DY/PY Start	Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 14.65	$ -	$ -	$ -	$ -
2028	$ 14.94	$ 14.94	$ -	$ -	$ -
2029	$ 15.24	$ 15.24	$ 15.24	$ -	$ -
2030	$ 15.54	$ 15.54	$ 15.54	$ 15.54	$ -
2031	$ -	$ 15.85	$ 15.85	$ 15.85	$ 15.85
2032	$ -	$ -	$ 16.17	$ 16.17	$ 16.17
2033	$ -	$ -	$ -	$ 16.49	$ 16.49
2034	$ -	$ -	$ -	$ -	$ 16.82
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Summer Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 7.33	$ -	$ -	$ -	$ -
2028	$ 7.47	$ 7.47	$ -	$ -	$ -
2029	$ 7.62	$ 7.62	$ 7.62	$ -	$ -
2030	$ 7.77	$ 7.77	$ 7.77	$ 7.77	$ -
2031	$ -	$ 7.93	$ 7.93	$ 7.93	$ 7.93
2032	$ -	$ -	$ 8.09	$ 8.09	$ 8.09
2033	$ -	$ -	$ -	$ 8.25	$ 8.25
2034	$ -	$ -	$ -	$ -	$ 8.41
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

DRIPE

Status

Complete

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

To Output Table

DY/PY Start	Energy DRIPE ($/MWh)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 14.73	$ -	$ -	$ -	$ -
2028	$ 24.38	$ 15.87	$ -	$ -	$ -
2029	$ 32.24	$ 25.98	$ 16.91	$ -	$ -
2030	$ 30.98	$ 34.08	$ 27.46	$ 17.87	$ -
2031	$ -	$ 32.77	$ 36.05	$ 29.05	$ 18.91
2032	$ -	$ -	$ 34.83	$ 38.31	$ 30.88
2033	$ -	$ -	$ -	$ 36.14	$ 39.75
2034	$ -	$ -	$ -	$ -	$ 37.50
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Winter Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 7.33	$ -	$ -	$ -	$ -
2028	$ 7.47	$ 7.47	$ -	$ -	$ -
2029	$ 7.62	$ 7.62	$ 7.62	$ -	$ -
2030	$ 7.77	$ 7.77	$ 7.77	$ 7.77	$ -
2031	$ -	$ 7.93	$ 7.93	$ 7.93	$ 7.93
2032	$ -	$ -	$ 8.09	$ 8.09	$ 8.09
2033	$ -	$ -	$ -	$ 8.25	$ 8.25
2034	$ -	$ -	$ -	$ -	$ 8.41
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

***Data Source** : PA_DRIPE_Study_Report_05.03.2024*

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$67.54	$68.89	$70.26	$71.67	$78.36	$79.92	$81.52	$83.15	$25.04
$68.89	$70.26	$71.67	$73.10	$79.92	$81.52	$83.15	$84.82	$25.54
$70.26	$71.67	$73.10	$74.56	$81.52	$83.15	$84.82	$86.51	$26.05
$71.67	$73.10	$74.56	$76.06	$83.15	$84.82	$86.51	$88.24	$26.57
$73.10	$74.56	$76.06	$77.58	$84.82	$86.51	$88.24	$90.01	$27.10

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$14.65	$24.23	$31.97	$30.62	$14.72	$24.39	$32.25	$30.98	$14.69
$15.77	$25.77	$33.68	$32.26	$15.87	$25.99	$34.08	$32.75	$15.81
$16.77	$27.15	$35.49	$34.13	$16.92	$27.46	$36.02	$34.78	$16.78
$17.67	$28.60	$37.55	$35.25	$17.88	$29.03	$38.26	$36.06	$17.68
$18.61	$30.26	$38.77	$36.41	$18.90	$30.83	$39.67	$37.42	$18.61

Generation Capacity DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$25.54	$26.05	$26.57	$78.36	$79.92	$81.52	$83.15	$78.36	$79.92
$26.05	$26.57	$27.10	$79.92	$81.52	$83.15	$84.82	$79.92	$81.52
$26.57	$27.10	$27.64	$81.52	$83.15	$84.82	$86.51	$81.52	$83.15
$27.10	$27.64	$28.20	$83.15	$84.82	$86.51	$88.24	$83.15	$84.82
$27.64	$28.20	$28.76	$84.82	$86.51	$88.24	$90.01	$84.82	$86.51

Electric Energy DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$24.28	$32.00	$30.64	$13.86	$22.45	$29.02	$27.27	$14.79	$24.53
$25.79	$33.70	$32.26	$14.61	$23.39	$29.99	$28.16	$15.96	$26.17
$27.16	$35.48	$34.12	$15.22	$24.17	$30.98	$29.17	$17.03	$27.66
$28.60	$37.53	$35.17	$15.73	$24.96	$32.09	$29.48	$18.00	$29.23
$30.25	$38.69	$36.28	$16.25	$25.86	$32.43	$29.72	$19.03	$31.02

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$81.52	$83.15	$14.65	$14.94	$15.24	$15.54	$25.04	$25.54	$26.05
$83.15	$84.82	$14.94	$15.24	$15.54	$15.85	$25.54	$26.05	$26.57
$84.82	$86.51	$15.24	$15.54	$15.85	$16.17	$26.05	$26.57	$27.10
$86.51	$88.24	$15.54	$15.85	$16.17	$16.49	$26.57	$27.10	$27.64
$88.24	$90.01	$15.85	$16.17	$16.49	$16.82	$27.10	$27.64	$28.20

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$32.47	$31.20	$14.73	$24.38	$32.24	$30.98	$13.25	$21.65	$28.61
$34.32	$32.97	$15.87	$25.98	$34.08	$32.77	$14.09	$23.06	$30.21
$36.27	$34.99	$16.91	$27.46	$36.05	$34.83	$15.01	$24.35	$31.97
$38.49	$36.25	$17.87	$29.05	$38.31	$36.14	$15.85	$25.76	$34.00
$39.88	$37.58	$18.91	$30.88	$39.75	$37.50	$16.77	$27.40	$35.31

Year 4
$26.57
$27.10
$27.64
$28.20
$28.76

Year 4
$27.47
$29.06
$30.90
$32.09
$33.36

To LI Output Table

PA ACT 129 Program Year	DY/PY Start	PECO	PPL	DLC	Met-Ed	Penelec	Penn Power
18	2027	$58.14	$44.87	$18.67	$18.10	$18.10	$18.10
19	2028	$59.30	$45.77	$19.04	$18.46	$18.46	$18.46
20	2029	$60.49	$46.68	$19.42	$18.83	$18.83	$18.83
21	2030	$61.70	$47.62	$19.81	$19.21	$19.21	$19.21
22	2031	$62.93	$48.57	$20.21	$19.59	$19.59	$19.59
23	2032	$64.19	$49.54	$20.61	$19.98	$19.98	$19.98
24	2033	$65.48	$50.53	$21.03	$20.38	$20.38	$20.38
25	2034	$66.78	$51.54	$21.45	$20.79	$20.79	$20.79
26	2035	$68.12	$52.57	$21.87	$21.21	$21.21	$21.21
27	2036	$69.48	$53.62	$22.31	$21.63	$21.63	$21.63
28	2037	$70.87	$54.70	$22.76	$22.06	$22.06	$22.06
29	2038	$72.29	$55.79	$23.21	$22.51	$22.51	$22.51
30	2039	$73.74	$56.91	$23.68	$22.96	$22.96	$22.96
31	2040	$75.21	$58.04	$24.15	$23.41	$23.41	$23.41
32	2041	$76.71	$59.21	$24.63	$23.88	$23.88	$23.88
33	2042	$78.25	$60.39	$25.13	$24.36	$24.36	$24.36
34	2043	$79.81	$61.60	$25.63	$24.85	$24.85	$24.85
35	2044	$81.41	$62.83	$26.14	$25.34	$25.34	$25.34
36	2045	$83.04	$64.09	$26.67	$25.85	$25.85	$25.85
37	2046	$84.70	$65.37	$27.20	$26.37	$26.37	$26.37

West Penn
$18.10
$18.46
$18.83
$19.21
$19.59
$19.98
$20.38
$20.79
$21.21
$21.63
$22.06
$22.51
$22.96
$23.41
$23.88
$24.36
$24.85
$25.34
$25.85
$26.37

Arrearages 2026 Data

EDC	Average kWh savings per participant (System Level)	Total Annual Impact Per MWh, $2026
PECO	288	$58.14
PPL	382	$44.87
DLC	556	$18.67
Met-Ed	350	$18.10
Penelec	325	$18.10
Penn Power	358	$18.10
West Penn	372	$18.10

Source
EDC specific (per draft memo)
EDC specific (per draft memo)
EDC specific (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)

Sector	Building Type	End Use	Summer Peak
Commercial	Composite	cooling	57.6%
Commercial	Composite	exterior_lighting	9.2%
Commercial	Composite	fans	25.9%
Commercial	Composite	heat_recovery	23.5%
Commercial	Composite	heat_rejection	57.2%
Commercial	Composite	heating	0.5%
Commercial	Composite	interior_equipment	24.1%
Commercial	Composite	interior_lighting	29.8%
Commercial	Composite	pumps	15.2%
Commercial	Composite	refrigeration	22.9%
Commercial	Composite	water_heating	25.0%
Commercial	Composite	whole_building	25.2%
Commercial	Education	cooling	64.2%
Commercial	Education	exterior_lighting	9.1%
Commercial	Education	fans	26.8%
Commercial	Education	heat_recovery	22.9%
Commercial	Education	heat_rejection	53.7%
Commercial	Education	heating	1.1%
Commercial	Education	interior_equipment	23.5%
Commercial	Education	interior_lighting	31.0%
Commercial	Education	pumps	25.7%
Commercial	Education	refrigeration	23.0%
Commercial	Education	water_heating	26.8%
Commercial	Education	whole_building	23.5%
Commercial	Grocery	cooling	56.4%
Commercial	Grocery	exterior_lighting	9.2%
Commercial	Grocery	fans	24.1%
Commercial	Grocery	heat_recovery	22.2%
Commercial	Grocery	heating	0.1%
Commercial	Grocery	interior_equipment	23.9%
Commercial	Grocery	interior_lighting	22.5%
Commercial	Grocery	pumps	8.4%
Commercial	Grocery	whole_building	24.0%
Commercial	Health	cooling	50.6%
Commercial	Health	exterior_lighting	9.1%
Commercial	Health	fans	23.2%
Commercial	Health	heat_recovery	20.5%
Commercial	Health	heat_rejection	50.1%
Commercial	Health	heating	1.4%
Commercial	Health	interior_equipment	23.3%
Commercial	Health	interior_lighting	27.8%
Commercial	Health	pumps	33.2%
Commercial	Health	refrigeration	23.7%
Commercial	Health	water_heating	22.2%
Commercial	Health	whole_building	25.8%
Commercial	Lodging	cooling	38.6%
Commercial	Lodging	exterior_lighting	9.2%
Commercial	Lodging	fans	27.9%
Commercial	Lodging	heat_recovery	19.6%
Commercial	Lodging	heat_rejection	47.6%
Commercial	Lodging	heating	0.2%
Commercial	Lodging	interior_equipment	19.6%
Commercial	Lodging	interior_lighting	21.7%
Commercial	Lodging	pumps	19.4%

Commercial	Lodging	refrigeration	21.5%
Commercial	Lodging	water_heating	18.8%
Commercial	Lodging	whole_building	22.0%
Commercial	Office	cooling	54.2%
Commercial	Office	exterior_lighting	9.2%
Commercial	Office	fans	25.0%
Commercial	Office	heat_recovery	25.9%
Commercial	Office	heat_rejection	56.6%
Commercial	Office	heating	0.2%
Commercial	Office	interior_equipment	21.8%
Commercial	Office	interior_lighting	32.8%
Commercial	Office	pumps	24.5%
Commercial	Office	water_heating	25.8%
Commercial	Office	whole_building	25.4%
Commercial	Restaurant	cooling	49.7%
Commercial	Restaurant	exterior_lighting	9.1%
Commercial	Restaurant	fans	24.4%
Commercial	Restaurant	heat_recovery	19.7%
Commercial	Restaurant	heating	0.7%
Commercial	Restaurant	interior_equipment	24.7%
Commercial	Restaurant	interior_lighting	25.0%
Commercial	Restaurant	pumps	8.4%
Commercial	Restaurant	refrigeration	22.0%
Commercial	Restaurant	water_heating	24.7%
Commercial	Restaurant	whole_building	24.3%
Commercial	Retail	cooling	56.0%
Commercial	Retail	exterior_lighting	9.2%
Commercial	Retail	fans	26.6%
Commercial	Retail	heat_recovery	22.7%
Commercial	Retail	heat_rejection	54.5%
Commercial	Retail	heating	0.9%
Commercial	Retail	interior_equipment	23.0%
Commercial	Retail	interior_lighting	30.6%
Commercial	Retail	pumps	4.3%
Commercial	Retail	water_heating	24.3%
Commercial	Retail	whole_building	26.4%
Commercial	Warehouse	cooling	64.1%
Commercial	Warehouse	exterior_lighting	9.3%
Commercial	Warehouse	fans	27.3%
Commercial	Warehouse	heat_recovery	23.7%
Commercial	Warehouse	heat_rejection	64.5%
Commercial	Warehouse	heating	0.0%
Commercial	Warehouse	interior_equipment	28.2%
Commercial	Warehouse	interior_lighting	30.0%
Commercial	Warehouse	pumps	2.5%
Commercial	Warehouse	whole_building	26.2%
Residential	Composite	ceiling_fan	19.3%
Residential	Composite	clothes_dryer	23.9%
Residential	Composite	clothes_washer	25.3%
Residential	Composite	cooling	48.8%
Residential	Composite	cooling_fans_pumps	52.2%
Residential	Composite	dishwasher	26.0%
Residential	Composite	freezer	22.3%
Residential	Composite	heating	0.7%
Residential	Composite	heating_fans_pumps	0.8%

Residential	Composite	heating_hp_bkup	0.0%
Residential	Composite	hot_tub_heater	22.2%
Residential	Composite	hot_tub_pump	22.5%
Residential	Composite	interior_lighting	20.8%
Residential	Composite	lighting_exterior	17.2%
Residential	Composite	lighting_garage	16.6%
Residential	Composite	mech_vent	21.4%
Residential	Composite	net	18.6%
Residential	Composite	plug_loads	18.8%
Residential	Composite	pool_heater	23.9%
Residential	Composite	pool_pump	24.0%
Residential	Composite	pv	34.8%
Residential	Composite	range_oven	22.7%
Residential	Composite	refrigerator	22.1%
Residential	Composite	water_heating	19.8%
Residential	Composite	well_pump	21.2%
Residential	Composite	whole_home	18.6%
Residential	Multi Family	ceiling_fan	19.3%
Residential	Multi Family	clothes_dryer	24.0%
Residential	Multi Family	clothes_washer	25.1%
Residential	Multi Family	cooling	47.9%
Residential	Multi Family	cooling_fans_pumps	49.5%
Residential	Multi Family	dishwasher	25.7%
Residential	Multi Family	freezer	22.3%
Residential	Multi Family	heating	0.5%
Residential	Multi Family	heating_fans_pumps	0.6%
Residential	Multi Family	heating_hp_bkup	0.0%
Residential	Multi Family	hot_tub_heater	22.2%
Residential	Multi Family	hot_tub_pump	22.6%
Residential	Multi Family	interior_lighting	20.8%
Residential	Multi Family	lighting_exterior	17.0%
Residential	Multi Family	mech_vent	22.1%
Residential	Multi Family	net	16.1%
Residential	Multi Family	plug_loads	18.8%
Residential	Multi Family	range_oven	22.8%
Residential	Multi Family	refrigerator	22.1%
Residential	Multi Family	water_heating	19.6%
Residential	Multi Family	well_pump	21.2%
Residential	Multi Family	whole_home	16.1%
Residential	Single Family	ceiling_fan	19.3%
Residential	Single Family	clothes_dryer	23.9%
Residential	Single Family	clothes_washer	25.3%
Residential	Single Family	cooling	49.1%
Residential	Single Family	cooling_fans_pumps	52.9%
Residential	Single Family	dishwasher	26.0%
Residential	Single Family	freezer	22.3%
Residential	Single Family	heating	0.8%
Residential	Single Family	heating_fans_pumps	0.8%
Residential	Single Family	heating_hp_bkup	0.0%
Residential	Single Family	hot_tub_heater	22.2%
Residential	Single Family	hot_tub_pump	22.5%
Residential	Single Family	interior_lighting	20.8%
Residential	Single Family	lighting_exterior	17.2%
Residential	Single Family	lighting_garage	16.6%
Residential	Single Family	mech_vent	21.2%

Residential	Single Family	net	19.3%
Residential	Single Family	plug_loads	18.8%
Residential	Single Family	pool_heater	23.9%
Residential	Single Family	pool_pump	24.0%
Residential	Single Family	pv	34.8%
Residential	Single Family	range_oven	22.7%
Residential	Single Family	refrigerator	22.1%
Residential	Single Family	water_heating	19.8%
Residential	Single Family	well_pump	21.2%
Residential	Single Family	whole_home	19.3%

Summer Off Peak	Winter Peak	Winter Off Peak	Shoulder Peak
29.0%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.8%	11.4%	17.6%
16.5%	14.2%	12.1%	19.3%
31.8%	1.3%	0.5%	6.0%
1.0%	24.6%	36.5%	16.0%
17.1%	14.3%	10.6%	20.3%
11.8%	17.2%	7.5%	23.8%
13.3%	15.4%	21.8%	15.5%
22.3%	11.0%	12.0%	15.9%
12.7%	18.7%	8.5%	24.7%
16.3%	14.3%	12.9%	17.9%
24.9%	1.2%	0.2%	7.0%
26.2%	8.7%	20.9%	10.1%
14.4%	15.6%	10.2%	21.0%
15.2%	14.6%	12.5%	20.0%
35.2%	1.2%	0.4%	5.9%
1.9%	27.5%	27.6%	20.9%
13.8%	16.8%	9.7%	23.7%
8.1%	19.9%	5.6%	27.6%
18.6%	12.3%	14.0%	15.4%
22.2%	11.1%	11.9%	16.0%
4.9%	26.5%	3.3%	34.7%
12.4%	17.2%	14.2%	19.0%
32.3%	1.2%	0.6%	6.1%
26.0%	8.8%	20.8%	10.2%
18.4%	13.8%	11.0%	18.9%
18.0%	13.5%	12.7%	18.2%
0.8%	24.7%	31.9%	18.5%
18.0%	13.4%	11.2%	19.4%
19.4%	12.8%	11.8%	17.7%
7.8%	16.4%	29.0%	14.3%
16.7%	14.0%	14.1%	16.7%
35.2%	1.9%	0.7%	7.4%
26.2%	8.7%	20.9%	10.1%
21.1%	11.7%	11.7%	16.9%
21.2%	11.6%	13.2%	16.5%
39.0%	1.1%	0.3%	5.6%
2.2%	21.6%	34.8%	15.2%
18.6%	13.6%	11.1%	19.1%
14.1%	15.8%	8.9%	21.8%
34.4%	5.4%	5.4%	11.5%
22.1%	11.1%	11.6%	16.1%
17.0%	14.9%	11.7%	19.9%
20.0%	12.2%	12.0%	16.2%
30.8%	5.3%	5.1%	10.8%
26.1%	8.8%	20.8%	10.2%
23.8%	10.2%	11.6%	13.8%
14.9%	15.3%	13.2%	21.0%
42.8%	0.9%	0.2%	4.9%
0.4%	26.4%	38.9%	15.1%
22.3%	11.1%	13.5%	15.9%
20.2%	12.4%	12.3%	17.0%
22.5%	11.1%	13.5%	15.8%

22.7%	10.8%	12.7%	15.6%
19.7%	12.6%	14.5%	17.0%
22.4%	11.1%	14.0%	14.5%
28.7%	2.4%	1.7%	8.2%
26.1%	8.7%	20.8%	10.2%
19.3%	12.3%	11.8%	17.2%
15.4%	15.6%	9.3%	21.6%
30.5%	1.5%	0.7%	7.1%
0.9%	24.3%	34.8%	16.8%
20.1%	12.5%	12.2%	17.8%
9.2%	18.6%	6.0%	25.7%
21.7%	10.7%	13.3%	14.7%
14.0%	17.4%	8.7%	23.0%
18.1%	13.0%	12.6%	16.9%
26.8%	4.6%	2.6%	10.5%
26.1%	8.8%	20.8%	10.2%
18.5%	13.4%	10.8%	19.1%
17.8%	12.8%	15.0%	17.0%
1.8%	25.2%	30.2%	19.9%
17.2%	14.5%	10.1%	20.3%
17.3%	13.9%	10.4%	19.4%
7.3%	16.6%	28.5%	15.0%
22.9%	10.6%	12.6%	15.4%
13.9%	17.1%	9.9%	22.5%
17.0%	14.2%	12.3%	18.4%
30.3%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.7%	10.7%	18.0%
18.4%	13.0%	12.3%	18.4%
27.7%	2.9%	1.5%	8.8%
1.6%	27.6%	30.8%	19.5%
18.9%	13.2%	11.5%	18.7%
11.3%	17.4%	7.3%	24.0%
3.5%	22.6%	25.4%	21.0%
14.5%	16.4%	10.4%	21.9%
17.5%	13.7%	12.3%	17.2%
28.5%	0.8%	0.1%	5.1%
26.0%	8.8%	20.8%	10.3%
19.8%	12.2%	12.1%	16.1%
15.7%	14.0%	13.7%	17.8%
30.0%	0.3%	0.0%	3.7%
0.1%	22.2%	48.6%	9.7%
13.6%	16.3%	8.3%	23.0%
12.1%	16.8%	7.4%	23.5%
2.2%	21.2%	36.0%	14.8%
14.0%	15.5%	12.7%	19.7%
19.4%	14.1%	14.2%	16.8%
15.6%	15.6%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.3%	2.0%	2.5%	5.1%
40.4%	0.1%	0.1%	4.5%
13.6%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.3%	37.3%	12.7%
1.9%	28.2%	37.5%	12.7%

0.2%	34.0%	50.3%	5.6%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.6%	12.3%	12.4%	17.4%
16.5%	16.5%	18.6%	14.8%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.3%	15.5%	10.7%	20.0%
23.7%	9.5%	11.0%	16.5%
16.1%	15.5%	13.5%	19.8%
17.1%	14.5%	14.0%	18.5%
16.5%	16.5%	18.6%	14.8%
19.4%	14.1%	14.2%	16.9%
15.7%	15.4%	11.2%	20.7%
17.8%	14.2%	10.0%	19.9%
38.0%	1.7%	2.0%	5.9%
39.9%	0.3%	0.3%	6.2%
13.7%	16.9%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.5%	28.7%	38.8%	11.8%
1.5%	29.1%	39.3%	11.5%
0.1%	36.3%	53.0%	3.7%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	14.0%	16.7%	16.0%
19.8%	12.7%	11.9%	18.1%
14.7%	18.0%	21.4%	14.3%
20.4%	13.3%	14.3%	16.5%
17.3%	15.5%	10.6%	20.2%
23.8%	9.5%	11.0%	16.5%
16.2%	15.5%	13.6%	19.6%
17.1%	14.5%	14.0%	18.5%
14.7%	18.0%	21.4%	14.3%
19.4%	14.1%	14.2%	16.8%
15.6%	15.7%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.2%	2.1%	2.7%	4.8%
40.5%	0.1%	0.1%	4.1%
13.5%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.2%	36.9%	13.0%
2.0%	28.0%	37.0%	13.0%
0.2%	33.4%	49.6%	6.1%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
19.0%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.8%	12.1%	12.5%	17.2%

17.0%	16.1%	17.9%	14.9%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.4%	15.5%	10.7%	19.9%
23.7%	9.5%	11.0%	16.5%
16.1%	15.6%	13.4%	19.8%
17.1%	14.5%	14.0%	18.5%
17.0%	16.1%	17.8%	14.9%

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			LW - LMP 2018	LW - LMP 2019	LW - LMP 2020	LW - LMP 2021	LW - LMP 2022
Duqu	DLC	DLCO/DUQ	39.98	27.69	22.79	39.17	74.76
Metr	Met-Ed	Met-Ed/MEC	37.06	26.34	21.16	39.97	82.2
PECO	PECO	PECO	36.36	24.75	19.29	33.55	71.67
Penn	Penelec	PENELEC/PE	37.9	26.17	20.84	37.73	73.26
Penn	Penn Power	ATSI	40.19	28.06	22.55	39.47	74.96
PPL U	PPL	PPL	35.95	24.85	19.42	35.92	75.74
West	West Penn	APS	39.78	27.83	22.4	40.44	79.01
	Western Hub	Western Hub	36.95	26.7	20.92	38.88	74.25

LW - LMP	LMP
2023	2024
31.31	
27.93	29.05
23.63	
31.01	31.8
31.05	31.96
25.73	
32.49	32.39
31.78	31.48

Table 11-6 Zonal and PJM real-time, load-weighted averag

	2018				
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP
AECO	$37.06	$37.68	($1.45)	$0.83	$25.07
AEP	$37.79	$38.16	$0.08	($0.44)	$28.21
APS	$39.78	$38.40	$1.12	$0.25	$27.83
ATSI	$40.19	$37.60	$1.99	$0.60	$28.06
BGE	$44.03	$38.86	$3.81	$1.36	$30.82
ComEd	$30.05	$37.42	($5.52)	($1.84)	$24.72
DAY	$38.96	$38.12	$0.17	$0.66	$29.52
DEOK	$39.16	$38.10	$1.99	($0.93)	$28.49
DLCO	$39.98	$37.68	$2.16	$0.14	$27.69
Dominion	$43.16	$39.04	$3.61	$0.52	$29.08
DPL	$43.76	$39.07	$3.15	$1.54	$27.71
EKPC	$36.20	$39.71	($2.30)	($1.21)	$28.18
JCPL	$37.08	$38.08	($1.65)	$0.65	$25.40
Met-Ed	$37.06	$38.09	($1.36)	$0.33	$26.34
OVEC	$30.89	$32.12	($0.25)	($0.97)	$26.23
PECO	$36.36	$38.11	($2.11)	$0.37	$24.75
PENELEC	$37.90	$37.69	($0.19)	$0.40	$26.17
Pepco	$42.60	$38.72	$2.97	$0.91	$29.68
PPL	$35.95	$38.34	($2.37)	($0.02)	$24.85
PSEG	$36.68	$37.57	($1.48)	$0.59	$25.28
RECO	$37.40	$37.81	($0.97)	$0.56	$25.72
PJM	$38.24	$38.19	$0.04	$0.02	$27.32

Table 11-8 Hub real-time, average LMP component

	2018			
	Real-Time LMP	Energy Component	Congestion Component	Compon
AEP Gen Hub	$33.29	$36.04	($1.34)	($1
AEP-DAY Hub	$34.74	$36.04	($0.71)	($0
ATSI Gen Hub	$36.94	$36.04	$1.01	($0
Chicago Gen Hub	$28.08	$36.04	($5.73)	($2
Chicago Hub	$28.61	$36.04	($5.71)	($1
Dominion Hub	$39.55	$36.04	$3.31	$0
Eastern Hub	$38.35	$36.04	$1.12	$
N Illinois Hub	$28.40	$36.04	($5.73)	($1
New Jersey Hub	$34.57	$36.04	($1.97)	$0
Ohio Hub	$34.56	$36.04	($0.89)	($0
West Interface Hub	$38.13	$36.04	$2.37	($0
Western Hub	$36.95	$36.04	$0.77	$0

The day-ahead components of LMP for each hub a

Table 11-5 Zonal real-time load-weig per MWh): January through June, 20

	2024 (Jan - Jun)			
	Real-Time LMP	Energy Component	Congestion Component	Com
ACEC	$27.72	$31.95	($4.66)	
AEP	$31.64	$31.46	$0.54	
APS	$32.39	$31.68	$0.56	
ATSI	$31.96	$31.30	$0.59	
BGE	$38.82	$32.06	$5.57	
COMED	$26.08	$31.50	($3.98)	
DAY	$33.44	$31.74	$1.08	
DOM	$37.66	$31.54	$5.46	
DPL	$29.31	$32.10	($3.71)	
DUKE	$32.24	$31.84	$0.66	
DUQ	$32.17	$31.37	$1.06	
EKPC	$32.74	$32.60	$0.55	
JCPLC	$28.17	$32.20	($4.49)	
MEC	$29.05	$31.56	($2.66)	
OVEC	$28.80	$30.05	($0.35)	
PE	$31.80	$31.08	$0.40	
PECO	$26.86	$31.66	($4.84)	
PEPCO	$38.06	$32.06	$5.00	
PPL	$26.71	$31.49	($4.53)	
PSEG	$28.53	$31.60	($3.48)	
REC	$30.70	$31.97	($1.67)	
PJM	$31.70	$31.61	$0.06	

Hub Components

The real-time components of LMP

Table 11-7 Hub real-time average L

		2024 (Ja
	Real-Time LMP	Energy Component
AEP Gen Hub	$28.50	$29.64
AEP-DAY Hub	$29.21	$29.64
ATSI Gen Hub	$29.87	$29.64
Chicago Gen Hub	$23.17	$29.64
Chicago Hub	$24.31	$29.64
Dominion Hub	$32.98	$29.64

Dominion Hub	$32.96	$29.64
Eastern Hub	$26.61	$29.64
N Illinois Hub	$23.93	$29.64
New Jersey Hub	$26.28	$29.64
Ohio Hub	$29.16	$29.64
West Interface Hub	$30.72	$29.64
Western Hub	$31.48	$29.64

ge LMP components (Dollars per MWh): 2018 and 2019

2019		
Energy Component	Congestion Component	Loss Component
$27.28	($2.39)	$0.17
$27.24	$1.00	($0.03)
$27.28	$0.52	$0.03
$27.16	$0.50	$0.41
$27.49	$2.47	$0.86
$27.12	($1.54)	($0.86)
$27.38	$1.12	$1.02
$27.33	$1.17	($0.00)
$27.18	$0.56	($0.05)
$27.39	$1.42	$0.28
$27.54	($0.39)	$0.56
$27.69	$0.65	($0.16)
$27.49	($2.18)	$0.09
$27.26	($0.74)	($0.18)
$26.39	$0.52	($0.68)
$27.25	($2.33)	($0.17)
$27.03	($0.76)	($0.10)
$27.46	$1.69	$0.53
$27.25	($1.97)	($0.42)
$27.14	($1.84)	($0.02)
$27.39	($1.64)	($0.03)
$27.28	$0.02	$0.02

s (Dollars per MWh): 2018 and 2019

		2019		
Loss nent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.41)	$26.03	$26.25	$0.48	($0.71)
.58)	$27.16	$26.25	$0.97	($0.06)
.11)	$26.77	$26.25	$0.57	($0.05)
.22)	$23.53	$26.25	($1.59)	($1.14)
.72)	$23.91	$26.25	($1.59)	($0.76)
0.20	$27.53	$26.25	$1.22	$0.06
1.19	$25.28	$26.25	($1.37)	$0.40
.91)	$23.74	$26.25	($1.61)	($0.90)
0.51	$24.03	$26.25	($2.19)	($0.03)
.58)	$27.29	$26.25	$1.05	($0.02)
.28)	$26.79	$26.25	$0.73	($0.19)
0.14	$26.70	$26.25	$0.53	($0.09)

ıre presented in Table 11-9 for 2018 and 2019.

Table 11-6 Zonal real-time loa

		2020	
	Real-Time LMP	Energy Component	Co Co
ACEC	$19.72	$22.04	
AEP	$22.14	$21.60	
APS	$22.40	$21.64	
ATSI	$22.55	$21.67	
BGE	$25.78	$21.89	
COMED	$20.18	$21.70	
DAY	$23.23	$21.76	
DOM	$23.05	$21.77	
DPL	$22.90	$21.94	
DUKE	$22.37	$21.72	
DUQ	$22.79	$21.75	
EKPC	$22.14	$21.79	
JCPLC	$20.05	$22.13	
MEC	$21.16	$21.74	
OVEC	$20.75	$20.78	
PE	$20.84	$21.50	
PECO	$19.29	$21.78	
PEPCO	$23.59	$21.85	
PPL	$19.42	$21.65	
PSEG	$19.69	$21.77	
REC	$20.74	$22.16	
PJM	$21.77	$21.73	

Hub Component

The real-time compone

Table 11-8 Hub real-ti

	Real-Ti LM
AEP Gen Hub	$20.
AEP-DAY Hub	$21.
ATSI Gen Hub	$20.
Chicago Gen Hub	$18.
Chicago Hub	$19.
Dominion Hub	$21.
Eastern Hub	$20.
N Illinois Hub	$19.
New Jersey Hub	$18.
Ohio Hub	$21.
West Interface Hub	$20.
Western Hub	$20.

The day-ahead compor

ghted average LMP components (Dollars
024 and 2025

		2025 (Jan - Jun)		
Loss ponent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
$0.44	$49.28	$53.87	($5.89)	$1.30
($0.36)	$49.50	$50.64	($0.36)	($0.78)
$0.16	$52.22	$51.49	$0.31	$0.43
$0.06	$48.29	$50.68	($2.29)	($0.09)
$1.19	$63.19	$53.06	$7.93	$2.20
($1.44)	$37.31	$51.32	($11.20)	($2.82)
$0.63	$48.80	$51.37	($3.01)	$0.45
$0.66	$67.75	$51.43	$15.08	$1.23
$0.92	$51.34	$53.44	($4.12)	$2.02
($0.26)	$47.20	$51.60	($3.33)	($1.07)
($0.26)	$47.46	$51.12	($2.93)	($0.72)
($0.40)	$49.88	$52.77	($1.62)	($1.27)
$0.46	$49.91	$53.98	($5.30)	$1.22
$0.15	$49.53	$51.73	($2.55)	$0.34
($0.91)	$42.51	$48.11	($3.80)	($1.81)
$0.32	$51.49	$50.41	$0.49	$0.60
$0.04	$46.19	$52.16	($6.42)	$0.46
$1.00	$63.40	$52.95	$8.60	$1.85
($0.25)	$45.37	$51.48	($5.95)	($0.16)
$0.40	$49.25	$52.46	($4.35)	$1.13
$0.40	$53.26	$53.36	($1.23)	$1.12
$0.02	$51.75	$51.58	$0.12	$0.04

for each hub are presented in Table 11-7 for the first six months of 2

.MP components (Dollars per MWh): January through June, 2024 and

n - Jun)		2025 (Jan - Jun)			
Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($0.10)	($1.04)	$42.04	$46.93	($3.04)	($1.85)
$0.05	($0.48)	$44.12	$46.93	($1.78)	($1.03)
$0.65	($0.41)	$44.00	$46.93	($1.89)	($1.05)
($4.78)	($1.69)	$32.37	$46.93	($11.46)	($3.09)
($4.03)	($1.29)	$33.31	$46.93	($11.17)	($2.45)
$3.26	$0.09	$52.14	$46.93	$5.06	$0.15

($3.75)	$0.72	$43.46	$46.93	($4.94)	$1.48
($4.25)	($1.45)	$33.23	$46.93	($10.98)	($2.72)
($3.69)	$0.34	$42.85	$46.93	($4.95)	$0.87
($0.00)	($0.47)	$44.28	$46.93	($1.57)	($1.08)
$1.46	($0.37)	$47.30	$46.93	$0.98	($0.61)
$1.50	$0.34	$48.89	$46.93	$1.43	$0.54

ıd-weighted average LMP components (Dollars per MWh): 2020 and 2021

			2021		
ıngestion mponent	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($2.36)	$0.05	$34.13	$40.20	($6.35)	$0.28
$0.45	$0.09	$40.31	$39.50	$0.83	($0.02)
$0.82	($0.06)	$40.44	$39.52	$0.94	($0.03)
$0.58	$0.30	$39.47	$39.66	($0.36)	$0.17
$3.30	$0.59	$45.77	$39.92	$4.79	$1.07
($1.08)	($0.44)	$37.00	$39.81	($1.69)	($1.13)
$0.49	$0.98	$42.92	$39.89	$1.51	$1.51
$1.23	$0.05	$44.67	$39.78	$4.34	$0.55
$0.65	$0.30	$40.24	$39.88	($0.31)	$0.67
$0.51	$0.14	$41.49	$39.84	$1.61	$0.04
$1.18	($0.15)	$39.17	$39.70	($0.04)	($0.49)
$0.31	$0.04	$41.20	$39.93	$1.35	($0.07)
($2.12)	$0.04	$34.52	$40.27	($5.96)	$0.21
($0.40)	($0.18)	$39.97	$39.69	$0.44	($0.16)
$0.32	($0.34)	$37.98	$38.08	$0.74	($0.84)
($0.52)	($0.14)	$37.73	$39.39	($1.38)	($0.27)
($2.25)	($0.23)	$33.55	$39.73	($5.92)	($0.25)
$1.47	$0.28	$44.62	$39.95	$3.96	$0.72
($1.85)	($0.39)	$35.92	$39.47	($3.00)	($0.55)
($2.03)	($0.04)	$35.78	$39.81	($4.17)	$0.14
($1.45)	$0.03	$38.80	$40.28	($1.71)	$0.23
$0.02	$0.01	$39.78	$39.72	$0.04	$0.02

S

ents of LMP for each hub are presented in Table 11-8 for 2020 and 2021.[15]

me average LMP components (Dollars per MWh): 2020 and 2021

	2020			2021			
me MP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.38	$20.63	$0.19	($0.44)	$37.44	$38.12	$0.36	($1.04)
.17	$20.63	$0.47	$0.07	$38.63	$38.12	$0.63	($0.12)
.91	$20.63	$0.33	($0.04)	$37.20	$38.12	($0.41)	($0.51)
.72	$20.63	($1.23)	($0.67)	$34.31	$38.12	($2.25)	($1.57)
.12	$20.63	($1.12)	($0.38)	$35.21	$38.12	($1.90)	($1.02)
.39	$20.62	$0.89	($0.13)	$41.47	$38.12	$3.17	$0.18
.40	$20.63	($0.42)	$0.20	$37.20	$38.12	($1.45)	$0.52
.02	$20.63	($1.11)	($0.49)	$34.96	$38.12	($1.94)	($1.23)
.63	$20.63	($1.93)	($0.07)	$33.20	$38.12	($4.98)	$0.06
.22	$20.63	$0.47	$0.13	$38.60	$38.12	$0.54	($0.06)
.93	$20.63	$0.48	($0.18)	$38.61	$38.12	$0.94	($0.46)
.92	$20.63	$0.41	($0.11)	$38.88	$38.12	$0.89	($0.14)

nents of LMP for each hub are presented in Table 11-9 for 2020 and 2021.

2024 and 2025.[1]

2025

Table 11-5 Zonal real-time load-weighted average LMP components (Dollars per M

	2022				2023			
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	L Compon
ACEC	$74.27	$82.01	($9.07)	$1.33	$24.94	$31.51	($6.80)	$(
AEP	$77.54	$79.32	($1.11)	($0.67)	$31.19	$30.83	$0.55	($0.
APS	$79.01	$79.61	($0.60)	$0.00	$32.49	$30.97	$1.47	$(
ATSI	$74.96	$78.32	($3.02)	($0.34)	$31.05	$30.80	$0.25	($0
BGE	$95.44	$81.87	$10.24	$3.33	$38.80	$31.29	$6.43	$1
COMED	$66.25	$78.91	($9.02)	($3.63)	$27.47	$30.88	($2.35)	($1
DAY	$80.43	$79.74	($1.06)	$1.74	$32.70	$31.03	$0.83	$(
DOM	$99.52	$81.08	$16.57	$1.88	$37.50	$31.00	$5.88	$(
DPL	$83.32	$82.21	($1.48)	$2.58	$31.06	$31.41	($0.94)	$(
DUKE	$79.54	$80.61	($0.37)	($0.70)	$32.10	$31.02	$1.02	$(
DUQ	$74.76	$79.27	($3.09)	($1.42)	$31.31	$30.86	$0.83	($0
EKPC	$83.16	$83.66	$0.05	($0.56)	$31.93	$31.17	$0.84	($0
JCPLC	$76.02	$82.22	($7.28)	$1.07	$25.89	$31.63	($5.93)	$(
MEC	$82.20	$79.14	$2.43	$0.63	$27.93	$31.08	($3.10)	($0
OVEC	$71.39	$74.99	($1.39)	($2.21)	$29.80	$29.81	$0.70	($0
PE	$73.26	$77.37	($3.65)	($0.46)	$31.01	$30.73	$0.23	$(
PECO	$71.67	$80.53	($9.11)	$0.25	$23.63	$31.14	($7.32)	($0
PEPCO	$91.68	$81.50	$7.61	$2.56	$36.59	$31.30	$4.46	$(
PPL	$75.74	$78.97	($2.95)	($0.28)	$25.73	$30.93	($4.78)	($0
PSEG	$74.74	$79.97	($6.06)	$0.83	$25.66	$31.11	($5.59)	$(
REC	$77.95	$81.82	($4.56)	$0.69	$27.90	$31.51	($3.75)	$(
PJM	$80.14	$79.98	$0.10	$0.06	$31.08	$31.00	$0.06	$(

Hub Components

The real-time components of LMP for each hub are presented in Table

Table 11-7 Hub real-time average LMP components (Dollars per MWh):

	2022					
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Ener Compone
AEP Gen Hub	$69.25	$73.38	($1.60)	($2.53)	$29.20	$29.
AEP-DAY Hub	$70.68	$73.38	($1.72)	($0.98)	$29.77	$29.
ATSI Gen Hub	$68.74	$73.38	($2.89)	($1.75)	$29.17	$29.
Chicago Gen Hub	$59.80	$73.38	($9.27)	($4.32)	$25.32	$29.
Chicago Hub	$61.15	$73.38	($8.97)	($3.27)	$25.83	$29.
Dominion Hub	$79.56	$73.38	$5.44	$0.74	$32.56	$29.
Eastern Hub	$70.80	$73.38	($4.41)	$1.83	$27.32	$29.
N Illinois Hub	$60.71	$73.38	($9.00)	($3.67)	$25.85	$29.
New Jersey Hub	$67.42	$73.38	($6.61)	$0.64	$24.06	$29.
Ohio Hub	$70.51	$73.38	($1.92)	($0.95)	$29.72	$29.
West Interface Hub	$72.66	$73.38	$0.33	($1.06)	$30.68	$29.
Western Hub	$74.25	$73.38	$0.65	$0.22	$31.78	$29.

(Wh): 2022 and 2023

Loss ient
0.22
(.19)
0.05
(.00)
1.08
(.06)
0.84
0.62
0.59
0.07
(.38)
(.08)
0.19
(.05)
(.70)
0.04
(.19)
0.83
(.43)
0.14
0.15
0.02

Table 3-34 Day-ahead and real-time zonal average l

	2024				
	Day-Ahead				
Zone	Average DLMP	Average PLMP	Difference	Percent Difference	Average DLMP
ACEC	$27.49	$27.54	$0.05	0.2%	$25.90
AEP	$31.12	$31.18	$0.06	0.2%	$29.05
APS	$32.27	$32.33	$0.06	0.2%	$29.80
ATSI	$31.46	$31.47	$0.01	0.0%	$29.08
BGE	$40.03	$40.11	$0.08	0.2%	$36.60
COMED	$25.48	$25.55	$0.07	0.3%	$23.28
DAY	$32.62	$32.69	$0.06	0.2%	$30.30
DUKE	$31.22	$31.28	$0.06	0.2%	$28.90
DOM	$36.96	$37.02	$0.06	0.2%	$33.54
DPL	$31.27	$31.36	$0.09	0.3%	$28.44
DUQ	$30.93	$30.97	$0.04	0.1%	$29.02
EKPC	$30.58	$30.64	$0.06	0.2%	$28.57
JCPLC	$27.52	$27.57	$0.06	0.2%	$26.00
MEC	$28.66	$28.71	$0.06	0.2%	$26.28
OVEC	$29.88	$29.93	$0.06	0.2%	$27.73
PECO	$27.11	$27.17	$0.05	0.2%	$25.56
PE	$32.06	$32.10	$0.04	0.1%	$29.46
PEPCO	$38.11	$38.18	$0.07	0.2%	$34.85
PPL	$26.76	$26.82	$0.06	0.2%	$24.86
PSEG	$27.78	$27.83	$0.06	0.2%	$26.33
REC	$30.13	$30.18	$0.05	0.2%	$28.14

11-7 for 2022 and 2023.[11]

2022 and 2023

2023		
rgy ent	Congestion Component	Loss Component
.61	$0.45	($0.86)
.61	$0.43	($0.27)
.61	$0.04	($0.48)
.61	($2.93)	($1.36)
.61	($2.80)	($0.98)
.61	$2.78	$0.17
.61	($2.73)	$0.44
.61	($2.62)	($1.13)
.61	($5.63)	$0.07
.61	$0.34	($0.23)
.61	$1.43	($0.35)
.61	$1.96	$0.20

Table 3-35 Day-ahead and real-time ave

	Day-Ahead		
Hub	Average DLMP	Average PLMP	Differen
AEP GEN HUB	$29.76	$29.79	$0.
AEP-DAYTON HUB	$30.70	$30.73	$0.
ATSI GEN HUB	$30.99	$31.01	$0.
CHICAGO GEN HUB	$24.78	$24.88	$0.
CHICAGO HUB	$25.75	$25.77	$0.
DOMINION HUB	$34.03	$34.07	$0.
EASTERN HUB	$31.23	$31.28	$0.
N ILLINOIS HUB	$25.36	$25.46	$0.
NEW JERSEY HUB	$27.65	$27.68	$0.
OHIO HUB	$30.66	$30.69	$0.
WEST INT HUB	$32.17	$32.19	$0.
WESTERN HUB	$33.80	$33.83	$0.

DLMP and PLMP (Dollars per

Real-Time		
Average PLMP	Difference	Percent Difference
$27.52	$1.62	6.3%
$31.35	$2.31	7.9%
$32.18	$2.38	8.0%
$31.32	$2.24	7.7%
$39.53	$2.93	8.0%
$25.22	$1.94	8.3%
$32.75	$2.46	8.1%
$31.21	$2.31	8.0%
$36.15	$2.61	7.8%
$30.94	$2.50	8.8%
$31.23	$2.21	7.6%
$30.84	$2.27	8.0%
$27.67	$1.67	6.4%
$28.15	$1.87	7.1%
$29.94	$2.20	7.9%
$27.12	$1.56	6.1%
$31.61	$2.15	7.3%
$37.61	$2.76	7.9%
$26.58	$1.72	6.9%
$28.02	$1.69	6.4%
$29.93	$1.79	6.4%

Zonal LMP

Table 3-54 sho

Table 3-54 Real

	Real-T
Zone	2023
ACEC	$23.30
AEP	$30.05
APS	$31.07
ATSI	$29.88
BGE	$36.40
COMED	$25.82
DAY	$31.28
DUKE	$30.69
DOM	$35.75
DPL	$27.03
DUQ	$30.14
EKPC	$30.41
JCPLC	$24.15
MEC	$26.59
OVEC	$29.67
PECO	$22.34
PE	$29.81
PEPCO	$34.36
PPL	$24.60
PSEG	$24.32
REC	$26.04
PJM	$29.69

erage DLMP and PLMP for PJM hubs (Dollars per MWh): 2024

2024					
		Real-Time			
ice	Percent Difference	Average DLMP	Average PLMP	Difference	Percent Difference
04	0.1%	$27.69	$29.92	$2.23	8.1%
03	0.1%	$28.42	$30.69	$2.27	8.0%
02	0.1%	$28.32	$30.50	$2.18	7.7%
09	0.4%	$22.31	$24.29	$1.98	8.9%
02	0.1%	$23.49	$25.44	$1.95	8.3%
04	0.1%	$31.26	$33.76	$2.50	8.0%
05	0.2%	$28.30	$30.79	$2.48	8.8%
.11	0.4%	$23.30	$25.23	$1.94	8.3%
03	0.1%	$26.11	$27.79	$1.67	6.4%
03	0.1%	$28.36	$30.62	$2.26	8.0%
02	0.1%	$29.80	$32.15	$2.35	7.9%
03	0.1%	$30.84	$33.24	$2.40	7.8%

' and Dispatch

ws real-time zonal average and load-weighted average LMP for 2023 and 2024.

l-time zonal average and load-weighted average LMP (Dollars per MWh): 2023 and 2024

Time Average LMP		Real-Time Load-Weighted Average LMP		
2024	Percent Change	2023	2024	Percent Change
$27.52	18.1%	$24.94	$30.60	22.7%
$31.35	4.3%	$31.19	$33.22	6.5%
$32.18	3.6%	$32.49	$34.49	6.2%
$31.32	4.8%	$31.05	$33.32	7.3%
$39.53	8.6%	$38.80	$44.87	15.7%
$25.22	(2.4%)	$27.47	$27.69	0.8%
$32.75	4.7%	$32.70	$35.23	7.7%
$31.21	1.7%	$32.10	$33.49	4.3%
$36.15	1.1%	$37.50	$39.07	4.2%
$30.94	14.5%	$31.06	$35.67	14.9%
$31.23	3.6%	$31.31	$33.42	6.8%
$30.84	1.4%	$31.93	$33.49	4.9%
$27.67	14.6%	$25.89	$30.79	18.9%
$28.15	5.9%	$27.93	$30.46	9.1%
$29.94	0.9%	$29.80	$30.14	1.1%
$27.12	21.4%	$23.63	$29.87	26.4%
$31.61	6.0%	$31.01	$33.24	7.2%
$37.61	9.4%	$36.59	$42.06	15.0%
$26.58	8.0%	$25.73	$28.53	10.9%
$28.02	15.2%	$25.66	$30.35	18.3%
$29.93	14.9%	$27.90	$32.65	17.0%
$31.32	5.5%	$31.08	$33.74	8.5%

DRIPE EDC-Column Lookup

EDC	DRIPE Column Ref
PECO	0
PPL	4
DLC	8
Met-Ed	12
Penelec	16
Penn Power	20
West Penn	24

Stacked Bars Offset Row Lookup

EDC	2026	2021
DLC	0	0
MetEd	4	5
PECO	8	10
Penelec	12	15
Penn Power	16	20
PPL	20	25
West Penn	24	30

Pennsylvania Act 129 Phase V Avoided Energy and Capacity Cost Calculator
This calculator is to be utilized with the Pennsylvania (PA) Act 129 Phase V Total Resource Cost (TRC) Test Order. This calculator, developed by the Statewide Evaluator (SWE), executes the methodology outlined within the TRC Test Order to develop avoided energy and capacity costs for TRC calculations. Please refer to the Phase V TRC Test Order for additional methodology narrative and source references. For Phase V, the start year shall be set to Program Year 18 (6/1/2026/5/31/2027). The user shall gather publicly available data sets as inputs. This calculator includes the costs of compliance with the Pennsylvania Alternative Energy Portfolio Standards (AEPS) Act within the avoided energy cost calculations.

Legend	
	Inputs - where no value is available, utilize text "No Value" and not a zero or null value
	Calculation Cell - do not edit
	Results for Segment 1 - Years 1 through 4
	Results for Segment 2 - Years 5 through 10
	Results for Segment 3 - Years 11 through 20

Data Needed	TRC Test Order Section
EDC Name	
Start Year	
Inflation Rate	A.7 Page 8
Plant Heat Rates	B.2.b.v Page 18
NYMEX Electric Futures at PJM Western Hub	B.2.a Page 15
PJM State of Market EDC Zone Locational Adjustment	B.2.a Page 15
NYMEX Natural Gas Futures at Henry Hub	B.2.b.i Page 16
EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars	B.2.b.iii Page 16
NYMEX Natural Gas Adjustments at Transco 6 (Non-NY) or Tetco M-3	B.2.b.ii Page 16
Bureau of Labor Statistics PPI Data for Electric Utilities	B.5 Page 18
PJM Base Residual Auction Results	B.7 Page 21
Transmission and Distribution Capacity Costs	B.8 Page 22
AEPS Avoided Costs	B.9 Page 24
Demand Reduction Induced Price Effects (DRIPE)	B.10 Page 25
Benefits Incurreced Through Reduced Arrearages Activity	B.12 Page 29

Monetary Issues:	All output dollars are nominal

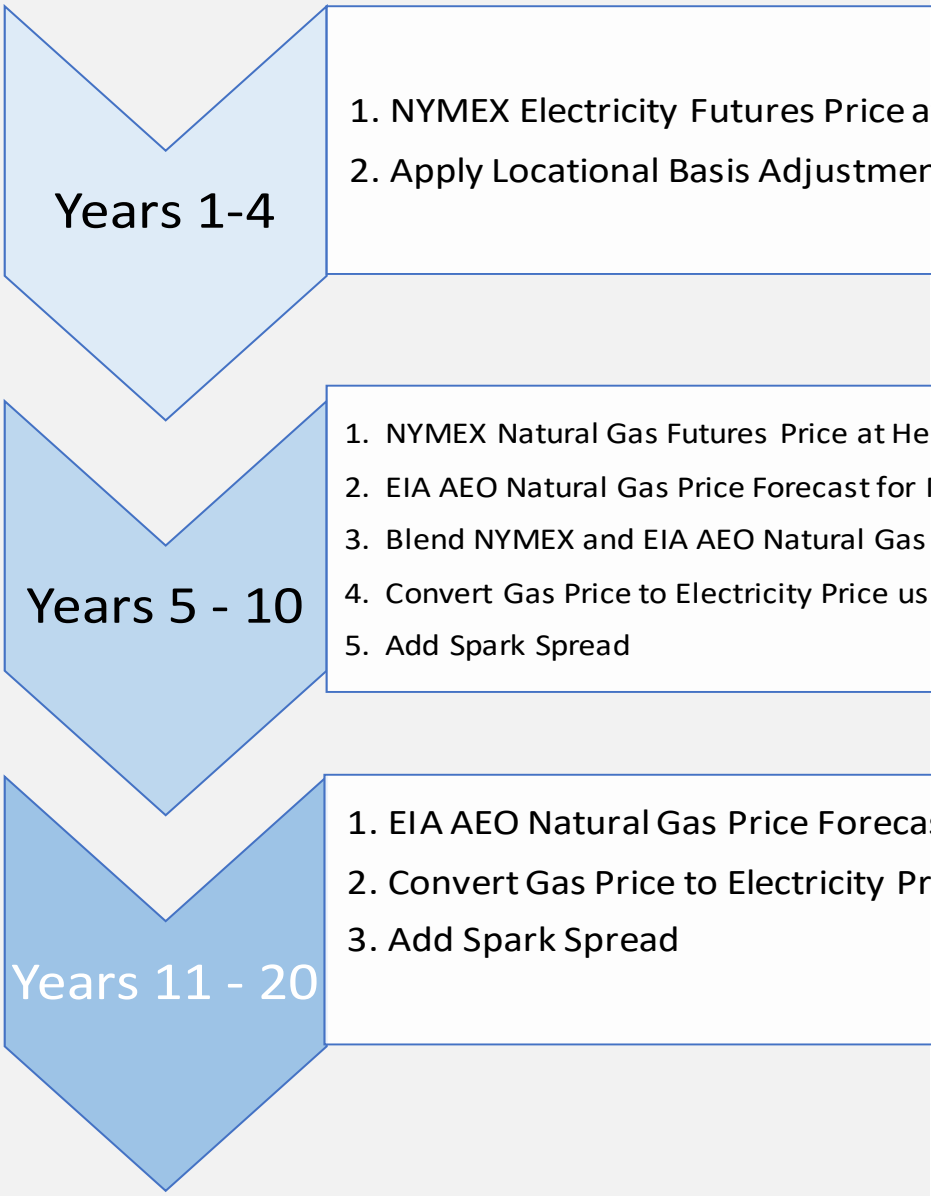
Calendarization Issues:	The PA Act 129 calendar follows the PJM calendar, which starts in the month of June and ends in the month of May. For a measure installed within a PA Act 129 program year, the avoided energy costs are based on the calendar year of the last months in the PJM calendar. For instance, a measure installed in PA Act 129 Program Year 18 (6/1/2026-5/31/2027), the avoided energy costs will be calculated based on 12 months of data from the calendar year 2027.

1. Included latest PJM Capacity Auction Results (2026/2027) per 2026 TRC Order, at page 38 ""EDC inclusion of the upco
of generation capacity calculation wil be an important mechanism to capture any market shifts."
Note that on Generation Capacity Tab, annual labels on Row 14 required correction.
3. Updated BLS data for CPI and PPI to add 2024 data.
2. Updated data with ICE August 21 values for PJM Western Hub, HH NG, Transco, and Tetco
4. Per SWE August 29, 2025 Guidance Memo:

* Correction Steps 1 and 2. Fixed calendarization issue, per steps outlined in the SWE memo. Please note that EIA Natu
* Additional issue 1: Not Applicable
* Additional Issue 2: Used 2025 PJM SOM Report for 2024 values, Tables 11-5 and 11-7 (See also SWE follow up email t
* Additional Issue 3: Switched from using NYMEX to ICE data (see 2. above)

5. EIA AEO data was updated to 2025 report for Mid Atlantic Region, Table 3, line 39, Natural Gas $/mmbtu in real dolla

Summary of Avoided Energy C



Input Tab
General Inputs
General Inputs
General Inputs
General Inputs
Elec Futures
Elec Futures
NG Futures
NG Futures
Adjustments
BLS Input
Generation Capacity
T&D Capacity
AEPS
DRIPE
Arrearages

ming auction results [2026/2027] within the PH V avoided cost

ıral Gas information had to be extended to 2046.

o Ed Miller from Patrick Burns dated: Sept 17, 2025.)

rs

ost Methodology

t PJM West Hub

nt from PJM West Hub to Operating Company Zone

nry Hub with Locational Adjustment

Mid-Atlantic Region

Price Forecast over 6 Year Period

ing On-Peak and Off-Peak Plant Heat Rates

st for Mid-Atlantic Region

ice using On-Peak and Off-Peak Plant Heat Rates

General			Act 129 PY
Company Name	West Penn		
Start Year (Program)	18	2027	18
Discount Rate	5%	TRC Test Order A.4 page 10	19
Inflation Rate	2%	TRC Test Order B.4 page 18	20
Plant Specifications			21
	Heat Rate (Btu/kWh)		22
Low Efficiency Plant	11030	TRC Test Order B.2.b.v page 17	23
High Efficiency Plant	7596	TRC Test Order B.2.b.v page 17	24
EDC Natural Gas Futures Source			25
Electric Distribution Companies	**EDC Abbreviation**	**NYMEX NG Futures Source**	26
Duquesne Light Co	DLC	Tetco M-3	27
Metropolitan Edison Co	Met-Ed	Transco 6 (Non-NY)	28
PECO Energy Co	PECO	Transco 6 (Non-NY)	29
Pennsylvania Electric Co	Penelec	Tetco M-3	30
Pennsylvania Power Co	Penn Power	Tetco M-3	31
PPL Utilities	PPL	Transco 6 (Non-NY)	32
West Penn Power Co	West Penn	Tetco M-3	33
Seasonal Definitions			34
Jan	Winter		35
Feb	Winter		36
Mar	Shoulder		37
Apr	Shoulder		38
May	Summer		39
Jun	Summer		40
Jul	Summer		41
Aug	Summer		42
Sep	Summer		43
Oct	Shoulder		44
Nov	Shoulder		45
Dec	Winter		46
			47

Calendar		
PY Start	**PY End**	**Avoided Energy YR**
2026	2027	2027
2027	2028	2028
2028	2029	2029
2029	2030	2030
2030	2031	2031
2031	2032	2032
2032	2033	2033
2033	2034	2034
2034	2035	2035
2035	2036	2036
2036	2037	2037
2037	2038	2038
2038	2039	2039
2039	2040	2040
2040	2041	2041
2041	2042	2042
2042	2043	2043
2043	2044	2044
2044	2045	2045
2045	2046	2046
2046	2047	2047
2047	2048	2048
2048	2049	2049
2049	2050	2050
2050	2051	2051
2051	2052	2052
2052	2053	2053
2053	2054	2054
2054	2055	2055
2055	2056	2056

PY Selection	PY18

SWE Note: This data excludes avoided energy costs from the Arrearag

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$87.65	$57.86	$91.93	$79.95	$74.12
19	2028	$97.28	$65.63	$104.81	$92.12	$83.15
20	2029	$104.35	$73.57	$113.31	$99.81	$89.76
21	2030	$102.08	$73.27	$113.91	$99.73	$91.23
22	2031	$73.85	$43.91	$81.17	$69.06	$59.84
23	2032	$73.87	$43.96	$83.73	$70.87	$60.50
24	2033	$76.25	$45.65	$88.08	$73.91	$62.91
25	2034	$79.14	$47.69	$93.47	$77.68	$66.13
26	2035	$81.93	$49.66	$98.52	$81.20	$69.34
27	2036	$84.52	$51.49	$103.08	$84.39	$72.08
28	2037	$86.08	$52.62	$106.26	$86.64	$73.79
29	2038	$85.47	$52.25	$104.54	$85.50	$73.06
30	2039	$85.05	$52.02	$103.28	$84.69	$72.55
31	2040	$85.48	$52.37	$104.06	$85.28	$73.02
32	2041	$86.80	$53.33	$107.02	$87.37	$74.51
33	2042	$88.25	$54.39	$110.30	$89.69	$76.16
34	2043	$89.75	$55.48	$113.67	$92.07	$77.85
35	2044	$90.77	$56.24	$115.89	$93.65	$79.00
36	2045	$91.56	$56.84	$117.52	$94.84	$79.88
37	2046	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY19

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$89.72	$58.07	$97.25	$84.56	$75.59
20	2029	$98.80	$68.02	$107.76	$94.26	$84.21
21	2030	$104.82	$76.01	$116.65	$102.47	$93.97
22	2031	$102.91	$72.97	$110.23	$98.12	$88.90
23	2032	$73.87	$43.96	$83.73	$70.87	$60.50

24	**2033**	$76.25	$45.65	$88.08	$73.91	$62.91
25	**2034**	$79.14	$47.69	$93.47	$77.68	$66.13
26	**2035**	$81.93	$49.66	$98.52	$81.20	$69.34
27	**2036**	$84.52	$51.49	$103.08	$84.39	$72.08
28	**2037**	$86.08	$52.62	$106.26	$86.64	$73.79
29	**2038**	$85.47	$52.25	$104.54	$85.50	$73.06
30	**2039**	$85.05	$52.02	$103.28	$84.69	$72.55
31	**2040**	$85.48	$52.37	$104.06	$85.28	$73.02
32	**2041**	$86.80	$53.33	$107.02	$87.37	$74.51
33	**2042**	$88.25	$54.39	$110.30	$89.69	$76.16
34	**2043**	$89.75	$55.48	$113.67	$92.07	$77.85
35	**2044**	$90.77	$56.24	$115.89	$93.65	$79.00
36	**2045**	$91.56	$56.84	$117.52	$94.84	$79.88
37	**2046**	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY20

		West Penn Zone Summer ($/MWh)		**West Penn Zone Winter ($/MWh)**		**West Penn DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$90.75	$59.97	$99.71	$86.21	$76.16
21	**2030**	$98.96	$70.15	$110.79	$96.61	$88.11
22	**2031**	$105.82	$75.88	$113.14	$101.03	$91.81
23	**2032**	$104.77	$74.86	$114.63	$101.77	$91.40
24	**2033**	$76.25	$45.65	$88.08	$73.91	$62.91
25	**2034**	$79.14	$47.69	$93.47	$77.68	$66.13
26	**2035**	$81.93	$49.66	$98.52	$81.20	$69.34
27	**2036**	$84.52	$51.49	$103.08	$84.39	$72.08
28	**2037**	$86.08	$52.62	$106.26	$86.64	$73.79
29	**2038**	$85.47	$52.25	$104.54	$85.50	$73.06
30	**2039**	$85.05	$52.02	$103.28	$84.69	$72.55
31	**2040**	$85.48	$52.37	$104.06	$85.28	$73.02
32	**2041**	$86.80	$53.33	$107.02	$87.37	$74.51
33	**2042**	$88.25	$54.39	$110.30	$89.69	$76.16
34	**2043**	$89.75	$55.48	$113.67	$92.07	$77.85
35	**2044**	$90.77	$56.24	$115.89	$93.65	$79.00
36	**2045**	$91.56	$56.84	$117.52	$94.84	$79.88
37	**2046**	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY21

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$90.46	$61.65	$102.29	$88.11	$79.61
22	2031	$99.61	$69.67	$106.93	$94.82	$85.60
23	2032	$107.87	$77.96	$117.73	$104.87	$94.50
24	2033	$108.34	$77.74	$120.17	$106.00	$95.00
25	2034	$79.14	$47.69	$93.47	$77.68	$66.13
26	2035	$81.93	$49.66	$98.52	$81.20	$69.34
27	2036	$84.52	$51.49	$103.08	$84.39	$72.08
28	2037	$86.08	$52.62	$106.26	$86.64	$73.79
29	2038	$85.47	$52.25	$104.54	$85.50	$73.06
30	2039	$85.05	$52.02	$103.28	$84.69	$72.55
31	2040	$85.48	$52.37	$104.06	$85.28	$73.02
32	2041	$86.80	$53.33	$107.02	$87.37	$74.51
33	2042	$88.25	$54.39	$110.30	$89.69	$76.16
34	2043	$89.75	$55.48	$113.67	$92.07	$77.85
35	2044	$90.77	$56.24	$115.89	$93.65	$79.00
36	2045	$91.56	$56.84	$117.52	$94.84	$79.88
37	2046	$93.38	$58.16	$121.68	$97.76	$81.95

PY Selection	PY22

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$90.62	$60.68	$97.94	$85.83	$76.61

23	**2032**	$101.27	$71.36	$111.13	$98.27	$87.90
24	**2033**	$111.56	$80.96	$123.39	$109.22	$98.22
25	**2034**	$112.50	$81.05	$126.83	$111.04	$99.49
26	**2035**	$81.93	$49.66	$98.52	$81.20	$69.34
27	**2036**	$84.52	$51.49	$103.08	$84.39	$72.08
28	**2037**	$86.08	$52.62	$106.26	$86.64	$73.79
29	**2038**	$85.47	$52.25	$104.54	$85.50	$73.06
30	**2039**	$85.05	$52.02	$103.28	$84.69	$72.55
31	**2040**	$85.48	$52.37	$104.06	$85.28	$73.02
32	**2041**	$86.80	$53.33	$107.02	$87.37	$74.51
33	**2042**	$88.25	$54.39	$110.30	$89.69	$76.16
34	**2043**	$89.75	$55.48	$113.67	$92.07	$77.85
35	**2044**	$90.77	$56.24	$115.89	$93.65	$79.00
36	**2045**	$91.56	$56.84	$117.52	$94.84	$79.88
37	**2046**	$93.38	$58.16	$121.68	$97.76	$81.95

es study. Please refer to the 'LI Output' tab for avoided costs to be used for Low Income programs only.

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$61.61	$72.59	$72.59	$8.83	$8.83	$41.25	$5.05
$70.61	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$76.18	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$76.29	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$47.25	$27.64	$27.64	$9.58	$9.58	$62.19	$9.02
$47.75	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21
$49.46	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$63.05	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$70.63	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$79.03	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$76.31	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$47.75	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21

$49.46	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

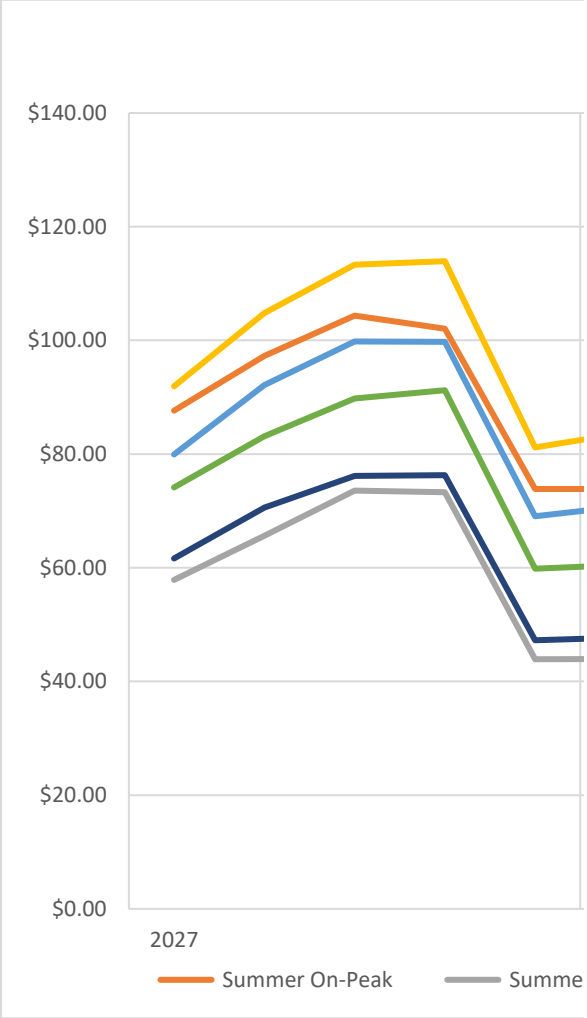
Zone Shoulder IWh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$62.58	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$73.17	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$79.22	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$78.65	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$49.46	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.67	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$73.01	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$81.75	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$81.55	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$51.72	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

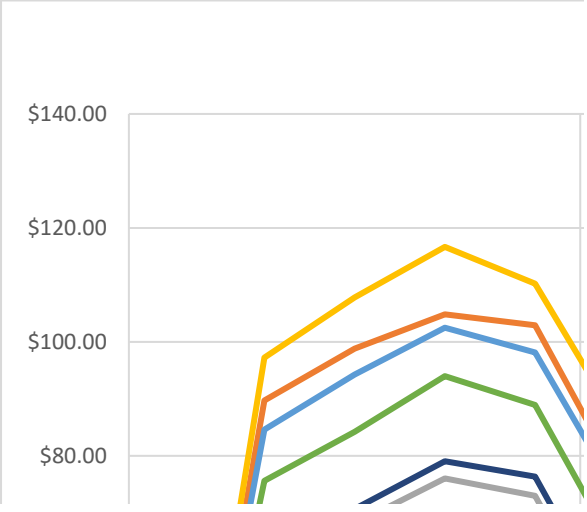
Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$64.02	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02

$75.15	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$84.77	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$85.08	$43.78	$43.78	$10.19	$10.19	$66.14	$9.59
$53.98	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$55.92	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$57.15	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$56.70	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$56.41	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$56.78	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$57.86	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$59.05	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$60.28	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$61.13	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$61.79	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$63.28	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.75	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

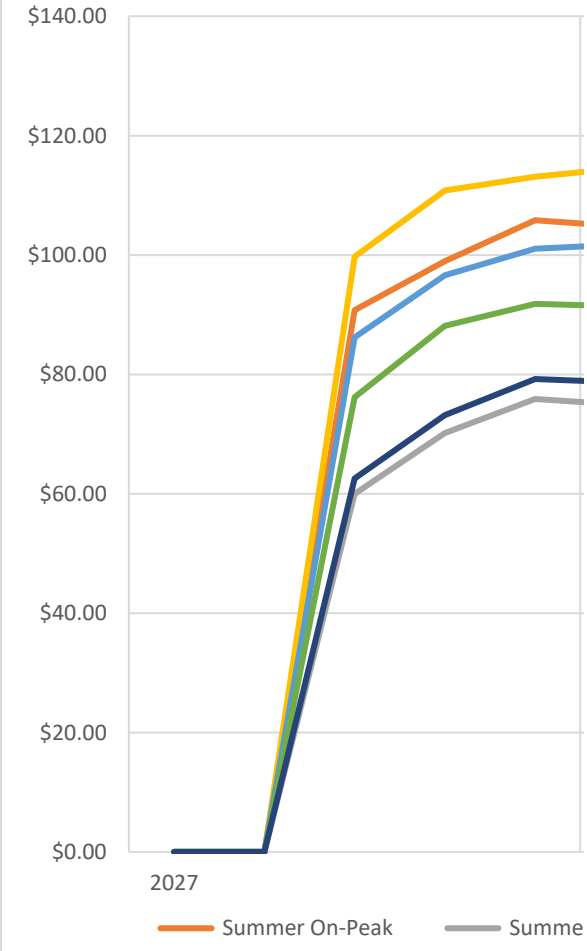


Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Se
$3.43	

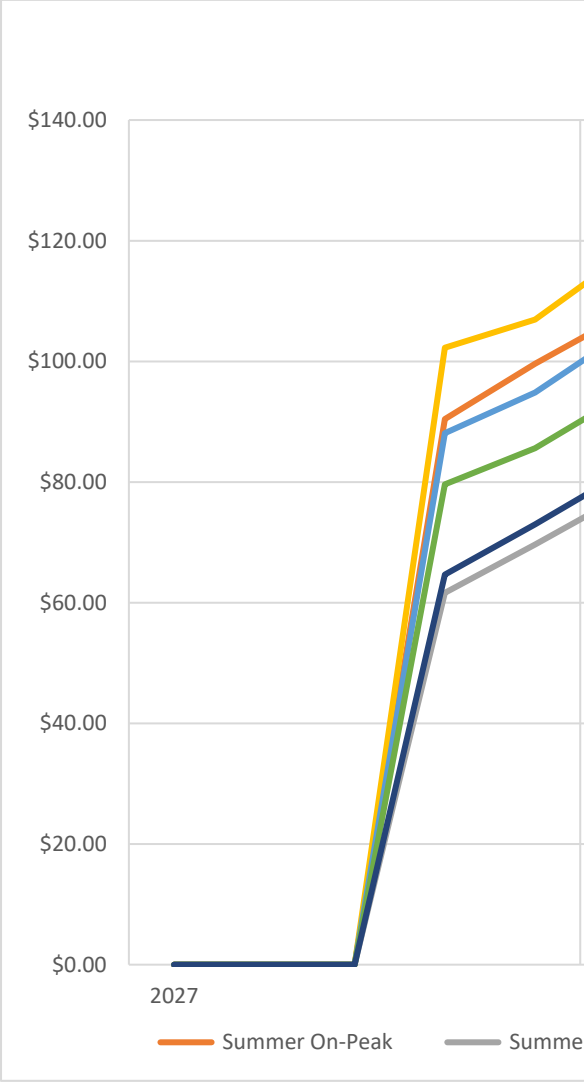


$3.68	Segment 2
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

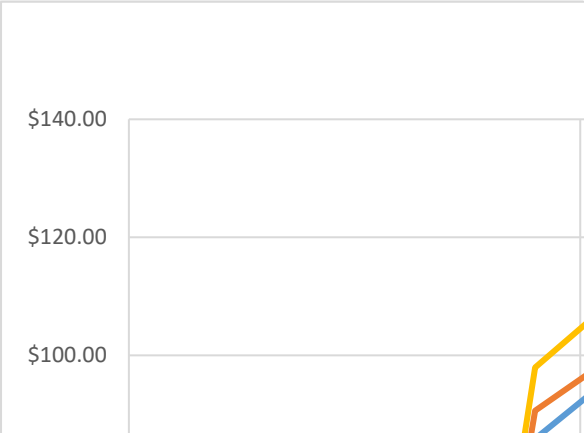
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



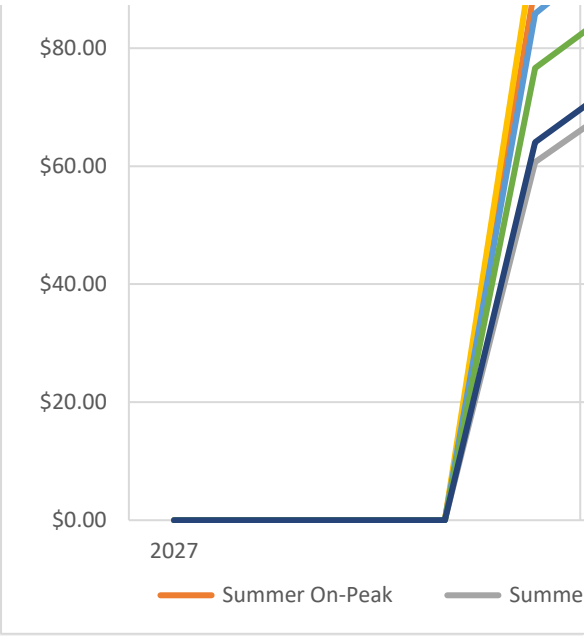
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



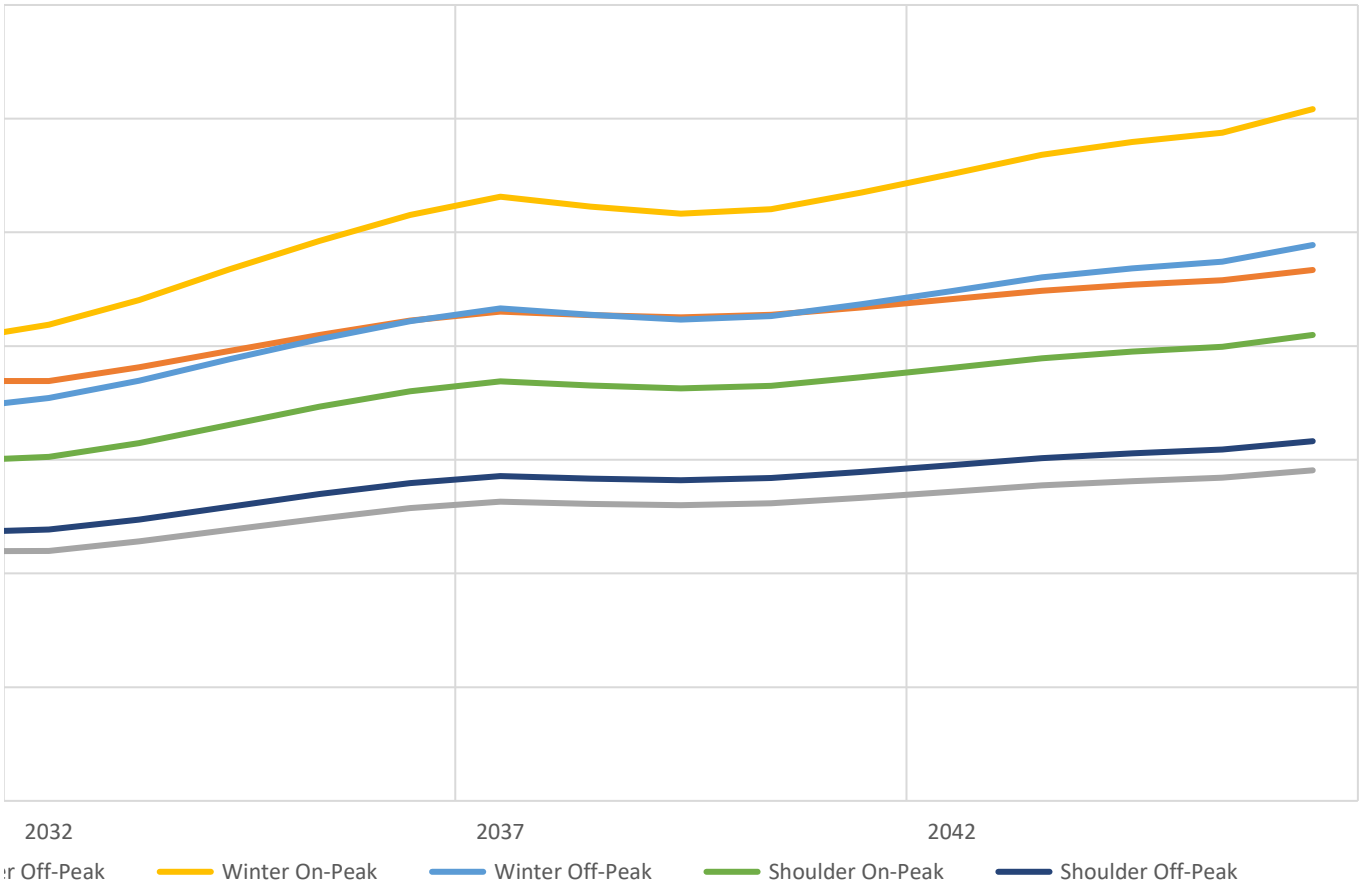
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.37	



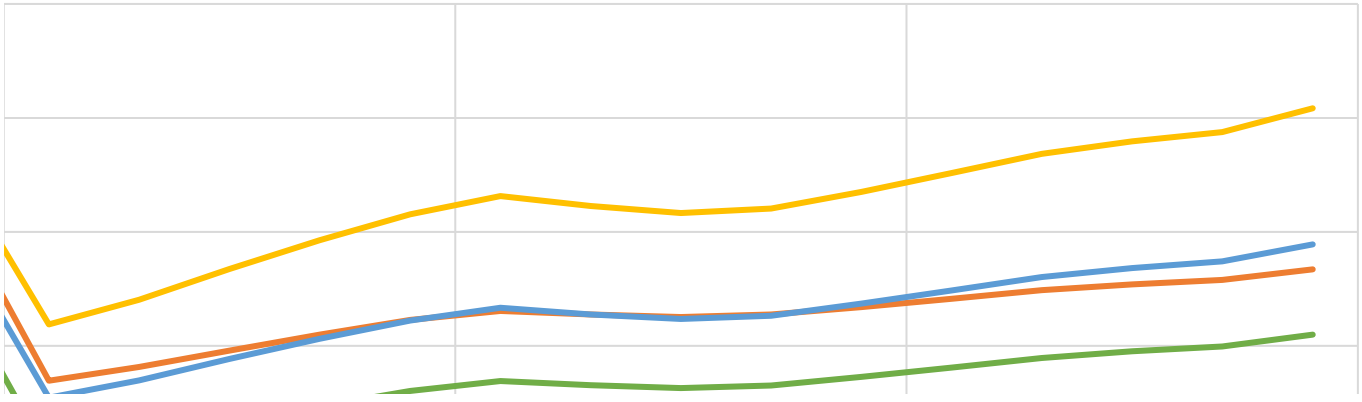
$3.43	Segment 2
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	

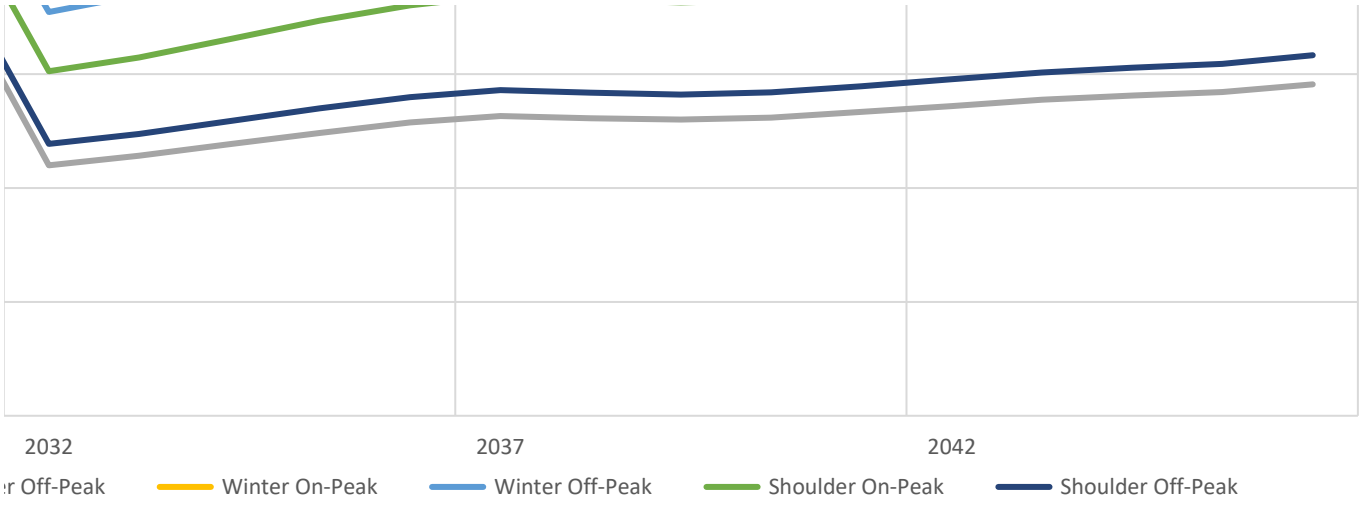


PY18 Avoided Energy Costs

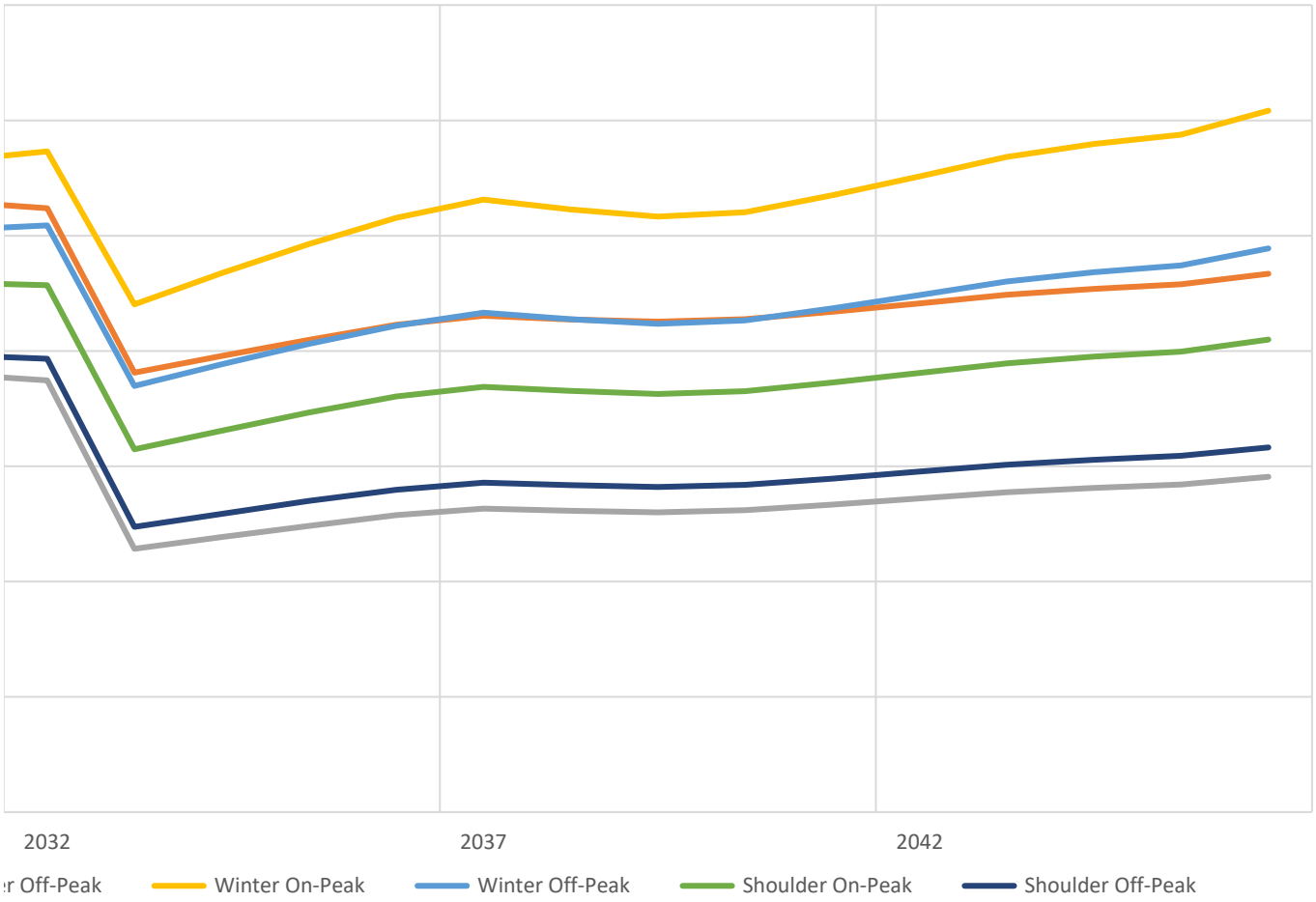


PY19 Avoided Energy Costs

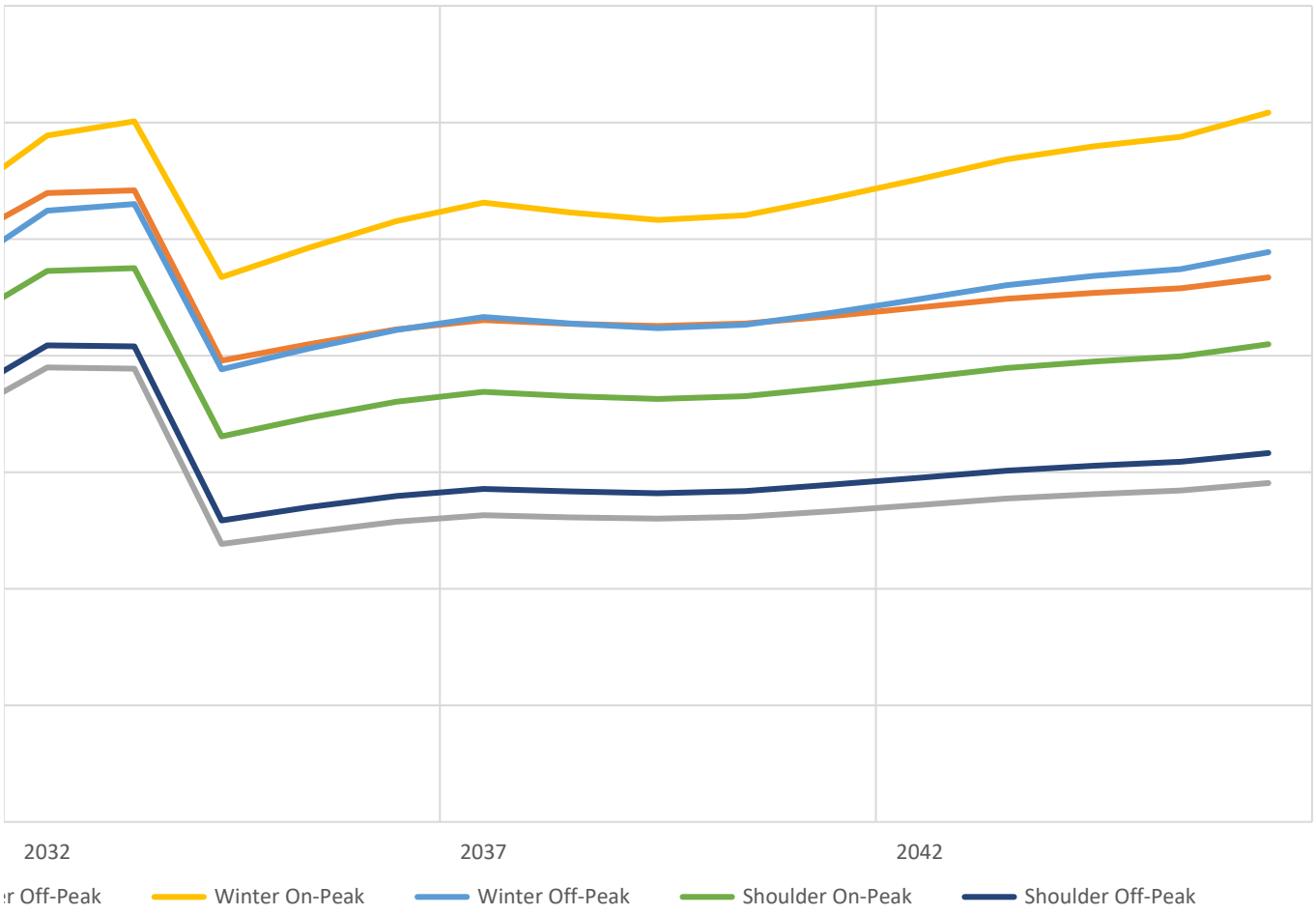




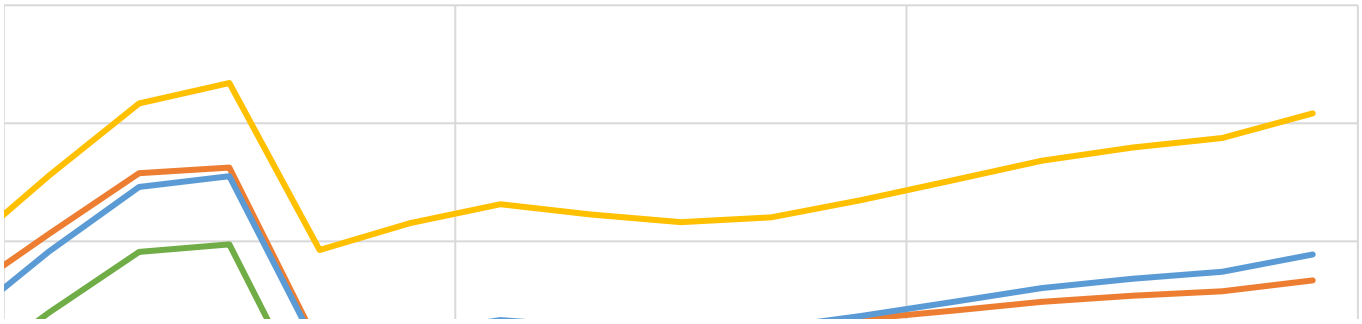
PY20 Avoided Energy Costs

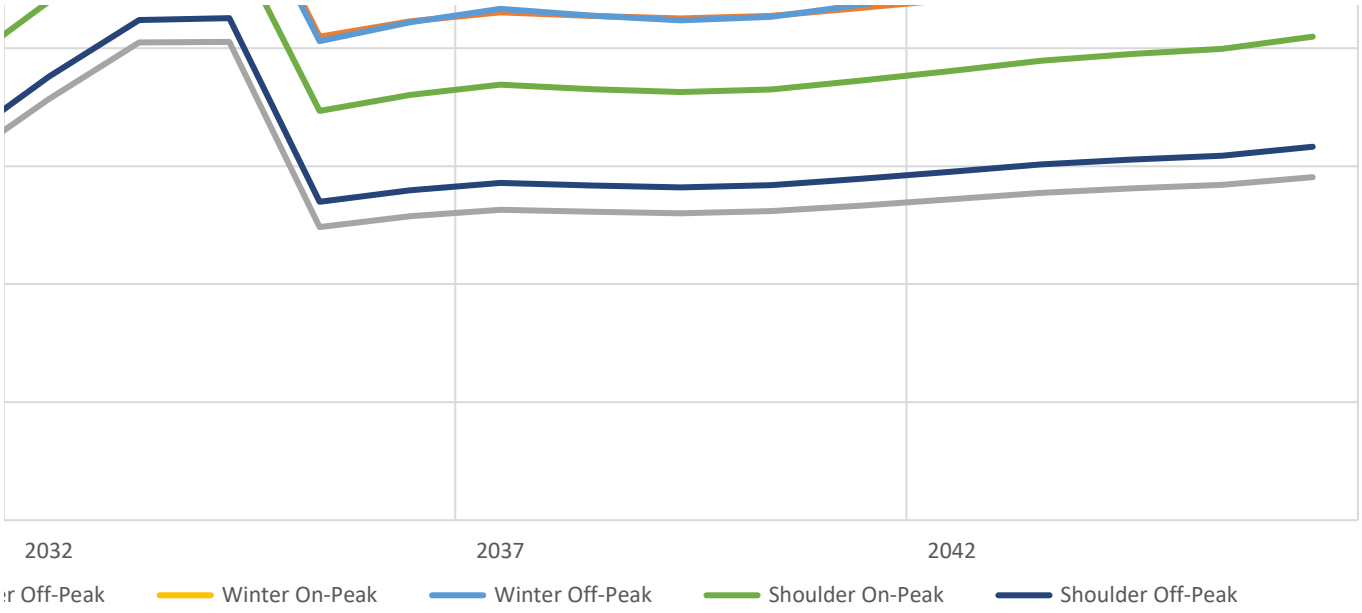


PY21 Avoided Energy Costs



PY22 Avoided Energy Costs




2032
2037
2042
r Off-Peak
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

PY Selection	PY18

SWE Note: This data includes avoided energy costs from the Arrearag

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$105.75	$75.96	$110.03	$98.05	$92.22
19	2028	$115.75	$84.09	$123.27	$110.59	$101.62
20	2029	$123.19	$92.40	$132.14	$118.64	$108.59
21	2030	$121.29	$92.48	$133.12	$118.94	$110.44
22	2031	$93.45	$63.50	$100.76	$88.65	$79.43
23	2032	$93.85	$63.95	$103.72	$90.86	$80.49
24	2033	$96.64	$66.04	$108.46	$94.30	$83.30
25	2034	$99.93	$68.48	$114.26	$98.47	$86.92
26	2035	$103.14	$70.87	$119.73	$102.41	$90.54
27	2036	$106.15	$73.12	$124.71	$106.02	$93.71
28	2037	$108.14	$74.68	$128.33	$108.70	$95.85
29	2038	$107.98	$74.76	$127.04	$108.01	$95.57
30	2039	$108.01	$74.97	$126.23	$107.64	$95.51
31	2040	$108.89	$75.78	$127.48	$108.70	$96.43
32	2041	$110.68	$77.21	$130.90	$111.25	$98.39
33	2042	$112.61	$78.75	$134.66	$114.05	$100.52
34	2043	$114.60	$80.33	$138.52	$116.92	$102.70
35	2044	$116.12	$81.58	$141.23	$119.00	$104.35
36	2045	$117.41	$82.69	$143.37	$120.69	$105.73
37	2046	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY19

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$108.19	$76.53	$115.71	$103.03	$94.06
20	2029	$117.64	$86.85	$126.59	$113.09	$103.04
21	2030	$124.03	$95.22	$135.86	$121.68	$113.18
22	2031	$122.51	$92.56	$129.82	$117.71	$108.49
23	2032	$93.85	$63.95	$103.72	$90.86	$80.49

24	**2033**	$96.64	$66.04	$108.46	$94.30	$83.30
25	**2034**	$99.93	$68.48	$114.26	$98.47	$86.92
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73
37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY20

		West Penn Zone Summer ($/MWh)		**West Penn Zone Winter ($/MWh)**		**West Penn DLC ($/M**
PA ACT 129 Program Year	**Year**	**Summer On-Peak**	**Summer Off-Peak**	**Winter On-Peak**	**Winter Off-Peak**	**Shoulder On-Peak**
18	**2027**	$0.00	$0.00	$0.00	$0.00	$0.00
19	**2028**	$0.00	$0.00	$0.00	$0.00	$0.00
20	**2029**	$109.59	$78.80	$118.54	$105.04	$94.99
21	**2030**	$118.17	$89.36	$130.00	$115.82	$107.32
22	**2031**	$125.42	$95.47	$132.73	$120.62	$111.40
23	**2032**	$124.75	$94.85	$134.62	$121.76	$111.39
24	**2033**	$96.64	$66.04	$108.46	$94.30	$83.30
25	**2034**	$99.93	$68.48	$114.26	$98.47	$86.92
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73
37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY21

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$109.67	$80.86	$121.50	$107.32	$98.82
22	2031	$119.21	$89.26	$126.52	$114.41	$105.19
23	2032	$127.85	$97.95	$137.72	$124.86	$114.49
24	2033	$128.73	$98.13	$140.55	$126.39	$115.39
25	2034	$99.93	$68.48	$114.26	$98.47	$86.92
26	2035	$103.14	$70.87	$119.73	$102.41	$90.54
27	2036	$106.15	$73.12	$124.71	$106.02	$93.71
28	2037	$108.14	$74.68	$128.33	$108.70	$95.85
29	2038	$107.98	$74.76	$127.04	$108.01	$95.57
30	2039	$108.01	$74.97	$126.23	$107.64	$95.51
31	2040	$108.89	$75.78	$127.48	$108.70	$96.43
32	2041	$110.68	$77.21	$130.90	$111.25	$98.39
33	2042	$112.61	$78.75	$134.66	$114.05	$100.52
34	2043	$114.60	$80.33	$138.52	$116.92	$102.70
35	2044	$116.12	$81.58	$141.23	$119.00	$104.35
36	2045	$117.41	$82.69	$143.37	$120.69	$105.73
37	2046	$119.75	$84.53	$148.05	$124.13	$108.32

PY Selection	PY22

		West Penn Zone Summer ($/MWh)		West Penn Zone Winter ($/MWh)		West Penn DLC ($/M
PA ACT 129 Program Year	Year	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak	Shoulder On-Peak
18	2027	$0.00	$0.00	$0.00	$0.00	$0.00
19	2028	$0.00	$0.00	$0.00	$0.00	$0.00
20	2029	$0.00	$0.00	$0.00	$0.00	$0.00
21	2030	$0.00	$0.00	$0.00	$0.00	$0.00
22	2031	$110.22	$80.27	$117.53	$105.42	$96.20

23	**2032**	$121.25	$91.35	$131.12	$118.26	$107.89
24	**2033**	$131.95	$101.35	$143.77	$129.61	$118.61
25	**2034**	$133.29	$101.84	$147.62	$131.83	$120.28
26	**2035**	$103.14	$70.87	$119.73	$102.41	$90.54
27	**2036**	$106.15	$73.12	$124.71	$106.02	$93.71
28	**2037**	$108.14	$74.68	$128.33	$108.70	$95.85
29	**2038**	$107.98	$74.76	$127.04	$108.01	$95.57
30	**2039**	$108.01	$74.97	$126.23	$107.64	$95.51
31	**2040**	$108.89	$75.78	$127.48	$108.70	$96.43
32	**2041**	$110.68	$77.21	$130.90	$111.25	$98.39
33	**2042**	$112.61	$78.75	$134.66	$114.05	$100.52
34	**2043**	$114.60	$80.33	$138.52	$116.92	$102.70
35	**2044**	$116.12	$81.58	$141.23	$119.00	$104.35
36	**2045**	$117.41	$82.69	$143.37	$120.69	$105.73
37	**2046**	$119.75	$84.53	$148.05	$124.13	$108.32

es Study and should only be applied for low income programs

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$79.71	$72.59	$72.59	$8.83	$8.83	$41.25	$5.05
$89.08	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$95.01	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$95.50	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$66.84	$27.64	$27.64	$9.58	$9.58	$62.19	$9.02
$67.74	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21
$69.84	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.52	$38.76	$38.76	$9.01	$9.01	$46.27	$6.06
$89.46	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$98.24	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$95.90	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$67.74	$28.21	$28.21	$9.78	$9.78	$63.48	$9.21

$69.84	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

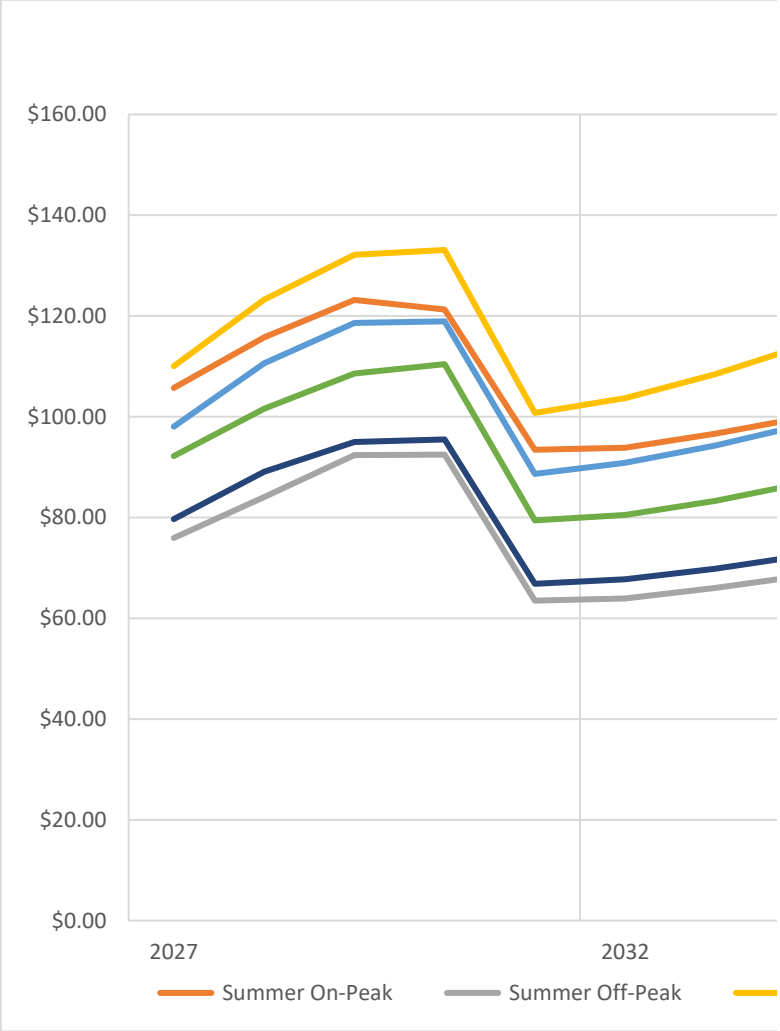
Zone Shoulder kWh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$81.41	$39.56	$39.56	$9.20	$9.20	$51.89	$7.01
$92.38	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$98.81	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$98.64	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$69.84	$28.80	$28.80	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.88	$40.37	$40.37	$9.39	$9.39	$56.92	$7.93
$92.60	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02
$101.74	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$101.93	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$72.51	$29.40	$29.40	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

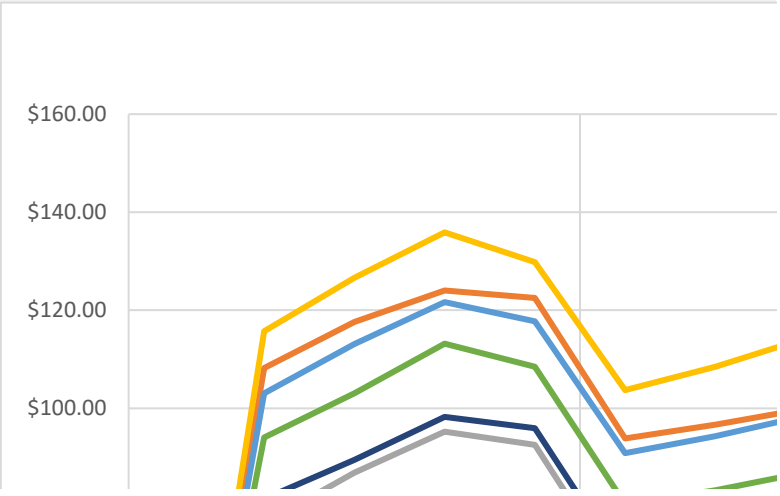
Zone Shoulder Wh)	West Penn Generation Capacity ($/kW/year)		West Penn Transmission Capacity ($/kW/year)		West Penn Distribution Capacity ($/kW/year)	
Shoulder Off-Peak	Summer	Winter	Summer	Winter	Summer	Winter
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
$83.61	$41.19	$41.19	$9.58	$9.58	$62.19	$9.02

$95.14	$42.03	$42.03	$9.78	$9.78	$63.48	$9.21
$105.15	$42.90	$42.90	$9.98	$9.98	$64.80	$9.40
$105.87	$43.78	$43.78	$10.19	$10.19	$66.14	$9.59
$75.19	$30.00	$30.00	$10.40	$10.40	$67.51	$9.79
$77.55	$30.63	$30.63	$10.62	$10.62	$68.91	$9.99
$79.21	$31.26	$31.26	$10.84	$10.84	$70.34	$10.20
$79.21	$31.91	$31.91	$11.06	$11.06	$71.79	$10.41
$79.36	$32.57	$32.57	$11.29	$11.29	$73.28	$10.63
$80.19	$33.24	$33.24	$11.53	$11.53	$74.80	$10.85
$81.74	$33.93	$33.93	$11.76	$11.76	$76.35	$11.07
$83.41	$34.64	$34.64	$12.01	$12.01	$77.93	$11.30
$85.13	$35.35	$35.35	$12.26	$12.26	$79.54	$11.53
$86.47	$36.09	$36.09	$12.51	$12.51	$81.19	$11.77
$87.64	$36.83	$36.83	$12.77	$12.77	$82.87	$12.02
$89.65	$37.60	$37.60	$13.03	$13.03	$84.59	$12.27

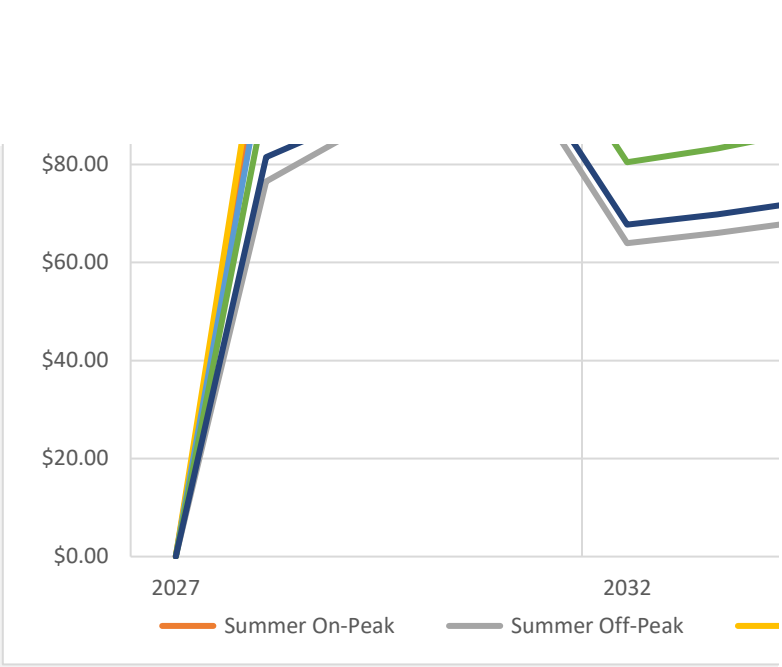
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$3.75	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



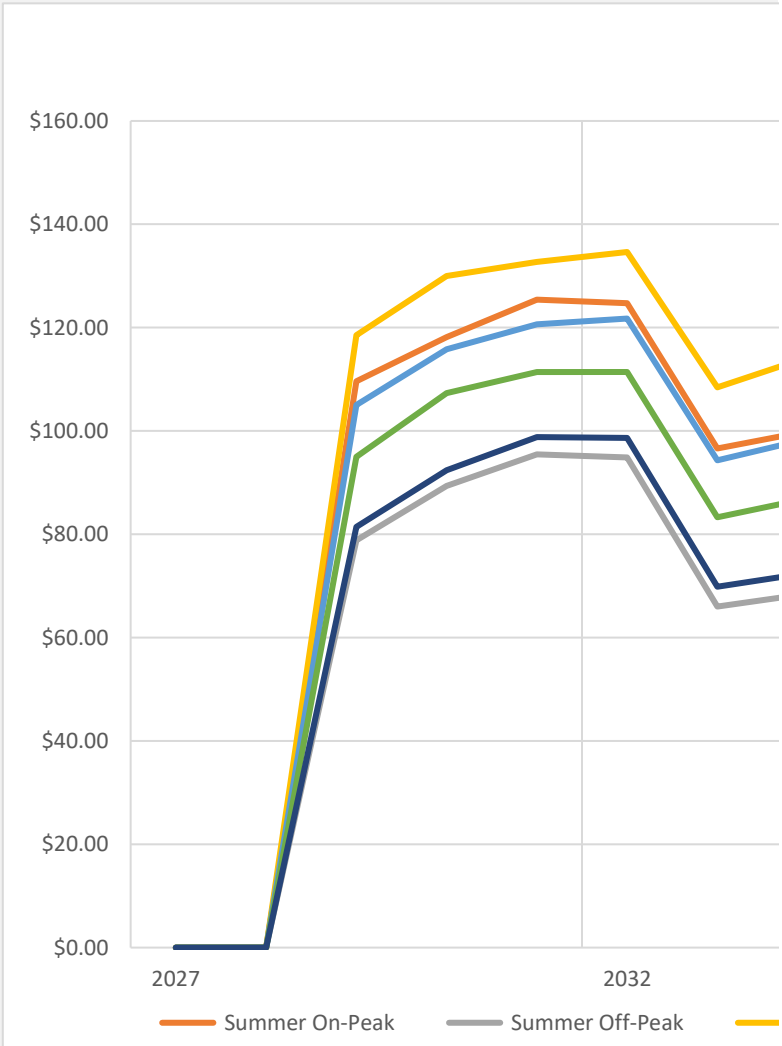
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$3.68	
$3.56	
$3.42	
$3.37	Se
$3.43	



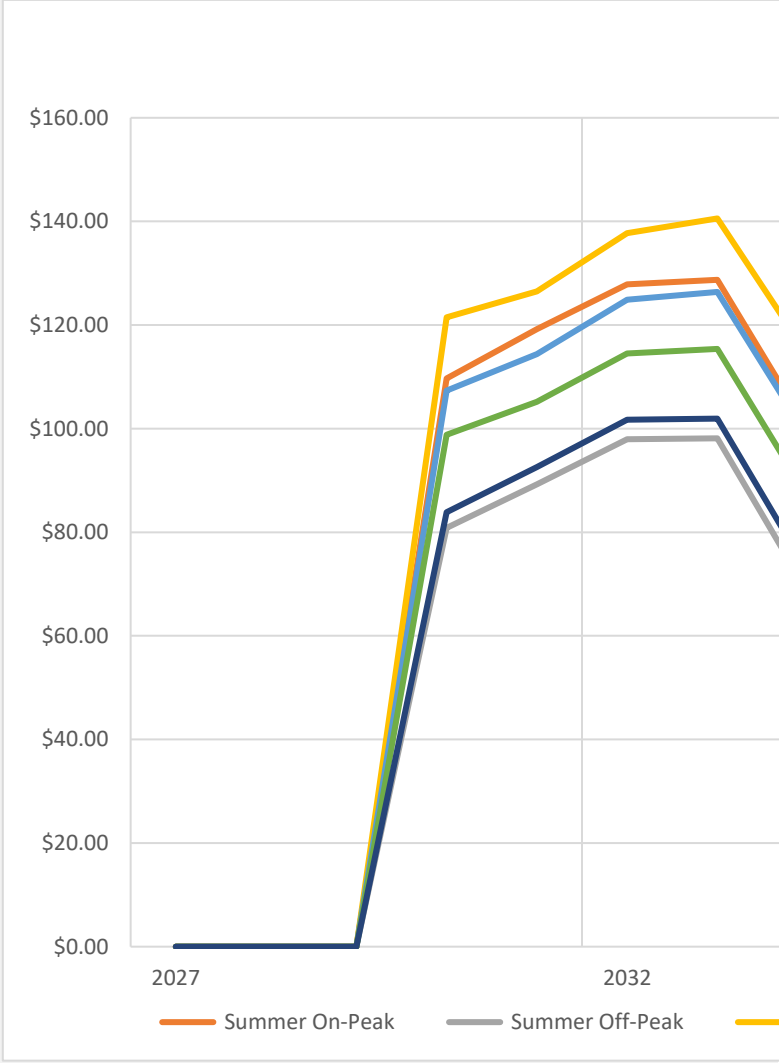
$3.68	Segment 2
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



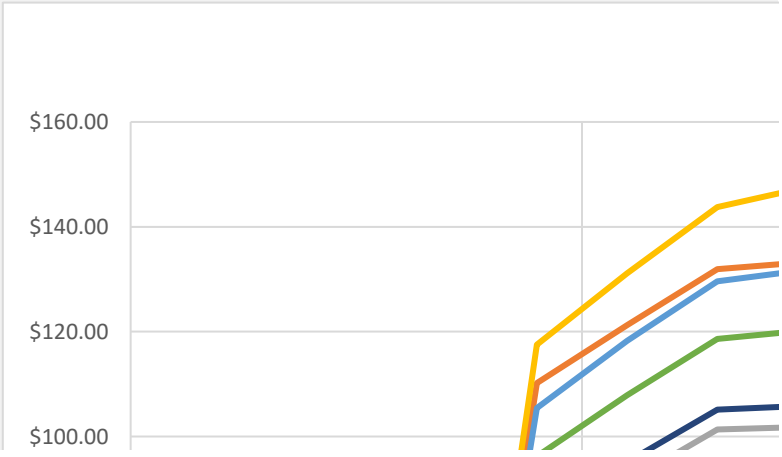
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$3.56	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



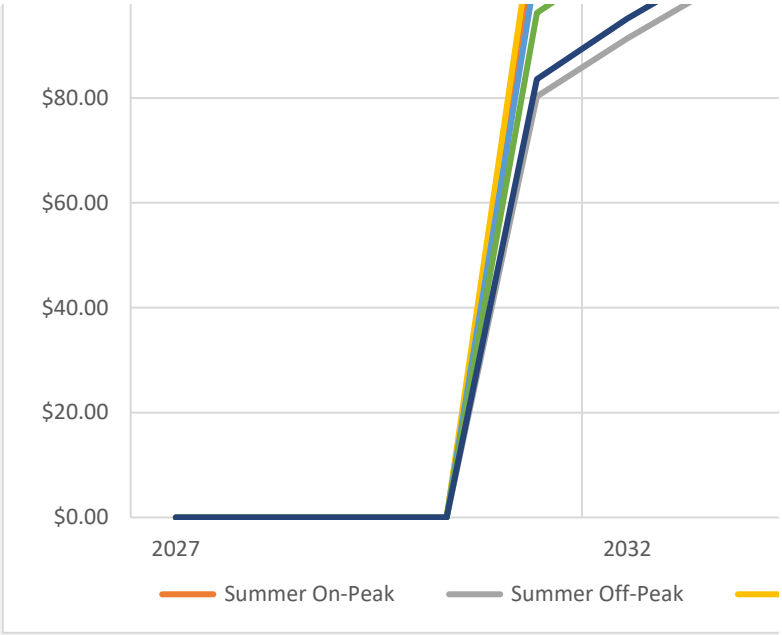
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$3.42	
$3.37	Segment 2
$3.43	
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



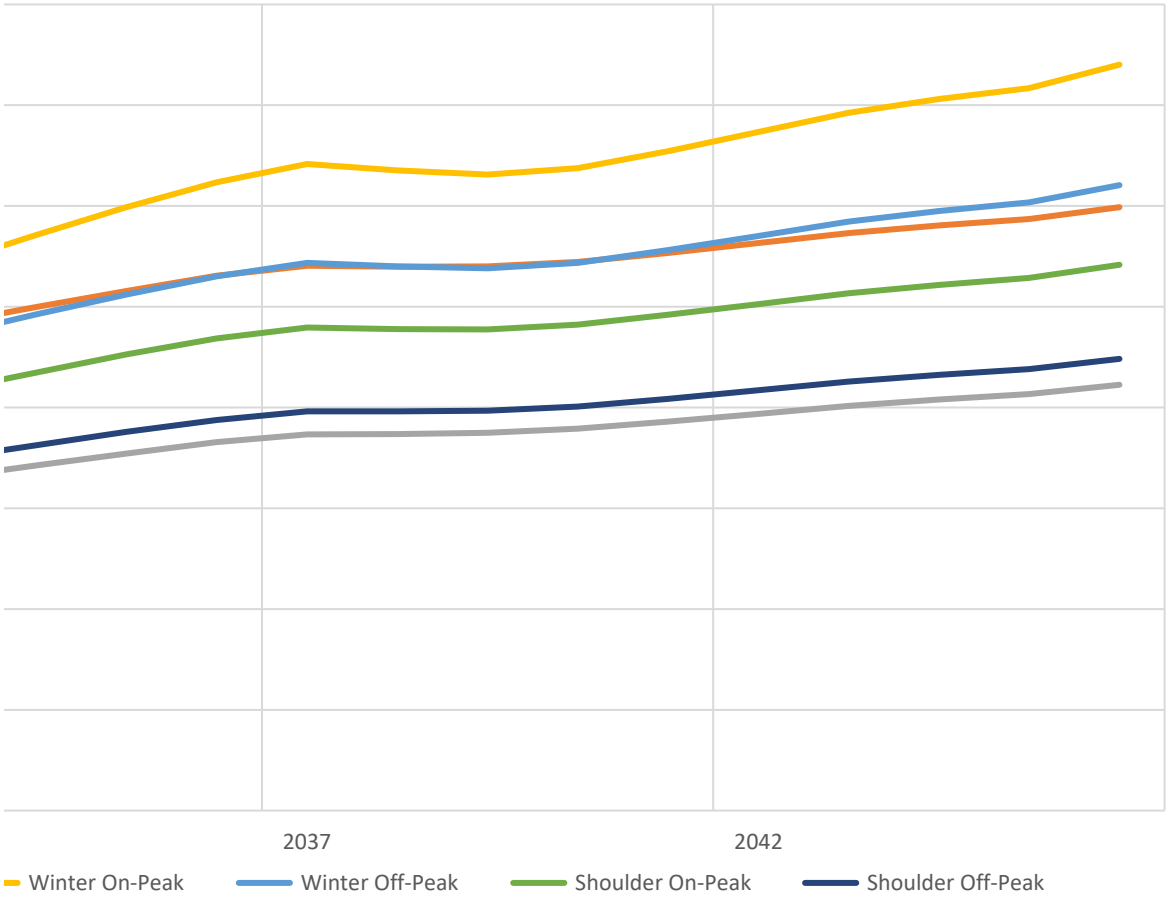
Avoided Natural Gas Fuel Costs ($/MMBTU)	
$0.00	Segment 1
$0.00	
$0.00	
$0.00	
$3.37	



$3.43	Segment 2
$3.68	
$4.00	
$4.30	
$4.57	
$4.73	Segment 3
$4.64	
$4.56	
$4.59	
$4.74	
$4.90	
$5.07	
$5.17	
$5.25	
$5.46	



PY18 Avoided Energy Costs



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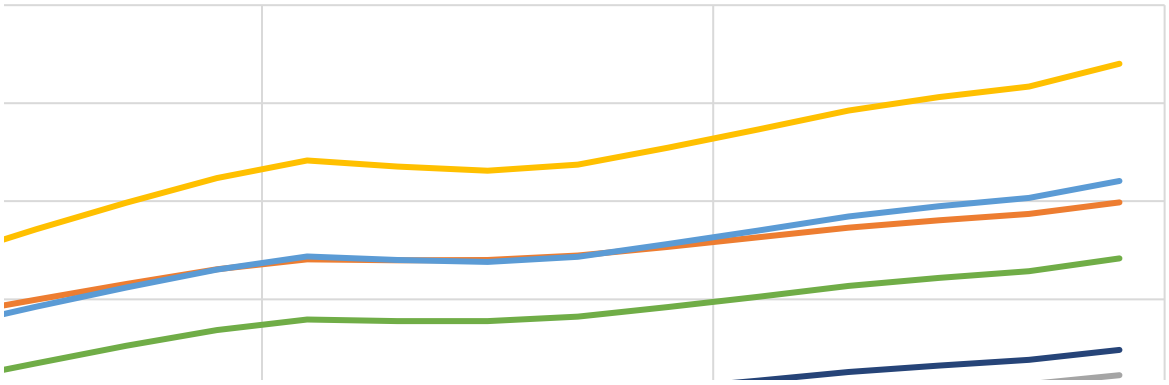
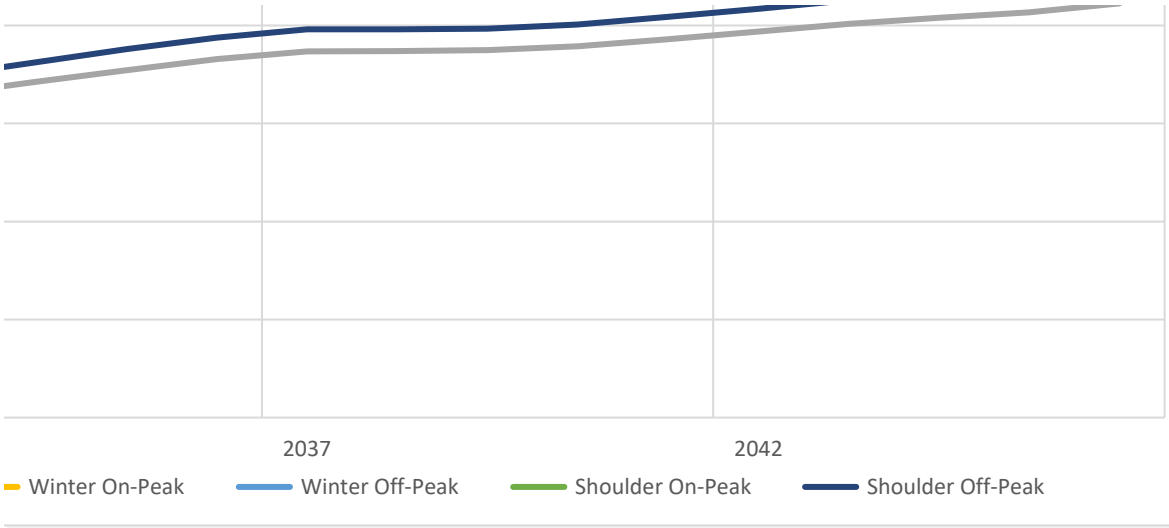
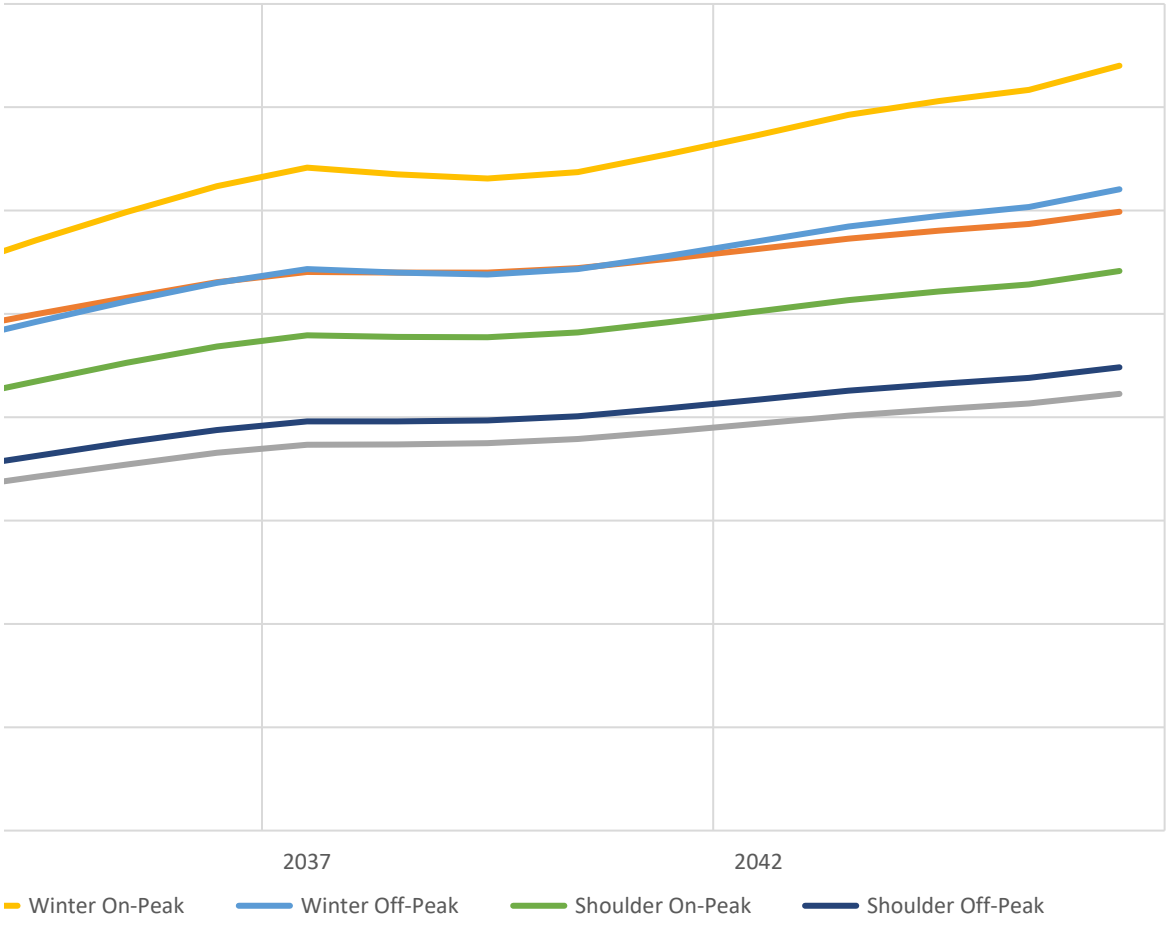
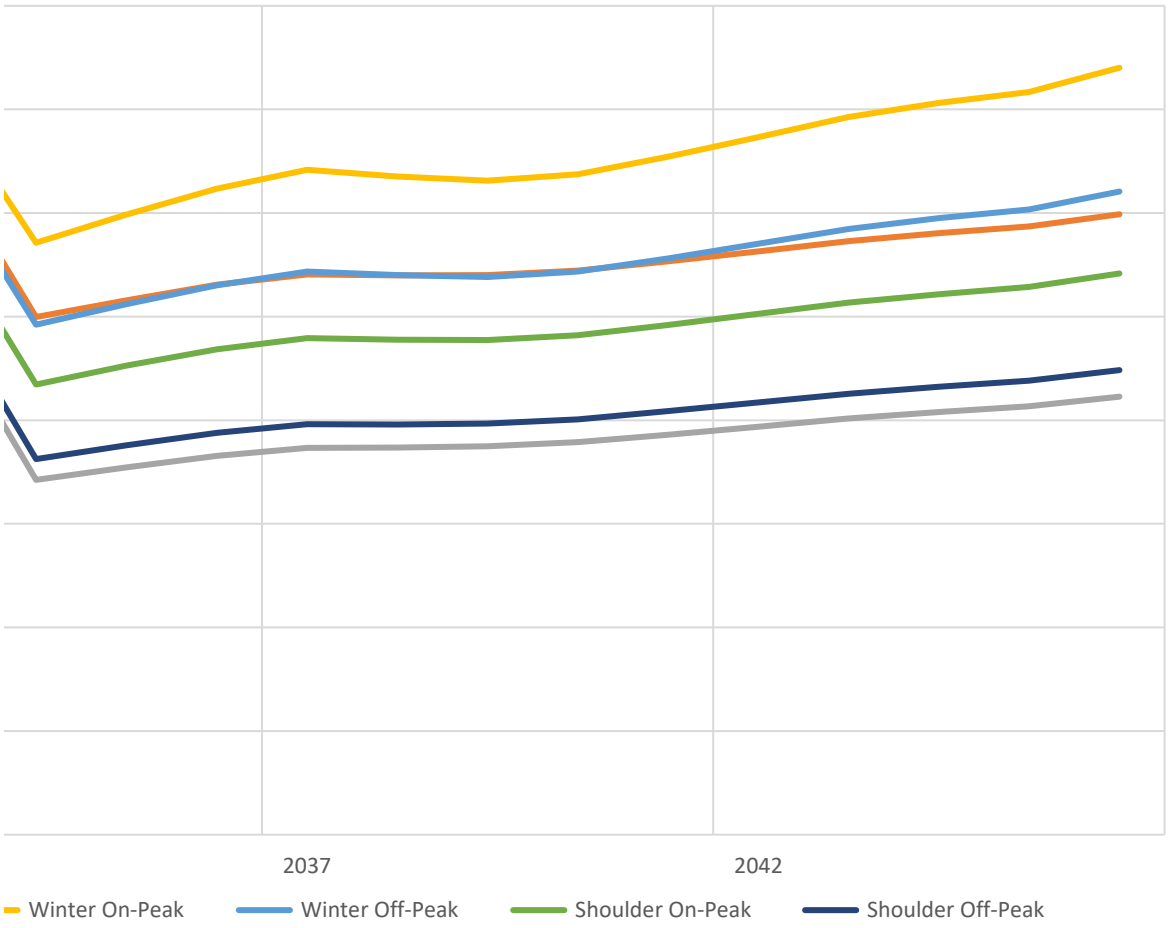




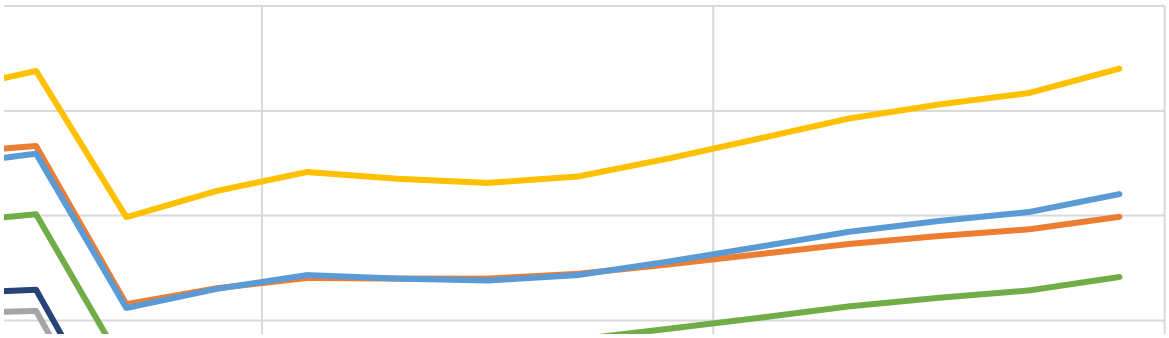
PY20 Avoided Energy Costs

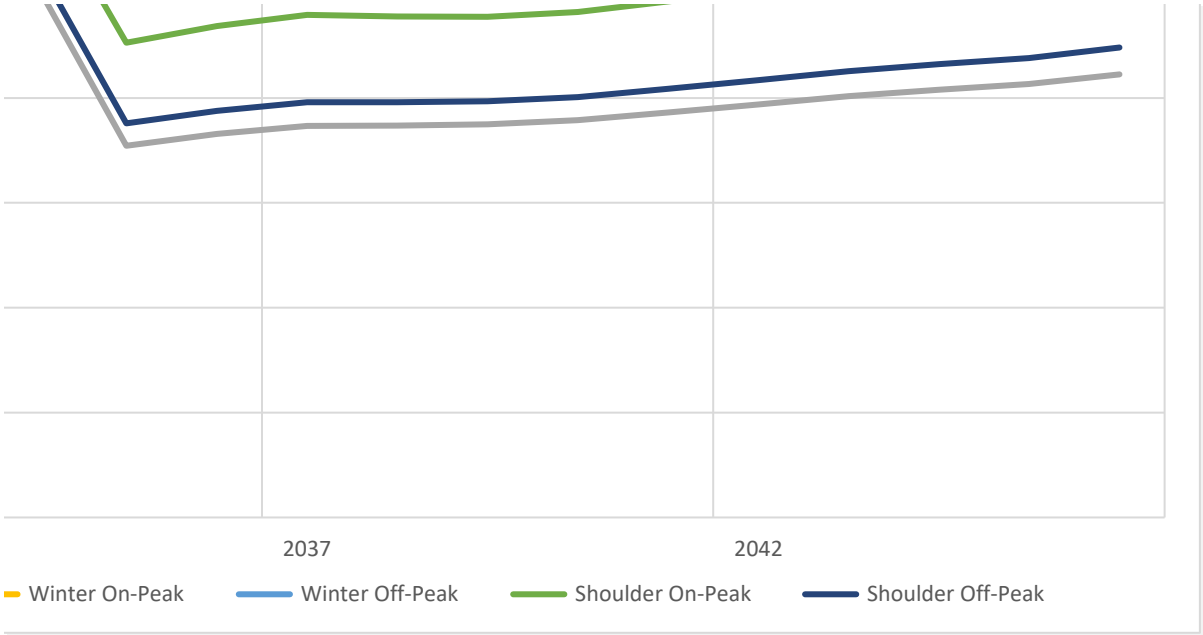


PY21 Avoided Energy Costs



PY22 Avoided Energy Costs




2037
2042
Winter On-Peak
Winter Off-Peak
Shoulder On-Peak
Shoulder Off-Peak

Record Field	Period	NYMEX: PJM Western Hub On-peak (Nominal $/MWh)	NYMEX: PJM Western Hub Off-peak (Nominal S/MWh)	West Penn Zone Adjusted On-Peak (Nominal $/MWh)	West Penn Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	$71.02	$56.19	$73.76	$58.35
2	Feb-26	$55.25	$45.15	$57.37	$46.89
3	Mar-26	$48.43	$41.64	$50.30	$43.24
4	Apr-26	$48.50	$41.09	$50.37	$42.67
5	May-26	$45.09	$26.67	$46.82	$27.70
6	Jun-26	$81.13	$33.97	$84.25	$35.28
7	Jul-26	$76.91	$37.46	$79.87	$38.90
8	Aug-26	$51.05	$30.44	$53.02	$31.61
9	Sep-26	$48.05	$29.10	$49.90	$30.22
10	Oct-26	$47.70	$32.60	$49.54	$33.85
11	Nov-26	$47.70	$37.00	$49.54	$38.42
12	Dec-26	$56.15	$46.20	$58.31	$47.98
13	Jan-27	$78.95	$65.15	$81.99	$67.66
14	Feb-27	$66.75	$55.85	$69.32	$58.00
15	Mar-27	$50.55	$41.60	$52.50	$43.20
16	Apr-27	$51.00	$38.70	$52.96	$40.19
17	May-27	$51.50	$33.55	$53.48	$34.84
18	Jun-27	$57.90	$34.00	$60.13	$35.31
19	Jul-27	$85.00	$43.00	$88.27	$44.65
20	Aug-27	$74.35	$37.05	$77.21	$38.48
21	Sep-27	$56.30	$34.05	$58.47	$35.36
22	Oct-27	$53.90	$37.45	$55.97	$38.89
23	Nov-27	$52.50	$42.00	$54.52	$43.62
24	Dec-27	$61.70	$51.80	$64.07	$53.79
25	Jan-28	$85.55	$70.45	$88.84	$73.16
26	Feb-28	$72.95	$61.75	$75.76	$64.13
27	Mar-28	$51.95	$43.00	$53.95	$44.65
28	Apr-28	$51.25	$39.30	$53.22	$40.81
29	May-28	$51.65	$33.35	$53.64	$34.63
30	Jun-28	$58.20	$33.55	$60.44	$34.84
31	Jul-28	$87.45	$41.70	$90.81	$43.30
32	Aug-28	$76.30	$38.30	$79.24	$39.77
33	Sep-28	$56.75	$31.05	$58.93	$32.24
34	Oct-28	$53.85	$36.80	$55.92	$38.22
35	Nov-28	$52.80	$42.45	$54.83	$44.08
36	Dec-28	$61.45	$51.10	$63.81	$53.07
37	Jan-29	$82.50	$70.65	$85.67	$73.37
38	Feb-29	$76.50	$64.05	$79.44	$66.51
39	Mar-29	$51.95	$42.40	$53.95	$44.03
40	Apr-29	$50.70	$37.35	$52.65	$38.79
41	May-29	$51.45	$34.90	$53.43	$36.24
42	Jun-29	$57.15	$34.15	$59.35	$35.46
43	Jul-29	$88.20	$40.90	$91.59	$42.47
44	Aug-29	$77.45	$37.60	$80.43	$39.05
45	Sep-29	$55.95	$34.45	$58.10	$35.78
46	Oct-29	$51.05	$35.35	$53.01	$36.71
47	Nov-29	$54.25	$40.55	$56.34	$42.11
48	Dec-29	$65.00	$50.30	$67.50	$52.24
49	Jan-30	$83.20	$69.15	$86.40	$71.81

50	Feb-30	$76.75	$62.70	$79.70	$65.11
51	Mar-30	$55.80	$46.20	$57.95	$47.98
52	Apr-30	$52.90	$37.15	$54.94	$38.58
53	May-30	$54.80	$35.60	$56.91	$36.97
54	Jun-30	$59.00	$34.75	$61.27	$36.09
55	Jul-30	$82.15	$41.75	$85.31	$43.36
56	Aug-30	$70.85	$38.40	$73.58	$39.88
57	Sep-30	$57.25	$34.85	$59.45	$36.19
58	Oct-30	$52.50	$35.55	$54.52	$36.92
59	Nov-30	$56.25	$41.00	$58.41	$42.58
60	Dec-30	$68.65	$55.80	$71.29	$57.95
End of Segment I					

Real-Time, Load-Weighted LMPs ($/MWh)

Zone	EDC	2020	2021	2022	2023	2024
	Western Hub	$ 20.92	$ 38.88	$ 74.25	$ 31.78	$ 33.24
#REF!	West Penn	$ 22.40	$ 40.44	$ 79.01	$ 32.49	$ 32.39

Source: PJM State of the Market Report, Tables in chapter 11

Basis Factor
104%

Natural Gas Futures

Status	*Data Needed: TRC Order Section*
Complete	NYMEX Natural Gas Futures at Henry Hub: B.2.b.i Page 15
Complete	EIA AEO Mid Atlantic Natural Gas Price Forecast in Real Dollars: B.2.b.iii Page 16

Record Field	Period	Month	Year	NYMEX: Henry Hub Natural Gas Price (Nominal $/MMBTU)	NYMEX: West Penn Natural Gas Price (Nominal $/MMBTU)	EIA AEO Gas Prices (Nominal $/MMBTU)
1	Jan-26	Jan	2026	$4.15	$6.73	$6.06
2	Feb-26	Feb	2026	$3.92	$5.97	$5.33
3	Mar-26	Mar	2026	$3.54	$3.33	$2.91
4	Apr-26	Apr	2026	$3.41	$3.03	$2.39
5	May-26	May	2026	$3.44	$2.76	$2.11
6	Jun-26	Jun	2026	$3.61	$2.81	$2.13
7	Jul-26	Jul	2026	$3.81	$2.96	$2.23
8	Aug-26	Aug	2026	$3.88	$3.00	$2.27
9	Sep-26	Sep	2026	$3.84	$2.59	$1.94
10	Oct-26	Oct	2026	$3.88	$2.61	$1.97
11	Nov-26	Nov	2026	$4.10	$3.33	$2.57
12	Dec-26	Dec	2026	$4.50	$5.24	$4.20
13	Jan-27	Jan	2027	$4.75	$7.32	$5.86
14	Feb-27	Feb	2027	$4.38	$6.42	$5.16
15	Mar-27	Mar	2027	$3.80	$3.59	$2.81
16	Apr-27	Apr	2027	$3.42	$3.04	$2.31
17	May-27	May	2027	$3.39	$2.72	$2.05
18	Jun-27	Jun	2027	$3.54	$2.74	$2.06
19	Jul-27	Jul	2027	$3.72	$2.87	$2.16
20	Aug-27	Aug	2027	$3.78	$2.90	$2.19
21	Sep-27	Sep	2027	$3.75	$2.50	$1.87
22	Oct-27	Oct	2027	$3.80	$2.53	$1.91
23	Nov-27	Nov	2027	$4.01	$3.25	$2.49
24	Dec-27	Dec	2027	$4.44	$5.17	$4.06
25	Jan-28	Jan	2028	$4.73	$7.31	$5.84
26	Feb-28	Feb	2028	$4.39	$6.44	$5.14
27	Mar-28	Mar	2028	$3.77	$3.56	$2.80
28	Apr-28	Apr	2028	$3.30	$2.92	$2.30
29	May-28	May	2028	$3.27	$2.59	$2.04
30	Jun-28	Jun	2028	$3.42	$2.62	$2.06
31	Jul-28	Jul	2028	$3.60	$2.74	$2.15
32	Aug-28	Aug	2028	$3.66	$2.79	$2.18
33	Sep-28	Sep	2028	$3.65	$2.40	$1.87
34	Oct-28	Oct	2028	$3.72	$2.44	$1.90
35	Nov-28	Nov	2028	$3.96	$3.19	$2.48
36	Dec-28	Dec	2028	$4.41	$5.15	$4.05
37	Jan-29	Jan	2029	$4.68	$7.25	$6.11
38	Feb-29	Feb	2029	$4.33	$6.38	$5.38
39	Mar-29	Mar	2029	$3.64	$3.43	$2.93
40	Apr-29	Apr	2029	$3.18	$2.80	$2.41
41	May-29	May	2029	$3.15	$2.48	$2.13
42	Jun-29	Jun	2029	$3.30	$2.50	$2.15

43	Jul-29	Jul	2029	$3.47	$2.62	$2.25
44	Aug-29	Aug	2029	$3.54	$2.67	$2.29
45	Sep-29	Sep	2029	$3.54	$2.29	$1.95
46	Oct-29	Oct	2029	$3.61	$2.34	$1.99
47	Nov-29	Nov	2029	$3.80	$3.03	$2.60
48	Dec-29	Dec	2029	$4.24	$4.98	$4.24
49	Jan-30	Jan	2030	$4.51	$7.13	$6.54
50	Feb-30	Feb	2030	$4.22	$6.31	$5.76
51	Mar-30	Mar	2030	$3.57	$3.35	$3.14
52	Apr-30	Apr	2030	$3.07	$2.68	$2.58
53	May-30	May	2030	$3.04	$2.34	$2.28
54	Jun-30	Jun	2030	$3.17	$2.35	$2.30
55	Jul-30	Jul	2030	$3.32	$2.45	$2.41
56	Aug-30	Aug	2030	$3.39	$2.49	$2.45
57	Sep-30	Sep	2030	$3.37	$2.09	$2.09
58	Oct-30	Oct	2030	$3.44	$2.14	$2.13
59	Nov-30	Nov	2030	$3.63	$2.85	$2.78
60	Dec-30	Dec	2030	$4.06	$4.82	$4.54
61	Jan-31	Jan	2031	$4.33	$7.01	$6.89
62	Feb-31	Feb	2031	$4.06	$6.19	$6.07
63	Mar-31	Mar	2031	$3.43	$3.21	$3.31
64	Apr-31	Apr	2031	$3.03	$2.64	$2.72
65	May-31	May	2031	$3.05	$2.34	$2.41
66	Jun-31	Jun	2031	$3.19	$2.35	$2.43
67	Jul-31	Jul	2031	$3.33	$2.44	$2.54
68	Aug-31	Aug	2031	$3.36	$2.45	$2.58
69	Sep-31	Sep	2031	$3.33	$2.02	$2.20
70	Oct-31	Oct	2031	$3.39	$2.06	$2.25
71	Nov-31	Nov	2031	$3.58	$2.79	$2.93
72	Dec-31	Dec	2031	$4.03	$4.80	$4.78
73	Jan-32	Jan	2032	$4.30	$7.03	$7.91
74	Feb-32	Feb	2032	$4.03	$6.20	$6.96
75	Mar-32	Mar	2032	$3.36	$3.14	$3.80
76	Apr-32	Apr	2032	$2.88	$2.48	$3.12
77	May-32	May	2032	$2.86	$2.14	$2.76
78	Jun-32	Jun	2032	$3.01	$2.16	$2.78
79	Jul-32	Jul	2032	$3.17	$2.27	$2.91
80	Aug-32	Aug	2032	$3.21	$2.27	$2.96
81	Sep-32	Sep	2032	$3.18	$1.85	$2.53
82	Oct-32	Oct	2032	$3.26	$1.90	$2.58
83	Nov-32	Nov	2032	$3.49	$2.67	$3.36
84	Dec-32	Dec	2032	$3.92	$4.70	$5.48
85	Jan-33	Jan	2033	$4.17	$6.95	$8.72
86	Feb-33	Feb	2033	$3.90	$6.11	$7.68
87	Mar-33	Mar	2033	$3.28	$3.05	$4.18
88	Apr-33	Apr	2033	$2.83	$2.42	$3.43
89	May-33	May	2033	$2.86	$2.13	$3.04
90	Jun-33	Jun	2033	$3.00	$2.13	$3.07
91	Jul-33	Jul	2033	$3.17	$2.24	$3.21
92	Aug-33	Aug	2033	$3.21	$2.26	$3.26
93	Sep-33	Sep	2033	$3.18	$1.83	$2.79
94	Oct-33	Oct	2033	$3.23	$1.85	$2.84
95	Nov-33	Nov	2033	$3.49	$2.66	$3.71
96	Dec-33	Dec	2033	$3.89	$4.69	$6.05
97	Jan-34	Jan	2034	$4.14	$6.98	$9.18

98	Feb-34	Feb	2034	$3.90	$6.16	$8.09
99	Mar-34	Mar	2034	$3.30	$3.07	$4.41
100	Apr-34	Apr	2034	$2.90	$2.48	$3.62
101	May-34	May	2034	$2.93	$2.18	$3.21
102	Jun-34	Jun	2034	$3.06	$2.18	$3.23
103	Jul-34	Jul	2034	$3.21	$2.27	$3.38
104	Aug-34	Aug	2034	$3.25	$2.28	$3.43
105	Sep-34	Sep	2034	$3.26	$1.88	$2.94
106	Oct-34	Oct	2034	$3.31	$1.90	$2.99
107	Nov-34	Nov	2034	$3.55	$2.71	$3.90
108	Dec-34	Dec	2034	$3.95	$4.76	$6.37
109	Jan-35	Jan	2035	$4.17	$7.07	$9.45
110	Feb-35	Feb	2035	$3.93	$6.23	$8.33
111	Mar-35	Mar	2035	$3.50	$3.26	$4.54
112	Apr-35	Apr	2035	$3.17	$2.74	$3.73
113	May-35	May	2035	$3.15	$2.38	$3.30
114	Jun-35	Jun	2035	$3.18	$2.28	$3.33
115	Jul-35	Jul	2035	$3.22	$2.26	$3.48
116	Aug-35	Aug	2035	$3.26	$2.27	$3.54
117	Sep-35	Sep	2035	$3.28	$1.87	$3.02
118	Oct-35	Oct	2035	$3.32	$1.89	$3.08
119	Nov-35	Nov	2035	$3.52	$2.66	$4.02
120	Dec-35	Dec	2035	$3.82	$4.65	$6.56
121	Jan-36	Jan	2036	$4.09	$7.05	$9.59
122	Feb-36	Feb	2036	$3.92	$6.27	$8.45
123	Mar-36	Mar	2036	$3.65	$3.41	$4.60
124	Apr-36	Apr	2036	$3.32	$2.89	$3.78
125	May-36	May	2036	$3.30	$2.52	$3.35
126	Jun-36	Jun	2036	$3.34	$2.42	$3.38
127	Jul-36	Jul	2036	$3.38	$2.40	$3.53
128	Aug-36	Aug	2036	$3.42	$2.41	$3.59
129	Sep-36	Sep	2036	$3.43	$2.00	$3.07
130	Oct-36	Oct	2036	$3.48	$2.01	$3.12
131	Nov-36	Nov	2036	$3.55	$2.67	$4.08
132	Dec-36	Dec	2036	$3.70	$4.55	$6.65
133	Jan-37	Jan	2037	$3.93	$6.94	$9.53
134	Feb-37	Feb	2037	$3.78	$6.18	$8.39
135	Mar-37	Mar	2037	$3.58	$3.33	$4.57
136	Apr-37	Apr	2037	$3.25	$2.80	$3.76
137	May-37	May	2037	$3.23	$2.43	$3.33
138	Jun-37	Jun	2037	$3.26	$2.32	$3.36
139	Jul-37	Jul	2037	$3.30	$2.30	$3.51
140	Aug-37	Aug	2037	$3.34	$2.31	$3.56
141	Sep-37	Sep	2037	$3.36	$1.89	$3.05
142	Oct-37	Oct	2037	$3.40	$1.91	$3.10
143	Nov-37	Nov	2037	$3.48	$2.58	$4.05
144	Dec-37	Dec	2037	$3.52	$4.38	$6.61
145	Jan-38	Jan	2038			$9.33
146	Feb-38	Feb	2038			$8.22
147	Mar-38	Mar	2038			$4.48
148	Apr-38	Apr	2038			$3.68
149	May-38	May	2038			$3.26
150	Jun-38	Jun	2038			$3.29
151	Jul-38	Jul	2038			$3.44
152	Aug-38	Aug	2038			$3.49

153	Sep-38	Sep	2038		$2.98
154	Oct-38	Oct	2038		$3.04
155	Nov-38	Nov	2038		$3.97
156	Dec-38	Dec	2038		$6.47
157	Jan-39	Jan	2039		$9.18
158	Feb-39	Feb	2039		$8.08
159	Mar-39	Mar	2039		$4.41
160	Apr-39	Apr	2039		$3.62
161	May-39	May	2039		$3.20
162	Jun-39	Jun	2039		$3.23
163	Jul-39	Jul	2039		$3.38
164	Aug-39	Aug	2039		$3.43
165	Sep-39	Sep	2039		$2.93
166	Oct-39	Oct	2039		$2.99
167	Nov-39	Nov	2039		$3.90
168	Dec-39	Dec	2039		$6.37
169	Jan-40	Jan	2040		$9.24
170	Feb-40	Feb	2040		$8.14
171	Mar-40	Mar	2040		$4.44
172	Apr-40	Apr	2040		$3.64
173	May-40	May	2040		$3.23
174	Jun-40	Jun	2040		$3.26
175	Jul-40	Jul	2040		$3.40
176	Aug-40	Aug	2040		$3.46
177	Sep-40	Sep	2040		$2.96
178	Oct-40	Oct	2040		$3.01
179	Nov-40	Nov	2040		$3.93
180	Dec-40	Dec	2040		$6.41
181	Jan-41	Jan	2041		$9.54
182	Feb-41	Feb	2041		$8.40
183	Mar-41	Mar	2041		$4.58
184	Apr-41	Apr	2041		$3.76
185	May-41	May	2041		$3.33
186	Jun-41	Jun	2041		$3.36
187	Jul-41	Jul	2041		$3.51
188	Aug-41	Aug	2041		$3.57
189	Sep-41	Sep	2041		$3.05
190	Oct-41	Oct	2041		$3.11
191	Nov-41	Nov	2041		$4.05
192	Dec-41	Dec	2041		$6.61
193	Jan-42	Jan	2042		$9.86
194	Feb-42	Feb	2042		$8.69
195	Mar-42	Mar	2042		$4.73
196	Apr-42	Apr	2042		$3.89
197	May-42	May	2042		$3.44
198	Jun-42	Jun	2042		$3.47
199	Jul-42	Jul	2042		$3.63
200	Aug-42	Aug	2042		$3.69
201	Sep-42	Sep	2042		$3.15
202	Oct-42	Oct	2042		$3.21
203	Nov-42	Nov	2042		$4.19
204	Dec-42	Dec	2042		$6.84
205	Jan-43	Jan	2043		$10.20
206	Feb-43	Feb	2043		$8.98
207	Mar-43	Mar	2043		$4.90

208	Apr-43	Apr	2043		$4.02
209	May-43	May	2043		$3.56
210	Jun-43	Jun	2043		$3.59
211	Jul-43	Jul	2043		$3.76
212	Aug-43	Aug	2043		$3.81
213	Sep-43	Sep	2043		$3.26
214	Oct-43	Oct	2043		$3.32
215	Nov-43	Nov	2043		$4.34
216	Dec-43	Dec	2043		$7.07
217	Jan-44	Jan	2044		$10.41
218	Feb-44	Feb	2044		$9.17
219	Mar-44	Mar	2044		$5.00
220	Apr-44	Apr	2044		$4.10
221	May-44	May	2044		$3.64
222	Jun-44	Jun	2044		$3.67
223	Jul-44	Jul	2044		$3.84
224	Aug-44	Aug	2044		$3.89
225	Sep-44	Sep	2044		$3.33
226	Oct-44	Oct	2044		$3.39
227	Nov-44	Nov	2044		$4.43
228	Dec-44	Dec	2044		$7.22
229	Jan-45	Jan	2045		$10.57
230	Feb-45	Feb	2045		$9.31
231	Mar-45	Mar	2045		$5.07
232	Apr-45	Apr	2045		$4.16
233	May-45	May	2045		$3.69
234	Jun-45	Jun	2045		$3.72
235	Jul-45	Jul	2045		$3.89
236	Aug-45	Aug	2045		$3.95
237	Sep-45	Sep	2045		$3.38
238	Oct-45	Oct	2045		$3.44
239	Nov-45	Nov	2045		$4.49
240	Dec-45	Dec	2045		$7.33
241	Jan-46	Jan	2046		$10.98
242	Feb-46	Feb	2046		$9.68
243	Mar-46	Mar	2046		$5.27
244	Apr-46	Apr	2046		$4.33
245	May-46	May	2046		$3.84
246	Jun-46	Jun	2046		$3.87
247	Jul-46	Jul	2046		$4.05
248	Aug-46	Aug	2046		$4.11
249	Sep-46	Sep	2046		$3.51
250	Oct-46	Oct	2046		$3.58
251	Nov-46	Nov	2046		$4.67
252	Dec-46	Dec	2046		$7.62
253	Jan-47	Jan	2047		$0.00
254	Feb-47	Feb	2047		$0.00
255	Mar-47	Mar	2047		$0.00
256	Apr-47	Apr	2047		$0.00
257	May-47	May	2047		$0.00
258	Jun-47	Jun	2047		$0.00
259	Jul-47	Jul	2047		$0.00
260	Aug-47	Aug	2047		$0.00
261	Sep-47	Sep	2047		$0.00
262	Oct-47	Oct	2047		$0.00

263	Nov-47	Nov	2047	$0.00
264	Dec-47	Dec	2047	$0.00

West Penn Natural Gas Price (Nominal $/MMBTU)
$6.73
$5.97
$3.33
$3.03
$2.76
$2.81
$2.96
$3.00
$2.59
$2.61
$3.33
$5.24
$7.32
$6.42
$3.59
$3.04
$2.72
$2.74
$2.87
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$2.50
$2.53
$3.25
$5.17
$7.31
$6.44
$3.56
$2.92
$2.59
$2.62
$2.74
$2.79
$2.40
$2.44
$3.19
$5.15
$7.25
$6.38
$3.43
$2.80
$2.48
$2.50

EIA AEO Mid-Atlantic Data
(Electric Power, Natural Gas 2024 Dollars)
[$/MMBTU]

	3	4	5	6	7
Year	**2025**	**2026**	**2027**	**2028**	**2029**
Real	$2.7247	$2.7802	$2.6369	$2.5768	$2.6437
Nominal	$2.89	$3.01	$2.91	$2.90	$3.04

$2.62
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$2.34
$3.03
$4.98
$7.13
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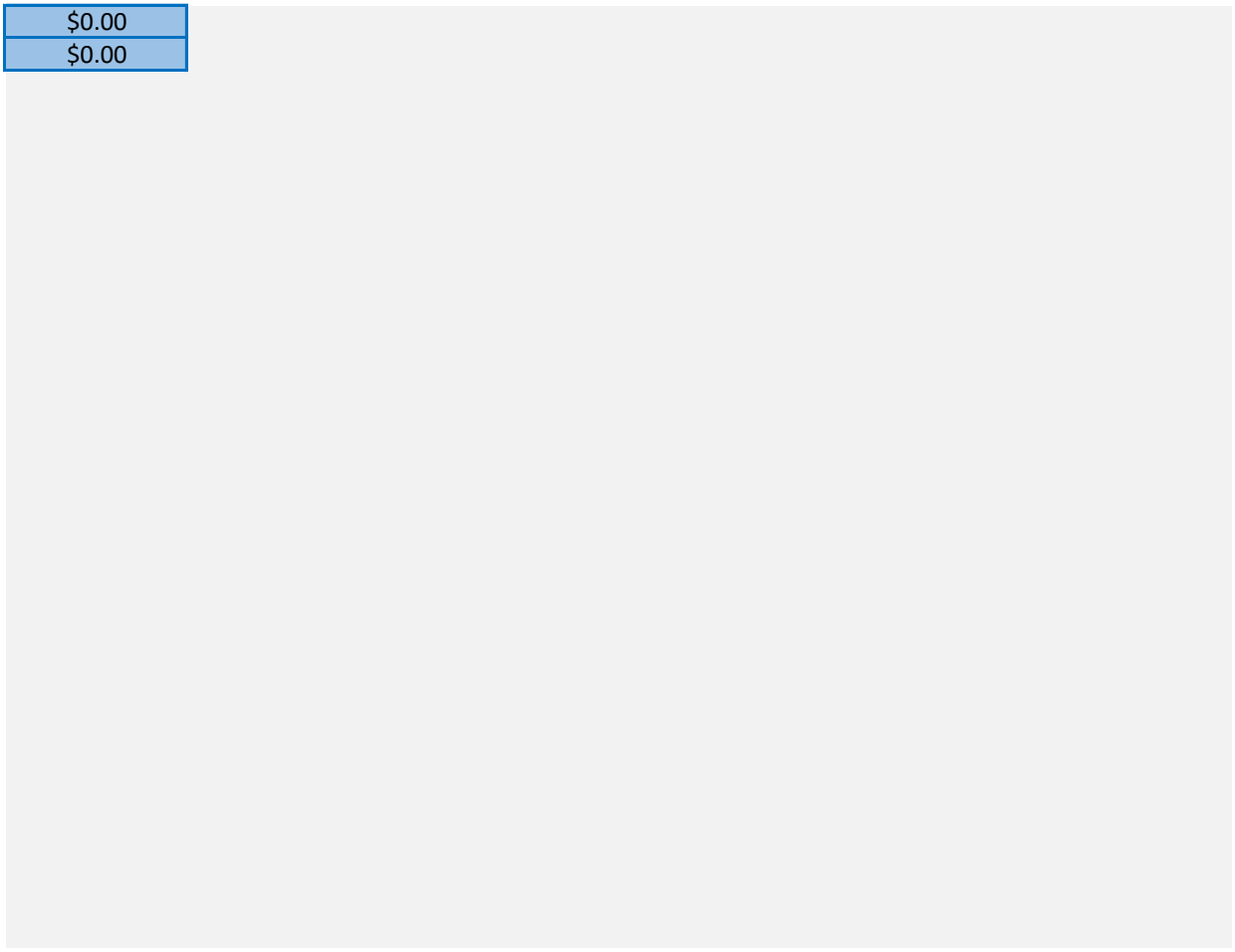

8	9	10	11	12	13	14	15	16
2030	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**
$2.7737	$2.8665	$3.2230	$3.4834	$3.5980	$3.6316	$3.6108	$3.5182	$3.3769
$3.25	$3.43	$3.93	$4.33	$4.56	$4.70	$4.76	$4.73	$4.64

17	18	19	20	21	22	23	24
2039	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**	**2046**
$3.2569	$3.2155	$3.2524	$3.2982	$3.3440	$3.3472	$3.3295	$3.3936
$4.56	$4.59	$4.74	$4.90	$5.07	$5.17	$5.25	$5.46

Record Field	Period	Month	Year	Season	West Penn Zone Adjusted On-Peak (Nominal $/MWh)	West Penn Zone Adjusted Off-Peak (Nominal $/MWh)
1	Jan-26	Jan	2026	Winter	$73.76	$58.35
2	Feb-26	Feb	2026	Winter	$57.37	$46.89
3	Mar-26	Mar	2026	Shoulder	$50.30	$43.24
4	Apr-26	Apr	2026	Shoulder	$50.37	$42.67
5	May-26	May	2026	Summer	$46.82	$27.70
6	Jun-26	Jun	2026	Summer	$84.25	$35.28
7	Jul-26	Jul	2026	Summer	$79.87	$38.90
8	Aug-26	Aug	2026	Summer	$53.02	$31.61
9	Sep-26	Sep	2026	Summer	$49.90	$30.22
10	Oct-26	Oct	2026	Shoulder	$49.54	$33.85
11	Nov-26	Nov	2026	Shoulder	$49.54	$38.42
12	Dec-26	Dec	2026	Winter	$58.31	$47.98
13	Jan-27	Jan	2027	Winter	$81.99	$67.66
14	Feb-27	Feb	2027	Winter	$69.32	$58.00
15	Mar-27	Mar	2027	Shoulder	$52.50	$43.20
16	Apr-27	Apr	2027	Shoulder	$52.96	$40.19
17	May-27	May	2027	Summer	$53.48	$34.84
18	Jun-27	Jun	2027	Summer	$60.13	$35.31
19	Jul-27	Jul	2027	Summer	$88.27	$44.65
20	Aug-27	Aug	2027	Summer	$77.21	$38.48
21	Sep-27	Sep	2027	Summer	$58.47	$35.36
22	Oct-27	Oct	2027	Shoulder	$55.97	$38.89
23	Nov-27	Nov	2027	Shoulder	$54.52	$43.62
24	Dec-27	Dec	2027	Winter	$64.07	$53.79
25	Jan-28	Jan	2028	Winter	$88.84	$73.16
26	Feb-28	Feb	2028	Winter	$75.76	$64.13
27	Mar-28	Mar	2028	Shoulder	$53.95	$44.65
28	Apr-28	Apr	2028	Shoulder	$53.22	$40.81
29	May-28	May	2028	Summer	$53.64	$34.63
30	Jun-28	Jun	2028	Summer	$60.44	$34.84
31	Jul-28	Jul	2028	Summer	$90.81	$43.30
32	Aug-28	Aug	2028	Summer	$79.24	$39.77
33	Sep-28	Sep	2028	Summer	$58.93	$32.24
34	Oct-28	Oct	2028	Shoulder	$55.92	$38.22
35	Nov-28	Nov	2028	Shoulder	$54.83	$44.08
36	Dec-28	Dec	2028	Winter	$63.81	$53.07
37	Jan-29	Jan	2029	Winter	$85.67	$73.37
38	Feb-29	Feb	2029	Winter	$79.44	$66.51
39	Mar-29	Mar	2029	Shoulder	$53.95	$44.03
40	Apr-29	Apr	2029	Shoulder	$52.65	$38.79
41	May-29	May	2029	Summer	$53.43	$36.24

42	Jun-29	Jun	2029	Summer	$59.35	$35.46
43	Jul-29	Jul	2029	Summer	$91.59	$42.47
44	Aug-29	Aug	2029	Summer	$80.43	$39.05
45	Sep-29	Sep	2029	Summer	$58.10	$35.78
46	Oct-29	Oct	2029	Shoulder	$53.01	$36.71
47	Nov-29	Nov	2029	Shoulder	$56.34	$42.11
48	Dec-29	Dec	2029	Winter	$67.50	$52.24
49	Jan-30	Jan	2030	Winter	$86.40	$71.81
50	Feb-30	Feb	2030	Winter	$79.70	$65.11
51	Mar-30	Mar	2030	Shoulder	$57.95	$47.98
52	Apr-30	Apr	2030	Shoulder	$54.94	$38.58
53	May-30	May	2030	Summer	$56.91	$36.97
54	Jun-30	Jun	2030	Summer	$61.27	$36.09
55	Jul-30	Jul	2030	Summer	$85.31	$43.36
56	Aug-30	Aug	2030	Summer	$73.58	$39.88
57	Sep-30	Sep	2030	Summer	$59.45	$36.19
58	Oct-30	Oct	2030	Shoulder	$54.52	$36.92
59	Nov-30	Nov	2030	Shoulder	$58.41	$42.58
60	Dec-30	Dec	2030	Winter	$71.29	$57.95
61	Jan-31	Jan	2031	Winter	$0.00	$0.00
62	Feb-31	Feb	2031	Winter	$0.00	$0.00
63	Mar-31	Mar	2031	Shoulder	$0.00	$0.00
64	Apr-31	Apr	2031	Shoulder	$0.00	$0.00
65	May-31	May	2031	Summer	$0.00	$0.00
66	Jun-31	Jun	2031	Summer	$0.00	$0.00
67	Jul-31	Jul	2031	Summer	$0.00	$0.00
68	Aug-31	Aug	2031	Summer	$0.00	$0.00
69	Sep-31	Sep	2031	Summer	$0.00	$0.00
70	Oct-31	Oct	2031	Shoulder	$0.00	$0.00
71	Nov-31	Nov	2031	Shoulder	$0.00	$0.00
72	Dec-31	Dec	2031	Winter	$0.00	$0.00
73	Jan-32	Jan	2032	Winter	$0.00	$0.00
74	Feb-32	Feb	2032	Winter	$0.00	$0.00
75	Mar-32	Mar	2032	Shoulder	$0.00	$0.00
76	Apr-32	Apr	2032	Shoulder	$0.00	$0.00
77	May-32	May	2032	Summer	$0.00	$0.00
78	Jun-32	Jun	2032	Summer	$0.00	$0.00
79	Jul-32	Jul	2032	Summer	$0.00	$0.00
80	Aug-32	Aug	2032	Summer	$0.00	$0.00
81	Sep-32	Sep	2032	Summer	$0.00	$0.00
82	Oct-32	Oct	2032	Shoulder	$0.00	$0.00
83	Nov-32	Nov	2032	Shoulder	$0.00	$0.00
84	Dec-32	Dec	2032	Winter	$0.00	$0.00
85	Jan-33	Jan	2033	Winter	$0.00	$0.00
86	Feb-33	Feb	2033	Winter	$0.00	$0.00
87	Mar-33	Mar	2033	Shoulder	$0.00	$0.00
88	Apr-33	Apr	2033	Shoulder	$0.00	$0.00

89	May-33	May	2033	Summer	$0.00	$0.00
90	Jun-33	Jun	2033	Summer	$0.00	$0.00
91	Jul-33	Jul	2033	Summer	$0.00	$0.00
92	Aug-33	Aug	2033	Summer	$0.00	$0.00
93	Sep-33	Sep	2033	Summer	$0.00	$0.00
94	Oct-33	Oct	2033	Shoulder	$0.00	$0.00
95	Nov-33	Nov	2033	Shoulder	$0.00	$0.00
96	Dec-33	Dec	2033	Winter	$0.00	$0.00
97	Jan-34	Jan	2034	Winter	$0.00	$0.00
98	Feb-34	Feb	2034	Winter	$0.00	$0.00
99	Mar-34	Mar	2034	Shoulder	$0.00	$0.00
100	Apr-34	Apr	2034	Shoulder	$0.00	$0.00
101	May-34	May	2034	Summer	$0.00	$0.00
102	Jun-34	Jun	2034	Summer	$0.00	$0.00
103	Jul-34	Jul	2034	Summer	$0.00	$0.00
104	Aug-34	Aug	2034	Summer	$0.00	$0.00
105	Sep-34	Sep	2034	Summer	$0.00	$0.00
106	Oct-34	Oct	2034	Shoulder	$0.00	$0.00
107	Nov-34	Nov	2034	Shoulder	$0.00	$0.00
108	Dec-34	Dec	2034	Winter	$0.00	$0.00
109	Jan-35	Jan	2035	Winter	$0.00	$0.00
110	Feb-35	Feb	2035	Winter	$0.00	$0.00
111	Mar-35	Mar	2035	Shoulder	$0.00	$0.00
112	Apr-35	Apr	2035	Shoulder	$0.00	$0.00
113	May-35	May	2035	Summer	$0.00	$0.00
114	Jun-35	Jun	2035	Summer	$0.00	$0.00
115	Jul-35	Jul	2035	Summer	$0.00	$0.00
116	Aug-35	Aug	2035	Summer	$0.00	$0.00
117	Sep-35	Sep	2035	Summer	$0.00	$0.00
118	Oct-35	Oct	2035	Shoulder	$0.00	$0.00
119	Nov-35	Nov	2035	Shoulder	$0.00	$0.00
120	Dec-35	Dec	2035	Winter	$0.00	$0.00
121	Jan-36	Jan	2036	Winter	$0.00	$0.00
122	Feb-36	Feb	2036	Winter	$0.00	$0.00
123	Mar-36	Mar	2036	Shoulder	$0.00	$0.00
124	Apr-36	Apr	2036	Shoulder	$0.00	$0.00
125	May-36	May	2036	Summer	$0.00	$0.00
126	Jun-36	Jun	2036	Summer	$0.00	$0.00
127	Jul-36	Jul	2036	Summer	$0.00	$0.00
128	Aug-36	Aug	2036	Summer	$0.00	$0.00
129	Sep-36	Sep	2036	Summer	$0.00	$0.00
130	Oct-36	Oct	2036	Shoulder	$0.00	$0.00
131	Nov-36	Nov	2036	Shoulder	$0.00	$0.00
132	Dec-36	Dec	2036	Winter	$0.00	$0.00
133	Jan-37	Jan	2037	Winter	$0.00	$0.00
134	Feb-37	Feb	2037	Winter	$0.00	$0.00
135	Mar-37	Mar	2037	Shoulder	$0.00	$0.00

136	Apr-37	Apr	2037	Shoulder	$0.00	$0.00
137	May-37	May	2037	Summer	$0.00	$0.00
138	Jun-37	Jun	2037	Summer	$0.00	$0.00
139	Jul-37	Jul	2037	Summer	$0.00	$0.00
140	Aug-37	Aug	2037	Summer	$0.00	$0.00
141	Sep-37	Sep	2037	Summer	$0.00	$0.00
142	Oct-37	Oct	2037	Shoulder	$0.00	$0.00
143	Nov-37	Nov	2037	Shoulder	$0.00	$0.00
144	Dec-37	Dec	2037	Winter	$0.00	$0.00
145	Jan-38	Jan	2038	Winter	$0.00	$0.00
146	Feb-38	Feb	2038	Winter	$0.00	$0.00
147	Mar-38	Mar	2038	Shoulder	$0.00	$0.00
148	Apr-38	Apr	2038	Shoulder	$0.00	$0.00
149	May-38	May	2038	Summer	$0.00	$0.00
150	Jun-38	Jun	2038	Summer	$0.00	$0.00
151	Jul-38	Jul	2038	Summer	$0.00	$0.00
152	Aug-38	Aug	2038	Summer	$0.00	$0.00
153	Sep-38	Sep	2038	Summer	$0.00	$0.00
154	Oct-38	Oct	2038	Shoulder	$0.00	$0.00
155	Nov-38	Nov	2038	Shoulder	$0.00	$0.00
156	Dec-38	Dec	2038	Winter	$0.00	$0.00
157	Jan-39	Jan	2039	Winter	$0.00	$0.00
158	Feb-39	Feb	2039	Winter	$0.00	$0.00
159	Mar-39	Mar	2039	Shoulder	$0.00	$0.00
160	Apr-39	Apr	2039	Shoulder	$0.00	$0.00
161	May-39	May	2039	Summer	$0.00	$0.00
162	Jun-39	Jun	2039	Summer	$0.00	$0.00
163	Jul-39	Jul	2039	Summer	$0.00	$0.00
164	Aug-39	Aug	2039	Summer	$0.00	$0.00
165	Sep-39	Sep	2039	Summer	$0.00	$0.00
166	Oct-39	Oct	2039	Shoulder	$0.00	$0.00
167	Nov-39	Nov	2039	Shoulder	$0.00	$0.00
168	Dec-39	Dec	2039	Winter	$0.00	$0.00
169	Jan-40	Jan	2040	Winter	$0.00	$0.00
170	Feb-40	Feb	2040	Winter	$0.00	$0.00
171	Mar-40	Mar	2040	Shoulder	$0.00	$0.00
172	Apr-40	Apr	2040	Shoulder	$0.00	$0.00
173	May-40	May	2040	Summer	$0.00	$0.00
174	Jun-40	Jun	2040	Summer	$0.00	$0.00
175	Jul-40	Jul	2040	Summer	$0.00	$0.00
176	Aug-40	Aug	2040	Summer	$0.00	$0.00
177	Sep-40	Sep	2040	Summer	$0.00	$0.00
178	Oct-40	Oct	2040	Shoulder	$0.00	$0.00
179	Nov-40	Nov	2040	Shoulder	$0.00	$0.00
180	Dec-40	Dec	2040	Winter	$0.00	$0.00
181	Jan-41	Jan	2041	Winter	$0.00	$0.00
182	Feb-41	Feb	2041	Winter	$0.00	$0.00

183	Mar-41	Mar	2041	Shoulder	$0.00	$0.00
184	Apr-41	Apr	2041	Shoulder	$0.00	$0.00
185	May-41	May	2041	Summer	$0.00	$0.00
186	Jun-41	Jun	2041	Summer	$0.00	$0.00
187	Jul-41	Jul	2041	Summer	$0.00	$0.00
188	Aug-41	Aug	2041	Summer	$0.00	$0.00
189	Sep-41	Sep	2041	Summer	$0.00	$0.00
190	Oct-41	Oct	2041	Shoulder	$0.00	$0.00
191	Nov-41	Nov	2041	Shoulder	$0.00	$0.00
192	Dec-41	Dec	2041	Winter	$0.00	$0.00
193	Jan-42	Jan	2042	Winter	$0.00	$0.00
194	Feb-42	Feb	2042	Winter	$0.00	$0.00
195	Mar-42	Mar	2042	Shoulder	$0.00	$0.00
196	Apr-42	Apr	2042	Shoulder	$0.00	$0.00
197	May-42	May	2042	Summer	$0.00	$0.00
198	Jun-42	Jun	2042	Summer	$0.00	$0.00
199	Jul-42	Jul	2042	Summer	$0.00	$0.00
200	Aug-42	Aug	2042	Summer	$0.00	$0.00
201	Sep-42	Sep	2042	Summer	$0.00	$0.00
202	Oct-42	Oct	2042	Shoulder	$0.00	$0.00
203	Nov-42	Nov	2042	Shoulder	$0.00	$0.00
204	Dec-42	Dec	2042	Winter	$0.00	$0.00
205	Jan-43	Jan	2043	Winter	$0.00	$0.00
206	Feb-43	Feb	2043	Winter	$0.00	$0.00
207	Mar-43	Mar	2043	Shoulder	$0.00	$0.00
208	Apr-43	Apr	2043	Shoulder	$0.00	$0.00
209	May-43	May	2043	Summer	$0.00	$0.00
210	Jun-43	Jun	2043	Summer	$0.00	$0.00
211	Jul-43	Jul	2043	Summer	$0.00	$0.00
212	Aug-43	Aug	2043	Summer	$0.00	$0.00
213	Sep-43	Sep	2043	Summer	$0.00	$0.00
214	Oct-43	Oct	2043	Shoulder	$0.00	$0.00
215	Nov-43	Nov	2043	Shoulder	$0.00	$0.00
216	Dec-43	Dec	2043	Winter	$0.00	$0.00
217	Jan-44	Jan	2044	Winter	$0.00	$0.00
218	Feb-44	Feb	2044	Winter	$0.00	$0.00
219	Mar-44	Mar	2044	Shoulder	$0.00	$0.00
220	Apr-44	Apr	2044	Shoulder	$0.00	$0.00
221	May-44	May	2044	Summer	$0.00	$0.00
222	Jun-44	Jun	2044	Summer	$0.00	$0.00
223	Jul-44	Jul	2044	Summer	$0.00	$0.00
224	Aug-44	Aug	2044	Summer	$0.00	$0.00
225	Sep-44	Sep	2044	Summer	$0.00	$0.00
226	Oct-44	Oct	2044	Shoulder	$0.00	$0.00
227	Nov-44	Nov	2044	Shoulder	$0.00	$0.00
228	Dec-44	Dec	2044	Winter	$0.00	$0.00
229	Jan-45	Jan	2045	Winter	$0.00	$0.00

230	Feb-45	Feb	2045	Winter	$0.00	$0.00
231	Mar-45	Mar	2045	Shoulder	$0.00	$0.00
232	Apr-45	Apr	2045	Shoulder	$0.00	$0.00
233	May-45	May	2045	Summer	$0.00	$0.00
234	Jun-45	Jun	2045	Summer	$0.00	$0.00
235	Jul-45	Jul	2045	Summer	$0.00	$0.00
236	Aug-45	Aug	2045	Summer	$0.00	$0.00
237	Sep-45	Sep	2045	Summer	$0.00	$0.00
238	Oct-45	Oct	2045	Shoulder	$0.00	$0.00
239	Nov-45	Nov	2045	Shoulder	$0.00	$0.00
240	Dec-45	Dec	2045	Winter	$0.00	$0.00
241	Jan-46	Jan	2046	Winter	$0.00	$0.00
242	Feb-46	Feb	2046	Winter	$0.00	$0.00
243	Mar-46	Mar	2046	Shoulder	$0.00	$0.00
244	Apr-46	Apr	2046	Shoulder	$0.00	$0.00
245	May-46	May	2046	Summer	$0.00	$0.00
246	Jun-46	Jun	2046	Summer	$0.00	$0.00
247	Jul-46	Jul	2046	Summer	$0.00	$0.00
248	Aug-46	Aug	2046	Summer	$0.00	$0.00
249	Sep-46	Sep	2046	Summer	$0.00	$0.00
250	Oct-46	Oct	2046	Shoulder	$0.00	$0.00
251	Nov-46	Nov	2046	Shoulder	$0.00	$0.00
252	Dec-46	Dec	2046	Winter	$0.00	$0.00
253	Jan-47	Jan	2047	Winter	$0.00	$0.00
254	Feb-47	Feb	2047	Winter	$0.00	$0.00
255	Mar-47	Mar	2047	Shoulder	$0.00	$0.00
256	Apr-47	Apr	2047	Shoulder	$0.00	$0.00
257	May-47	May	2047	Summer	$0.00	$0.00
258	Jun-47	Jun	2047	Summer	$0.00	$0.00
259	Jul-47	Jul	2047	Summer	$0.00	$0.00
260	Aug-47	Aug	2047	Summer	$0.00	$0.00
261	Sep-47	Sep	2047	Summer	$0.00	$0.00
262	Oct-47	Oct	2047	Shoulder	$0.00	$0.00
263	Nov-47	Nov	2047	Shoulder	$0.00	$0.00
264	Dec-47	Dec	2047	Winter	$0.00	$0.00

West Penn Zone NG Converted On-Peak (Nominal $/MWh)	West Penn Zone NG Converted Off-Peak (Nominal $/MWh)	West Penn Zone Spark Spread On-Peak (Nominal $/MWh)	West Penn Zone Spark Spread Off-Peak (Nominal $/MWh)	West Penn Zone On-Peak (Nominal $/MWh)	West Penn Zone Off-Peak (Nominal $/MWh)
$74.19	$51.09	-$0.43	$7.26	$73.76	$58.35
$65.84	$45.34	-$8.47	$1.54	$57.37	$46.89
$36.72	$25.29	$13.58	$17.96	$50.30	$43.24
$33.40	$23.00	$16.97	$19.67	$50.37	$42.67
$30.43	$20.96	$16.39	$6.74	$46.82	$27.70
$31.01	$21.35	$53.24	$13.92	$84.25	$35.28
$32.64	$22.48	$47.23	$16.42	$79.87	$38.90
$33.05	$22.76	$19.96	$8.85	$53.02	$31.61
$28.54	$19.65	$21.36	$10.57	$49.90	$30.22
$28.78	$19.82	$20.76	$14.04	$49.54	$33.85
$36.77	$25.32	$12.77	$13.10	$49.54	$38.42
$57.74	$39.77	$0.57	$8.21	$58.31	$47.98
$80.75	$55.61	$1.23	$12.04	$81.99	$67.66
$70.86	$48.80	-$1.54	$9.20	$69.32	$58.00
$39.60	$27.27	$12.90	$15.93	$52.50	$43.20
$33.51	$23.08	$19.45	$17.11	$52.96	$40.19
$29.96	$20.63	$23.52	$14.21	$53.48	$34.84
$30.22	$20.81	$29.90	$14.49	$60.13	$35.31
$31.62	$21.77	$56.65	$22.88	$88.27	$44.65
$32.01	$22.04	$45.20	$16.43	$77.21	$38.48
$27.53	$18.96	$30.93	$16.40	$58.47	$35.36
$27.89	$19.21	$28.08	$19.68	$55.97	$38.89
$35.82	$24.67	$18.70	$18.95	$54.52	$43.62
$57.07	$39.30	$7.00	$14.49	$64.07	$53.79
$80.59	$55.50	$8.25	$17.66	$88.84	$73.16
$71.02	$48.91	$4.74	$15.22	$75.76	$64.13
$39.21	$27.00	$14.74	$17.65	$53.95	$44.65
$32.19	$22.17	$21.04	$18.65	$53.22	$40.81
$28.58	$19.68	$25.06	$14.95	$53.64	$34.63
$28.88	$19.89	$31.56	$14.95	$60.44	$34.84
$30.24	$20.82	$60.58	$22.48	$90.81	$43.30
$30.73	$21.16	$48.51	$18.61	$79.24	$39.77
$26.45	$18.22	$32.48	$14.03	$58.93	$32.24
$26.92	$18.54	$29.00	$19.67	$55.92	$38.22
$35.23	$24.26	$19.60	$19.82	$54.83	$44.08
$56.79	$39.11	$7.03	$13.96	$63.81	$53.07
$79.94	$55.05	$5.74	$18.32	$85.67	$73.37
$70.35	$48.45	$9.09	$18.06	$79.44	$66.51
$37.79	$26.02	$16.16	$18.01	$53.95	$44.03
$30.83	$21.23	$21.82	$17.56	$52.65	$38.79
$27.31	$18.81	$26.12	$17.44	$53.43	$36.24

$27.60	$19.01	$31.75	$16.46	$59.35	$35.46
$28.90	$19.91	$62.69	$22.57	$91.59	$42.47
$29.40	$20.25	$51.03	$18.80	$80.43	$39.05
$25.24	$17.38	$32.86	$18.39	$58.10	$35.78
$25.78	$17.75	$27.24	$18.96	$53.01	$36.71
$33.47	$23.05	$22.87	$19.06	$56.34	$42.11
$54.90	$37.81	$12.60	$14.43	$67.50	$52.24
$78.63	$54.15	$7.77	$17.66	$86.40	$71.81
$69.56	$47.90	$10.14	$17.21	$79.70	$65.11
$36.97	$25.46	$20.98	$22.52	$57.95	$47.98
$29.54	$20.35	$25.39	$18.23	$54.94	$38.58
$25.86	$17.81	$31.05	$19.16	$56.91	$36.97
$25.97	$17.88	$35.30	$18.20	$61.27	$36.09
$27.05	$18.63	$58.26	$24.73	$85.31	$43.36
$27.51	$18.95	$46.07	$20.93	$73.58	$39.88
$23.07	$15.89	$36.39	$20.31	$59.45	$36.19
$23.62	$16.27	$30.90	$20.65	$54.52	$36.92
$31.47	$21.67	$26.95	$20.91	$58.41	$42.58
$53.13	$36.59	$18.16	$21.36	$71.29	$57.95
$77.14	$53.12	$5.87	$16.76	$83.01	$69.89
$68.11	$46.91	$5.72	$15.23	$73.83	$62.14
$35.54	$24.47	$16.53	$18.91	$52.07	$43.38
$29.21	$20.11	$22.38	$18.26	$51.59	$38.37
$25.96	$17.88	$26.99	$16.78	$52.95	$34.66
$26.05	$17.94	$32.79	$16.36	$58.85	$34.30
$27.10	$18.66	$60.78	$23.64	$87.88	$42.31
$27.18	$18.72	$48.69	$19.08	$75.87	$37.80
$22.62	$15.58	$33.85	$17.64	$56.47	$33.21
$23.04	$15.87	$29.40	$20.15	$52.44	$36.02
$30.96	$21.32	$22.49	$20.09	$53.45	$41.41
$52.88	$36.42	$11.43	$16.39	$64.31	$52.81
$80.29	$55.29	$5.87	$16.76	$86.15	$72.05
$70.79	$48.75	$5.72	$15.23	$76.51	$63.98
$36.68	$25.26	$16.53	$18.91	$53.20	$44.17
$29.36	$20.22	$22.38	$18.26	$51.74	$38.47
$25.59	$17.62	$26.99	$16.78	$52.57	$34.40
$25.81	$17.77	$32.79	$16.36	$58.61	$34.13
$27.04	$18.62	$60.78	$23.64	$87.82	$42.26
$27.23	$18.75	$48.69	$19.08	$75.92	$37.83
$22.57	$15.54	$33.85	$17.64	$56.43	$33.18
$23.11	$15.92	$29.40	$20.15	$52.51	$36.07
$31.66	$21.81	$22.49	$20.09	$54.15	$41.90
$54.30	$37.39	$11.43	$16.39	$65.73	$53.79
$85.00	$58.54	$5.87	$16.76	$90.87	$75.30
$74.83	$51.53	$5.72	$15.23	$80.55	$66.77
$39.00	$26.86	$16.53	$18.91	$55.53	$45.77
$31.48	$21.68	$22.38	$18.26	$53.86	$39.94

$27.79	$19.14	$26.99	$16.78	$54.77	$35.92
$27.96	$19.26	$32.79	$16.36	$60.76	$35.62
$29.31	$20.19	$60.78	$23.64	$90.09	$43.83
$29.63	$20.41	$48.69	$19.08	$78.32	$39.49
$24.70	$17.01	$33.85	$17.64	$58.56	$34.65
$25.08	$17.27	$29.40	$20.15	$54.48	$37.42
$34.29	$23.61	$22.49	$20.09	$56.77	$43.71
$58.12	$40.03	$11.43	$16.39	$69.55	$56.42
$90.89	$62.59	$5.87	$16.76	$96.76	$79.35
$80.11	$55.17	$5.72	$15.23	$85.83	$70.40
$42.29	$29.12	$16.53	$18.91	$58.82	$48.03
$34.55	$23.79	$22.38	$18.26	$56.93	$42.05
$30.54	$21.03	$26.99	$16.78	$57.52	$37.81
$30.68	$21.13	$32.79	$16.36	$63.47	$37.49
$32.03	$22.05	$60.78	$23.64	$92.80	$45.70
$32.42	$22.32	$48.69	$19.08	$81.11	$41.41
$27.41	$18.88	$33.85	$17.64	$61.26	$36.52
$27.85	$19.18	$29.40	$20.15	$57.25	$39.33
$37.39	$25.75	$22.49	$20.09	$59.88	$45.84
$62.67	$43.16	$11.43	$16.39	$74.10	$59.55
$96.75	$66.63	$5.87	$16.76	$102.62	$83.39
$85.25	$58.71	$5.72	$15.23	$90.98	$73.94
$46.03	$31.70	$16.53	$18.91	$62.56	$50.61
$37.99	$26.16	$22.38	$18.26	$60.37	$44.42
$33.52	$23.08	$26.99	$16.78	$60.51	$39.86
$33.42	$23.01	$32.79	$16.36	$66.21	$39.37
$34.56	$23.80	$60.78	$23.64	$95.33	$47.44
$35.02	$24.12	$48.69	$19.08	$83.71	$43.20
$29.71	$20.46	$33.85	$17.64	$63.56	$38.10
$30.22	$20.81	$29.40	$20.15	$59.62	$40.96
$40.05	$27.58	$22.49	$20.09	$62.54	$47.68
$66.33	$45.68	$11.43	$16.39	$77.76	$62.07
$101.75	$70.08	$5.87	$16.76	$107.62	$86.84
$89.73	$61.80	$5.72	$15.23	$95.46	$77.03
$48.89	$33.67	$16.53	$18.91	$65.41	$52.58
$40.27	$27.73	$22.38	$18.26	$62.65	$45.99
$35.63	$24.54	$26.99	$16.78	$62.61	$41.32
$35.73	$24.61	$32.79	$16.36	$68.53	$40.97
$37.16	$25.59	$60.78	$23.64	$97.94	$49.23
$37.70	$25.96	$48.69	$19.08	$86.39	$45.04
$32.13	$22.13	$33.85	$17.64	$65.98	$39.77
$32.70	$22.52	$29.40	$20.15	$62.10	$42.67
$42.74	$29.44	$22.49	$20.09	$65.23	$49.53
$70.05	$48.24	$11.43	$16.39	$81.48	$64.63
$105.10	$72.38	$5.87	$16.76	$110.97	$89.14
$92.58	$63.76	$5.72	$15.23	$98.31	$78.99
$50.45	$34.75	$16.53	$18.91	$66.98	$53.66

$41.42	$28.52	$22.38	$18.26	$63.80	$46.78
$36.70	$25.27	$26.99	$16.78	$63.69	$42.05
$37.02	$25.49	$32.79	$16.36	$69.81	$41.85
$38.71	$26.66	$60.78	$23.64	$99.48	$50.30
$39.31	$27.07	$48.69	$19.08	$88.00	$46.15
$33.61	$23.14	$33.85	$17.64	$67.46	$40.78
$34.24	$23.58	$29.40	$20.15	$63.64	$43.73
$44.68	$30.77	$22.49	$20.09	$67.16	$50.86
$72.90	$50.20	$11.43	$16.39	$84.33	$66.60
$102.90	$70.86	$5.87	$16.76	$108.77	$87.63
$90.64	$62.42	$5.72	$15.23	$96.36	$77.65
$49.40	$34.02	$16.53	$18.91	$65.93	$52.93
$40.55	$27.93	$22.38	$18.26	$62.93	$46.18
$35.93	$24.74	$26.99	$16.78	$62.92	$41.52
$36.24	$24.96	$32.79	$16.36	$69.04	$41.32
$37.89	$26.10	$60.78	$23.64	$98.67	$49.74
$38.49	$26.50	$48.69	$19.08	$87.18	$45.59
$32.90	$22.66	$33.85	$17.64	$66.76	$40.30
$33.52	$23.09	$29.40	$20.15	$62.92	$43.24
$43.74	$30.12	$22.49	$20.09	$66.23	$50.22
$71.37	$49.15	$11.43	$16.39	$82.80	$65.54
$101.23	$69.71	$5.87	$16.76	$107.10	$86.48
$89.17	$61.41	$5.72	$15.23	$94.89	$76.64
$48.59	$33.47	$16.53	$18.91	$65.12	$52.38
$39.89	$27.47	$22.38	$18.26	$62.27	$45.73
$35.35	$24.34	$26.99	$16.78	$62.33	$41.12
$35.65	$24.55	$32.79	$16.36	$68.45	$40.91
$37.28	$25.67	$60.78	$23.64	$98.06	$49.32
$37.86	$26.07	$48.69	$19.08	$86.55	$45.16
$32.37	$22.29	$33.85	$17.64	$66.22	$39.93
$32.98	$22.71	$29.40	$20.15	$62.38	$42.86
$43.03	$29.63	$22.49	$20.09	$65.52	$49.73
$70.21	$48.35	$11.43	$16.39	$81.64	$64.75
$101.94	$70.20	$5.87	$16.76	$107.81	$86.97
$89.80	$61.84	$5.72	$15.23	$95.52	$77.07
$48.94	$33.70	$16.53	$18.91	$65.46	$52.61
$40.17	$27.67	$22.38	$18.26	$62.55	$45.92
$35.60	$24.51	$26.99	$16.78	$62.58	$41.29
$35.90	$24.73	$32.79	$16.36	$68.70	$41.08
$37.54	$25.85	$60.78	$23.64	$98.32	$49.50
$38.13	$26.26	$48.69	$19.08	$86.82	$45.34
$32.60	$22.45	$33.85	$17.64	$66.45	$40.09
$33.21	$22.87	$29.40	$20.15	$62.61	$43.02
$43.33	$29.84	$22.49	$20.09	$65.82	$49.93
$70.71	$48.69	$11.43	$16.39	$82.14	$65.09
$105.18	$72.43	$5.87	$16.76	$111.04	$89.19
$92.64	$63.80	$5.72	$15.23	$98.37	$79.03

$50.49	$34.77	$16.53	$18.91	$67.02	$53.68
$41.45	$28.54	$22.38	$18.26	$63.83	$46.80
$36.73	$25.29	$26.99	$16.78	$63.71	$42.07
$37.04	$25.51	$32.79	$16.36	$69.84	$41.87
$38.73	$26.67	$60.78	$23.64	$99.51	$50.32
$39.34	$27.09	$48.69	$19.08	$88.03	$46.17
$33.63	$23.16	$33.85	$17.64	$67.48	$40.80
$34.26	$23.60	$29.40	$20.15	$63.66	$43.75
$44.71	$30.79	$22.49	$20.09	$67.19	$50.88
$72.95	$50.24	$11.43	$16.39	$84.38	$66.63
$108.79	$74.92	$5.87	$16.76	$114.66	$91.68
$95.83	$65.99	$5.72	$15.23	$101.55	$81.22
$52.22	$35.96	$16.53	$18.91	$68.75	$54.87
$42.87	$29.52	$22.38	$18.26	$65.25	$47.78
$37.99	$26.16	$26.99	$16.78	$64.97	$42.94
$38.31	$26.39	$32.79	$16.36	$71.11	$42.75
$40.06	$27.59	$60.78	$23.64	$100.84	$51.23
$40.69	$28.02	$48.69	$19.08	$89.38	$47.10
$34.79	$23.96	$33.85	$17.64	$68.64	$41.60
$35.44	$24.41	$29.40	$20.15	$64.84	$44.56
$46.24	$31.85	$22.49	$20.09	$68.73	$51.94
$75.45	$51.96	$11.43	$16.39	$86.89	$68.35
$112.51	$77.48	$5.87	$16.76	$118.38	$94.24
$99.10	$68.25	$5.72	$15.23	$104.83	$83.48
$54.01	$37.19	$16.53	$18.91	$70.54	$56.10
$44.34	$30.53	$22.38	$18.26	$66.72	$48.79
$39.29	$27.05	$26.99	$16.78	$66.27	$43.83
$39.62	$27.29	$32.79	$16.36	$72.42	$43.65
$41.43	$28.53	$60.78	$23.64	$102.21	$52.18
$42.08	$28.98	$48.69	$19.08	$90.77	$48.06
$35.97	$24.77	$33.85	$17.64	$69.83	$42.41
$36.65	$25.24	$29.40	$20.15	$66.05	$45.39
$47.82	$32.93	$22.49	$20.09	$70.31	$53.03
$78.03	$53.74	$11.43	$16.39	$89.46	$70.13
$114.87	$79.10	$5.87	$16.76	$120.73	$95.87
$101.18	$69.68	$5.72	$15.23	$106.90	$84.91
$55.14	$37.97	$16.53	$18.91	$71.67	$56.88
$45.27	$31.17	$22.38	$18.26	$67.65	$49.43
$40.11	$27.62	$26.99	$16.78	$67.09	$44.40
$40.46	$27.86	$32.79	$16.36	$73.25	$44.22
$42.30	$29.13	$60.78	$23.64	$103.08	$52.78
$42.96	$29.59	$48.69	$19.08	$91.65	$48.67
$36.73	$25.29	$33.85	$17.64	$70.58	$42.93
$37.42	$25.77	$29.40	$20.15	$66.82	$45.92
$48.83	$33.63	$22.49	$20.09	$71.31	$53.72
$79.67	$54.87	$11.43	$16.39	$91.10	$71.26
$116.54	$80.26	$5.87	$16.76	$122.41	$97.02

$102.66	$70.70	$5.72	$15.23	$108.38	$85.93
$55.95	$38.53	$16.53	$18.91	$72.47	$57.44
$45.93	$31.63	$22.38	$18.26	$68.31	$49.89
$40.70	$28.03	$26.99	$16.78	$67.68	$44.81
$41.05	$28.27	$32.79	$16.36	$73.84	$44.63
$42.92	$29.56	$60.78	$23.64	$103.70	$53.20
$43.59	$30.02	$48.69	$19.08	$92.28	$49.10
$37.27	$25.66	$33.85	$17.64	$71.12	$43.30
$37.97	$26.15	$29.40	$20.15	$67.37	$46.30
$49.54	$34.12	$22.49	$20.09	$72.03	$54.21
$80.84	$55.67	$11.43	$16.39	$92.27	$72.06
$121.16	$83.44	$5.87	$16.76	$127.03	$100.20
$106.73	$73.50	$5.72	$15.23	$112.45	$88.73
$58.16	$40.05	$16.53	$18.91	$74.69	$58.96
$47.75	$32.88	$22.38	$18.26	$70.13	$51.14
$42.31	$29.14	$26.99	$16.78	$69.29	$45.92
$42.67	$29.39	$32.79	$16.36	$75.47	$45.75
$44.62	$30.73	$60.78	$23.64	$105.40	$54.37
$45.31	$31.21	$48.69	$19.08	$94.00	$50.29
$38.74	$26.68	$33.85	$17.64	$72.59	$44.32
$39.47	$27.18	$29.40	$20.15	$68.87	$47.33
$51.50	$35.47	$22.49	$20.09	$73.99	$55.56
$84.04	$57.87	$11.43	$16.39	$95.47	$74.27
$0.00	$0.00	$5.87	$16.76	$5.87	$16.76
$0.00	$0.00	$5.72	$15.23	$5.72	$15.23
$0.00	$0.00	$16.53	$18.91	$16.53	$18.91
$0.00	$0.00	$22.38	$18.26	$22.38	$18.26
$0.00	$0.00	$26.99	$16.78	$26.99	$16.78
$0.00	$0.00	$32.79	$16.36	$32.79	$16.36
$0.00	$0.00	$60.78	$23.64	$60.78	$23.64
$0.00	$0.00	$48.69	$19.08	$48.69	$19.08
$0.00	$0.00	$33.85	$17.64	$33.85	$17.64
$0.00	$0.00	$29.40	$20.15	$29.40	$20.15
$0.00	$0.00	$22.49	$20.09	$22.49	$20.09
$0.00	$0.00	$11.43	$16.39	$11.43	$16.39

Record Field	Period	Month	Year	Tetco M-3	Locational Gas Adjustment ($/MMBtu)
1	Jan-26	Jan	2026	$5.87	$1.720
2	Feb-26	Feb	2026	$4.50	$0.576
3	Mar-26	Mar	2026	$3.69	$0.148
4	Apr-26	Apr	2026	$3.22	-$0.188
5	May-26	May	2026	$2.40	-$1.037
6	Jun-26	Jun	2026	$2.17	-$1.443
7	Jul-26	Jul	2026	$2.17	-$1.643
8	Aug-26	Aug	2026	$2.50	-$1.375
9	Sep-26	Sep	2026	$1.93	-$1.903
10	Oct-26	Oct	2026	$1.86	-$2.024
11	Nov-26	Nov	2026	$2.62	-$1.482
12	Dec-26	Dec	2026	$4.54	$0.047
13	Jan-27	Jan	2027	$7.30	$2.547
14	Feb-27	Feb	2027	$6.34	$1.960
15	Mar-27	Mar	2027	$3.15	-$0.656
16	Apr-27	Apr	2027	$2.85	-$0.570
17	May-27	May	2027	$2.71	-$0.685
18	Jun-27	Jun	2027	$2.81	-$0.737
19	Jul-27	Jul	2027	$3.12	-$0.602
20	Aug-27	Aug	2027	$3.07	-$0.710
21	Sep-27	Sep	2027	$2.62	-$1.129
22	Oct-27	Oct	2027	$2.57	-$1.230
23	Nov-27	Nov	2027	$3.20	-$0.809
24	Dec-27	Dec	2027	$5.25	$0.809
25	Jan-28	Jan	2028	$7.57	$2.835
26	Feb-28	Feb	2028	$7.07	$2.676
27	Mar-28	Mar	2028	$3.41	-$0.355
28	Apr-28	Apr	2028	$2.87	-$0.425
29	May-28	May	2028	$2.74	-$0.533
30	Jun-28	Jun	2028	$2.87	-$0.553
31	Jul-28	Jul	2028	$3.05	-$0.550
32	Aug-28	Aug	2028	$2.97	-$0.696
33	Sep-28	Sep	2028	$2.61	-$1.042
34	Oct-28	Oct	2028	$2.73	-$0.984
35	Nov-28	Nov	2028	$3.36	-$0.602
36	Dec-28	Dec	2028	$5.47	$1.056
37	Jan-29	Jan	2029	$7.86	$3.187
38	Feb-29	Feb	2029	$7.30	$2.970
39	Mar-29	Mar	2029	$3.65	$0.011
40	Apr-29	Apr	2029	$2.84	-$0.337
41	May-29	May	2029	$2.70	-$0.457
42	Jun-29	Jun	2029	$2.83	-$0.474
43	Jul-29	Jul	2029	$2.86	-$0.619
44	Aug-29	Aug	2029	$2.81	-$0.732
45	Sep-29	Sep	2029	$2.61	-$0.925
46	Oct-29	Oct	2029	$2.75	-$0.858
47	Nov-29	Nov	2029	$3.64	-$0.162

Month	Locational Adjustment ($/MMBtu)
Jan	$2.57
Feb	$2.05
Mar	-$0.21
Apr	-$0.38
May	-$0.68
Jun	-$0.80
Jul	-$0.85
Aug	-$0.88
Sep	-$1.25
Oct	-$1.27
Nov	-$0.76
Dec	$0.74

48	Dec-29	Dec	2029	$5.28	$1.041

Load Shape	Spark Spread On-Peak ($/MWh)	Spark Spread Off-Peak ($/MWh)
201.2%	$5.75	$16.42
177.3%	$5.61	$14.92
96.6%	$16.19	$18.53
79.3%	$21.93	$17.89
70.3%	$26.44	$16.44
70.9%	$32.13	$16.03
74.1%	$59.54	$23.16
75.3%	$47.70	$18.69
64.3%	$33.17	$17.28
65.6%	$28.80	$19.74
85.5%	$22.03	$19.68
139.6%	$11.20	$16.06

Commentary:	In some cases, the spark spread may be a negative monetary value. In the marketplace, this may occur for a short period, but usually for an entire month. However, this factor accounts for differences in the heat rate assumptions and the real market values. Escalation is later applied in a positive manner as not to over devalue future spark spreads.

	Henry,H,F	Panhandle	TCO,TCO,F	TETCO-M3	Transco-Z6
				Tetco M-3	Transco 6 (N
1/1/2025	3.514	3.946	3.174	5.874	4.762
2/1/2025	3.535	3.57	3.3	4.5	3.98
3/1/2025	3.906	3.35	3.51	3.69	3.62
4/1/2025	3.95	3.09	3.23	3.22	3.17
5/1/2025	3.17	2.49	2.54	2.4	2.33
6/1/2025	3.204	2.6	2.45	2.17	2.13
7/1/2025	3.261	2.51	2.2	2.17	2.13
8/1/2025	3.081	2.61	2.53	2.5	2.48
Sep-25	2.83	2.361	2.076	1.934	1.836
Oct-25	2.91	2.369	1.946	1.859	1.764
Nov-25	3.25	2.805	2.542	2.615	2.519
Dec-25	3.82	3.732	3.37	4.544	4.234
Jan-26	4.15	4.429	3.782	7.296	6.756
Feb-26	3.92	4.199	3.594	6.339	5.699
Mar-26	3.54	3.142	3.124	3.147	3.11
Apr-26	3.41	2.863	2.913	2.848	2.743
May-26	3.44	2.825	2.809	2.709	2.562
Jun-26	3.61	2.905	2.873	2.805	2.805
Jul-26	3.81	3.241	3.103	3.118	3.118
Aug-26	3.88	3.33	3.015	3.07	3.08
Sep-26	3.84	3.197	2.799	2.617	2.605
Oct-26	3.88	3.183	2.688	2.573	2.578
Nov-26	4.10	3.552	3.077	3.202	3.225
Dec-26	4.50	4.369	3.837	5.245	5.095
Jan-27	4.75	5.011	4.331	7.569	7.237
Feb-27	4.38	4.674	3.964	7.069	6.231
Mar-27	3.80	3.323	3.345	3.413	3.275
Apr-27	3.42	2.89	2.983	2.873	2.953
May-27	3.39	2.789	2.782	2.736	2.629
Jun-27	3.54	2.944	2.83	2.867	2.85
Jul-27	3.72	3.188	2.888	3.045	3.07
Aug-27	3.78	3.238	2.888	2.968	3.022
Sep-27	3.75	3.196	2.816	2.606	2.698
Oct-27	3.80	3.171	2.753	2.731	2.578
Nov-27	4.01	3.556	3.063	3.356	3.313
Dec-27	4.44	4.281	3.748	5.466	5.088
Jan-28	4.73	4.932	4.366	7.862	7.566
Feb-28	4.39	4.581	4.038	7.303	6.655
Mar-28	3.77	3.476	3.386	3.65	3.443
Apr-28	3.30	2.808	2.676	2.838	2.928
May-28	3.27	2.739	2.629	2.697	2.747
Jun-28	3.42	2.895	2.742	2.83	2.838
Jul-28	3.60	3.13	2.895	2.855	2.935
Aug-28	3.66	3.194	2.924	2.812	2.894
Sep-28	3.65	3.128	2.87	2.613	2.723
Oct-28	3.72	3.14	2.993	2.753	2.613
Nov-28	3.96	3.366	3.403	3.636	3.138

Dec-28	4.41	4.18	3.832	5.28	5.122
Jan-29	4.68	4.865	4.185	7.967	7.827
Feb-29	4.33	4.508	3.871	6.875	6.601
Mar-29	3.64	3.727	3.141	3.767	3.574
Apr-29	3.18	2.705	2.603	2.653	2.755
May-29	3.15	2.636	2.564	2.516	2.454
Jun-29	3.30	2.792	2.676	2.652	2.672
Jul-29	3.47	3.026	2.872	2.746	2.784
Aug-29	3.54	3.092	2.899	2.792	2.864
Sep-29	3.54	3.076	2.85	2.596	2.706
Oct-29	3.61	3.116	2.953	2.749	2.799
Nov-29	3.80	3.388	3.308	3.773	3.198
Dec-29	4.24	3.847	3.727	4.994	4.797
Jan-30	4.51	4.65	4.087	6.953	7.135
Feb-30	4.22	4.35	3.825	6.42	6.618
Mar-30	3.57	3.947	3.144	3.501	3.471
Apr-30	3.07	2.628	2.501	2.541	2.588
May-30	3.04	2.551	2.454	2.396	2.264
Jun-30	3.17	2.692	2.552	2.517	2.472
Jul-30	3.32	2.908	2.698	2.548	2.541
Aug-30	3.39	2.97	2.725	2.59	2.618
Sep-30	3.37	2.936	2.658	2.378	2.448
Oct-30	3.44	3.013	2.793	2.531	2.536
Nov-30	3.63	3.19	3.077	3.54	2.857
Dec-30	4.06	3.382	3.489	4.752	4.559
Jan-31	4.33	4.479	3.929	6.716	6.926
Feb-31	4.06	4.194	3.682	6.122	6.412
Mar-31	3.43	3.807	3.017	3.227	3.294
Apr-31	3.03	2.597	2.467	2.534	2.584
May-31	3.05	2.568	2.468	2.442	2.32
Jun-31	3.19	2.707	2.565	2.557	2.515
Jul-31	3.33	2.919	2.706	2.561	2.556
Aug-31	3.36	2.941	2.694	2.564	2.594
Sep-31	3.33	2.897	2.617	2.345	2.407
Oct-31	3.39	2.963	2.74	2.483	2.49
Nov-31	3.58	3.221	3.269	3.511	2.886
Dec-31	4.03	3.428	3.696	4.75	4.59
Jan-32	4.30	4.298	4.298	6.718	6.96
Feb-32	4.03	4.028	4.028	6.046	6.443
Mar-32	3.36	3.363	3.363	3.128	3.298
Apr-32	2.88	2.883	2.883	2.371	2.345
May-32	2.86	2.863	2.863	2.235	2.033
Jun-32	3.01	3.013	3.013	2.371	2.253
Jul-32	3.17	3.173	3.173	2.423	2.348
Aug-32	3.21	3.205	3.205	2.43	2.39
Sep-32	3.18	3.18	3.18	2.218	2.218
Oct-32	3.26	3.255	3.255	2.37	2.307
Nov-32	3.49	3.485	3.485	3.117	2.47
Dec-32	3.92	3.915	3.915	4.327	4.145

Jan-33	4.17	4.165	4.165	6.625	6.493
Feb-33	3.90	3.9	3.9	5.88	6.002
Mar-33	3.28	3.28	3.28	3.015	2.878
Apr-33	2.83	2.83	2.83	2.258	2.22
May-33	2.86	2.86	2.86	2.172	1.955
Jun-33	3.00	3.002	3.002	2.3	2.17
Jul-33	3.17	3.167	3.167	2.469	2.379
Aug-33	3.21	3.207	3.207	2.485	2.429
Sep-33	3.18	3.182	3.182	2.27	2.257
Oct-33	3.23	3.228	3.228	2.396	2.318
Nov-33	3.49	3.488	3.488	4.186	2.53
Dec-33	3.89	3.888	3.888	5.366	4.176
Jan-34	4.14	4.143	4.143	6.675	6.531
Feb-34	3.90	3.903	3.903	5.878	6.063
Mar-34	3.30	3.303	3.303	3.041	2.963
Apr-34	2.90	2.903	2.903	2.348	2.435
May-34	2.93	2.933	2.933	2.263	2.165
Jun-34	3.06	3.063	3.063	2.378	2.373
Jul-34	3.21	3.208	3.208	2.528	2.558
Aug-34	3.25	3.248	3.248	2.543	2.608
Sep-34	3.26	3.263	3.263	2.368	2.481
Oct-34	3.31	3.309	3.309	2.494	2.537
Nov-34	3.55	3.549	3.549	5.394	2.579
Dec-34	3.95	3.949	3.949	6.574	4.219
Jan-35	4.17	4.169	4.169	6.701	6.401
Feb-35	3.93	3.929	3.929	5.904	5.949
Mar-35	3.50	3.499	3.499	3.237	3.004
Apr-35	3.17	3.169	3.169	2.614	2.631
May-35	3.15	3.147	3.147	2.477	2.312
Jun-35	3.18	3.182	3.182	2.497	2.422
Jul-35	3.22	3.222	3.222	2.542	2.504
Aug-35	3.26	3.262	3.262	2.557	2.554
Sep-35	3.28	3.277	3.277	2.382	2.425
Oct-35	3.32	3.323	3.323	2.508	2.483
Nov-35	3.52	3.523	3.523	5.341	2.325
Dec-35	3.82	3.823	3.823	6.421	3.865
Jan-36	4.09	4.093	4.093	4.093	6.233
Feb-36	3.92	3.923	3.923	3.923	5.851
Mar-36	3.65	3.653	3.653	3.653	3.063
Apr-36	3.32	3.323	3.323	3.323	2.721
May-36	3.30	3.301	3.301	3.301	2.401
Jun-36	3.34	3.336	3.336	3.336	2.511
Jul-36	3.38	3.376	3.376	3.376	2.594
Aug-36	3.42	3.416	3.416	3.416	2.644
Sep-36	3.43	3.431	3.431	3.431	2.513
Oct-36	3.48	3.477	3.477	3.477	2.572
Nov-36	3.55	3.549	3.549	3.549	2.287

	Dec-36	3.70	3.704	3.704	3.704	3.682
	Jan-37	3.93	3.929	3.929	3.929	3.929
	Feb-37	3.78	3.779	3.779	3.779	3.779
	Mar-37	3.58	3.579	3.579	3.579	3.579
	Apr-37	3.25	3.249	3.249	3.249	3.249
	May-37	3.23	3.227	3.227	3.227	3.227
	Jun-37	3.26	3.262	3.262	3.262	3.262
	Jul-37	3.30	3.302	3.302	3.302	3.302
	Aug-37	3.34	3.342	3.342	3.342	3.342
	Sep-37	3.36	3.357	3.357	3.357	3.357
	Oct-37	3.40	3.403	3.403	3.403	3.403
	Nov-37	3.48	3.475	3.475	3.475	3.475
		3.515	3.493	2.835	6.063	3.493

Transco-Z6 (NY),TZS,F

Ion-NY)

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2.861		-0.555	2.61	-0.5375	2.63 checks
2.429		-0.67	2.477	-0.835	2.31 checks
2.577	note: NG values beyond May 2035 are not used				
2.61					
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PPI Industry Data
Original Data Value

Source:	https://data.bls.gov/timeseries/PCU221110221110
Series ID:	PCU221110221110
Series Title:	PPI industry data for Electric power generation, not seasonally
Industry:	Electric power generation
Product:	Electric power generation
Base Date:	200312
Years:	2015 to 2025

Years in Escalation Rate	5

Year	Jan	Feb	Mar	Apr	May	Jun	Jul
2019	134.3	150.9	152.9	132.0	129.9	136.1	137.4
2020	126.7	124.0	122.6	120.6	118.5	124.9	134.0
2021	133.3	744.7	154.3	139.2	141.7	172.2	175.8
2022	167.9	168.5	169.4	193.2	277.7	234.3	296.1
2023	265.8	165.2	175.3	153.9	136.2	150.9	178.8
2024	194.3	147.4	142.8	136.6	155.6	146.8	171.1
2025	160.2	166.0	153.0	149.5	153.1	158.0	

Aug	Sep	Oct	Nov	Dec	Annual Avg.	Full Year Flag
170.1	169.5	140.4	140.2	131.5	143.8	1
153.0	139.4	140.8	141.6	136.5	131.9	1
181.2	187.2	191.0	180.4	163.1	213.7	1
274.9	286.9	207.8	194.1	310.7	231.8	1
280.5	201.8	159.5	167.5	155.5	182.6	1
170.3	165.8	160.9	141.6	159.1	157.7	1
					Data Missing	0

PPI Inflation Rate	**3.64%**
CPI Inflation Rate	**3.57%**
BLS Escalation Rate	**0.07%**

Commentary:

CPI-U, All Items Less Food and Ene

The BLS escalation rate is based on the latest five full years of available data. It is important to have a full year of data as the historical trend is that months early in the year have a higher value than the annual average.

Year	Jan	Feb
2019	260.1	261.1
2020	266.0	267.3
2021	269.8	270.7
2022	286.0	288.1
2023	302.0	304.0
2024	313.6	315.4
2025	323.8	325.3

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Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
261.8	262.3	262.6	263.2	263.6	264.2	264.5	265.1	265.1
267.3	266.1	265.8	266.3	267.7	268.8	269.1	269.3	269.5
271.7	274.0	275.9	278.2	279.1	279.5	279.9	281.6	282.8
289.3	290.8	292.5	294.7	295.6	297.2	298.4	299.3	299.6
305.5	306.9	308.1	308.9	309.4	310.1	310.8	311.4	311.6
317.1	318.0	318.6	319.0	319.2	320.0	321.1	321.8	321.9
325.9	326.8	327.5	328.4					
								CPI Infl

Dec	Annual Avg.	Flag
264.9	263.2	1
269.2	267.7	1
283.9	277.3	1
300.1	294.3	1
311.9	308.4	1
322.0	319.0	1
	Data Missing	0
ation Rate	**3.56811%**	

Generation Capacity

Status | *Data Needed: TRC Order Section*

Complete | PJM Base Residual Auction Results: B.6 Page 17

		Seasor			
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$25.00	$17.07	$14.46	$134.96
Met-Ed	METED	$47.90	$24.75	$24.75	$134.96
PECO	PECO	$48.93	$24.75	$27.48	$134.96
Penelec	PENLC	$47.90	$24.75	$24.75	$134.96
Penn Power	ATSI	$25.00	$17.07	$14.46	$134.96
PPL	PL	$47.90	$24.75	$24.75	$134.96
West Penn	APS	$25.00	$17.07	$14.46	$134.96

Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$60.07	$60.07	$60.07
19	2027	2028	$25.99	$28.98	$29.25
20	2028	2029	$26.53	$29.58	$29.86
21	2029	2030	$27.08	$30.19	$30.48
22	2030	2031	$27.64	$30.81	$31.11
23	2031	2032	$28.21	$31.45	$31.75
24	2032	2033	$28.80	$32.10	$32.41
25	2033	2034	$29.40	$32.77	$33.08
26	2034	2035	$30.00	$33.45	$33.77
27	2035	2036	$30.63	$34.14	$34.46
28	2036	2037	$31.26	$34.85	$35.18
29	2037	2038	$31.91	$35.57	$35.91
30	2038	2039	$32.57	$36.31	$36.65
31	2039	2040	$33.24	$37.06	$37.41
32	2040	2041	$33.93	$37.83	$38.19
33	2041	2042	$34.64	$38.61	$38.98
34	2042	2043	$35.35	$39.41	$39.78
35	2043	2044	$36.09	$40.23	$40.61
36	2044	2045	$36.83	$41.06	$41.45
37	2045	2046	$37.60	$41.91	$42.31
38	2046	2047	$38.37	$42.78	$43.18
39	2047	2048	$39.17	$43.66	$44.08

ıally Adjusted BRA Results (Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$48.93	$24.75	$27.48	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59
$164.59	$47.90	$24.75	$24.75	$134.96	$164.59
$164.59	$25.00	$17.07	$14.46	$134.96	$164.59

Avoided Generation Capacity Forecast in Nominal Dollars (Nominal $/kW-year)					
Summer					
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$60.07	$60.07	$60.07	$60.07	$60.07	$60.07
$28.98	$25.99	$28.98	$25.99	$25.99	$28.98
$29.58	$26.53	$29.58	$26.53	$26.53	$29.58
$30.19	$27.08	$30.19	$27.08	$27.08	$30.19
$30.81	$27.64	$30.81	$27.64	$27.64	$30.81
$31.45	$28.21	$31.45	$28.21	$28.21	$31.45
$32.10	$28.80	$32.10	$28.80	$28.80	$32.10
$32.77	$29.40	$32.77	$29.40	$29.40	$32.77
$33.45	$30.00	$33.45	$30.00	$30.00	$33.45
$34.14	$30.63	$34.14	$30.63	$30.63	$34.14
$34.85	$31.26	$34.85	$31.26	$31.26	$34.85
$35.57	$31.91	$35.57	$31.91	$31.91	$35.57
$36.31	$32.57	$36.31	$32.57	$32.57	$36.31
$37.06	$33.24	$37.06	$33.24	$33.24	$37.06
$37.83	$33.93	$37.83	$33.93	$33.93	$37.83
$38.61	$34.64	$38.61	$34.64	$34.64	$38.61
$39.41	$35.35	$39.41	$35.35	$35.35	$39.41
$40.23	$36.09	$40.23	$36.09	$36.09	$40.23
$41.06	$36.83	$41.06	$36.83	$36.83	$41.06
$41.91	$37.60	$41.91	$37.60	$37.60	$41.91
$42.78	$38.37	$42.78	$38.37	$38.37	$42.78
$43.66	$39.17	$43.66	$39.17	$39.17	$43.66

Seasonally Adjusted PJM BRA Res					
Summer					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

Winter					
PECO	Penelec	Penn Power	PPL	West Penn	Inflation Flag
$60.07	$60.07	$60.07	$60.07	$60.07	0
$29.25	$28.98	$25.99	$28.98	$25.99	0
$29.86	$29.58	$26.53	$29.58	$26.53	1
$30.48	$30.19	$27.08	$30.19	$27.08	1
$31.11	$30.81	$27.64	$30.81	$27.64	1
$31.75	$31.45	$28.21	$31.45	$28.21	1
$32.41	$32.10	$28.80	$32.10	$28.80	1
$33.08	$32.77	$29.40	$32.77	$29.40	1
$33.77	$33.45	$30.00	$33.45	$30.00	1
$34.46	$34.14	$30.63	$34.14	$30.63	1
$35.18	$34.85	$31.26	$34.85	$31.26	1
$35.91	$35.57	$31.91	$35.57	$31.91	1
$36.65	$36.31	$32.57	$36.31	$32.57	1
$37.41	$37.06	$33.24	$37.06	$33.24	1
$38.19	$37.83	$33.93	$37.83	$33.93	1
$38.98	$38.61	$34.64	$38.61	$34.64	1
$39.78	$39.41	$35.35	$39.41	$35.35	1
$40.61	$40.23	$36.09	$40.23	$36.09	1
$41.45	$41.06	$36.83	$41.06	$36.83	1
$42.31	$41.91	$37.60	$41.91	$37.60	1
$43.18	$42.78	$38.37	$42.78	$38.37	1
$44.08	$43.66	$39.17	$43.66	$39.17	1

sults (Real $/kW-year)					
Winter					
2020/2021	2021/2022	2024/2025	2025/2026	2026/2027	5-Year Average
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$17.86	$9.03	$10.03	$49.26	$60.07	$29.25
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99
$17.48	$9.03	$9.03	$49.26	$60.07	$28.98
$9.13	$6.23	$5.28	$49.26	$60.07	$25.99

Input Flag
annual
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average
average

Years Averaged	5

Demand Split	
Summer	50%
Winter	50%

PJM BRA Results (					
		Summer			
EDC	Zone	2022/2021	2023/2024	2024/2025	2025/2026
DLC	DLCO	$50.00	$34.13	$28.92	$269.92
Met-Ed	METED	$95.79	$49.49	$49.49	$269.92
PECO	PECO	$97.86	$49.49	$54.95	$269.92
Penelec	PENLC	$95.79	$49.49	$49.49	$269.92
Penn Power	ATSI	$50.00	$34.13	$28.92	$269.92
PPL	PL	$95.79	$49.49	$49.49	$269.92
West Penn	APS	$50.00	$34.13	$28.92	$269.92

Note: Data through 2024-25 BRA auction does not include winter peak values. Assumed BRA results encompa

Real $/MW-day)					
	Winter				
2026/2027	2022/2021	2023/2024	2024/2025	2025/2026	2026/2027
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$97.86	$49.49	$54.95	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17
$329.17	$95.79	$49.49	$49.49	$269.92	$329.17
$329.17	$50.00	$34.13	$28.92	$269.92	$329.17

ass value for both summer and winter peak. This may change for future auctions

Avoided Transmission Capacity Forecast in Nominal Dollars					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$61.07	$58.92	$22.48
19	2027	2028	$62.33	$60.14	$22.94
20	2028	2029	$63.62	$61.38	$23.42
21	2029	2030	$64.94	$62.66	$23.90
22	2030	2031	$66.29	$63.95	$24.40
23	2031	2032	$67.66	$65.28	$24.90
24	2032	2033	$69.06	$66.63	$25.42
25	2033	2034	$70.49	$68.01	$25.95
26	2034	2035	$71.95	$69.42	$26.48
27	2035	2036	$73.44	$70.86	$27.03
28	2036	2037	$74.96	$72.33	$27.59
29	2037	2038	$76.52	$73.82	$28.16
30	2038	2039	$78.10	$75.35	$28.75
31	2039	2040	$79.72	$76.92	$29.34
32	2040	2041	$81.37	$78.51	$29.95
33	2041	2042	$83.06	$80.13	$30.57
34	2042	2043	$84.78	$81.79	$31.20
35	2043	2044	$86.53	$83.49	$31.85
36	2044	2045	$88.33	$85.22	$32.51
37	2045	2046	$90.16	$86.98	$33.18

Avoided Transmission Capacity Forecast in Nominal Dollar					
Act 129 PY	DY/PY Start	DY/PY End	DLC	Met-Ed	PECO
18	2026	2027	$0.00	$0.00	$0.00
19	2027	2028	$0.00	$0.00	$0.00
20	2028	2029	$0.00	$0.00	$0.00
21	2029	2030	$0.00	$0.00	$0.00
22	2030	2031	$0.00	$0.00	$0.00
23	2031	2032	$0.00	$0.00	$0.00
24	2032	2033	$0.00	$0.00	$0.00
25	2033	2034	$0.00	$0.00	$0.00
26	2034	2035	$0.00	$0.00	$0.00
27	2035	2036	$0.00	$0.00	$0.00
28	2036	2037	$0.00	$0.00	$0.00
29	2037	2038	$0.00	$0.00	$0.00
30	2038	2039	$0.00	$0.00	$0.00
31	2039	2040	$0.00	$0.00	$0.00
32	2040	2041	$0.00	$0.00	$0.00
33	2041	2042	$0.00	$0.00	$0.00
34	2042	2043	$0.00	$0.00	$0.00
35	2043	2044	$0.00	$0.00	$0.00
36	2044	2045	$0.00	$0.00	$0.00
37	2045	2046	$0.00	$0.00	$0.00

s ($/kW-year) - Summer				Avoided Distrl	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$44.19	$77.10	$48.00	$8.83	$59.28	$52.46
$45.10	$78.69	$48.99	$9.01	$64.43	$55.82
$46.04	$80.32	$50.00	$9.20	$69.93	$58.95
$46.99	$81.99	$51.04	$9.39	$76.21	$62.16
$47.97	$83.69	$52.10	$9.58	$81.30	$65.41
$48.96	$85.42	$53.18	$9.78	$82.99	$66.77
$49.97	$87.19	$54.28	$9.98	$84.71	$68.15
$51.01	$88.99	$55.40	$10.19	$86.46	$69.56
$52.07	$90.84	$56.55	$10.40	$88.25	$71.00
$53.14	$92.72	$57.72	$10.62	$90.08	$72.47
$54.24	$94.64	$58.92	$10.84	$91.95	$73.97
$55.37	$96.60	$60.14	$11.06	$93.85	$75.51
$56.52	$98.60	$61.38	$11.29	$95.80	$77.07
$57.69	$100.64	$62.66	$11.53	$97.78	$78.67
$58.88	$102.73	$63.95	$11.76	$99.81	$80.30
$60.10	$104.86	$65.28	$12.01	$101.87	$81.96
$61.35	$107.03	$66.63	$12.26	$103.98	$83.66
$62.62	$109.25	$68.01	$12.51	$106.14	$85.39
$63.91	$111.51	$69.42	$12.77	$108.34	$87.16
$65.24	$113.82	$70.86	$13.03	$110.58	$88.97

s ($/kW-year) - Winter				Avoided Distr	
Penelec	Penn Power	PPL	West Penn	DLC	Met-Ed
$14.73	$0.00	$48.00	$8.83	$0.21	$6.70
$15.03	$0.00	$48.99	$9.01	$0.12	$7.21
$15.35	$0.00	$50.00	$9.20	$0.18	$8.16
$15.66	$0.00	$51.04	$9.39	$0.18	$8.64
$15.99	$0.00	$52.10	$9.58	$0.29	$9.68
$16.32	$0.00	$53.18	$9.78	$0.29	$9.88
$16.66	$0.00	$54.28	$9.98	$0.30	$10.09
$17.00	$0.00	$55.40	$10.19	$0.30	$10.30
$17.36	$0.00	$56.55	$10.40	$0.31	$10.51
$17.71	$0.00	$57.72	$10.62	$0.32	$10.73
$18.08	$0.00	$58.92	$10.84	$0.32	$10.95
$18.46	$0.00	$60.14	$11.06	$0.33	$11.18
$18.84	$0.00	$61.38	$11.29	$0.34	$11.41
$19.23	$0.00	$62.66	$11.53	$0.34	$11.65
$19.63	$0.00	$63.95	$11.76	$0.35	$11.89
$20.03	$0.00	$65.28	$12.01	$0.36	$12.13
$20.45	$0.00	$66.63	$12.26	$0.37	$12.39
$20.87	$0.00	$68.01	$12.51	$0.37	$12.64
$21.30	$0.00	$69.42	$12.77	$0.38	$12.90
$21.75	$0.00	$70.86	$13.03	$0.39	$13.17

ɔution Capacity Forecast in Nominal Dollars ($/kW-year) - Summer				
PECO	Penelec	Penn Power	PPL	West Penn
$39.61	$37.18	$43.52	$25.11	$41.25
$47.21	$42.64	$45.52	$26.68	$46.27
$49.64	$47.98	$45.17	$29.00	$51.89
$51.04	$53.05	$45.79	$31.55	$56.92
$50.53	$57.97	$45.98	$33.94	$62.19
$51.57	$59.17	$46.93	$34.64	$63.48
$52.64	$60.39	$47.91	$35.36	$64.80
$53.73	$61.65	$48.90	$36.09	$66.14
$54.85	$62.92	$49.91	$36.84	$67.51
$55.98	$64.23	$50.94	$37.60	$68.91
$57.14	$65.56	$52.00	$38.38	$70.34
$58.33	$66.91	$53.08	$39.17	$71.79
$59.53	$68.30	$54.18	$39.99	$73.28
$60.77	$69.72	$55.30	$40.81	$74.80
$62.03	$71.16	$56.44	$41.66	$76.35
$63.31	$72.63	$57.61	$42.52	$77.93
$64.62	$74.14	$58.81	$43.40	$79.54
$65.96	$75.67	$60.03	$44.30	$81.19
$67.33	$77.24	$61.27	$45.22	$82.87
$68.72	$78.84	$62.54	$46.16	$84.59

ɾbution Capacity Forecast in Nominal Dollars ($/kW-year) - Winter				
PECO	Penelec	Penn Power	PPL	West Penn
$10.26	$5.79	$16.27	$32.44	$5.05
$5.67	$5.97	$16.76	$36.48	$6.06
$5.54	$6.24	$19.33	$39.40	$7.01
$5.08	$6.58	$20.57	$41.88	$7.93
$7.16	$7.24	$22.70	$44.30	$9.02
$7.31	$7.39	$23.17	$45.22	$9.21
$7.46	$7.54	$23.65	$46.16	$9.40
$7.62	$7.69	$24.14	$47.12	$9.59
$7.78	$7.85	$24.64	$48.09	$9.79
$7.94	$8.02	$25.15	$49.09	$9.99
$8.10	$8.18	$25.67	$50.10	$10.20
$8.27	$8.35	$26.20	$51.14	$10.41
$8.44	$8.53	$26.74	$52.20	$10.63
$8.62	$8.70	$27.30	$53.28	$10.85
$8.80	$8.88	$27.86	$54.39	$11.07
$8.98	$9.07	$28.44	$55.51	$11.30
$9.16	$9.25	$29.03	$56.66	$11.53
$9.35	$9.45	$29.63	$57.84	$11.77
$9.55	$9.64	$30.25	$59.04	$12.02
$9.75	$9.84	$30.87	$60.26	$12.27

Summer Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$22.48	PECO
PPL	$48.00	PPL
Duquesne Light	$61.07	DLC
FE: Met-Ed	$58.92	Met-Ed
FE: Penelec	$44.19	Penelec
FE: Penn Power	$77.10	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Winter Transmission ($/kW-year system-level)		
EDC	2026	Tool Lookup
PECO	$0.00	PECO
PPL	$48.00	PPL
Duquesne Light	$0.00	DLC
FE: Met-Ed	$0.00	Met-Ed
FE: Penelec	$14.73	Penelec
FE: Penn Power	$0.00	Penn Power
FE: West Penn Power	$8.83	West Penn

EDC
PECO
PPL
Duquesne Light
FE: Met-Ed
FE: Penelec
FE: Penn Power
FE: West Penn Power

Summer Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$39.61	$47.21	$49.64	$51.04	$50.53	PECO
$25.11	$26.68	$29.00	$31.55	$33.94	PPL
$59.28	$64.43	$69.93	$76.21	$81.30	DLC
$52.46	$55.82	$58.95	$62.16	$65.41	Met-Ed
$37.18	$42.64	$47.98	$53.05	$57.97	Penelec
$43.52	$45.52	$45.17	$45.79	$45.98	Penn Power
$41.25	$46.27	$51.89	$56.92	$62.19	West Penn

Winter Distribution ($/kW-year Nominal)					
2026	2027	2028	2029	2030	Tool Lookup
$10.26	$5.67	$5.54	$5.08	$7.16	PECO
$32.44	$36.48	$39.40	$41.88	$44.30	PPL
$0.21	$0.12	$0.18	$0.18	$0.29	DLC
$6.70	$7.21	$8.16	$8.64	$9.68	Met-Ed
$5.79	$5.97	$6.24	$6.58	$7.24	Penelec
$16.27	$16.76	$19.33	$20.57	$22.70	Penn Power
$5.05	$6.06	$7.01	$7.93	$9.02	West Penn

Alternative Energy Portfolio Standards (AEPS) Act

Year	2026
Load (MWh)	1,000

Credit	**Tier Req (weight)**	**Price**		**Required Credits**	**Cost**
Solar	0.5%	$37.25		5	$186
Tier I	8.0%	$34.20		80	$2,736
Tier II	10.0%	$39.63		100	$3,963
			Total	**185**	**$6,885**

Weighted Avg. Price (Per Credit)
$37.21

Weighted Avg. Price (Per MWh)
$6.88

Alternative Enery Credit Prices as of 05/01/24				
Tier	**Reporting Year**	**Marex (Bid price)**	**Marex (Offer price)**	**Avg Price**
Solar	2024	$34.50	$35.50	$35.00
	2025	$37.00	$38.00	$37.50
	2026	$36.75	$37.75	$37.25
	2027	$36.50	$37.50	$37.00
Tier I	2023	$34.55	$35.05	$34.80
	2024	$34.50	$35.00	$34.75
	2025	$34.55	$35.05	$34.80
	2026	$33.95	$34.45	$34.20
Tier II	2023	$33.50	$34.25	$33.88
	2024	$35.00	$35.75	$35.38
	2025	$38.50	$39.25	$38.88
	2026	$39.25	$40.00	$39.63

Program Year	PY Start	PY End.	AEPS Cost
18	2027	2028	$6.88
19	2028	2029	$7.02
20	2029	2030	$7.16
21	2030	2031	$7.31
22	2031	2032	$7.45
23	2032	2033	$7.60
24	2033	2034	$7.75
25	2034	2035	$7.91
26	2035	2036	$8.07
27	2036	2037	$8.23
28	2037	2038	$8.39
29	2038	2039	$8.56
30	2039	2040	$8.73
31	2040	2041	$8.91
32	2041	2042	$9.08
33	2042	2043	$9.27
34	2043	2044	$9.45
35	2044	2045	$9.64
36	2045	2046	$9.83
37	2046	2047	$10.03
38	2047	2048	$10.23
39	2048	2049	$10.43
40	2049	2050	$10.64
41	2050	2051	$10.86
42	2051	2052	$11.07
43	2052	2053	$11.30
44	2053	2054	$11.52
45	2054	2055	$11.75
46	2055	2056	$11.99
47	2056	2057	$12.23

	EDC Name:	West Penn
	Column Start:	24

Demand Split	
Summer	50%
Winter	50%

DY/PY Start	Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 25.04	$ -	$ -	$ -	$ -
2028	$ 25.54	$ 25.54	$ -	$ -	$ -
2029	$ 26.05	$ 26.05	$ 26.05	$ -	$ -
2030	$ 26.57	$ 26.57	$ 26.57	$ 26.57	$ -
2031	$ -	$ 27.10	$ 27.10	$ 27.10	$ 27.10
2032	$ -	$ -	$ 27.64	$ 27.64	$ 27.64
2033	$ -	$ -	$ -	$ 28.20	$ 28.20
2034	$ -	$ -	$ -	$ -	$ 28.76
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Summer Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 12.52	$ -	$ -	$ -	$ -
2028	$ 12.77	$ 12.77	$ -	$ -	$ -
2029	$ 13.03	$ 13.03	$ 13.03	$ -	$ -
2030	$ 13.29	$ 13.29	$ 13.29	$ 13.29	$ -
2031	$ -	$ 13.55	$ 13.55	$ 13.55	$ 13.55
2032	$ -	$ -	$ 13.82	$ 13.82	$ 13.82
2033	$ -	$ -	$ -	$ 14.10	$ 14.10
2034	$ -	$ -	$ -	$ -	$ 14.38
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

DRIPE

Status

Complete

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

Data from DRI

Start Year
PY18
PY19
PY20
PY21
PY22

To Output Table

DY/PY Start	Energy DRIPE ($/MWh)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 13.25	$ -	$ -	$ -	$ -
2028	$ 21.65	$ 14.09	$ -	$ -	$ -
2029	$ 28.61	$ 23.06	$ 15.01	$ -	$ -
2030	$ 27.47	$ 30.21	$ 24.35	$ 15.85	$ -
2031	$ -	$ 29.06	$ 31.97	$ 25.76	$ 16.77
2032	$ -	$ -	$ 30.90	$ 34.00	$ 27.40
2033	$ -	$ -	$ -	$ 32.09	$ 35.31
2034	$ -	$ -	$ -	$ -	$ 33.36
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -
2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

To Output Table

DY/PY Start	Winter Generation Capacity DRIPE ($/kW yr)				
	PY18	PY19	PY20	PY21	PY22
2027	$ 12.52	$ -	$ -	$ -	$ -
2028	$ 12.77	$ 12.77	$ -	$ -	$ -
2029	$ 13.03	$ 13.03	$ 13.03	$ -	$ -
2030	$ 13.29	$ 13.29	$ 13.29	$ 13.29	$ -
2031	$ -	$ 13.55	$ 13.55	$ 13.55	$ 13.55
2032	$ -	$ -	$ 13.82	$ 13.82	$ 13.82
2033	$ -	$ -	$ -	$ 14.10	$ 14.10
2034	$ -	$ -	$ -	$ -	$ 14.38
2035	$ -	$ -	$ -	$ -	$ -
2036	$ -	$ -	$ -	$ -	$ -
2037	$ -	$ -	$ -	$ -	$ -

2038	$ -	$ -	$ -	$ -	$ -
2039	$ -	$ -	$ -	$ -	$ -
2040	$ -	$ -	$ -	$ -	$ -
2041	$ -	$ -	$ -	$ -	$ -
2042	$ -	$ -	$ -	$ -	$ -
2043	$ -	$ -	$ -	$ -	$ -
2044	$ -	$ -	$ -	$ -	$ -
2045	$ -	$ -	$ -	$ -	$ -
2046	$ -	$ -	$ -	$ -	$ -

***Data Source** : PA_DRIPE_Study_Report_05.03.2024*

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$67.54	$68.89	$70.26	$71.67	$78.36	$79.92	$81.52	$83.15	$25.04
$68.89	$70.26	$71.67	$73.10	$79.92	$81.52	$83.15	$84.82	$25.54
$70.26	$71.67	$73.10	$74.56	$81.52	$83.15	$84.82	$86.51	$26.05
$71.67	$73.10	$74.56	$76.06	$83.15	$84.82	$86.51	$88.24	$26.57
$73.10	$74.56	$76.06	$77.58	$84.82	$86.51	$88.24	$90.01	$27.10

PE report (5.3.24)

PECO				PPL				
Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 1**
$14.65	$24.23	$31.97	$30.62	$14.72	$24.39	$32.25	$30.98	$14.69
$15.77	$25.77	$33.68	$32.26	$15.87	$25.99	$34.08	$32.75	$15.81
$16.77	$27.15	$35.49	$34.13	$16.92	$27.46	$36.02	$34.78	$16.78
$17.67	$28.60	$37.55	$35.25	$17.88	$29.03	$38.26	$36.06	$17.68
$18.61	$30.26	$38.77	$36.41	$18.90	$30.83	$39.67	$37.42	$18.61

Generation Capacity DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$25.54	$26.05	$26.57	$78.36	$79.92	$81.52	$83.15	$78.36	$79.92
$26.05	$26.57	$27.10	$79.92	$81.52	$83.15	$84.82	$79.92	$81.52
$26.57	$27.10	$27.64	$81.52	$83.15	$84.82	$86.51	$81.52	$83.15
$27.10	$27.64	$28.20	$83.15	$84.82	$86.51	$88.24	$83.15	$84.82
$27.64	$28.20	$28.76	$84.82	$86.51	$88.24	$90.01	$84.82	$86.51

Electric Energy DRIPE Estimates (System Level)

DLC			Met-Ed				Pen	
Year 2	Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2
$24.28	$32.00	$30.64	$13.86	$22.45	$29.02	$27.27	$14.79	$24.53
$25.79	$33.70	$32.26	$14.61	$23.39	$29.99	$28.16	$15.96	$26.17
$27.16	$35.48	$34.12	$15.22	$24.17	$30.98	$29.17	$17.03	$27.66
$28.60	$37.53	$35.17	$15.73	$24.96	$32.09	$29.48	$18.00	$29.23
$30.25	$38.69	$36.28	$16.25	$25.86	$32.43	$29.72	$19.03	$31.02

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$81.52	$83.15	$14.65	$14.94	$15.24	$15.54	$25.04	$25.54	$26.05
$83.15	$84.82	$14.94	$15.24	$15.54	$15.85	$25.54	$26.05	$26.57
$84.82	$86.51	$15.24	$15.54	$15.85	$16.17	$26.05	$26.57	$27.10
$86.51	$88.24	$15.54	$15.85	$16.17	$16.49	$26.57	$27.10	$27.64
$88.24	$90.01	$15.85	$16.17	$16.49	$16.82	$27.10	$27.64	$28.20

elec		Penn Power				West Penn Power		
Year 3	Year 4	Year 1	Year 2	Year 3	Year 4	Year 1	Year 2	Year 3
$32.47	$31.20	$14.73	$24.38	$32.24	$30.98	$13.25	$21.65	$28.61
$34.32	$32.97	$15.87	$25.98	$34.08	$32.77	$14.09	$23.06	$30.21
$36.27	$34.99	$16.91	$27.46	$36.05	$34.83	$15.01	$24.35	$31.97
$38.49	$36.25	$17.87	$29.05	$38.31	$36.14	$15.85	$25.76	$34.00
$39.88	$37.58	$18.91	$30.88	$39.75	$37.50	$16.77	$27.40	$35.31

Year 4
$26.57
$27.10
$27.64
$28.20
$28.76

Year 4
$27.47
$29.06
$30.90
$32.09
$33.36

To LI Output Table

PA ACT 129 Program Year	DY/PY Start	PECO	PPL	DLC	Met-Ed	Penelec	Penn Power
18	2027	$58.14	$44.87	$18.67	$18.10	$18.10	$18.10
19	2028	$59.30	$45.77	$19.04	$18.46	$18.46	$18.46
20	2029	$60.49	$46.68	$19.42	$18.83	$18.83	$18.83
21	2030	$61.70	$47.62	$19.81	$19.21	$19.21	$19.21
22	2031	$62.93	$48.57	$20.21	$19.59	$19.59	$19.59
23	2032	$64.19	$49.54	$20.61	$19.98	$19.98	$19.98
24	2033	$65.48	$50.53	$21.03	$20.38	$20.38	$20.38
25	2034	$66.78	$51.54	$21.45	$20.79	$20.79	$20.79
26	2035	$68.12	$52.57	$21.87	$21.21	$21.21	$21.21
27	2036	$69.48	$53.62	$22.31	$21.63	$21.63	$21.63
28	2037	$70.87	$54.70	$22.76	$22.06	$22.06	$22.06
29	2038	$72.29	$55.79	$23.21	$22.51	$22.51	$22.51
30	2039	$73.74	$56.91	$23.68	$22.96	$22.96	$22.96
31	2040	$75.21	$58.04	$24.15	$23.41	$23.41	$23.41
32	2041	$76.71	$59.21	$24.63	$23.88	$23.88	$23.88
33	2042	$78.25	$60.39	$25.13	$24.36	$24.36	$24.36
34	2043	$79.81	$61.60	$25.63	$24.85	$24.85	$24.85
35	2044	$81.41	$62.83	$26.14	$25.34	$25.34	$25.34
36	2045	$83.04	$64.09	$26.67	$25.85	$25.85	$25.85
37	2046	$84.70	$65.37	$27.20	$26.37	$26.37	$26.37

West Penn
$18.10
$18.46
$18.83
$19.21
$19.59
$19.98
$20.38
$20.79
$21.21
$21.63
$22.06
$22.51
$22.96
$23.41
$23.88
$24.36
$24.85
$25.34
$25.85
$26.37

Arrearages 2026 Data

EDC	Average kWh savings per participant (System Level)	Total Annual Impact Per MWh, $2026
PECO	288	$58.14
PPL	382	$44.87
DLC	556	$18.67
Met-Ed	350	$18.10
Penelec	325	$18.10
Penn Power	358	$18.10
West Penn	372	$18.10

Source
EDC specific (per draft memo)
EDC specific (per draft memo)
EDC specific (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)
Statewide (per draft memo)

Sector	Building Type	End Use	Summer Peak
Commercial	Composite	cooling	57.6%
Commercial	Composite	exterior_lighting	9.2%
Commercial	Composite	fans	25.9%
Commercial	Composite	heat_recovery	23.5%
Commercial	Composite	heat_rejection	57.2%
Commercial	Composite	heating	0.5%
Commercial	Composite	interior_equipment	24.1%
Commercial	Composite	interior_lighting	29.8%
Commercial	Composite	pumps	15.2%
Commercial	Composite	refrigeration	22.9%
Commercial	Composite	water_heating	25.0%
Commercial	Composite	whole_building	25.2%
Commercial	Education	cooling	64.2%
Commercial	Education	exterior_lighting	9.1%
Commercial	Education	fans	26.8%
Commercial	Education	heat_recovery	22.9%
Commercial	Education	heat_rejection	53.7%
Commercial	Education	heating	1.1%
Commercial	Education	interior_equipment	23.5%
Commercial	Education	interior_lighting	31.0%
Commercial	Education	pumps	25.7%
Commercial	Education	refrigeration	23.0%
Commercial	Education	water_heating	26.8%
Commercial	Education	whole_building	23.5%
Commercial	Grocery	cooling	56.4%
Commercial	Grocery	exterior_lighting	9.2%
Commercial	Grocery	fans	24.1%
Commercial	Grocery	heat_recovery	22.2%
Commercial	Grocery	heating	0.1%
Commercial	Grocery	interior_equipment	23.9%
Commercial	Grocery	interior_lighting	22.5%
Commercial	Grocery	pumps	8.4%
Commercial	Grocery	whole_building	24.0%
Commercial	Health	cooling	50.6%
Commercial	Health	exterior_lighting	9.1%
Commercial	Health	fans	23.2%
Commercial	Health	heat_recovery	20.5%
Commercial	Health	heat_rejection	50.1%
Commercial	Health	heating	1.4%
Commercial	Health	interior_equipment	23.3%
Commercial	Health	interior_lighting	27.8%
Commercial	Health	pumps	33.2%
Commercial	Health	refrigeration	23.7%
Commercial	Health	water_heating	22.2%
Commercial	Health	whole_building	25.8%
Commercial	Lodging	cooling	38.6%
Commercial	Lodging	exterior_lighting	9.2%
Commercial	Lodging	fans	27.9%
Commercial	Lodging	heat_recovery	19.6%
Commercial	Lodging	heat_rejection	47.6%
Commercial	Lodging	heating	0.2%
Commercial	Lodging	interior_equipment	19.6%
Commercial	Lodging	interior_lighting	21.7%
Commercial	Lodging	pumps	19.4%

Commercial	Lodging	refrigeration	21.5%
Commercial	Lodging	water_heating	18.8%
Commercial	Lodging	whole_building	22.0%
Commercial	Office	cooling	54.2%
Commercial	Office	exterior_lighting	9.2%
Commercial	Office	fans	25.0%
Commercial	Office	heat_recovery	25.9%
Commercial	Office	heat_rejection	56.6%
Commercial	Office	heating	0.2%
Commercial	Office	interior_equipment	21.8%
Commercial	Office	interior_lighting	32.8%
Commercial	Office	pumps	24.5%
Commercial	Office	water_heating	25.8%
Commercial	Office	whole_building	25.4%
Commercial	Restaurant	cooling	49.7%
Commercial	Restaurant	exterior_lighting	9.1%
Commercial	Restaurant	fans	24.4%
Commercial	Restaurant	heat_recovery	19.7%
Commercial	Restaurant	heating	0.7%
Commercial	Restaurant	interior_equipment	24.7%
Commercial	Restaurant	interior_lighting	25.0%
Commercial	Restaurant	pumps	8.4%
Commercial	Restaurant	refrigeration	22.0%
Commercial	Restaurant	water_heating	24.7%
Commercial	Restaurant	whole_building	24.3%
Commercial	Retail	cooling	56.0%
Commercial	Retail	exterior_lighting	9.2%
Commercial	Retail	fans	26.6%
Commercial	Retail	heat_recovery	22.7%
Commercial	Retail	heat_rejection	54.5%
Commercial	Retail	heating	0.9%
Commercial	Retail	interior_equipment	23.0%
Commercial	Retail	interior_lighting	30.6%
Commercial	Retail	pumps	4.3%
Commercial	Retail	water_heating	24.3%
Commercial	Retail	whole_building	26.4%
Commercial	Warehouse	cooling	64.1%
Commercial	Warehouse	exterior_lighting	9.3%
Commercial	Warehouse	fans	27.3%
Commercial	Warehouse	heat_recovery	23.7%
Commercial	Warehouse	heat_rejection	64.5%
Commercial	Warehouse	heating	0.0%
Commercial	Warehouse	interior_equipment	28.2%
Commercial	Warehouse	interior_lighting	30.0%
Commercial	Warehouse	pumps	2.5%
Commercial	Warehouse	whole_building	26.2%
Residential	Composite	ceiling_fan	19.3%
Residential	Composite	clothes_dryer	23.9%
Residential	Composite	clothes_washer	25.3%
Residential	Composite	cooling	48.8%
Residential	Composite	cooling_fans_pumps	52.2%
Residential	Composite	dishwasher	26.0%
Residential	Composite	freezer	22.3%
Residential	Composite	heating	0.7%
Residential	Composite	heating_fans_pumps	0.8%

Residential	Composite	heating_hp_bkup	0.0%
Residential	Composite	hot_tub_heater	22.2%
Residential	Composite	hot_tub_pump	22.5%
Residential	Composite	interior_lighting	20.8%
Residential	Composite	lighting_exterior	17.2%
Residential	Composite	lighting_garage	16.6%
Residential	Composite	mech_vent	21.4%
Residential	Composite	net	18.6%
Residential	Composite	plug_loads	18.8%
Residential	Composite	pool_heater	23.9%
Residential	Composite	pool_pump	24.0%
Residential	Composite	pv	34.8%
Residential	Composite	range_oven	22.7%
Residential	Composite	refrigerator	22.1%
Residential	Composite	water_heating	19.8%
Residential	Composite	well_pump	21.2%
Residential	Composite	whole_home	18.6%
Residential	Multi Family	ceiling_fan	19.3%
Residential	Multi Family	clothes_dryer	24.0%
Residential	Multi Family	clothes_washer	25.1%
Residential	Multi Family	cooling	47.9%
Residential	Multi Family	cooling_fans_pumps	49.5%
Residential	Multi Family	dishwasher	25.7%
Residential	Multi Family	freezer	22.3%
Residential	Multi Family	heating	0.5%
Residential	Multi Family	heating_fans_pumps	0.6%
Residential	Multi Family	heating_hp_bkup	0.0%
Residential	Multi Family	hot_tub_heater	22.2%
Residential	Multi Family	hot_tub_pump	22.6%
Residential	Multi Family	interior_lighting	20.8%
Residential	Multi Family	lighting_exterior	17.0%
Residential	Multi Family	mech_vent	22.1%
Residential	Multi Family	net	16.1%
Residential	Multi Family	plug_loads	18.8%
Residential	Multi Family	range_oven	22.8%
Residential	Multi Family	refrigerator	22.1%
Residential	Multi Family	water_heating	19.6%
Residential	Multi Family	well_pump	21.2%
Residential	Multi Family	whole_home	16.1%
Residential	Single Family	ceiling_fan	19.3%
Residential	Single Family	clothes_dryer	23.9%
Residential	Single Family	clothes_washer	25.3%
Residential	Single Family	cooling	49.1%
Residential	Single Family	cooling_fans_pumps	52.9%
Residential	Single Family	dishwasher	26.0%
Residential	Single Family	freezer	22.3%
Residential	Single Family	heating	0.8%
Residential	Single Family	heating_fans_pumps	0.8%
Residential	Single Family	heating_hp_bkup	0.0%
Residential	Single Family	hot_tub_heater	22.2%
Residential	Single Family	hot_tub_pump	22.5%
Residential	Single Family	interior_lighting	20.8%
Residential	Single Family	lighting_exterior	17.2%
Residential	Single Family	lighting_garage	16.6%
Residential	Single Family	mech_vent	21.2%

Residential	Single Family	net	19.3%
Residential	Single Family	plug_loads	18.8%
Residential	Single Family	pool_heater	23.9%
Residential	Single Family	pool_pump	24.0%
Residential	Single Family	pv	34.8%
Residential	Single Family	range_oven	22.7%
Residential	Single Family	refrigerator	22.1%
Residential	Single Family	water_heating	19.8%
Residential	Single Family	well_pump	21.2%
Residential	Single Family	whole_home	19.3%

Summer Off Peak	Winter Peak	Winter Off Peak	Shoulder Peak
29.0%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.8%	11.4%	17.6%
16.5%	14.2%	12.1%	19.3%
31.8%	1.3%	0.5%	6.0%
1.0%	24.6%	36.5%	16.0%
17.1%	14.3%	10.6%	20.3%
11.8%	17.2%	7.5%	23.8%
13.3%	15.4%	21.8%	15.5%
22.3%	11.0%	12.0%	15.9%
12.7%	18.7%	8.5%	24.7%
16.3%	14.3%	12.9%	17.9%
24.9%	1.2%	0.2%	7.0%
26.2%	8.7%	20.9%	10.1%
14.4%	15.6%	10.2%	21.0%
15.2%	14.6%	12.5%	20.0%
35.2%	1.2%	0.4%	5.9%
1.9%	27.5%	27.6%	20.9%
13.8%	16.8%	9.7%	23.7%
8.1%	19.9%	5.6%	27.6%
18.6%	12.3%	14.0%	15.4%
22.2%	11.1%	11.9%	16.0%
4.9%	26.5%	3.3%	34.7%
12.4%	17.2%	14.2%	19.0%
32.3%	1.2%	0.6%	6.1%
26.0%	8.8%	20.8%	10.2%
18.4%	13.8%	11.0%	18.9%
18.0%	13.5%	12.7%	18.2%
0.8%	24.7%	31.9%	18.5%
18.0%	13.4%	11.2%	19.4%
19.4%	12.8%	11.8%	17.7%
7.8%	16.4%	29.0%	14.3%
16.7%	14.0%	14.1%	16.7%
35.2%	1.9%	0.7%	7.4%
26.2%	8.7%	20.9%	10.1%
21.1%	11.7%	11.7%	16.9%
21.2%	11.6%	13.2%	16.5%
39.0%	1.1%	0.3%	5.6%
2.2%	21.6%	34.8%	15.2%
18.6%	13.6%	11.1%	19.1%
14.1%	15.8%	8.9%	21.8%
34.4%	5.4%	5.4%	11.5%
22.1%	11.1%	11.6%	16.1%
17.0%	14.9%	11.7%	19.9%
20.0%	12.2%	12.0%	16.2%
30.8%	5.3%	5.1%	10.8%
26.1%	8.8%	20.8%	10.2%
23.8%	10.2%	11.6%	13.8%
14.9%	15.3%	13.2%	21.0%
42.8%	0.9%	0.2%	4.9%
0.4%	26.4%	38.9%	15.1%
22.3%	11.1%	13.5%	15.9%
20.2%	12.4%	12.3%	17.0%
22.5%	11.1%	13.5%	15.8%

22.7%	10.8%	12.7%	15.6%
19.7%	12.6%	14.5%	17.0%
22.4%	11.1%	14.0%	14.5%
28.7%	2.4%	1.7%	8.2%
26.1%	8.7%	20.8%	10.2%
19.3%	12.3%	11.8%	17.2%
15.4%	15.6%	9.3%	21.6%
30.5%	1.5%	0.7%	7.1%
0.9%	24.3%	34.8%	16.8%
20.1%	12.5%	12.2%	17.8%
9.2%	18.6%	6.0%	25.7%
21.7%	10.7%	13.3%	14.7%
14.0%	17.4%	8.7%	23.0%
18.1%	13.0%	12.6%	16.9%
26.8%	4.6%	2.6%	10.5%
26.1%	8.8%	20.8%	10.2%
18.5%	13.4%	10.8%	19.1%
17.8%	12.8%	15.0%	17.0%
1.8%	25.2%	30.2%	19.9%
17.2%	14.5%	10.1%	20.3%
17.3%	13.9%	10.4%	19.4%
7.3%	16.6%	28.5%	15.0%
22.9%	10.6%	12.6%	15.4%
13.9%	17.1%	9.9%	22.5%
17.0%	14.2%	12.3%	18.4%
30.3%	1.8%	1.0%	7.0%
26.1%	8.7%	20.8%	10.2%
18.8%	12.7%	10.7%	18.0%
18.4%	13.0%	12.3%	18.4%
27.7%	2.9%	1.5%	8.8%
1.6%	27.6%	30.8%	19.5%
18.9%	13.2%	11.5%	18.7%
11.3%	17.4%	7.3%	24.0%
3.5%	22.6%	25.4%	21.0%
14.5%	16.4%	10.4%	21.9%
17.5%	13.7%	12.3%	17.2%
28.5%	0.8%	0.1%	5.1%
26.0%	8.8%	20.8%	10.3%
19.8%	12.2%	12.1%	16.1%
15.7%	14.0%	13.7%	17.8%
30.0%	0.3%	0.0%	3.7%
0.1%	22.2%	48.6%	9.7%
13.6%	16.3%	8.3%	23.0%
12.1%	16.8%	7.4%	23.5%
2.2%	21.2%	36.0%	14.8%
14.0%	15.5%	12.7%	19.7%
19.4%	14.1%	14.2%	16.8%
15.6%	15.6%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.3%	2.0%	2.5%	5.1%
40.4%	0.1%	0.1%	4.5%
13.6%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.3%	37.3%	12.7%
1.9%	28.2%	37.5%	12.7%

0.2%	34.0%	50.3%	5.6%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.6%	12.3%	12.4%	17.4%
16.5%	16.5%	18.6%	14.8%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.3%	15.5%	10.7%	20.0%
23.7%	9.5%	11.0%	16.5%
16.1%	15.5%	13.5%	19.8%
17.1%	14.5%	14.0%	18.5%
16.5%	16.5%	18.6%	14.8%
19.4%	14.1%	14.2%	16.9%
15.7%	15.4%	11.2%	20.7%
17.8%	14.2%	10.0%	19.9%
38.0%	1.7%	2.0%	5.9%
39.9%	0.3%	0.3%	6.2%
13.7%	16.9%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.5%	28.7%	38.8%	11.8%
1.5%	29.1%	39.3%	11.5%
0.1%	36.3%	53.0%	3.7%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
18.9%	14.0%	16.7%	16.0%
19.8%	12.7%	11.9%	18.1%
14.7%	18.0%	21.4%	14.3%
20.4%	13.3%	14.3%	16.5%
17.3%	15.5%	10.6%	20.2%
23.8%	9.5%	11.0%	16.5%
16.2%	15.5%	13.6%	19.6%
17.1%	14.5%	14.0%	18.5%
14.7%	18.0%	21.4%	14.3%
19.4%	14.1%	14.2%	16.8%
15.6%	15.7%	11.3%	20.7%
17.6%	14.4%	10.0%	19.8%
37.2%	2.1%	2.7%	4.8%
40.5%	0.1%	0.1%	4.1%
13.5%	17.0%	9.6%	22.7%
23.9%	9.4%	11.0%	16.3%
1.8%	28.2%	36.9%	13.0%
2.0%	28.0%	37.0%	13.0%
0.2%	33.4%	49.6%	6.1%
23.6%	9.7%	10.9%	16.6%
24.0%	10.7%	12.0%	15.2%
16.2%	15.5%	12.7%	19.2%
19.0%	13.9%	16.6%	16.1%
18.2%	14.1%	17.6%	16.3%
20.8%	12.1%	12.5%	17.2%

17.0%	16.1%	17.9%	14.9%
20.4%	13.3%	14.3%	16.5%
14.3%	17.9%	10.6%	21.4%
14.3%	17.9%	10.6%	21.4%
16.3%	11.2%	5.6%	22.4%
17.4%	15.5%	10.7%	19.9%
23.7%	9.5%	11.0%	16.5%
16.1%	15.6%	13.4%	19.8%
17.1%	14.5%	14.0%	18.5%
17.0%	16.1%	17.8%	14.9%

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			LW - LMP 2018	LW - LMP 2019	LW - LMP 2020	LW - LMP 2021	LW - LMP 2022
Duqu	DLC	DLCO/DUQ	39.98	27.69	22.79	39.17	74.76
Metr	Met-Ed	Met-Ed/MEC	37.06	26.34	21.16	39.97	82.2
PECO	PECO	PECO	36.36	24.75	19.29	33.55	71.67
Penn	Penelec	PENELEC/PE	37.9	26.17	20.84	37.73	73.26
Penn	Penn Power	ATSI	40.19	28.06	22.55	39.47	74.96
PPL U	PPL	PPL	35.95	24.85	19.42	35.92	75.74
West	West Penn	APS	39.78	27.83	22.4	40.44	79.01
	Western Hub	Western Hub	36.95	26.7	20.92	38.88	74.25

LW - LMP	LMP
2023	2024
31.31	
27.93	29.05
23.63	
31.01	31.8
31.05	31.96
25.73	
32.49	32.39
31.78	31.48

Table 11-6 Zonal and PJM real-time, load-weighted averag

	2018				
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP
AECO	$37.06	$37.68	($1.45)	$0.83	$25.07
AEP	$37.79	$38.16	$0.08	($0.44)	$28.21
APS	$39.78	$38.40	$1.12	$0.25	$27.83
ATSI	$40.19	$37.60	$1.99	$0.60	$28.06
BGE	$44.03	$38.86	$3.81	$1.36	$30.82
ComEd	$30.05	$37.42	($5.52)	($1.84)	$24.72
DAY	$38.96	$38.12	$0.17	$0.66	$29.52
DEOK	$39.16	$38.10	$1.99	($0.93)	$28.49
DLCO	$39.98	$37.68	$2.16	$0.14	$27.69
Dominion	$43.16	$39.04	$3.61	$0.52	$29.08
DPL	$43.76	$39.07	$3.15	$1.54	$27.71
EKPC	$36.20	$39.71	($2.30)	($1.21)	$28.18
JCPL	$37.08	$38.08	($1.65)	$0.65	$25.40
Met-Ed	$37.06	$38.09	($1.36)	$0.33	$26.34
OVEC	$30.89	$32.12	($0.25)	($0.97)	$26.23
PECO	$36.36	$38.11	($2.11)	$0.37	$24.75
PENELEC	$37.90	$37.69	($0.19)	$0.40	$26.17
Pepco	$42.60	$38.72	$2.97	$0.91	$29.68
PPL	$35.95	$38.34	($2.37)	($0.02)	$24.85
PSEG	$36.68	$37.57	($1.48)	$0.59	$25.28
RECO	$37.40	$37.81	($0.97)	$0.56	$25.72
PJM	$38.24	$38.19	$0.04	$0.02	$27.32

Table 11-8 Hub real-time, average LMP component

	2018			
	Real-Time LMP	Energy Component	Congestion Component	Compon
AEP Gen Hub	$33.29	$36.04	($1.34)	($1
AEP-DAY Hub	$34.74	$36.04	($0.71)	($0
ATSI Gen Hub	$36.94	$36.04	$1.01	($0
Chicago Gen Hub	$28.08	$36.04	($5.73)	($2
Chicago Hub	$28.61	$36.04	($5.71)	($1
Dominion Hub	$39.55	$36.04	$3.31	$0
Eastern Hub	$38.35	$36.04	$1.12	$
N Illinois Hub	$28.40	$36.04	($5.73)	($1
New Jersey Hub	$34.57	$36.04	($1.97)	$0
Ohio Hub	$34.56	$36.04	($0.89)	($0
West Interface Hub	$38.13	$36.04	$2.37	($0
Western Hub	$36.95	$36.04	$0.77	$0

The day-ahead components of LMP for each hub a

Table 11-5 Zonal real-time load-weig per MWh): January through June, 20

	2024 (Jan - Jun)			
	Real-Time LMP	Energy Component	Congestion Component	Com
ACEC	$27.72	$31.95	($4.66)	
AEP	$31.64	$31.46	$0.54	
APS	$32.39	$31.68	$0.56	
ATSI	$31.96	$31.30	$0.59	
BGE	$38.82	$32.06	$5.57	
COMED	$26.08	$31.50	($3.98)	
DAY	$33.44	$31.74	$1.08	
DOM	$37.66	$31.54	$5.46	
DPL	$29.31	$32.10	($3.71)	
DUKE	$32.24	$31.84	$0.66	
DUQ	$32.17	$31.37	$1.06	
EKPC	$32.74	$32.60	$0.55	
JCPLC	$28.17	$32.20	($4.49)	
MEC	$29.05	$31.56	($2.66)	
OVEC	$28.80	$30.05	($0.35)	
PE	$31.80	$31.08	$0.40	
PECO	$26.86	$31.66	($4.84)	
PEPCO	$38.06	$32.06	$5.00	
PPL	$26.71	$31.49	($4.53)	
PSEG	$28.53	$31.60	($3.48)	
REC	$30.70	$31.97	($1.67)	
PJM	$31.70	$31.61	$0.06	

Hub Components

The real-time components of LMP

Table 11-7 Hub real-time average L

		2024 (Ja
	Real-Time LMP	Energy Component
AEP Gen Hub	$28.50	$29.64
AEP-DAY Hub	$29.21	$29.64
ATSI Gen Hub	$29.87	$29.64
Chicago Gen Hub	$23.17	$29.64
Chicago Hub	$24.31	$29.64
Dominion Hub	$32.98	$29.64

Dominion Hub	$32.96	$29.64
Eastern Hub	$26.61	$29.64
N Illinois Hub	$23.93	$29.64
New Jersey Hub	$26.28	$29.64
Ohio Hub	$29.16	$29.64
West Interface Hub	$30.72	$29.64
Western Hub	$31.48	$29.64

ge LMP components (Dollars per MWh): 2018 and 2019

2019		
Energy Component	Congestion Component	Loss Component
$27.28	($2.39)	$0.17
$27.24	$1.00	($0.03)
$27.28	$0.52	$0.03
$27.16	$0.50	$0.41
$27.49	$2.47	$0.86
$27.12	($1.54)	($0.86)
$27.38	$1.12	$1.02
$27.33	$1.17	($0.00)
$27.18	$0.56	($0.05)
$27.39	$1.42	$0.28
$27.54	($0.39)	$0.56
$27.69	$0.65	($0.16)
$27.49	($2.18)	$0.09
$27.26	($0.74)	($0.18)
$26.39	$0.52	($0.68)
$27.25	($2.33)	($0.17)
$27.03	($0.76)	($0.10)
$27.46	$1.69	$0.53
$27.25	($1.97)	($0.42)
$27.14	($1.84)	($0.02)
$27.39	($1.64)	($0.03)
$27.28	$0.02	$0.02

s (Dollars per MWh): 2018 and 2019

		2019		
Loss nent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.41)	$26.03	$26.25	$0.48	($0.71)
.58)	$27.16	$26.25	$0.97	($0.06)
.11)	$26.77	$26.25	$0.57	($0.05)
.22)	$23.53	$26.25	($1.59)	($1.14)
.72)	$23.91	$26.25	($1.59)	($0.76)
0.20	$27.53	$26.25	$1.22	$0.06
1.19	$25.28	$26.25	($1.37)	$0.40
.91)	$23.74	$26.25	($1.61)	($0.90)
0.51	$24.03	$26.25	($2.19)	($0.03)
.58)	$27.29	$26.25	$1.05	($0.02)
.28)	$26.79	$26.25	$0.73	($0.19)
0.14	$26.70	$26.25	$0.53	($0.09)

ıre presented in Table 11-9 for 2018 and 2019.

Table 11-6 Zonal real-time loa

		2020	
	Real-Time LMP	Energy Component	Co Co
ACEC	$19.72	$22.04	
AEP	$22.14	$21.60	
APS	$22.40	$21.64	
ATSI	$22.55	$21.67	
BGE	$25.78	$21.89	
COMED	$20.18	$21.70	
DAY	$23.23	$21.76	
DOM	$23.05	$21.77	
DPL	$22.90	$21.94	
DUKE	$22.37	$21.72	
DUQ	$22.79	$21.75	
EKPC	$22.14	$21.79	
JCPLC	$20.05	$22.13	
MEC	$21.16	$21.74	
OVEC	$20.75	$20.78	
PE	$20.84	$21.50	
PECO	$19.29	$21.78	
PEPCO	$23.59	$21.85	
PPL	$19.42	$21.65	
PSEG	$19.69	$21.77	
REC	$20.74	$22.16	
PJM	$21.77	$21.73	

Hub Component

The real-time compone

Table 11-8 Hub real-ti

	Real-Ti LM
AEP Gen Hub	$20.
AEP-DAY Hub	$21.
ATSI Gen Hub	$20.
Chicago Gen Hub	$18.
Chicago Hub	$19.
Dominion Hub	$21.
Eastern Hub	$20.
N Illinois Hub	$19.
New Jersey Hub	$18.
Ohio Hub	$21.
West Interface Hub	$20.
Western Hub	$20.

The day-ahead compor

ghted average LMP components (Dollars
024 and 2025

		2025 (Jan - Jun)		
Loss ponent	Real-Time LMP	Energy Component	Congestion Component	Loss Component
$0.44	$49.28	$53.87	($5.89)	$1.30
($0.36)	$49.50	$50.64	($0.36)	($0.78)
$0.16	$52.22	$51.49	$0.31	$0.43
$0.06	$48.29	$50.68	($2.29)	($0.09)
$1.19	$63.19	$53.06	$7.93	$2.20
($1.44)	$37.31	$51.32	($11.20)	($2.82)
$0.63	$48.80	$51.37	($3.01)	$0.45
$0.66	$67.75	$51.43	$15.08	$1.23
$0.92	$51.34	$53.44	($4.12)	$2.02
($0.26)	$47.20	$51.60	($3.33)	($1.07)
($0.26)	$47.46	$51.12	($2.93)	($0.72)
($0.40)	$49.88	$52.77	($1.62)	($1.27)
$0.46	$49.91	$53.98	($5.30)	$1.22
$0.15	$49.53	$51.73	($2.55)	$0.34
($0.91)	$42.51	$48.11	($3.80)	($1.81)
$0.32	$51.49	$50.41	$0.49	$0.60
$0.04	$46.19	$52.16	($6.42)	$0.46
$1.00	$63.40	$52.95	$8.60	$1.85
($0.25)	$45.37	$51.48	($5.95)	($0.16)
$0.40	$49.25	$52.46	($4.35)	$1.13
$0.40	$53.26	$53.36	($1.23)	$1.12
$0.02	$51.75	$51.58	$0.12	$0.04

for each hub are presented in Table 11-7 for the first six months of 2

.MP components (Dollars per MWh): January through June, 2024 and

n - Jun)		2025 (Jan - Jun)			
Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($0.10)	($1.04)	$42.04	$46.93	($3.04)	($1.85)
$0.05	($0.48)	$44.12	$46.93	($1.78)	($1.03)
$0.65	($0.41)	$44.00	$46.93	($1.89)	($1.05)
($4.78)	($1.69)	$32.37	$46.93	($11.46)	($3.09)
($4.03)	($1.29)	$33.31	$46.93	($11.17)	($2.45)
$3.26	$0.09	$52.14	$46.93	$5.06	$0.15

($3.75)	$0.72	$43.46	$46.93	($4.94)	$1.48
($4.25)	($1.45)	$33.23	$46.93	($10.98)	($2.72)
($3.69)	$0.34	$42.85	$46.93	($4.95)	$0.87
($0.00)	($0.47)	$44.28	$46.93	($1.57)	($1.08)
$1.46	($0.37)	$47.30	$46.93	$0.98	($0.61)
$1.50	$0.34	$48.89	$46.93	$1.43	$0.54

ıd-weighted average LMP components (Dollars per MWh): 2020 and 2021

			2021		
ıngestion mponent	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
($2.36)	$0.05	$34.13	$40.20	($6.35)	$0.28
$0.45	$0.09	$40.31	$39.50	$0.83	($0.02)
$0.82	($0.06)	$40.44	$39.52	$0.94	($0.03)
$0.58	$0.30	$39.47	$39.66	($0.36)	$0.17
$3.30	$0.59	$45.77	$39.92	$4.79	$1.07
($1.08)	($0.44)	$37.00	$39.81	($1.69)	($1.13)
$0.49	$0.98	$42.92	$39.89	$1.51	$1.51
$1.23	$0.05	$44.67	$39.78	$4.34	$0.55
$0.65	$0.30	$40.24	$39.88	($0.31)	$0.67
$0.51	$0.14	$41.49	$39.84	$1.61	$0.04
$1.18	($0.15)	$39.17	$39.70	($0.04)	($0.49)
$0.31	$0.04	$41.20	$39.93	$1.35	($0.07)
($2.12)	$0.04	$34.52	$40.27	($5.96)	$0.21
($0.40)	($0.18)	$39.97	$39.69	$0.44	($0.16)
$0.32	($0.34)	$37.98	$38.08	$0.74	($0.84)
($0.52)	($0.14)	$37.73	$39.39	($1.38)	($0.27)
($2.25)	($0.23)	$33.55	$39.73	($5.92)	($0.25)
$1.47	$0.28	$44.62	$39.95	$3.96	$0.72
($1.85)	($0.39)	$35.92	$39.47	($3.00)	($0.55)
($2.03)	($0.04)	$35.78	$39.81	($4.17)	$0.14
($1.45)	$0.03	$38.80	$40.28	($1.71)	$0.23
$0.02	$0.01	$39.78	$39.72	$0.04	$0.02

S

ents of LMP for each hub are presented in Table 11-8 for 2020 and 2021.[15]

me average LMP components (Dollars per MWh): 2020 and 2021

	2020			2021			
me MP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
.38	$20.63	$0.19	($0.44)	$37.44	$38.12	$0.36	($1.04)
.17	$20.63	$0.47	$0.07	$38.63	$38.12	$0.63	($0.12)
.91	$20.63	$0.33	($0.04)	$37.20	$38.12	($0.41)	($0.51)
.72	$20.63	($1.23)	($0.67)	$34.31	$38.12	($2.25)	($1.57)
.12	$20.63	($1.12)	($0.38)	$35.21	$38.12	($1.90)	($1.02)
.39	$20.62	$0.89	($0.13)	$41.47	$38.12	$3.17	$0.18
.40	$20.63	($0.42)	$0.20	$37.20	$38.12	($1.45)	$0.52
.02	$20.63	($1.11)	($0.49)	$34.96	$38.12	($1.94)	($1.23)
.63	$20.63	($1.93)	($0.07)	$33.20	$38.12	($4.98)	$0.06
.22	$20.63	$0.47	$0.13	$38.60	$38.12	$0.54	($0.06)
.93	$20.63	$0.48	($0.18)	$38.61	$38.12	$0.94	($0.46)
.92	$20.63	$0.41	($0.11)	$38.88	$38.12	$0.89	($0.14)

nents of LMP for each hub are presented in Table 11-9 for 2020 and 2021.

2024 and 2025.[1]

2025

Table 11-5 Zonal real-time load-weighted average LMP components (Dollars per M

	2022				2023			
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	L Compon
ACEC	$74.27	$82.01	($9.07)	$1.33	$24.94	$31.51	($6.80)	$(
AEP	$77.54	$79.32	($1.11)	($0.67)	$31.19	$30.83	$0.55	($0.
APS	$79.01	$79.61	($0.60)	$0.00	$32.49	$30.97	$1.47	$(
ATSI	$74.96	$78.32	($3.02)	($0.34)	$31.05	$30.80	$0.25	($0
BGE	$95.44	$81.87	$10.24	$3.33	$38.80	$31.29	$6.43	$1
COMED	$66.25	$78.91	($9.02)	($3.63)	$27.47	$30.88	($2.35)	($1
DAY	$80.43	$79.74	($1.06)	$1.74	$32.70	$31.03	$0.83	$(
DOM	$99.52	$81.08	$16.57	$1.88	$37.50	$31.00	$5.88	$(
DPL	$83.32	$82.21	($1.48)	$2.58	$31.06	$31.41	($0.94)	$(
DUKE	$79.54	$80.61	($0.37)	($0.70)	$32.10	$31.02	$1.02	$(
DUQ	$74.76	$79.27	($3.09)	($1.42)	$31.31	$30.86	$0.83	($0
EKPC	$83.16	$83.66	$0.05	($0.56)	$31.93	$31.17	$0.84	($0
JCPLC	$76.02	$82.22	($7.28)	$1.07	$25.89	$31.63	($5.93)	$(
MEC	$82.20	$79.14	$2.43	$0.63	$27.93	$31.08	($3.10)	($0
OVEC	$71.39	$74.99	($1.39)	($2.21)	$29.80	$29.81	$0.70	($0
PE	$73.26	$77.37	($3.65)	($0.46)	$31.01	$30.73	$0.23	$(
PECO	$71.67	$80.53	($9.11)	$0.25	$23.63	$31.14	($7.32)	($0
PEPCO	$91.68	$81.50	$7.61	$2.56	$36.59	$31.30	$4.46	$(
PPL	$75.74	$78.97	($2.95)	($0.28)	$25.73	$30.93	($4.78)	($0
PSEG	$74.74	$79.97	($6.06)	$0.83	$25.66	$31.11	($5.59)	$(
REC	$77.95	$81.82	($4.56)	$0.69	$27.90	$31.51	($3.75)	$(
PJM	$80.14	$79.98	$0.10	$0.06	$31.08	$31.00	$0.06	$(

Hub Components

The real-time components of LMP for each hub are presented in Table

Table 11-7 Hub real-time average LMP components (Dollars per MWh):

	2022					
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Ener Compone
AEP Gen Hub	$69.25	$73.38	($1.60)	($2.53)	$29.20	$29.
AEP-DAY Hub	$70.68	$73.38	($1.72)	($0.98)	$29.77	$29.
ATSI Gen Hub	$68.74	$73.38	($2.89)	($1.75)	$29.17	$29.
Chicago Gen Hub	$59.80	$73.38	($9.27)	($4.32)	$25.32	$29.
Chicago Hub	$61.15	$73.38	($8.97)	($3.27)	$25.83	$29.
Dominion Hub	$79.56	$73.38	$5.44	$0.74	$32.56	$29.
Eastern Hub	$70.80	$73.38	($4.41)	$1.83	$27.32	$29.
N Illinois Hub	$60.71	$73.38	($9.00)	($3.67)	$25.85	$29.
New Jersey Hub	$67.42	$73.38	($6.61)	$0.64	$24.06	$29.
Ohio Hub	$70.51	$73.38	($1.92)	($0.95)	$29.72	$29.
West Interface Hub	$72.66	$73.38	$0.33	($1.06)	$30.68	$29.
Western Hub	$74.25	$73.38	$0.65	$0.22	$31.78	$29.

(Wh): 2022 and 2023

Loss ient
0.22
(.19)
0.05
(.00)
1.08
(.06)
0.84
0.62
0.59
0.07
(.38)
(.08)
0.19
(.05)
(.70)
0.04
(.19)
0.83
(.43)
0.14
0.15
0.02

Table 3-34 Day-ahead and real-time zonal average l

	2024				
	Day-Ahead				
Zone	Average DLMP	Average PLMP	Difference	Percent Difference	Average DLMP
ACEC	$27.49	$27.54	$0.05	0.2%	$25.90
AEP	$31.12	$31.18	$0.06	0.2%	$29.05
APS	$32.27	$32.33	$0.06	0.2%	$29.80
ATSI	$31.46	$31.47	$0.01	0.0%	$29.08
BGE	$40.03	$40.11	$0.08	0.2%	$36.60
COMED	$25.48	$25.55	$0.07	0.3%	$23.28
DAY	$32.62	$32.69	$0.06	0.2%	$30.30
DUKE	$31.22	$31.28	$0.06	0.2%	$28.90
DOM	$36.96	$37.02	$0.06	0.2%	$33.54
DPL	$31.27	$31.36	$0.09	0.3%	$28.44
DUQ	$30.93	$30.97	$0.04	0.1%	$29.02
EKPC	$30.58	$30.64	$0.06	0.2%	$28.57
JCPLC	$27.52	$27.57	$0.06	0.2%	$26.00
MEC	$28.66	$28.71	$0.06	0.2%	$26.28
OVEC	$29.88	$29.93	$0.06	0.2%	$27.73
PECO	$27.11	$27.17	$0.05	0.2%	$25.56
PE	$32.06	$32.10	$0.04	0.1%	$29.46
PEPCO	$38.11	$38.18	$0.07	0.2%	$34.85
PPL	$26.76	$26.82	$0.06	0.2%	$24.86
PSEG	$27.78	$27.83	$0.06	0.2%	$26.33
REC	$30.13	$30.18	$0.05	0.2%	$28.14

11-7 for 2022 and 2023.[11]

2022 and 2023

2023		
rgy ent	Congestion Component	Loss Component
.61	$0.45	($0.86)
.61	$0.43	($0.27)
.61	$0.04	($0.48)
.61	($2.93)	($1.36)
.61	($2.80)	($0.98)
.61	$2.78	$0.17
.61	($2.73)	$0.44
.61	($2.62)	($1.13)
.61	($5.63)	$0.07
.61	$0.34	($0.23)
.61	$1.43	($0.35)
.61	$1.96	$0.20

Table 3-35 Day-ahead and real-time ave

	Day-Ahead		
Hub	Average DLMP	Average PLMP	Differen
AEP GEN HUB	$29.76	$29.79	$0.
AEP-DAYTON HUB	$30.70	$30.73	$0.
ATSI GEN HUB	$30.99	$31.01	$0.
CHICAGO GEN HUB	$24.78	$24.88	$0.
CHICAGO HUB	$25.75	$25.77	$0.
DOMINION HUB	$34.03	$34.07	$0.
EASTERN HUB	$31.23	$31.28	$0.
N ILLINOIS HUB	$25.36	$25.46	$0.
NEW JERSEY HUB	$27.65	$27.68	$0.
OHIO HUB	$30.66	$30.69	$0.
WEST INT HUB	$32.17	$32.19	$0.
WESTERN HUB	$33.80	$33.83	$0.

DLMP and PLMP (Dollars per

Real-Time		
Average PLMP	Difference	Percent Difference
$27.52	$1.62	6.3%
$31.35	$2.31	7.9%
$32.18	$2.38	8.0%
$31.32	$2.24	7.7%
$39.53	$2.93	8.0%
$25.22	$1.94	8.3%
$32.75	$2.46	8.1%
$31.21	$2.31	8.0%
$36.15	$2.61	7.8%
$30.94	$2.50	8.8%
$31.23	$2.21	7.6%
$30.84	$2.27	8.0%
$27.67	$1.67	6.4%
$28.15	$1.87	7.1%
$29.94	$2.20	7.9%
$27.12	$1.56	6.1%
$31.61	$2.15	7.3%
$37.61	$2.76	7.9%
$26.58	$1.72	6.9%
$28.02	$1.69	6.4%
$29.93	$1.79	6.4%

Zonal LMP

Table 3-54 sho

Table 3-54 Real

	Real-T
Zone	2023
ACEC	$23.30
AEP	$30.05
APS	$31.07
ATSI	$29.88
BGE	$36.40
COMED	$25.82
DAY	$31.28
DUKE	$30.69
DOM	$35.75
DPL	$27.03
DUQ	$30.14
EKPC	$30.41
JCPLC	$24.15
MEC	$26.59
OVEC	$29.67
PECO	$22.34
PE	$29.81
PEPCO	$34.36
PPL	$24.60
PSEG	$24.32
REC	$26.04
PJM	$29.69

erage DLMP and PLMP for PJM hubs (Dollars per MWh): 2024

2024					
		Real-Time			
ice	Percent Difference	Average DLMP	Average PLMP	Difference	Percent Difference
04	0.1%	$27.69	$29.92	$2.23	8.1%
03	0.1%	$28.42	$30.69	$2.27	8.0%
02	0.1%	$28.32	$30.50	$2.18	7.7%
09	0.4%	$22.31	$24.29	$1.98	8.9%
02	0.1%	$23.49	$25.44	$1.95	8.3%
04	0.1%	$31.26	$33.76	$2.50	8.0%
05	0.2%	$28.30	$30.79	$2.48	8.8%
.11	0.4%	$23.30	$25.23	$1.94	8.3%
03	0.1%	$26.11	$27.79	$1.67	6.4%
03	0.1%	$28.36	$30.62	$2.26	8.0%
02	0.1%	$29.80	$32.15	$2.35	7.9%
03	0.1%	$30.84	$33.24	$2.40	7.8%

' and Dispatch

ws real-time zonal average and load-weighted average LMP for 2023 and 2024.

l-time zonal average and load-weighted average LMP (Dollars per MWh): 2023 and 2024

Time Average LMP		Real-Time Load-Weighted Average LMP		
2024	Percent Change	2023	2024	Percent Change
$27.52	18.1%	$24.94	$30.60	22.7%
$31.35	4.3%	$31.19	$33.22	6.5%
$32.18	3.6%	$32.49	$34.49	6.2%
$31.32	4.8%	$31.05	$33.32	7.3%
$39.53	8.6%	$38.80	$44.87	15.7%
$25.22	(2.4%)	$27.47	$27.69	0.8%
$32.75	4.7%	$32.70	$35.23	7.7%
$31.21	1.7%	$32.10	$33.49	4.3%
$36.15	1.1%	$37.50	$39.07	4.2%
$30.94	14.5%	$31.06	$35.67	14.9%
$31.23	3.6%	$31.31	$33.42	6.8%
$30.84	1.4%	$31.93	$33.49	4.9%
$27.67	14.6%	$25.89	$30.79	18.9%
$28.15	5.9%	$27.93	$30.46	9.1%
$29.94	0.9%	$29.80	$30.14	1.1%
$27.12	21.4%	$23.63	$29.87	26.4%
$31.61	6.0%	$31.01	$33.24	7.2%
$37.61	9.4%	$36.59	$42.06	15.0%
$26.58	8.0%	$25.73	$28.53	10.9%
$28.02	15.2%	$25.66	$30.35	18.3%
$29.93	14.9%	$27.90	$32.65	17.0%
$31.32	5.5%	$31.08	$33.74	8.5%

DRIPE EDC-Column Lookup

EDC	DRIPE Column Ref
PECO	0
PPL	4
DLC	8
Met-Ed	12
Penelec	16
Penn Power	20
West Penn	24

Stacked Bars Offset Row Lookup

EDC	2026	2021
DLC	0	0
MetEd	4	5
PECO	8	10
Penelec	12	15
Penn Power	16	20
PPL	20	25
West Penn	24	30

Before continuing to the tables...

1. Select EDC

EDC Name	FirstEnergy

(Data from Impler

EDC Name
Duquesne Light
PECO
PPL
FirstEnergy
Not yet selected

2. Review Cell Colors Legend

Lookup
Formula
EDC Entered
No action needed - leave cell empty

(Plan submittals do not need to retain cell shading)

mentation Order which populates Lookup cells)

Baseline MWh	Baseline MW	MWh Goal	Low-Incon	MW Goal	Budget Limit
14,085,512	2,518	261,583	18,933	46.5	$97,729,760
39,386,000	7,899	1,111,685	74,456	194.8	$427,385,830
38,214,368	6,592	828,231	65,678	151	$307,506,880
54,975,912	9,515	1,097,605	86,913	191	$390,320,135

Table 1: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Sector	Total Discounted Lifetime Costs ($000)	Total Discounted Lifetime Benefits ($000) [3]	Present Value of Net[1] Benefits ($000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate Residential (exclusive of Low-Income)[2]	$236,618	$255,609	$18,991	1.1
Residential Low-Income	$69,638	$80,373	$10,735	1.2
Small Commercial & Industrial	$366,833	$427,391	$60,558	1.2
Large Commercial & Industrial	$381,610	$401,116	$19,507	1.1
Total Portfolio	$1,054,699	$1,164,489	$109,790	1.1

1 "Net" refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

2 The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

3 Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

Table 2: Summary of Portfolio Energy Savings

MWh Saved for Consumption Reductions (Meter-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh [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
Baseline[1]	54,975,912		54,975,912		54,975,912		54,975,912		54,975,912		54,975,912	
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Savings	55,429	491,758	67,497	517,939	59,440	495,503	57,241	422,680	52,376	404,240	291,982	2,332,119
Residential Low-Income Sub-Sector – Projected Incremental Savings[5]	13,992	116,978	15,182	118,168	14,773	117,759	13,488	114,350	13,050	113,912	70,486	581,167
Small C&I Sector – Projected Incremental Savings	72,447	972,748	72,447	972,748	72,447	972,748	72,447	972,748	72,447	972,748	362,235	4,863,741
Large C&I Sector – Projected Incremental Savings	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	78,866	1,117,115	394,329	5,585,577
EE&C Plan Total – Projected Incremental Savings	220,734	2,698,599	233,992	2,725,970	225,526	2,703,125	222,041	2,626,893	216,739	2,608,015	1,119,031	13,362,603
EE&C Plan Total – Projected Cumulative Savings[6]	220,734	2,698,599	454,725	5,424,570	680,252	8,127,694	902,293	10,754,588	1,119,031	13,362,603	1,119,031	13,362,603
EE&C Plan Total – Percentage of Target to be Met[2]	20%		41%		62%		82%		102%		102%	
Estimated Phase IV Carryover Savings[3]											0	
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	220,734		233,992		225,526		222,041		216,739		1,119,031	
Cumulative Percent Reduction from Baseline	0.4%		0.8%		1.2%		1.6%		2.0%		2.0%	
Commission-Identified Goal											1,097,605	

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

2 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

3 The Phase V Implementation Order limits energy carryover to 20% of an EDC's Phase V compliance target.

4 MWh saved are on a gross-verified basis.

5 Per the Phase V Implementation Order, the low-income savings target includes savings from programs solely directed at low-income customers or low-income-verified participants in multifamily housing programs. For the Company, this includes the Low-Income Energy Efficiency Program as well as the Multifamily component of the Commercial & Industrial Energy Solutions Programs, Small and Large, under which the Company projects savings of approximately 17,600 MWh from low-income customer participation, which combined with the Low Income Energy Efficiency Program exceeds its low-income savings target.

6 1st-Year MWh-Total for the EE&C Plan Total – Projected Cumulative Savings value is the result of a formula correction

Table 2a: Summary of Portfolio Energy Savings and Spending (FirstEnergy ONLY)

FirstEnergy Rate District [2]	PY18		PY19		PY20		PY21		PY22		Total	
	1st-Year MWh [1]	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)	1st-Year MWh	Spend ($1,000)
Met-Ed	61,770	$22,646	65,537	$22,123	63,173	$21,922	62,237	$21,273	60,744	$21,371	313,461	$109,334
Penelec	55,720	$20,428	58,690	$19,812	56,228	$19,512	55,096	$18,832	53,575	$18,848	279,310	$97,432
West Penn Power	83,354	$30,559	88,573	$29,899	85,578	$29,697	84,377	$28,840	82,490	$29,021	424,372	$148,017
Penn Power	19,889	$7,291	21,193	$7,154	20,547	$7,130	20,331	$6,949	19,929	$7,011	101,888	$35,536
FirstEnergy PA Total	220,734	$80,924	233,992	$78,988	225,526	$78,262	222,041	$75,894	216,739	$76,251	1,119,031	$390,320

1 MWh saved are on a gross-verified basis.

2 Annual Rate District level energy savings and spending are based on the Company's Plan projections and allocated to the Rate District level based on its most recent sales forecast dated June 2025

Table 3: Summary of Portfolio Demand Savings

System-Level MW Savings (Average of Summer and Winter)	PY18	PY19	PY20	PY21	PY22	Total
	1st-Year MW [4]	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW	1st-Year MW
Baseline[1]	9,515	9,515	9,515	9,515	9,515	9,515
Market Rate Residential Sector (exclusive of Low-Income) – Projected Incremental Annual Savings	10.2	12.2	11.3	10.0	8.4	52.1
Residential Low-Income Sub-Sector – Projected Incremental Annual Savings	3.1	3.1	3.2	3.0	2.8	15.1
Small C&I Sector – Projected Incremental Annual Savings	10.3	10.3	10.3	10.3	10.3	51.3
Large C&I Sector – Projected Incremental Annual Savings	10.7	10.7	10.7	10.7	10.7	53.5
Coincident Demand Reduction From EE Subtotal	**34.2**	**36.3**	**35.4**	**34.0**	**32.1**	**172.0**
Residential Load Shifting - Projected MW Savings	15.1	15.8	16.7	17.5	18.4	16.7
Small C&I Sector Load Shifting – Projected MW Savings	2.0	2.1	2.1	2.1	2.2	2.1
Large C&I Sector Load Shifting – Projected MW Savings	2.2	2.2	2.3	2.3	2.3	2.3
Daily Load Shifting Subtotal	**19.4**	**20.1**	**21.0**	**22.0**	**22.8**	**21.0**
Cumulative Projected Compliance Savings[2]	**38.1**	**78.4**	**118.0**	**156.4**	**193.0**	**193.0**
Cumulative EE&C Plan Total – Percentage of Target to be Met[3]	20%	41%	62%	82%	101%	101%
Estimated Phase IV Carryover Savings [5]						**0**
Total Cumulative Projected Savings Phase V + Estimated Phase IV Carryover Savings	**38.1**	**78.4**	**118.0**	**156.4**	**193.0**	**193.0**
Cumulative Percent Reduction from Baseline	0.4%	0.8%	1.2%	1.6%	2.0%	2.0%
Commission-Identified Goal[1]						191.0

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

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

3 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year.

4 MW saved are on a gross-verified basis.

5 50% of any excess Phase IV demand reduction can be claimed as carryover.

Table 4: Summary of Seasonal Demand Savings

Component MW Savings (System-Level)	PY18		PY19		PY20		PY21		PY22		Total	
	Summer MW [1]	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW	Summer MW	Winter MW
Coincident Reduction from EE - Residential	15.6	11.0	17.6	13.0	16.8	12.2	15.7	10.4	13.8	8.5	79.4	55.0
Coincident Reduction from EE - Non-Residential	25.1	16.9	25.1	16.9	25.1	16.9	25.1	16.9	25.1	16.9	125.3	84.3
Daily Load Shifting - Residential [3]	12.4	17.8	12.7	18.8	13.3	20.1	13.9	21.2	14.5	22.2	13.3	20.0
Daily Load Shifting - Non-Residential	4.2	4.3	4.2	4.4	4.3	4.4	4.3	4.5	4.4	4.5	4.3	4.4
Total											222.4	163.7
Phase V Peak Demand Reduction Target											191.0	
Percentage of Goal In Season [2]											116%	86%

1 MW saved are on a gross-verified basis, and MW are at the system-level.

2 The June 18, 2025 Implementation Order directed that EDCs achieve at least 15 percent of the target amount in each program year. The cells with the percentage of goal in each season (M12 and N12) will appear green if this condition has been met.

3 Daily load-shifting savings average across the phase, EE sums across the phase.

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY20		PY21		PY22		Phase V	
	$000	%	$000	%	$000	%	$000	%	$000	%	$000	%
Residential Market Rate	$23,305	29%	$23,384	30%	$23,038	29%	$20,692	27%	$20,885	27%	$111,305	28.5%
Residential Low-Income	$10,618	13%	$10,408	13%	$10,458	13%	$10,383	14%	$10,287	13%	$52,154	13.4%
Small C&I	$22,916	28%	$22,306	28%	$22,320	29%	$22,346	29%	$22,366	29%	$112,254	28.8%
Large C&I	$19,272	24%	$18,843	24%	$18,846	24%	$18,863	25%	$18,871	25%	$94,694	24.3%
Common Costs	$4,814	6%	$4,047	5%	$3,601	5%	$3,610	5%	$3,843	5%	$19,913	5.1%
Total Portfolio Budget [1]	**$80,924**	**100%**	**$78,988**	**100%**	**$78,262**	**100%**	**$75,894**	**100%**	**$76,251**	**100%**	**$390,320**	**100%**
SWE Cost[2]	$800		$800		$800		$800		$800		**$4,000**	

1 Cells with total percentages in row 11 will be green when the totals are above 99.9% and below 100.1%. All of these cells should be green once filled out to ensure correct cell values.

2 Company Assumption Based on PH IV allocation of existing SWE contract

Table 6: Program Summaries

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) [2]	
Market Rate Residential Programs (exclusive of Low-Income)	Residential Energy Solutions Program	Residential	The program provides incentives to residential customers operating under residential tariff rates, and/or retailers, contractors, distributors or manufacturers, to promote customer installation or completion of energy efficient products and projects, such as EnergyStar qualified appliances, HVAC upgrades, solar photovoltaic equipment, agricultural equipment and other energy efficient equipment. This program promotes energy efficiency of customer homes through incentives, customer education and adoption of energy efficient behaviors and equipment, and program delivery methods including home energy reports, audits, and direct install measures. The program also provides incentives to turn in and recycle inefficient appliances, and for construction of energy efficient new homes. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction achieved through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	291,982	2,332,119	68.8	26%	36%
								0%	0%
								0%	0%
	Totals for Residential Sector				291,982	2,332,119	68.8	**26%**	**36%**
Residential Low-Income Programs	Low Income Energy Efficiency Program	Residential	This program provides specific energy efficiency measures, projects, education and awareness to help low-income customers increase their energy efficiency and control their energy spending. The program promotes energy efficiency of low-income customer homes through a broad range of components and measures including customized home energy reports and no-cost direct install measures and comprehensive whole-house projects. The program also provides enhanced incentives to turn-in and recycle inefficient appliances and for the purchase of energy efficient products such as EnergyStar qualified appliances and other energy efficient equipment. The program targets and promotes low-income customer participation through various activities including but not limited to customer education, community outreach, giveaways and enhanced financial incentives. The program also coordinates with the Company's Low Income Usage Reduction Program and other conservation programs to increase participation and energy savings by the Company's low-income customers.	17	70,486	581,167	15.1	6%	8%
								0%	0%
								0%	0%
	Totals for Low-Income Sector				70,486	581,167	15.1	**6%**	**8%**

	Program Name	Program Market	Program Two-Sentence Summary	Program Years Operated	Compliance MWh-year	Lifetime MWh Savings	Compliance MW-year	Percentage of Portfolio Resource Savings (MWh% and MW%) [2]	
Small C&I Programs	C&I Energy Solutions Program - Small	Small C&I[3]	The Energy Solutions Program - Small provides incentives to small commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissiong and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	362,235	4,863,741	53.4	32%	28%
								0%	0%
								0%	0%
	Totals for Small C&I Sector				362,235	4,863,741	53.4	**32%**	**28%**
Large C&I Programs	C&I Energy Solutions Program - Large	Large C&I	The Energy Solutions Program - Large provides incentives to large commercial and industrial customers, including government, non-profit, institutional and multifamily customers, to install qualifying energy efficiency equipment, recycle inefficient appliances, upgrade less efficient equipment to more efficient end use technology, retrofit specialized equipment and processes, applications and end uses, and complete qualifying energy efficient building shell or system improvements. The program will also promote behavioral savings, adoption of energy saving technologies and efficient building operations through customer education and outreach, audits with direct install measures, building tune-up, energy management strategies, meter data analysis or retrocommissiong and building operations training. This program also includes a Daily Load Shifting and Peak Demand Reduction component that promotes load shifting and demand reductions by customers through incentives for the control of connected devices and custom load shifting strategies tailored to customer opportunities. Lastly, the program includes a Front of the Meter component that captures energy savings and peak demand reduction through efficient upgrades, installations or operational changes completed on the energy delivery system.	17	394,329	5,585,577	55.8	35%	29%
								0%	0%
								0%	0%
	Totals for Large C&I Sector				394,329	5,585,577	55.8	**35%**	**29%**
	Totals for Plan [1]				1,119,031	13,362,603	193.0	**100%**	**100%**

1 Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

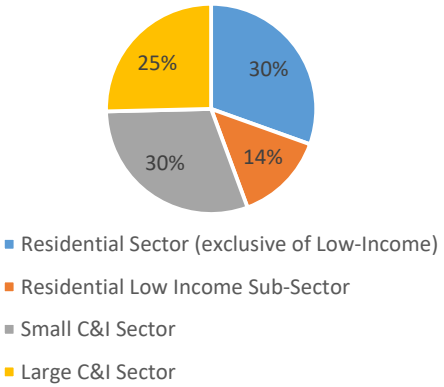
2 If rows need to be added to accommodate more than 3 programs per sector, ensure total and percentage formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

3 Includes projected participation of Low Income households living in Multifamily housing.

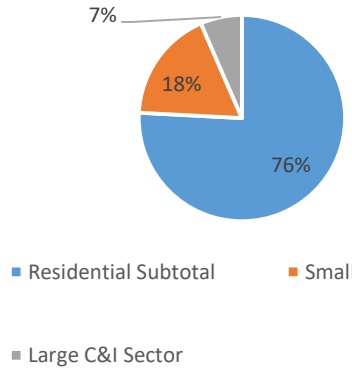
Table 7: Budget and Parity Analysis Summary

Customer Sector	Phase V EE&C Budget (inclusive of allocated common cost)	% of Total EDC EE&C Budget	% of EDC Total Annual Revenue [1]	% of EDC Total MWh Sales
Residential Sector (*exclusive of Low-Income*)	$118,927,997	30%	76%	37%
Residential Low Income Sub-Sector	$54,246,395	14%		
Residential Subtotal	$173,174,392	44%	76%	37%
Small C&I Sector	$118,074,265	30%	18%	21%
Large C&I Sector	$99,070,866	25%	7%	42%
Non-Residential Subtotal	$217,145,131	56%	24%	63%
EDC TOTAL [3]	**$390,319,523**	**100%**	**100%**	**100%**
EDC TOTAL as Share of Budget Ceiling	**100.0%**			

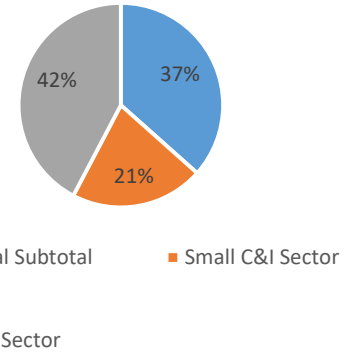
% Budget by Customer Sector (populates when data is entered above)



% Revenue by Customer Sector



% MWh Sales by Customer Sector



1 EDCs should use calendar year 2024 to compute the share of revenue and MWh sales by customer sector. Total revenue should be inclusive of collections on behalf of competitive generation suppliers.

2 Budget amounts in this table should exclude SWE costs.

3 Cells F10, G10 and H10 will be green when the totals are above 99.9% and below 100.1%. All cells should be green once filled out to ensure correct subtotals.

Table 8: Eligible Measures

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	Freezer Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$60.00	5	$100.00
Residential Energy Solutions Program	Products	Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$60.00	6	$100.00
Residential Energy Solutions Program	Products	Room Air Conditioner Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$30.00	3	$50.00
Residential Energy Solutions Program	Products	Dehumidifier Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$30.00	4	$50.00
Residential Energy Solutions Program	Products	LV Refrigerator Recycling	1 Unit	No	No	An existing working unit generally older than 10 years.	$30.00	5	$50.00
Residential Energy Solutions Program	Products	Cooler Recycling	1 Unit	No	No	PA TRM	$30.00	5	$50.00
Residential Energy Solutions Program	Products	Clothes Washer	1 Unit	No	No	ENERGY STAR or PA TRM	$35.72	14	$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	14	$100.00
Residential Energy Solutions Program	Products	Refrigerator - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	14	$100.00
Residential Energy Solutions Program	Products	Freezer - PY18 to PY20	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	11	$75.00
Residential Energy Solutions Program	Products	Freezer - PY21 & PY22	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	11	$75.00
Residential Energy Solutions Program	Products	Clothes Dryer - PY18 & PY19	1 Unit	No	No	ENERGY STAR or PA TRM	$206.34	14	$100.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	Clothes Dryer - PY20 to PY22	1 Unit	No	No	ENERGY STAR or PA TRM	$206.34	14	$100.00
Residential Energy Solutions Program	Products	Air Purifier / Cleaner	1 Unit	No	No	PA TRM	$39.00	9	$40.00
Residential Energy Solutions Program	Products	Room Air Conditioner	1 Unit	No	Yes	PA TRM	$95.08	9	$50.00
Residential Energy Solutions Program	Products	Dehumidifier	1 Unit	No	No	ENERGY STAR or PA TRM	$0.00	12	$50.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY18 to PY20	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
Residential Energy Solutions Program	Products	Heat Pump Water Heater - PY21 & PY22	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
Residential Energy Solutions Program	Products	Pool Pump Variable Speed	1 Unit	No	No	ENERGY STAR or PA TRM	$218.07	10	$400.00
Residential Energy Solutions Program	Products	Dishwasher	1 Unit	No	No	ENERGY STAR or PA TRM	$79.45	10	$75.00
Residential Energy Solutions Program	Products	EV Charging Cord - Level 2 - Res	1 Unit	No	No	ENERGY STAR or MA TRM	$143.00	10	$150.00
Residential Energy Solutions Program	Products	Smart Thermostat - Aplncs	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	$103.53	9	$100.00
Residential Energy Solutions Program	Products	Cooler	1 Unit	No	No	ENERGY STAR or PA TRM	$281.84	14	$100.00
Residential Energy Solutions Program	Products	Clothes Washer/Dryer Combo	1 Unit	No	No	ENERGY STAR	$242.06	14	$200.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	LED Linear	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Residential Energy Solutions Program	Products	LED Nightlights (Mrktplace)	1 Unit	No	No	PA TRM	$2.60	8	$5.00
Residential Energy Solutions Program	Products	Holiday Lights (Mrktplace)	100 Light String	No	No	PA TRM	$0.67	10	$5.00
Residential Energy Solutions Program	Products	Smart Strip Plug Outlet	1 Unit	No	No	PA TRM	$40.91	5	$25.00
Residential Energy Solutions Program	Products	Residential Occupancy Sensor	1 Unit	No	No	PA TRM	$24.51	8	$30.00
Residential Energy Solutions Program	Products	LED Linear (Mrktplace)	Per 4' Unit	No	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Residential Energy Solutions Program	Products	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	$20.80	7	$0.20 per kWh and/or $550 per kW saved
Residential Energy Solutions Program	Products	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	$9,025.00	10	$975.00
Residential Energy Solutions Program	Products	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	$557.44	15	$650.00
Residential Energy Solutions Program	Products	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	$226.20	13	$640.00
Residential Energy Solutions Program	Products	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	$5,839.98	15	$975.00
Residential Energy Solutions Program	Products	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	$5,607.89	15	$50.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Products	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	$552.98	10	$350.00
Residential Energy Solutions Program	Products	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	$6,716.86	15	$1,500.00
Residential Energy Solutions Program	Products	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	$13,745.19	5	$0.20 per kWh and/or $550 per kW saved
Residential Energy Solutions Program	Products	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
Residential Energy Solutions Program	Products	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	$16.64	15	$25.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$417.59	15	$1,500.00
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Most Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$1,043.99	15	$2,000.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$417.59	15	$750.00
Residential Energy Solutions Program	HVAC & Solar	Central Air Conditioner - Most Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$1,043.99	15	$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Ductless Mini-Split Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	$710.54	15	$1,500.00
Residential Energy Solutions Program	HVAC & Solar	PTAC	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$521.99	15	$500.00
Residential Energy Solutions Program	HVAC & Solar	PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$521.99	15	$750.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	HVAC & Solar	Heat Pump - Water & GeoT	1- 3 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$18,664.80	15	$7,500.00
Residential Energy Solutions Program	HVAC & Solar	Furnace Fan (Retrofit or New to ECM)	1 Unit	No	No	PA TRM	$196.11	5	$150.00
Residential Energy Solutions Program	HVAC & Solar	Smart Thermostat - HVAC	1 Unit controlling 2.5 Ton CAC / ASHP	No	No	ENERGY STAR or PA TRM	$103.53	9	$100.00
Residential Energy Solutions Program	HVAC & Solar	AC or HP Maintenance	1 - Unit	No	No	PA TRM	$141.40	3	$150.00
Residential Energy Solutions Program	HVAC & Solar	HE Bathroom Fans	1-20 CFM unit	No	No	ENERGY STAR or PA TRM	$52.42	15	$25.00
Residential Energy Solutions Program	HVAC & Solar	Window Heat Pump	1 - Unit	No	Yes	PA TRM	$1,227.74	9	$500.00
Residential Energy Solutions Program	HVAC & Solar	REH to Heat Pump	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$2,087.94	15	$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to DMS Heat Pump	1- 1.5 ton unit	No	Yes	ENERGY STAR or PA TRM	$3,552.72	15	$3,000.00
Residential Energy Solutions Program	HVAC & Solar	REH to PTHP	1-1.25 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$2,609.93	15	$1,000.00
Residential Energy Solutions Program	HVAC & Solar	Solar	1 kW DC Installed Capacity	No	No	PA TRM	$1,910.63	15	$500.00
Residential Energy Solutions Program	Comprehensive Audits	Comprehensive Audit	1 - Audit w DI & Wgtd Retrofits	No	Yes	In-Home Audit w/ direct install measures. Also provides incentive for program measures meeting program, PA TRM or evaluation requirements.	$2,929.17	5	Audit - Up to $750 for the cost of the audit with direct install measures, plus up to $2,500 for audit recommended measures and additional incentives
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Solar	1 kW DC Installed Capacity	No	Yes	PA TRM	$1,910.63	15	$500.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - Heat Pump - Eff	1- 2.75 ton unit	No	Yes	ENERGY STAR or PA TRM	$730.79	15	$2,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - CAC - Eff	1-2.75 Ton Unit	No	Yes	ENERGY STAR or PA TRM	$730.79	15	$1,000.00
Residential Energy Solutions Program	Comprehensive Audits	Comp Audit - HPWH	1-50 gal unit	No	Yes	ENERGY STAR or PA TRM	$1,915.00	10	$1,000.00
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - DI - Res	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Up to $250 for the cost of an audit with direct install measures
Residential Energy Solutions Program	Multi Family - Res	MF - Common - DI - Res	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Prescriptive - Res	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Prescriptive - Res	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Residential Energy Solutions Program	Multi Family - Res	MF - Tenant - Custom - Res	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
Residential Energy Solutions Program	Multi Family - Res	MF - Common - Custom - Res	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 1	Per HH	No	No	Residential customer meeting program requirements	$0.00	1	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 2	Per HH	No	No	Residential customer meeting program requirements	$0.00	2	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 3	Per HH	No	No	Residential customer meeting program requirements	$0.00	1	NA

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 4	Per HH	No	No	Residential customer meeting program requirements	$0.00	2	NA
Residential Energy Solutions Program	Behavioral	Behavioral Ph5 Yr 5	Per HH	No	No	Residential customer meeting program requirements	$0.00	1	NA
Residential Energy Solutions Program	Behavioral	On-Line Audit	Per HH	No	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	$0.00	1	NA
Residential Energy Solutions Program	New Homes	NC -Townhouse and duplex units	NC Townhouse and Duplex	No	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$2,000.00
Residential Energy Solutions Program	New Homes	NC - Two-on-Two condominium units	NC Two on Two Cond Units	No	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Residential Energy Solutions Program	New Homes	NC - Single-family detached units	NC Single Family Detached	No	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family Low Rise	NC MultiFamily Low Rise	No	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Residential Energy Solutions Program	New Homes	NC - Manufactured Housing	NC Mfg Housing	No	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	$2,802.97	14	$3,000.00
Residential Energy Solutions Program	New Homes	NC - Multi Family High Rise	NC MultiFamily Low Rise	No	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Residential Energy Solutions Program	DLS & DR - Res	Behavioral DLS & DR	Vendor	No	No	Active residential customers with AMI, sufficient usage and usage history, and meets participation or other program requirements.	$0.00	1	NA
Residential Energy Solutions Program	DLS & DR - Res	Managed Charging	Vendor	No	No	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$250.00
Residential Energy Solutions Program	DLS & DR - Res	Storage	Vendor	No	No	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$1,000.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DR	Vendor	No	No	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$50.00
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Summer	Vendor	No	No	Smart thermostats installed on electric cooling systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	NA
Residential Energy Solutions Program	DLS & DR - Res	Thermostat DLS-Winter	Vendor	No	No	Smart thermostats installed on electric heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	NA
Residential Energy Solutions Program	FTM-Res	Front of Meter Measures - Res	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	$0.00	-	$0.00
Low Income Energy Efficiency Program	Weatherization	Customer Engagement - LI	1 Tenant Space	Yes	Yes	In-Home Audit w/ direct install measures or a welcome kit. Eligible to single family home customers.	$172.50	13	NA
Low Income Energy Efficiency Program	Weatherization	LIURP Lookback - LI	1-1.25 Ton Unit	Yes	Yes	Direct installation of heat pumps for water and space heating with in 5 years of being weatherized by LIURP	$3,600.00	15	NA
Low Income Energy Efficiency Program	Weatherization	WARM Plus	Per HH	Yes	Yes	WARM Plus - Weatherization services provided to customers that qualify at or below 150% of the Federal Poverty Income Guidelines in coordination with the Low Income Usage Reduction program	$1,275.00	13	NA
Low Income Energy Efficiency Program	Weatherization	WARM Extra Measures	Per HH	Yes	Yes	WARM - Extra Measures - additional energy efficiency measures provided in coordination with the Low Income Usage Reduction program--measures above and beyond what that program provides. For customers who qualify at or below 150% of the Federal Poverty Income Guidelines	$1,032.50	13	NA
Low Income Energy Efficiency Program	LI - Products	Freezer Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$60.00	5	$125.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$60.00	6	$125.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$30.00	3	$75.00
Low Income Energy Efficiency Program	LI - Products	Dehumidifier Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$30.00	4	$75.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Products	LV Refrigerator Recycling - LI	1 Unit	Yes	No	An existing working unit generally older than 10 years.	$30.00	5	$75.00
Low Income Energy Efficiency Program	LI - Products	Cooler Recycling - LI	1 Unit	Yes	No	PA TRM	$30.00	5	$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$35.72	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Refrigerator - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY18 to PY20 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	11	$75.00
Low Income Energy Efficiency Program	LI - Products	Freezer - PY21 & PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	11	$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY18 & PY19 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$206.34	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Clothes Dryer - PY20 to PY22 - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$206.34	14	$100.00
Low Income Energy Efficiency Program	LI - Products	Air Purifier / Cleaner - LI	1 Unit	-	-	PA TRM	$39.00	9	$40.00
Low Income Energy Efficiency Program	LI - Products	Room Air Conditioner - LI	1 Unit	-	-	PA TRM	$95.08	9	$50.00
Low Income Energy Efficiency Program	LI - Products	Dehumidifier - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$0.00	12	$50.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Products	Dishwasher - LI	1 Unit	-	-	ENERGY STAR or PA TRM	$79.45	10	$75.00
Low Income Energy Efficiency Program	LI - Products	Clothes Washer/Dryer Combo - LI	1 Unit	-	-	ENERGY STAR	$242.06	14	$200.00
Low Income Energy Efficiency Program	LI - Products	LED Linear - LI	Per 4' Unit	-	-	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Low Income Energy Efficiency Program	LI - Products	LED Nightlights (Mrktplace) - LI	1 Unit	Yes	No	PA TRM	$2.60	8	$5.00
Low Income Energy Efficiency Program	LI - Products	Holiday Lights (Mrktplace) - LI	100 Light String	Yes	No	PA TRM	$0.67	10	$5.00
Low Income Energy Efficiency Program	LI - Products	Smart Strip Plug Outlet - LI	1 Unit	Yes	No	PA TRM	$40.91	5	$25.00
Low Income Energy Efficiency Program	LI - Products	Residential Occupancy Sensor - LI	1 Unit	Yes	No	PA TRM	$24.51	8	$30.00
Low Income Energy Efficiency Program	LI - Products	LED Linear (Mrktplace) - LI	Per 4' Unit	Yes	No	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$14.25	15	$20.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump - HEAR	1- 2.75 ton unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	$1,148.37	15	$2,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY18 to PY20 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	$1,684.76	10	$1,000.00
Low Income Energy Efficiency Program	LI - HVAC	Heat Pump Water Heater - PY21 & PY22 - HEAR	1-50 gal unit	Yes	Yes	ENERGY STAR or PA TRM or IRA - HEAR program requirements	$1,684.76	10	$1,000.00
Low Income Energy Efficiency Program	LI - Audits	Audit / Technical Scoping Studies	-	Yes	No	Audit meeting IRA - HER program requirements	$0.00	-	$1,500.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 1 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 2 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 3 - LI	Per HH	Yes	No	#N/A	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 4 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	Behavioral Ph5 Yr 5 - LI	Per HH	Yes	No	Residential customer meeting program requirements	$0.00	1	NA
Low Income Energy Efficiency Program	LI - Behavioral	On-Line Audit - LI	Per HH	Yes	No	Online Audit process including recommendations and education emphasizing key points, general conservation tips and information on tools and resources supporting implementation of measures and efficiency behaviors that reduces consumption of energy and demand.	$0.00	1	NA
Low Income Energy Efficiency Program	LI - New Homes	NC -Townhouse and duplex units - LI	NC Townhouse and Duplex	Yes	Yes	Residential townhome or duplex to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$2,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Two-on-Two condominium units - LI	NC Two on Two Cond Units	Yes	Yes	Residential 2 on 2 condominium to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Single-family detached units - LI	NC Single Family Detached	Yes	Yes	Residential single family detached home to be constructed meeting Energy Star certification or built at a higher efficiency level than the current adopted building cord, or PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family Low Rise - LI	NC MultiFamily Low Rise	Yes	Yes	Multi Family Low Rise homes to be constructed meeting Energy Star certification, or built at a higher efficiency level than the current adopted building cord, or PA TRM.. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$1,500.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Manufactured Housing - LI	NC Mfg Housing	Yes	Yes	Purchase and installation of a Residential manufactured home compliant to and certified by EPA's ENERGY STAR Manufactured Home' program standard.	$2,802.97	14	$3,000.00
Low Income Energy Efficiency Program	LI - New Homes	NC - Multi Family High Rise - LI	NC MultiFamily Low Rise	Yes	Yes	PA TRM. Incremental incentives may be available for the purchase and installation of additional measures.	$2,802.97	14	$3,000.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - DI - Res - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Multi-Family Tenant Space Audit w/ direct install measures.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - DI - Res - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Prescriptive - Res - LI	1-50 gal unit	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Prescriptive - Res - LI	1 Unit	Yes	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Tenant - Custom - Res - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
Low Income Energy Efficiency Program	LI - Multifamily - Res	MF - Common - Custom - Res - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI - LI	1 Tenant Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Multi-Family Tenant Space Audit w/ direct install measures.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI - LI	1 Common Space	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI - LI	1-50 gal unit	Yes	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI - LI	1 Unit	Yes	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI - LI	1 Project	Yes	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - DI - SCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Up to $250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - DI - SCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Prescriptive - SCI	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Prescriptive - SCI	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Tenant - Custom - SCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.
C&I Energy Solutions Program - Small	Multi Family - SCI	MF - Common - Custom - SCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 <=5.4 Tn - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$2,087.94	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	$1,859.85	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Air Conditioning - Level 1 >=20 Tn - SCI	1- 20 ton unit	No	N/A	ENERGY STAR or PA TRM	$709.41	15	300/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Level 1 <=5.4 Tn - SCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	$555.71	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Pump - Water & GeoT - SCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$31,108.00	15	500/Ton
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ductless Mini-Split HP – SCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	$710.54	15	500/Ton

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTAC - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$168.79	15	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	PTHP - SCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$139.92	15	$750.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner- SCI	1-1 ton unit	No	N/A	PA TRM	$95.08	9	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Smart Thermostat - SCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	$75.97	11	$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Custom - SCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Circulating Pump (Mid Strm) - SCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	$66.31	15	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	HVAC - Maintenance - SCI	1-5 Ton Unit	No	N/A	PA TRM or evaluation guidelines	$437.79	3	$300.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Furnace Fan (Retrofit or New to ECM) - SCI	1 Unit	No	N/A	PA TRM	$395.48	5	$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Daylight & Occupancy) - SCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	$52.67	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Control (Network) - SCI	Per sq-ft of building lighting controlled	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	$0.68	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Linear - SCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$206.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Exit Sign - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$68.67	15	$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture External - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$412.44	14	$0.20 per kWh and/or $550 per kW saved

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture Internal - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$466.23	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Lamp Mogul Base - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$430.37	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street & Area Lighting (Customer Owned) - SCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Reach in Refrig / Frzer Light - SCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$58.68	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Reach in Refrig / Frzer Occupancy Sensor - SCI	1 Unit	No	N/A	PA TRM	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Other - SCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$39,799.72	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting - Custom - SCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	$198,998.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Linear Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$30.53	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	High/Low Bay Lamp - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$243.80	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	LED Fixture - MS - SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$122.11	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Lighting Controls - MS-SCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$52.67	8	$0.20 per kWh and/or $550 per kW saved

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt)-SCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	$504.02	12	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	ECM Evap Fan Motor - SCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$353.45	15	$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Evap Fan Controls - SCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$766.60	15	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	$682.94	12	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - Reach In - SCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	$453.12	12	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerated Case Cover - SCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	$79.31	9	$22.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Anti Sweat Heater Controls - SCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	$1,119.27	12	$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Strip Curtain - SCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	$10.02	4	$7.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Ice Machine - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$381.47	10	$590 0-500 lbs $980 501-1000 lbs $1100 over 1000 lbs
C&I Energy Solutions Program - Small	Prescriptive - SCI	Beverage Vending Machine - Controls - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$234.30	5	$125.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Steam Cooker - SCI	1- unit	No	N/A	ENERGY STAR or PA TRM	$2,537.60	12	$150/pan
C&I Energy Solutions Program - Small	Prescriptive - SCI	Fryer - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,903.20	12	$500.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Griddle - SCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,289.28	12	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Hot Food Holding Cabinet - SCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	$549.55	12	$500 - full size $375 - 3/4 size $225 - 1/2 size
C&I Energy Solutions Program - Small	Prescriptive - SCI	Combination Oven - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,898.69	12	$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Convection Oven - SCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	$1,118.48	12	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dishwasher - SCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,539.87	10	$500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Induction Cooktop - SCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	$573.73	10	$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Pre-Rinse Sprayer - SCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	$112.90	8	$175.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	5	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	6	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Room Air Conditioner Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	3	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifiers Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	4	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	LV Refrigerator Recycling - SCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	5	$50.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	Cooler Recycling - SCI	1 Unit	No	N/A	PA TRM	$30.00	5	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	EV Charging Cord - Level 2 - SCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	$143.00	10	$150.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Washer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$35.72	14	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Clothes Dryer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$206.34	14	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Refrigerator - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	14	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Water Heater - Heat Pump - SCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Freezer - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	11	$75.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dehumidifier - SCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	12	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Uninterruptible Power Supply (UPS) - SCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	$46.80	7	$200.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Agricultural Process Lighting	1 Unit	No	N/A	Installation of new or replacement of lighting equipment to a higher efficiency than existing or designed for agriculture grow processes, or PA TRM. Requires pre-approval by the program.	$20.80	7	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Auto Milker Takeoff	Per Unit	No	N/A	Installation of a new automatic milker takeoffs to replace pre-existing manual takeoffs on dairy milking vacuum pump systems equipped with a variable speed drive (VSD).	$9,025.00	10	$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Scroll Compressor	Per Unit	No	N/A	Installation of a scroll compressor to replace an existing reciprocating compressor or to be installed in a new construction application.	$557.44	15	$650.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Prescriptive - SCI	HE Ventilation Fans	1 Unit	No	N/A	PA TRM, Installation of high efficiency ventilation fans and/or the installation of a thermostat controlling either new efficient fans or existing.	$226.20	13	$640.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Heat Reclaimer	1 Unit	No	N/A	PA TRM, Installation of a refrigeration heat recovery (RHR) system on dairy farmer milk refrigeration systems.	$5,839.98	15	$975.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	High Volume Low Speed Fan	1 Unit	No	N/A	PA TRM, Installation of new or replacement of conventional circulating fans with High Volume Low Speed (HVLS) fans meeting program requirements.	$5,607.89	15	$50.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Livestock Waterer	1 Unit	No	N/A	Installation of a energy efficient livestock watering system that is thermostatically controlled and has factory-installed insulation with a minimum thickness of 2 inches.	$552.98	10	$350.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Dairy Vac Pump VSD Control	1 Unit	No	N/A	Installation of VFD and controls on dairy vacuum pumps, or the purchase of dairy vacuum pumps with variable speed capability. Pre-existing pumps with VSD's are not eligible.	$6,716.86	15	$1,500.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Low Pressure Irrigation	1 Unit	No	N/A	Installation of a low-pressure irrigation system in agriculture applications with a minimum of 50% reduction in pumping pressure.	$13,745.19	5	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Custom - Agricultural	1 Unit	No	N/A	Replacement or retrofit of existing farm type equipment or process changes or enhancements that results in electric energy savings, including construction of new facilities. Requires pre-approval by the program.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Prescriptive - SCI	Engine Block Heater Timer	1 Unit	No	N/A	Installation of timers used to control engine block heaters on existing farm equipment	$16.64	15	$25.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Utility Owned(EMU))	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	15	$100.00
C&I Energy Solutions Program - Small	Prescriptive - SCI	Street Lighting (Tariff / Customer Owned(MU))	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	15	$100.00
C&I Energy Solutions Program - Small	Custom - SCI	Custom - SCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Compressed Air - SCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	$46,284.92	15	$0.20 per kWh and/or $550 per kW saved

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Refrigeration - SCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Solar - SCI	1 kW DC Installed Capacity	No	N/A	PA TRM	$1,928.12	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - CHP - SCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	$4,529,325.97	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Bldg Improvements - SCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.	$149,387.80	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - New Construction - SCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	$29,997.08	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Custom - SCI	Custom - Audit & Education - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,225.00	1	$1,500.00
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Tune Up - SCI	1 Project	No	N/A	Portfolio of measures and services that focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency, including the installation of energy efficiency measures.	$37,782.88	13	Up to 80% of the project cost
C&I Energy Solutions Program - Small	Energy Management - SCI	Virtual/Meter Data Commissioning - SCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	$1,172.74	2	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Energy Management - SCI	Retrocommissioning - SCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	$5,863.72	3	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Small	Energy Management - SCI	Building Operations Training - SCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE $1000 per person.
C&I Energy Solutions Program - Small	Energy Management - SCI	Customer Concierge - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$3,500.00	1	NA
C&I Energy Solutions Program - Small	Energy Management - SCI	Energy Consultation - SCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$1,225.00	1	NA

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Small	Energy Management - SCI	Audits - SCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,225.00	1	$1,500.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$250.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$1,000.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DR	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$50.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Thermostat DLS	-	No	N/A	Smart thermostats installed on electric cooling and/or heating systems meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$0.00
C&I Energy Solutions Program - Small	DLS & DR - SCI	Custom DLS & DR - SCI	Vendor	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements.	$0.00	1	$20,000.00
C&I Energy Solutions Program - Small	FTM-SCI	Front of Meter Measures - SCI	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	$0.00	-	$0.00
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - DI - LCI	1 Tenant Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$175.00	13	Up to $250 for the cost of an audit with direct install measures
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - DI - LCI	1 Common Space	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$21,518.40	14	Up to 80% of the project cost
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Prescriptive - LCI	1-50 gal unit	No	Yes	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$1,915.00	10	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Prescriptive - LCI	1 Unit	No	No	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$35.72	14	Removal with recycle of inefficient appliances and/or the purchase and installation of ENERGY STAR rated appliances or equipment.
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Tenant - Custom - LCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Installation of Custom energy efficiency measures including, but not limited to: lighting, HVAC, appliances, etc.

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Multi Family - LCI	MF - Common - Custom - LCI	1 Project	No	N/A	Audit w/ direct install measures. Also provides incentive for/or direct installation of program measures including measures meeting program, PA TRM or evaluation requirements. Eligible to multifamily buildings including both common areas and tenant spaces.	$46,284.92	15	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems.
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 <=5.4 Tn - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$2,087.94	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	1- 11 ton unit	No	N/A	ENERGY STAR or PA TRM	$1,859.85	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Air Conditioning - Level 1 >=20 Tn - LCI	1- 20 ton unit	No	N/A	ENERGY STAR or PA TRM	$709.41	15	300/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Level 1 <=5.4 Tn - LCI	1 - 5 ton unit	No	N/A	ENERGY STAR or PA TRM	$555.71	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Heat Pump - Water & GeoT - LCI	1-5 ton unit	No	N/A	ENERGY STAR or PA TRM	$31,108.00	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ductless Mini-Split HP – LCI	1-1.5 ton unit	No	N/A	ENERGY STAR or PA TRM	$710.54	15	500/Ton
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTAC - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$168.79	15	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	PTHP - LCI	1 - 1 ton unit	No	N/A	ENERGY STAR or PA TRM	$139.92	15	$750.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner- LCI	1-1 ton unit	No	N/A	PA TRM	$95.08	9	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Smart Thermostat - LCI	1-5 Ton Unit	No	N/A	ENERGY STAR or PA TRM	$75.97	11	$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Custom - LCI	1 Project	No	N/A	Purchase and installation of new high-efficiency HVAC equipment in place of standard efficiency equipment. Also includes new or retrofit of HVAC controls/controllers (e.g thermostats, demand control ventilation, etc.) that optimizes ventilation and economization control schemes of a building's HVAC system based on occupancy or sensor level inputs.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Circulating Pump (Mid Strm) - LCI	1-unit	No	N/A	Purchase and installation of a new ECM or BPM circulator pump, r/p single speed motor for space and hot water heating in commercial applications.	$66.31	15	$100.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	HVAC - Maintenance - LCI	1-5 Ton Unit	No	N/A	Maintenance services applicable to C&I customers for documented tune-ups of packaged and split systems up to 20 Tons (following PA TRM guidelines.)	$437.79	3	$300.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Furnace Fan (Retrofit or New to ECM) - LCI	1 Unit	No	N/A	PA TRM	$395.48	5	$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls (Daylight & Occupancy) - LCI	1 unit controller	No	N/A	Non-networked lighting controls including, but not limited to: daylight On/Off, dimming, occupancy sensors (wall plate, remote & fixture mounted), time clocks and switching controls.	$52.67	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Control (Network) - LCI	Per sq-ft of building lighting controlled	No	N/A	New installation of a networked lighting control system by applying, but not limited to: occupancy sensors, photo sensors, and dimming controls where the system must dim or turn off individual fixtures based on local occupancy and/or light levels. The control system must include luminaire-level lighting control (LLLC) that can switch lights on and off based on occupancy and is capable of full-range dimming based on local light levels.	$0.68	8	$0.60 Per Watt Controlled
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Linear - LCI	1- 4 lamp trougher	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$206.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Exit Sign - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$68.67	15	$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture External - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$412.44	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture Internal - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$466.23	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Lamp Mogul Base - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$430.37	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Street & Area Lighting (Customer Owned) - LCI	1 Unit	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$197.25	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Reach in Refrig / Frzer Light - LCI	1 Door	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$58.68	8	$0.20 per kWh and/or $550 per kW saved

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	Reach in Refrig / Frzer Occupancy Sensor - LCI	1 Unit	No	N/A	PA TRM	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Other - LCI	1 Project	No	N/A	ENERGY STAR, Design Lights Consortium (DLC) listed or PA TRM	$39,799.72	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting - Custom - LCI	1 Project	No	N/A	Installation of lighting equipment to a higher efficiency than existing or designed meeting program requirements. Requires pre-approval by the program.	$198,998.58	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Linear Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$30.53	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	High/Low Bay Lamp - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$243.80	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	LED Fixture - MS - LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamps and fixtures. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$122.11	14	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Lighting Controls - MS-LCI	1- Unit	No	N/A	Midstream delivery of maintenance replacement lamp and fixture controls. Must meet ENERGY STAR or DLC, as applicable, or PA TRM.	$52.67	8	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	1- Unit	No	N/A	Purchase and installation of a no-heat/low-heat clear glass door with heat reflective treated glass, gas filled, or both installed on an upright display case, or PA TRM.	$504.02	12	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	ECM Evap Fan Motor - LCI	1 Unit	No	N/A	Purchase and installation of a ECM motor to replace a permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$353.45	15	$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Evap Fan Controls - LCI	1 Unit	No	N/A	Purchase and installation of ON/OFF controls or multispeed controls for an uncontrolled ECM or permanent split capacitor or shaded pole motor in a commercial refrigeration unit.	$766.60	15	$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial refrigerator meeting ENERGY STAR, PA TRM, or program requirements.	$682.94	12	$200.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - Reach In - LCI	1-100CF Unit	No	N/A	Purchase and installation of a new high efficiency packaged commercial freezer meeting ENERGY STAR, PA TRM, or program requirements.	$453.12	12	$200.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerated Case Cover - LCI	Per LF of Case	No	N/A	Purchase and installation of night covers on existing open type refrigerated display cases, or PA TRM.	$79.31	9	$22.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Anti Sweat Heater Control - LCI	1-unit	No	N/A	Installation of door heater controls on commercial glass door refrigerators, coolers or freezers utilizing either ON/OFF or micro pulse controls in place of no controls.	$1,119.27	12	$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Strip Curtain - LCI	Per SF	No	N/A	Purchase and installation of strip curtains applied to walk in cooler or freezer doors; curtains must be at least 0.06" thick. Low temp strip curtains must be used on low temp applications, or PA TRM.	$10.02	4	$7.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Ice Machine - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$381.47	10	$590 0-500 lbs $980 501-1000 lbs $1100 over 1000 lbs
C&I Energy Solutions Program - Large	Prescriptive - LCI	Beverage Vending Machine - Controls - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$234.30	5	$125.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Steam Cooker - LCI	1- unit	No	N/A	ENERGY STAR or PA TRM	$2,537.60	12	$150/pan
C&I Energy Solutions Program - Large	Prescriptive - LCI	Fryer - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,903.20	12	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Griddle - LCI	1-Unit	No	N/A	ENERGY STAR or PA TRM	$1,289.28	12	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Hot Food Holding Cabinet - LCI	1-15 CU. FT. unit	No	N/A	ENERGY STAR or PA TRM	$549.55	12	$500 - full size $375 - 3/4 size $225 - 1/2 size
C&I Energy Solutions Program - Large	Prescriptive - LCI	Combination Oven - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,898.69	12	$1,500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Convection Oven - LCI	1-full size unit	No	N/A	ENERGY STAR or PA TRM	$1,118.48	12	$500.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dishwasher - LCI	1-unit	No	N/A	ENERGY STAR or PA TRM	$1,539.87	10	$500.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	Induction Cooktop - LCI	1-Two well unit	No	N/A	ENERGY STAR or PA TRM	$573.73	10	$25.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Pre-Rinse Sprayer - LCI	1-unit	No	N/A	Purchase and installation of a new sprayer replacing an existing unit that use 1.6 GPM or less, on/off squeeze lever, and cleanability of performance of at least 26 seconds, or PA TRM Electric water heating only.	$112.90	8	$175.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	5	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$60.00	6	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Room Air Conditioner Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	3	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifiers Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	4	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	LV Refrigerator Recycling - LCI	1 Unit	No	N/A	An existing working unit generally older than 10 years.	$30.00	5	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Cooler Recycling - LCI	1 Unit	No	N/A	PA TRM	$30.00	5	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	EV Charging Cord - Level 2 - LCI	1 Unit	No	N/A	ENERGY STAR or MA TRM	$143.00	10	$150.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Washer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$35.72	14	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Clothes Dryer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$206.34	14	$100.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Refrigerator - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	14	$100.00

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Prescriptive - LCI	Water Heater - Heat Pump - LCI	1-50 gal unit	No	N/A	ENERGY STAR or PA TRM	$1,684.76	10	$1,000.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Freezer - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	11	$75.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Dehumidifier - LCI	1 Unit	No	N/A	ENERGY STAR or PA TRM	$0.00	12	$50.00
C&I Energy Solutions Program - Large	Prescriptive - LCI	Uninterruptible Power Supply (UPS) - LCI	1 - 5kVA Unit	No	N/A	ENERGY STAR or PA TRM	$46.80	7	$200.00
C&I Energy Solutions Program - Large	Custom - LCI	Custom - LCI	1 Project	No	N/A	Replacement or retrofit of existing equipment or process changes or enhancements that result in the more efficient use of electrical energy.	$47,090.03	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Compressed Air - LCI	1 Project	No	N/A	New installation, replacement or retrofit of air-compressor systems, including but not limited to: new compressors, air dryers, or increased storage capacity. Other efficiency measures such as leak repair, controls, high efficiency nozzles, piping enhancements, and no loss drains are also eligible.	$91,959.50	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Refrigeration - LCI	1 Project	No	N/A	New or retrofit of refrigeration measures on commercial walk-in refrigerators and coolers, including, but not limited to high efficiency fan motors, evaporator fan controllers, floating head pressure controls, evaporator coil defrost controls and variable speed compressor motors.	$40,520.02	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Solar - LCI	1 kW DC Installed Capacity	No	N/A	PA TRM	$1,928.12	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - CHP - LCI	1 Project	No	N/A	Program Specification. (Normally these fall under custom. Can we put see Custom_	$4,529,325.97	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Bldg Improvements - LCI	1 Project	No	N/A	Retrofit of existing building shell, electrical & electric mechanical retrofits to greater efficiency components and processes, including but not limited to: wall and ceiling insulation, windows, reduction of conditioned CF w/ SF of floor space remaining the same, reduction in window size w/ improved R value, installation of building energy management systems. Including a focus on the adjustment, maintenance and improvement of building systems to achieve maximum operating efficiency	$149,387.80	15	$0.20 per kWh and/or $550 per kW saved and/or Up to 80% of the project cost
C&I Energy Solutions Program - Large	Custom - LCI	Custom - New Construction - LCI	1 Project	No	N/A	Implementation of design principles to reduce building electric consumption using current ASHRAE 90.1 or IECC baselines, as applicable.	$29,997.08	15	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Custom - LCI	Custom - Audit & Education - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,225.00	1	$1,500.00
C&I Energy Solutions Program - Large	Energy Management - LCI	Virtual/Meter Data Commissioning - LCI	1 Project	No	N/A	Virtual assessment and engagement of energy usage performance using meter data, remote analytics and building modeling to determine and report energy saving strategies and opportunities for setting, upgrading and/or replacement of building operations, systems and equipment. Pre and post enrollment meter usage data may be used to further evaluate building energy savings.	$1,172.74	2	$0.20 per kWh and/or $550 per kW saved

Program	Program Component	Measure	Unit	Low-Income Measure (Yes/No) [1]	Comprehensive Measure (Yes/No) [2,3]	Eligibility Requirements[4]	Incremental Cost ($/unit)	Estimated Useful Life	Incentive Amount or Incentive Range ($/unit)[5]
C&I Energy Solutions Program - Large	Energy Management - LCI	Retrocommissioning - LCI	1 Project	No	N/A	Adjusting electrical, electro-mechanical, mechanical and control system setpoints and schedules to improve system performance to existing building conditions and use, including the implementation of energy savings measures identified through systems monitoring and building operations training.	$58,637.21	3	$0.20 per kWh and/or $550 per kW saved
C&I Energy Solutions Program - Large	Energy Management - LCI	Building Operations Training - LCI	1 Unit	No	N/A	Obtain Building Operations Certification (BOC) by attending a certified training program or other training programs as related to the efficient design, operations and maintenance of buildings.	$6,000.00	13	Up to 70% of the cost to attend qualified BOC training course and NTE $1000 per person.
C&I Energy Solutions Program - Large	Energy Management - LCI	Customer Concierge - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$3,500.00	1	NA
C&I Energy Solutions Program - Large	Energy Management - LCI	Energy Consultation - LCI	1 Project	No	N/A	Consultative services, including but not limited to, Program Concierge, Energy Advisor, Benchmarking and Technical Services to engage, promote and support customer participation in programs.	$1,750.00	1	NA
C&I Energy Solutions Program - Large	Energy Management - LCI	Audits - LCI	1 Project	No	N/A	Comprehensive Energy Audit for commercial/industrial facilities or manufacturing processes recommending installation of efficient equipment, building shell/envelop improvements, manufacturing process changes, building operating changes, or other energy efficiency improvements. Audit must meet minimum audit requirements for buildings or for process equipment.	$1,750.00	1	$1,500.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Managed Charging	Company Assumption	No	N/A	Managed charging device (e.g., electric vehicle/charger) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$250.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Storage	-	No	N/A	Energy storage device (e.g., battery) meeting program technical, connectivity, control, functionality and participation or other program requirements.	$0.00	1	$1,000.00
C&I Energy Solutions Program - Large	DLS & DR - LCI	Custom DLS & DR - LCI	-	No	N/A	Active C&I customers with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements.	$0.00	1	$50,000.00
C&I Energy Solutions Program - Large	FTM-LCI	Front of Meter Measures - LCI	-	No	No	Purchase, installation, and implementaiton of equipment to improve the operation and efficiency of the Company's energy delivery system.	$0.00	-	$0.00

1 Indicate whether the measure counts towards the "proportionate number of measures" requirement.
2 Indicate whether the measure will be part of comprehensive measure reporting.
3 For Comprehensive Measures, see 'Table 8 Addendum' tab for a designation of measures by TRM number
4 Measure eligibility may change during the term of the plan to address market uncertainty and changes and or where supported by evaluation.
5 All values listed are "Up to Values". The Company may provide tiered, blocked, prescriptive, and/or performance-based incentives that are within the amounts listed based on varying measure characteristics, market conditions, or other factors.

TRM Measure Number

2.1.1
2.1.2
2.1.3
2.1.4
2.2.1
2.2.2
2.2.3
2.2.4
2.2.5
2.2.6
2.2.7
2.2.8
2.2.9
2.2.10
2.2.11
2.2.12
2.2.13
2.2.14
2.3.1
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2.3.3
2.3.4
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2.3.6
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2.4.11
2.4.12
2.4.13
2.4.14
2.5.1
2.6.1
2.6.2
2.6.3

2.6.4
2.6.5
2.7.1
2.7.2
2.7.3
2.8.1
2.8.2
2.8.3
2.9.1

TRM Name

Residential LED lighting
Residential Occupancy Sensors
LED and Electroluminescent Nightlights
Holiday Lights
High Efficiency Equipment: ASHP, CAC, GSHP, PTAC, PTHP
High Efficiency Equipment for midstream delivery: ASHP, CAC, PTAC, PTHP
High Efficiency Equipment: Ductless Heat Pumps with Midstream Delivery Option
ECM Circulation Fans
GSHP Desuperheaters
Air Conditioner & Heat Pump Maintenance
Room Air Conditioners
Room AC (RAC) Retirement
Window Heat Pump
Duct Sealing & Duct Insulation
Air Handler Filter Whistles
ENERGY STAR® Certified Connected Thermostats
Furnace Maintenance
ENERGY STAR Bathroom Exhaust Fan
Heat Pump Water Heaters
Solar Water Heaters
Water Heater Tank Wrap
Water Heater Temperature Setback
Water Heater Pipe Insulation
Low Flow Faucet Aerators
Low Flow Showerheads
Thermostatic Shower Restriction Valves
Drain Water Heat Recovery Units
Smart Water Heater Controller
ENERGY STAR Refrigerators
ENERGY STAR Freezers
Refrigerator / Freezer Recycling with and without Replacement
Low-Capacity Refrigerator / Freezer Recycling Without Replacement
ENERGY STAR Coolers
Cooler Recycling with and without replacement
Residential Induction Cooktops
ENERGY STAR Clothes Washers
ENERGY STAR Clothes Dryers
ENERGY STAR Dishwashers
ENERGY STAR Dehumidifiers
Dehumidifier Retirement
ENERGY STAR Ceiling Fans
ENERGY STAR Air Purifiers
Advanced Power Strips
Residential Air Sealing
Weather Stripping, Caulking, and Outlet Gaskets
Ceiling/Attic, Wall, Floor and Rim Joist Insulation

Basement or Crawl Space Wall Insulation
ENERGY STAR Windows
Residential New Construction
ENERGY STAR Manufactured Homes
Home Energy Reports
ENERGY STAR Pool Pumps
Variable Speed Pool Pumps
Photovoltaic (PV) Solar Generation
Direct Load Control and Behavior-Based Demand Response Programs

Comprehensive?	Notes
No	
No	
No	
No	
Yes	
Yes	For reporting, ideally, EDCs will be able to link to an address so t
Yes	For reporting, ideally, EDCs will be able to link to an address so t
No	
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Yes, if paired with other comprehensive	
Yes, if paired with other comprehensive	
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No	
Yes, if paired with other comprehensive	
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Yes, if paired with other comprehensive	
Yes, if paired with other comprehensive	
Yes, if paired with other comprehensive	
Yes, if paired with other comprehensive	
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Yes	
No	
Yes	

Background and General Instructions

As described in Section A.4.c of the 2025 Implementation
installation of comprehensive, longer-lived, deeper-saving
agreed that requiring enhanced tracking and reporting on t
different measures and program offerings perform in Phase
to work with the SWE to develop reporting requirements fo
Phase V.

This tab includes the Commission's designation of measur
8) and Phase V EDC Annual Reports. Note that some appli
comprehensive measures

The Commission will provide further guidance for reporting
residential). This will include reporting on projects that incl
that receive multiple comprehensive measures across mul

Yes
Yes
Yes
Yes
No
No
No
Yes, if paired with other comprehensive
No

Order (Phase V), the Commission recognized the keen stakeholder interest in the
s measures through the EDCs' comprehensive programs. The Commission
his topic will provide valuable information to understand better how these
e V. Therefore, the Commission directed the Bureau of Technical Utility Services
r comprehensive program offerings for the EDCs comprehensive programs in

res as "Comprehensive" for reporting purposes in the EE&C Plan Template (Table
ance measures can be considered comprehensive if they are installed with other

g on Comprehensive projects (market rate residential and low-income
lude multiple comprehensive measures at the same premise, including premises
ltipe program years in Phase V

Table 9: Estimated Savings and Participation

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Freezer Recycling	*2.4.3*	Energy Savings (MWh) [2]	1,514.51	1,514.51	1,514.51	1,514.51	1,514.51	**7,572.56**
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.92**
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	**0.66**
		Projected Participation [3]	2,000	2,000	2,000	2,000	2,000	**10,000**
Refrigerator Recycling	*2.4.3*	Energy Savings (MWh)	3,786.81	3,786.81	3,786.81	3,786.81	3,786.81	**18,934.06**
		Summer Demand Reduction (MW)	0.56	0.56	0.56	0.56	0.56	**2.81**
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	**2.10**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
Room Air Conditioner Recycling	*2.2.8*	Energy Savings (MWh)	765.21	765.21	765.21	765.21	765.21	**3,826.04**
		Summer Demand Reduction (MW)	2.08	2.08	2.08	2.08	2.08	**10.40**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7,250	7,250	7,250	7,250	7,250	**36,250**
Dehumidifier Recycling	*2.4.12*	Energy Savings (MWh)	3,561.93	3,561.93	3,561.93	3,561.93	3,561.93	**17,809.63**
		Summer Demand Reduction (MW)	1.38	1.38	1.38	1.38	1.38	**6.88**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7,250	7,250	7,250	7,250	7,250	**36,250**
LV Refrigerator Recycling	*2.4.4*	Energy Savings (MWh)	78.45	78.45	78.45	78.45	78.45	**392.25**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	200	200	200	200	200	**1,000**
Cooler Recycling	*2.4.6*	Energy Savings (MWh)	5.20	5.20	5.20	5.20	5.20	**26.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Clothes Washer	*2.4.8*	Energy Savings (MWh)	195.55	195.55	195.55	195.55	195.55	**977.76**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	1,750	1,750	1,750	1,750	1,750	**8,750**
Refrigerator - PY18 to PY20	*2.4.1*	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	**112.72**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	500	500	500	0	0	**1,500**
Refrigerator - PY21 & PY22	*2.4.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	**0.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Freezer - PY18 to PY20	*2.4.2*	Energy Savings (MWh)	2.03	2.03	2.03	0.00	0.00	**6.09**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	0	0	**150**
Freezer - PY21 & PY22	*2.4.2*	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	**0.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Clothes Dryer - PY18 & PY19	*2.4.9*	Energy Savings (MWh)	37.18	37.18	0.00	0.00	0.00	**74.36**
		Summer Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.01	0.01	0.00	0.00	0.00	**0.01**
		Projected Participation	500	500	0	0	0	**1,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Clothes Dryer - PY20 to PY22	*2.4.9*	Energy Savings (MWh)	0.00	0.00	16.68	16.68	16.68	**50.03**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	0	0	500	500	500	**1,500**
Air Purifier / Cleaner	*2.4.14*	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	**1,287.05**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.21**
		Projected Participation	1,500	1,500	1,500	1,500	1,500	**7,500**
Room Air Conditioner	*2.2.7*	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	**216.48**
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,300	3,300	3,300	3,300	3,300	**16,500**
Dehumidifier	*2.4.11*	Energy Savings (MWh)	73.93	73.93	73.93	73.93	73.93	**369.66**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	500	500	500	500	500	**2,500**
Heat Pump Water Heater - PY18 to PY20	*2.3.1*	Energy Savings (MWh)	9,310.57	9,310.57	9,310.57	0.00	0.00	**27,931.70**
		Summer Demand Reduction (MW)	1.08	1.08	1.08	0.00	0.00	**3.23**
		Winter Demand Reduction (MW)	1.79	1.79	1.79	0.00	0.00	**5.38**
		Projected Participation	4,750	4,750	4,750	0	0	**14,250**
Heat Pump Water Heater - PY21 & PY22	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	11.55	11.55	**23.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	50	50	**100**
Pool Pump Variable Speed	*2.8.1 & 2.8.2*	Energy Savings (MWh)	5.50	5.50	5.50	5.50	5.50	**27.48**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Dishwasher	*2.4.10*	Energy Savings (MWh)	98.34	98.34	98.34	98.34	98.34	**491.69**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	2,000	2,000	2,000	2,000	2,000	**10,000**
EV Charging Cord - Level 2 - Res	*MA TRM V11*	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	**0.55**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Smart Thermostat - AplncsS	*2.2.12*	Energy Savings (MWh)	1,686.00	1,686.00	1,686.00	1,686.00	1,686.00	**8,430.00**
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	**1.69**
		Winter Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	**0.71**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**
Cooler	*2.4.5*	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	**0.23**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Clothes Washer/Dryer Combo	*2.4.8 & 2.4.9*	Energy Savings (MWh)	21.76	21.76	21.76	21.76	21.76	**108.82**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	150	150	150	150	150	**750**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
LED Linear	*2.1.1*	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	**506.58**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
LED Nightlights (Mrktplace)	*2.1.3*	Energy Savings (MWh)	107.14	107.14	107.14	107.14	107.14	**535.71**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7,500	7,500	7,500	7,500	7,500	**37,500**
Holiday Lights (Mrktplace)	*2.1.4*	Energy Savings (MWh)	132.00	132.00	132.00	132.00	132.00	**660.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10,000	10,000	10,000	10,000	10,000	**50,000**
Smart Strip Plug Outlet	*2.5.1*	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	**1,559.26**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.20**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.25**
		Projected Participation	2,750	2,750	2,750	2,750	2,750	**13,750**
Residential Occupancy Sensor	*2.1.2*	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	**101.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
LED Linear (Mrktplace)	*2.1.1*	Energy Savings (MWh)	101.32	101.32	101.32	101.32	101.32	**506.58**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
Agricultural Process Lighting	*3.1.7*	Energy Savings (MWh)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Auto Milker Takeoff	*4.1.1*	Energy Savings (MWh)	1.94	1.94	1.94	1.94	1.94	**9.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dairy Scroll Compressor	*4.1.2*	Energy Savings (MWh)	0.80	0.80	0.80	0.80	0.80	**3.99**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
HE Ventilation Fans	*4.1.3*	Energy Savings (MWh)	3.28	3.28	3.28	3.28	3.28	**16.39**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Heat Reclaimer	*4.1.4*	Energy Savings (MWh)	5.06	5.06	5.06	5.06	5.06	**25.28**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
High Volume Low Speed Fan	*4.1.5*	Energy Savings (MWh)	43.00	43.00	43.00	43.00	43.00	**215.00**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Livestock Waterer	*4.1.6*	Energy Savings (MWh)	1.00	1.00	1.00	1.00	1.00	**5.02**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dairy Vac Pump VSD Control	*4.1.7*	Energy Savings (MWh)	10.08	10.08	10.08	10.08	10.08	**50.38**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1	1	1	1	1	**5**
Low Pressure Irrigation	*4.1.8*	Energy Savings (MWh)	12.98	12.98	12.98	12.98	12.98	**64.92**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Custom - Agricultural	*1.17*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Projected Participation	1	1	1	1	1	**5**
Engine Block Heater Timer	*3.11.2*	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	**3.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Heat Pump - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	141.64	141.64	141.64	141.64	141.64	**708.19**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	250	250	250	250	250	**1,250**
Heat Pump - Most Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	36.68	36.68	36.68	36.68	36.68	**183.39**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	25	25	25	25	25	**125**
Central Air Conditioner - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	88.91	88.91	88.91	88.91	88.91	**444.55**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	300	300	300	300	300	**1,500**
Central Air Conditioner - Most Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	5.96	5.96	5.96	5.96	5.96	**29.78**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Ductless Mini-Split Heat Pump	*2.2.1 & 2.2.2*	Energy Savings (MWh)	127.82	127.82	127.82	127.82	127.82	**639.09**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	125	125	125	125	125	**625**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
PTAC	*2.2.1 & 2.2.2*	Energy Savings (MWh)	8.67	8.67	8.67	8.67	8.67	**43.34**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
PTHP	*2.2.1 & 2.2.2*	Energy Savings (MWh)	17.62	17.62	17.62	17.62	17.62	**88.10**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	80	80	80	80	80	**400**
Heat Pump - Water & GeoT	*2.2.1 & 2.2.2*	Energy Savings (MWh)	83.39	83.39	83.39	83.39	83.39	**416.93**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	55	55	55	55	55	**275**
Furnace Fan (Retrofit or New to ECM)	*2.2.4*	Energy Savings (MWh)	4.89	4.89	4.89	4.89	4.89	**24.44**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	25	25	25	25	25	**125**
Smart Thermostat - HVAC	*2.2.12*	Energy Savings (MWh)	7.94	7.94	7.94	7.94	7.94	**39.71**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	25	25	25	25	25	**125**
AC or HP Maintenance	*2.2.6*	Energy Savings (MWh)	101.99	101.99	101.99	101.99	101.99	**509.96**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	800	800	800	800	800	**4,000**
HE Bathroom Fans	*2.2.14*	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	**0.60**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Window Heat Pump	*2.2.9*	Energy Savings (MWh)	39.94	39.94	39.94	39.94	39.94	**199.69**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Projected Participation	100	100	100	100	100	**500**
REH to Heat Pump	*2.2.1 & 2.2.2*	Energy Savings (MWh)	3,214.59	3,214.59	3,214.59	3,214.59	3,214.59	**16,072.94**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.33**
		Winter Demand Reduction (MW)	1.09	1.09	1.09	1.09	1.09	**5.43**
		Projected Participation	450	450	450	450	450	**2,250**
REH to DMS Heat Pump	*2.2.1 & 2.2.2*	Energy Savings (MWh)	2,367.20	2,367.20	2,367.20	2,367.20	2,367.20	**11,835.98**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.26**
		Winter Demand Reduction (MW)	0.92	0.92	0.92	0.92	0.92	**4.58**
		Projected Participation	600	600	600	600	600	**3,000**
REH to PTHP	*2.2.1 & 2.2.2*	Energy Savings (MWh)	89.89	89.89	89.89	89.89	89.89	**449.47**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	25	25	25	25	25	**125**
Solar	*2.8.3*	Energy Savings (MWh)	10,107.92	10,107.92	10,107.92	10,107.92	10,107.92	**50,539.60**
		Summer Demand Reduction (MW)	2.62	2.62	2.62	2.62	2.62	**13.08**
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	**1.74**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Comprehensive Audit	*Actuals & 2.6*	Energy Savings (MWh)	570.03	570.03	570.03	570.03	570.03	**2,850.13**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.89**
		Projected Participation	400	400	400	400	400	**2,000**
Comp Audit - Solar	*2.8.3*	Energy Savings (MWh)	25.27	25.27	25.27	25.27	25.27	**126.35**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
Comp Audit - Heat Pump - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	56.66	56.66	56.66	56.66	56.66	**283.28**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	100	100	100	100	100	**500**
Comp Audit - CAC - Eff	*2.2.1 & 2.2.2*	Energy Savings (MWh)	29.64	29.64	29.64	29.64	29.64	**148.18**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	100	100	100	100	100	**500**
Comp Audit - HPWH	*2.3.1*	Energy Savings (MWh)	23.10	23.10	23.10	23.10	23.10	**115.50**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	100	100	100	100	100	**500**
MF - Tenant - DI - Res	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	23.34	23.34	23.34	23.34	23.34	**116.72**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	200	200	200	200	200	**1,000**
MF - Common - DI - Res	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	95.20	95.20	95.20	95.20	95.20	**476.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Projected Participation	8	8	8	8	8	**40**
MF - Tenant - Prescriptive - Res	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Prescriptive - Res	*2.4.8*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Tenant - Custom - Res	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Custom - Res	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Behavioral Ph5 Yr 1	*CSP & 2.7.3*	Energy Savings (MWh)	11,454.13	0.00	0.00	0.00	0.00	**11,454.13**
		Summer Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	**2.33**
		Winter Demand Reduction (MW)	2.33	0.00	0.00	0.00	0.00	**2.33**
		Projected Participation	368,300	0	0	0	0	**368,300**
Behavioral Ph5 Yr 2	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	23,522.19	0.00	0.00	0.00	**23,522.19**
		Summer Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	**4.31**
		Winter Demand Reduction (MW)	0.00	4.31	0.00	0.00	0.00	**4.31**
		Projected Participation	0	426,900	0	0	0	**426,900**
Behavioral Ph5 Yr 3	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	15,485.94	0.00	0.00	**15,485.94**
		Summer Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	**3.42**
		Winter Demand Reduction (MW)	0.00	0.00	3.42	0.00	0.00	**3.42**
		Projected Participation	0	0	341,100	0	0	**341,100**
Behavioral Ph5 Yr 4	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	22,625.28	0.00	**22,625.28**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	**3.58**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	3.58	0.00	**3.58**
		Projected Participation	0	0	0	392,800	0	**392,800**
Behavioral Ph5 Yr 5	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	17,760.60	**17,760.60**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.92	**1.92**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	1.92	**1.92**
		Projected Participation	0	0	0	0	379,500	**379,500**
On-Line Audit	*CSP & 2.7.3*	Energy Savings (MWh)	360.00	360.00	360.00	360.00	360.00	**1,800.00**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Projected Participation	2,400	2,400	2,400	2,400	2,400	**12,000**
NC -Townhouse and duplex units	*2.7.1*	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	**923.03**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.19**
		Projected Participation	120	120	120	120	120	**600**
NC - Two-on-Two condominium units	*2.7.1*	Energy Savings (MWh)	184.61	184.61	184.61	184.61	184.61	**923.03**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.19**
		Projected Participation	120	120	120	120	120	**600**
NC - Single-family detached units	*2.7.1*	Energy Savings (MWh)	2,840.09	2,840.09	2,840.09	2,840.09	2,840.09	**14,200.43**
		Summer Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	**1.83**
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	**2.86**
		Projected Participation	1,200	1,200	1,200	1,200	1,200	**6,000**
NC - Multi Family Low Rise	*2.7.1*	Energy Savings (MWh)	397.61	397.61	397.61	397.61	397.61	**1,988.06**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.26**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Projected Participation	280	280	280	280	280	**1,400**
NC - Manufactured Housing	*2.7.1*	Energy Savings (MWh)	304.84	304.84	304.84	304.84	304.84	**1,524.18**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.20**
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.31**
		Projected Participation	184	184	184	184	184	**920**
NC - Multi Family High Rise	*2.7.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Behavioral DLS & DR	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	**35.79**
		Winter Demand Reduction (MW)	7.16	7.16	7.16	7.16	7.16	**35.79**
		Projected Participation	600,000	600,000	600,000	600,000	600,000	**3,000,000**
Managed Charging	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	**3.34**
		Winter Demand Reduction (MW)	0.49	0.55	0.66	0.77	0.88	**3.34**
		Projected Participation	2,250	2,500	3,000	3,500	4,000	**15,250**
Storage	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.03	1.16	1.29	1.41	1.54	**6.43**
		Winter Demand Reduction (MW)	2.06	2.31	2.57	2.83	3.09	**12.86**
		Projected Participation	400	450	500	550	600	**2,500**
Thermostat DR	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.69	1.75	1.93	2.17	2.41	**9.93**
		Winter Demand Reduction (MW)	2.91	3.02	3.33	3.74	4.16	**17.16**
		Projected Participation	7,000	7,250	8,000	9,000	10,000	**41,250**
Thermostat DLS-Summer	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.99	2.08	2.25	2.42	2.51	**11.24**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	11,500	12,000	13,000	14,000	14,500	**65,000**
Thermostat DLS-Winter	*CSP & 2.9.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	5.22	5.80	6.38	6.67	6.96	**31.03**
		Projected Participation	9,000	10,000	11,000	11,500	12,000	**53,500**
Front of Meter Measures - Res	*1.17*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Customer Engagement - LI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	837.95	837.95	837.95	837.95	837.95	**4,189.77**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.54**
		Winter Demand Reduction (MW)	0.13	0.13	0.13	0.13	0.13	**0.67**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**
LIURP Lookback - LI	*2.2.1 & 2.2.2*	Energy Savings (MWh)	359.57	359.57	359.57	359.57	359.57	**1,797.87**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.57**
		Projected Participation	100	100	100	100	100	**500**
WARM Plus	*Res Vol 2*	Energy Savings (MWh)	1,871.37	1,871.37	1,871.37	1,871.37	1,871.37	**9,356.86**
		Summer Demand Reduction (MW)	0.20	0.20	0.20	0.20	0.20	**1.00**
		Winter Demand Reduction (MW)	0.37	0.37	0.37	0.37	0.37	**1.84**
		Projected Participation	1,500	1,500	1,500	1,500	1,500	**7,500**
WARM Extra Measures	*Res Vol 2*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.55**
		Winter Demand Reduction (MW)	0.22	0.22	0.22	0.22	0.22	**1.09**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Freezer Recycling - LI	*2.4.3*	Energy Savings (MWh)	302.90	302.90	302.90	302.90	302.90	**1,514.51**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Projected Participation	400	400	400	400	400	**2,000**
Refrigerator Recycling - LI	*2.4.3*	Energy Savings (MWh)	757.36	757.36	757.36	757.36	757.36	**3,786.81**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.56**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.42**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Room Air Conditioner Recycling - LI	*2.2.8*	Energy Savings (MWh)	395.80	395.80	395.80	395.80	395.80	**1,978.99**
		Summer Demand Reduction (MW)	1.08	1.08	1.08	1.08	1.08	**5.38**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,750	3,750	3,750	3,750	3,750	**18,750**
Dehumidifier Recycling - LI	*2.4.12*	Energy Savings (MWh)	1,842.38	1,842.38	1,842.38	1,842.38	1,842.38	**9,211.88**
		Summer Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	**3.56**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,750	3,750	3,750	3,750	3,750	**18,750**
LV Refrigerator Recycling - LI	*2.4.4*	Energy Savings (MWh)	11.77	11.77	11.77	11.77	11.77	**58.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	30	30	30	30	30	**150**
Cooler Recycling - LI	*2.4.6*	Energy Savings (MWh)	1.04	1.04	1.04	1.04	1.04	**5.20**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Clothes Washer - LI	*2.4.8*	Energy Savings (MWh)	335.23	335.23	335.23	335.23	335.23	**1,676.16**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.27**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.27**
		Projected Participation	3,000	3,000	3,000	3,000	3,000	**15,000**
Refrigerator - PY18 to PY20 - LI	*2.4.1*	Energy Savings (MWh)	37.57	37.57	37.57	0.00	0.00	**112.72**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	500	500	500	0	0	**1,500**
Refrigerator - PY21 & PY22 - LI	*2.4.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.04	0.04	**0.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Freezer - PY18 to PY20 - LI	*2.4.2*	Energy Savings (MWh)	10.15	10.15	10.15	0.00	0.00	**30.45**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	250	250	250	0	0	**750**
Freezer - PY21 & PY22 - LI	*2.4.2*	Energy Savings (MWh)	0.00	0.00	0.00	0.05	0.05	**0.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Clothes Dryer - PY18 & PY19 - LI	*2.4.9*	Energy Savings (MWh)	111.55	111.55	111.55	0.00	0.00	**334.64**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	**0.05**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.00	0.00	**0.05**
		Projected Participation	1,500	1,500	1,500	0	0	**4,500**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Clothes Dryer - PY20 to PY22 - LI	*2.4.9*	Energy Savings (MWh)	0.00	0.00	0.00	0.17	0.17	**0.33**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	5	5	**10**
Air Purifier / Cleaner - LI	*2.4.14*	Energy Savings (MWh)	257.41	257.41	257.41	257.41	257.41	**1,287.05**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.21**
		Projected Participation	1,500	1,500	1,500	1,500	1,500	**7,500**
Room Air Conditioner - LI	*2.2.7*	Energy Savings (MWh)	43.30	43.30	43.30	43.30	43.30	**216.48**
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.40**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,300	3,300	3,300	3,300	3,300	**16,500**
Dehumidifier - LI	*2.4.11*	Energy Savings (MWh)	8.87	8.87	8.87	8.87	8.87	**44.36**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	60	60	60	60	60	**300**
Dishwasher - LI	*2.4.10*	Energy Savings (MWh)	49.17	49.17	49.17	49.17	49.17	**245.85**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Clothes Washer/Dryer Combo - LI	*2.4.8 & 2.4.9*	Energy Savings (MWh)	145.09	145.09	145.09	145.09	145.09	**725.47**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
LED Linear - LI	*2.1.1*	Energy Savings (MWh)	121.58	121.58	121.58	121.58	121.58	**607.90**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Projected Participation	6,000	6,000	6,000	6,000	6,000	**30,000**
LED Nightlights (Mrktplace) - LI	*2.1.3*	Energy Savings (MWh)	42.86	42.86	42.86	42.86	42.86	**214.29**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3,000	3,000	3,000	3,000	3,000	**15,000**
Holiday Lights (Mrktplace) - LI	*2.1.4*	Energy Savings (MWh)	66.00	66.00	66.00	66.00	66.00	**330.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**
Smart Strip Plug Outlet - LI	*2.5.1*	Energy Savings (MWh)	311.85	311.85	311.85	311.85	311.85	**1,559.26**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.20**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.25**
		Projected Participation	2,750	2,750	2,750	2,750	2,750	**13,750**
Residential Occupancy Sensor - LI	*2.1.2*	Energy Savings (MWh)	20.32	20.32	20.32	20.32	20.32	**101.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
LED Linear (Mrktplace) - LI	*2.1.1*	Energy Savings (MWh)	121.58	121.58	121.58	121.58	121.58	**607.90**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Projected Participation	6,000	6,000	6,000	6,000	6,000	**30,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Heat Pump - HEAR	*2.2.1 & 2.2.2*	Energy Savings (MWh)	2.83	2.83	2.83	2.83	2.83	**14.16**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Heat Pump Water Heater - PY18 to PY20 - HEAR	*2.3.1*	Energy Savings (MWh)	9.80	9.80	9.80	0.00	0.00	**29.40**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	0	0	**15**
Heat Pump Water Heater - PY21 & PY22 - HEAR	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.23	0.23	**0.46**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	1	1	**2**
Audit / Technical Scoping Studies	*0*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Behavioral Ph5 Yr 1 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	2,872.00	0.00	0.00	0.00	0.00	**2,872.00**
		Summer Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	**0.37**
		Winter Demand Reduction (MW)	0.37	0.00	0.00	0.00	0.00	**0.37**
		Projected Participation	43,800	0	0	0	0	**43,800**
Behavioral Ph5 Yr 2 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	4,062.00	0.00	0.00	0.00	**4,062.00**
		Summer Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	**0.45**
		Winter Demand Reduction (MW)	0.00	0.45	0.00	0.00	0.00	**0.45**
		Projected Participation	0	43,300	0	0	0	**43,300**
Behavioral Ph5 Yr 3 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	3,653.00	0.00	0.00	**3,653.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	**0.48**
		Winter Demand Reduction (MW)	0.00	0.00	0.48	0.00	0.00	**0.48**
		Projected Participation	0	0	49,800	0	0	**49,800**
Behavioral Ph5 Yr 4 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	2,536.00	0.00	**2,536.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	**0.34**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.34	0.00	**0.34**
		Projected Participation	0	0	0	48,900	0	**48,900**
Behavioral Ph5 Yr 5 - LI	*CSP & 2.7.3*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	2,098.00	**2,098.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.10	**0.10**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.10	**0.10**
		Projected Participation	0	0	0	0	36,000	**36,000**
On-Line Audit - LI	*CSP & 2.7.3*	Energy Savings (MWh)	120.00	120.00	120.00	120.00	120.00	**600.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	800	800	800	800	800	**4,000**
NC -Townhouse and duplex units - LI	*2.7.1*	Energy Savings (MWh)	7.69	7.69	7.69	7.69	7.69	**38.46**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
NC - Two-on-Two condominium units - LI	*2.7.1*	Energy Savings (MWh)	4.62	4.62	4.62	4.62	4.62	**23.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**15**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
NC - Single-family detached units - LI	*2.7.1*	Energy Savings (MWh)	4.73	4.73	4.73	4.73	4.73	**23.67**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
NC - Multi Family Low Rise - LI	*2.7.1*	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	**71.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
NC - Manufactured Housing - LI	*2.7.1*	Energy Savings (MWh)	49.70	49.70	49.70	49.70	49.70	**248.51**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Projected Participation	30	30	30	30	30	**150**
NC - Multi Family High Rise - LI	*2.7.1*	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	**7.10**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - DI - Res - LI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	496.05	496.05	496.05	496.05	496.05	**2,480.27**
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.30**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.39**
		Projected Participation	4,250	4,250	4,250	4,250	4,250	**21,250**
MF - Common - DI - Res - LI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	1,309.00	1,309.00	1,309.00	1,309.00	1,309.00	**6,545.00**
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.88**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.91**
		Projected Participation	110	110	110	110	110	**550**
MF - Tenant - Prescriptive - Res - LI	*2.3.1*	Energy Savings (MWh)	25.41	25.41	25.41	25.41	25.41	**127.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	110	110	110	110	110	**550**
MF - Common - Prescriptive - Res - LI	*2.4.8*	Energy Savings (MWh)	12.29	12.29	12.29	12.29	12.29	**61.46**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	110	110	110	110	110	**550**
MF - Tenant - Custom - Res - LI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Custom - Res - LI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Tenant - DI - SCI - LI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	601.10	601.10	601.10	601.10	601.10	**3,005.50**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.36**
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.46**
		Projected Participation	5,150	5,150	5,150	5,150	5,150	**25,750**
MF - Common - DI - SCI - LI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	2,499.00	2,499.00	2,499.00	2,499.00	2,499.00	**12,495.00**
		Summer Demand Reduction (MW)	0.33	0.33	0.33	0.33	0.33	**1.64**
		Winter Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	**1.71**
		Projected Participation	210	210	210	210	210	**1,050**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
MF - Tenant - Prescriptive - SCI - LI	*2.3.1*	Energy Savings (MWh)	80.85	80.85	80.85	80.85	80.85	**404.25**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Projected Participation	350	350	350	350	350	**1,750**
MF - Common - Prescriptive - SCI - LI	*2.4.8*	Energy Savings (MWh)	39.11	39.11	39.11	39.11	39.11	**195.55**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	350	350	350	350	350	**1,750**
MF - Tenant - Custom - SCI - LI	*1.17 & 3.10*	Energy Savings (MWh)	200.00	200.00	200.00	200.00	200.00	**1,000.00**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	2	2	2	2	2	**10**
MF - Common - Custom - SCI - LI	*1.17 & 3.10*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - DI - SCI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	11.67	11.67	11.67	11.67	11.67	**58.36**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	100	100	100	100	100	**500**
MF - Common - DI - SCI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	23.80	23.80	23.80	23.80	23.80	**119.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	2	2	2	2	2	**10**
MF - Tenant - Prescriptive - SCI	*2.3.1*	Energy Savings (MWh)	0.23	0.23	0.23	0.23	0.23	**1.16**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Common - Prescriptive - SCI	*2.4.8*	Energy Savings (MWh)	0.11	0.11	0.11	0.11	0.11	**0.56**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - Custom - SCI	*1.17 & 3.10*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	1	1	1	1	1	**5**
MF - Common - Custom - SCI	*1.17 & 3.10*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	1	1	1	1	1	**5**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Air Conditioning - Level 1 <=5.4 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	203.41	203.41	203.41	203.41	203.41	**1,017.04**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.51**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	756	756	756	756	756	**3,780**
Air Conditioning - Level 1 >5.4 < 20 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	1,155.34	1,155.34	1,155.34	1,155.34	1,155.34	**5,776.68**
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	**2.89**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	820	820	820	820	820	**4,100**
Air Conditioning - Level 1 >=20 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	1,317.80	1,317.80	1,317.80	1,317.80	1,317.80	**6,589.02**
		Summer Demand Reduction (MW)	0.66	0.66	0.66	0.66	0.66	**3.30**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	820	820	820	820	820	**4,100**
Heat Pump - Level 1 <=5.4 Tn - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	209.85	209.85	209.85	209.85	209.85	**1,049.27**
		Summer Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.23**
		Projected Participation	315	315	315	315	315	**1,575**
Heat Pump - Water & GeoT - SCI	*3.2.4*	Energy Savings (MWh)	48.00	48.00	48.00	48.00	48.00	**239.99**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	25	25	25	25	25	**125**
Ductless Mini-Split HP – SCI	*3.2.5 & 3.2.6*	Energy Savings (MWh)	111.65	111.65	111.65	111.65	111.65	**558.26**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.09**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	315	315	315	315	315	**1,575**
PTAC - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	104.69	104.69	104.69	104.69	104.69	**523.45**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.26**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1,260	1,260	1,260	1,260	1,260	**6,300**
PTHP - SCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	48.68	48.68	48.68	48.68	48.68	**243.39**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	315	315	315	315	315	**1,575**
Room Air Conditioner- SCI	*3.2.9*	Energy Savings (MWh)	1.50	1.50	1.50	1.50	1.50	**7.49**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	63	63	63	63	63	**315**
Smart Thermostat - SCI	*3.2.18*	Energy Savings (MWh)	7.14	7.14	7.14	7.14	7.14	**35.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	35	35	35	35	35	**175**
HVAC - Custom - SCI	*3.2*	Energy Savings (MWh)	700.00	700.00	700.00	700.00	700.00	**3,500.00**
		Summer Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.38**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.19**
		Projected Participation	7	7	7	7	7	**35**
Circulating Pump (Mid Strm) - SCI	*3.3.5*	Energy Savings (MWh)	1.97	1.97	1.97	1.97	1.97	**9.86**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7	7	7	7	7	**35**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
HVAC - Maintenance - SCI	*3.2.7 & 3.2.8*	Energy Savings (MWh)	56.26	56.26	56.26	56.26	56.26	**281.31**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	190	190	190	190	190	**950**
Furnace Fan (Retrofit or New to ECM) - SCI	*3.3.3*	Energy Savings (MWh)	1.42	1.42	1.42	1.42	1.42	**7.08**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	7	7	7	7	7	**35**
Lighting Control (Daylight & Occupancy) - SCI	*3.1.3*	Energy Savings (MWh)	423.89	423.89	423.89	423.89	423.89	**2,119.43**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.37**
		Winter Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.30**
		Projected Participation	4,000	4,000	4,000	4,000	4,000	**20,000**
Lighting Control (Network) - SCI	*3.1.3*	Energy Savings (MWh)	1,854.50	1,854.50	1,854.50	1,854.50	1,854.50	**9,272.49**
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	**1.61**
		Winter Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	**1.31**
		Projected Participation	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	**7,500,000**
LED Linear - SCI	*3.1.1*	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	**34,422.67**
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	**5.97**
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	**4.86**
		Projected Participation	40,000	40,000	40,000	40,000	40,000	**200,000**
Exit Sign - SCI	*3.1.4*	Energy Savings (MWh)	0.21	0.21	0.21	0.21	0.21	**1.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
LED Fixture External - SCI	*3.1.1*	Energy Savings (MWh)	0.41	0.41	0.41	0.41	0.41	**2.07**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
LED Fixture Internal - SCI	*3.1.1*	Energy Savings (MWh)	7,614.44	7,614.44	7,614.44	7,614.44	7,614.44	**38,072.20**
		Summer Demand Reduction (MW)	1.32	1.32	1.32	1.32	1.32	**6.60**
		Winter Demand Reduction (MW)	1.07	1.07	1.07	1.07	1.07	**5.37**
		Projected Participation	13,000	13,000	13,000	13,000	13,000	**65,000**
LED Lamp Mogul Base - SCI	*3.1.1*	Energy Savings (MWh)	315.39	315.39	315.39	315.39	315.39	**1,576.95**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.27**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.22**
		Projected Participation	800	800	800	800	800	**4,000**
Street & Area Lighting (Customer Owned) - SCI	*3.1.1*	Energy Savings (MWh)	1.26	1.26	1.26	1.26	1.26	**6.30**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
LED Reach in Refrig / Frzer Light - SCI	*3.1.5*	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	**253.34**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	200	200	200	200	200	**1,000**
Reach in Refrig / Frzer Occupancy Sensor - SCI	*3.5.15*	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	**76.32**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	200	200	200	200	200	**1,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Lighting - Other - SCI	*3.1*	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	**2,500.00**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.43**
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.35**
		Projected Participation	5	5	5	5	5	**25**
Lighting - Custom - SCI	*1.17 & 3.1*	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	**12,500.01**
		Summer Demand Reduction (MW)	0.43	0.43	0.43	0.43	0.43	**2.17**
		Winter Demand Reduction (MW)	0.35	0.35	0.35	0.35	0.35	**1.76**
		Projected Participation	5	5	5	5	5	**25**
Linear Lamp - MS - SCI	*3.1.6*	Energy Savings (MWh)	2,578.84	2,578.84	2,578.84	2,578.84	2,578.84	**12,894.19**
		Summer Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	**2.84**
		Winter Demand Reduction (MW)	0.38	0.38	0.38	0.38	0.38	**1.91**
		Projected Participation	125,000	125,000	125,000	125,000	125,000	**625,000**
High/Low Bay Lamp - MS - SCI	*3.1.6*	Energy Savings (MWh)	6,004.55	6,004.55	6,004.55	6,004.55	6,004.55	**30,022.76**
		Summer Demand Reduction (MW)	1.32	1.32	1.32	1.32	1.32	**6.60**
		Winter Demand Reduction (MW)	0.89	0.89	0.89	0.89	0.89	**4.44**
		Projected Participation	20,500	20,500	20,500	20,500	20,500	**102,500**
LED Fixture - MS - SCI	*3.1.6*	Energy Savings (MWh)	1,526.67	1,526.67	1,526.67	1,526.67	1,526.67	**7,633.36**
		Summer Demand Reduction (MW)	0.34	0.34	0.34	0.34	0.34	**1.68**
		Winter Demand Reduction (MW)	0.23	0.23	0.23	0.23	0.23	**1.13**
		Projected Participation	18,500	18,500	18,500	18,500	18,500	**92,500**
Lighting Controls - MS-SCI	*3.1.6*	Energy Savings (MWh)	1,878.04	1,878.04	1,878.04	1,878.04	1,878.04	**9,390.18**
		Summer Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	**2.06**
		Winter Demand Reduction (MW)	0.28	0.28	0.28	0.28	0.28	**1.39**
		Projected Participation	31,350	31,350	31,350	31,350	31,350	**156,750**
Ref/Frzr -Reach In Special Doors (low/No Anti Swt)- SCI	*3.5.11*	Energy Savings (MWh)	4.12	4.12	4.12	4.12	4.12	**20.60**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
ECM Evap Fan Motor - SCI	*3.5.2*	Energy Savings (MWh)	212.62	212.62	212.62	212.62	212.62	**1,063.11**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Projected Participation	150	150	150	150	150	**750**
Evap Fan Controls - SCI	*3.5.3*	Energy Savings (MWh)	61.32	61.32	61.32	61.32	61.32	**306.60**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	75	75	75	75	75	**375**
Refrigerator - Reach In - SCI	*3.5.1*	Energy Savings (MWh)	16.10	16.10	16.10	16.10	16.10	**80.48**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	30	30	30	30	30	**150**
Freezer - Reach In - SCI	*3.5.1*	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	**116.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Refrigerated Case Cover - SCI	*3.5.9, 3.5.14 & 3.5.15*	Energy Savings (MWh)	158.60	158.60	158.60	158.60	158.60	**793.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2,000	2,000	2,000	2,000	2,000	**10,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Anti Sweat Heater Controls - SCI	*3.5.5*	Energy Savings (MWh)	201.84	201.84	201.84	201.84	201.84	**1,009.22**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	300	300	300	300	300	**1,500**
Strip Curtain - SCI	*3.5.8*	Energy Savings (MWh)	1.48	1.48	1.48	1.48	1.48	**7.40**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	40	40	40	40	40	**200**
Ice Machine - SCI	*3.7.1*	Energy Savings (MWh)	8.55	8.55	8.55	8.55	8.55	**42.77**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	20	20	20	20	20	**100**
Beverage Vending Machine - Controls - SCI	*3.7.2*	Energy Savings (MWh)	18.75	18.75	18.75	18.75	18.75	**93.77**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Steam Cooker - SCI	*3.7.3*	Energy Savings (MWh)	52.76	52.76	52.76	52.76	52.76	**263.82**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	10	10	10	10	10	**50**
Fryer - SCI	*3.7.6*	Energy Savings (MWh)	11.87	11.87	11.87	11.87	11.87	**59.37**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Griddle - SCI	*3.7.9*	Energy Savings (MWh)	27.39	27.39	27.39	27.39	27.39	**136.97**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**
Hot Food Holding Cabinet - SCI	*3.7.7*	Energy Savings (MWh)	5.45	5.45	5.45	5.45	5.45	**27.27**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Combination Oven - SCI	*3.7.4*	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	**117.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Convection Oven - SCI	*3.7.5*	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	**63.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Dishwasher - SCI	*3.7.8*	Energy Savings (MWh)	37.65	37.65	37.65	37.65	37.65	**188.24**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**
Induction Cooktop - SCI	*3.7.10*	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Pre-Rinse Sprayer - SCI	*3.4.2*	Energy Savings (MWh)	46.02	46.02	46.02	46.02	46.02	**230.08**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	25	25	25	25	25	**125**
Freezer Recycling - SCI	*2.4.3*	Energy Savings (MWh)	11.36	11.36	11.36	11.36	11.36	**56.79**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	15	15	15	15	15	**75**
Refrigerator Recycling - SCI	*2.4.3*	Energy Savings (MWh)	378.68	378.68	378.68	378.68	378.68	**1,893.41**
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.28**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.21**
		Projected Participation	500	500	500	500	500	**2,500**
Room Air Conditioner Recycling - SCI	*2.2.8*	Energy Savings (MWh)	42.22	42.22	42.22	42.22	42.22	**211.09**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.56**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	400	400	400	400	400	**2,000**
Dehumidifiers Recycling - SCI	*2.4.12*	Energy Savings (MWh)	147.39	147.39	147.39	147.39	147.39	**736.95**
		Summer Demand Reduction (MW)	0.06	0.06	0.06	0.06	0.06	**0.28**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	300	300	300	300	300	**1,500**
LV Refrigerator Recycling - SCI	*2.4.4*	Energy Savings (MWh)	5.88	5.88	5.88	5.88	5.88	**29.42**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	15	15	15	15	15	**75**
Cooler Recycling - SCI	*2.4.6*	Energy Savings (MWh)	1.56	1.56	1.56	1.56	1.56	**7.80**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	15	15	15	15	15	**75**
EV Charging Cord - Level 2 - SCI	*MA TRM V11*	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	**3.32**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	30	30	30	30	30	**150**
Clothes Washer - SCI	*2.4.8*	Energy Savings (MWh)	1.12	1.12	1.12	1.12	1.12	**5.59**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Clothes Dryer - SCI	*2.4.9*	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	**3.72**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Refrigerator - SCI	*2.4.1*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Water Heater - Heat Pump - SCI	*2.3.1*	Energy Savings (MWh)	1.16	1.16	1.16	1.16	1.16	**5.78**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Freezer - SCI	*2.4.2*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dehumidifier - SCI	*2.4.11*	Energy Savings (MWh)	2.96	2.96	2.96	2.96	2.96	**14.79**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
Uninterruptible Power Supply (UPS) - SCI	*3.11.4*	Energy Savings (MWh)	14.20	14.20	14.20	14.20	14.20	**71.01**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Agricultural Process Lighting	*3.1.7*	Energy Savings (MWh)	7.28	7.28	7.28	7.28	7.28	**36.42**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	200	200	200	200	200	**1,000**
Auto Milker Takeoff	*4.1.1*	Energy Savings (MWh)	19.38	19.38	19.38	19.38	19.38	**96.90**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**
Dairy Scroll Compressor	*4.1.2*	Energy Savings (MWh)	3.99	3.99	3.99	3.99	3.99	**19.93**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
HE Ventilation Fans	*4.1.3*	Energy Savings (MWh)	0.66	0.66	0.66	0.66	0.66	**3.28**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Heat Reclaimer	*4.1.4*	Energy Savings (MWh)	25.28	25.28	25.28	25.28	25.28	**126.38**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	5	5	5	5	5	**25**
High Volume Low Speed Fan	*4.1.5*	Energy Savings (MWh)	86.00	86.00	86.00	86.00	86.00	**430.01**
		Summer Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.23**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Livestock Waterer	*4.1.6*	Energy Savings (MWh)	10.04	10.04	10.04	10.04	10.04	**50.20**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	10	10	10	10	10	**50**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Dairy Vac Pump VSD Control	*4.1.7*	Energy Savings (MWh)	50.38	50.38	50.38	50.38	50.38	**251.91**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	5	5	5	5	5	**25**
Low Pressure Irrigation	*4.1.8*	Energy Savings (MWh)	64.92	64.92	64.92	64.92	64.92	**324.62**
		Summer Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.91**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Custom - Agricultural	*1.17*	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	**250.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	1	1	1	1	1	**3**
Engine Block Heater Timer	*3.11.2*	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	**1.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**3**
Street Lighting (Tariff / Utility Owned(EMU))	*3.1.1*	Energy Savings (MWh)	252.00	252.00	252.00	252.00	252.00	**1,260.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Street Lighting (Tariff / Customer Owned(MU))	*3.1.1*	Energy Savings (MWh)	252.00	252.00	252.00	252.00	252.00	**1,260.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.16**
		Projected Participation	1,000	1,000	1,000	1,000	1,000	**5,000**
Custom - SCI	*1.17*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.44**
		Winter Demand Reduction (MW)	0.05	0.05	0.05	0.05	0.05	**0.24**
		Projected Participation	10	10	10	10	10	**50**
Custom - Compressed Air - SCI	*1.17 & 3.10*	Energy Savings (MWh)	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	**10,000.00**
		Summer Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	**1.19**
		Winter Demand Reduction (MW)	0.24	0.24	0.24	0.24	0.24	**1.19**
		Projected Participation	20	20	20	20	20	**100**
Custom - Refrigeration - SCI	*1.17 & 3.5*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.51**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.41**
		Projected Participation	10	10	10	10	10	**50**
Custom - Solar - SCI	*1.17 & 3.11.6*	Energy Savings (MWh)	2,302.25	2,302.25	2,302.25	2,302.25	2,302.25	**11,511.25**
		Summer Demand Reduction (MW)	0.61	0.61	0.61	0.61	0.61	**3.06**
		Winter Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.44**
		Projected Participation	2,000	2,000	2,000	2,000	2,000	**10,000**
Custom - CHP - SCI	*1.17*	Energy Savings (MWh)	5,000.00	5,000.00	5,000.00	5,000.00	5,000.00	**25,000.00**
		Summer Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	**2.99**
		Winter Demand Reduction (MW)	0.60	0.60	0.60	0.60	0.60	**2.99**
		Projected Participation	1	1	1	1	1	**3**
Custom - Bldg Improvements - SCI	*1.17 & Vol 2*	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	**250.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**3**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Custom - New Construction - SCI	*1.17 & Vol 2*	Energy Savings (MWh)	800.00	800.00	800.00	800.00	800.00	**4,000.00**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.49**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.10**
		Projected Participation	8	8	8	8	8	**40**
Custom - Audit & Education - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Building Tune Up - SCI	*3.2.7,8,17,20&21, 3.4.3, 3.5.3,4,5,6,10,12&16, 3.6.2*	Energy Savings (MWh)	14,518.19	14,518.19	14,518.19	14,518.19	14,518.19	**72,590.94**
		Summer Demand Reduction (MW)	2.04	2.04	2.04	2.04	2.04	**10.19**
		Winter Demand Reduction (MW)	1.67	1.67	1.67	1.67	1.67	**8.34**
		Projected Participation	280	280	280	280	280	**1,400**
Virtual/Meter Data Commissioning - SCI	*1.17*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.43**
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.36**
		Projected Participation	100	100	100	100	100	**500**
Retrocommissioning - SCI	*1.17*	Energy Savings (MWh)	50.00	50.00	50.00	50.00	50.00	**250.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	5	5	5	5	5	**25**
Building Operations Training - SCI	*3.11.5*	Energy Savings (MWh)	2,500.00	2,500.00	2,500.00	2,500.00	2,500.00	**12,500.00**
		Summer Demand Reduction (MW)	0.36	0.36	0.36	0.36	0.36	**1.79**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.89**
		Projected Participation	50	50	50	50	50	**250**
Customer Concierge - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Energy Consultation - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Audits - SCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Managed Charging	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	**0.16**
		Winter Demand Reduction (MW)	0.02	0.03	0.03	0.04	0.04	**0.16**
		Projected Participation	113	125	150	175	200	**763**
Storage	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	**0.32**
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	**0.64**
		Projected Participation	20	23	25	28	30	**126**
Thermostat DR	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.11	0.12	0.13	0.14	0.16	**0.66**
		Winter Demand Reduction (MW)	0.11	0.12	0.13	0.14	0.16	**0.66**
		Projected Participation	350	363	400	450	500	**2,063**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Thermostat DLS	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.20	0.21	0.23	0.24	0.25	**1.14**
		Winter Demand Reduction (MW)	0.20	0.21	0.23	0.24	0.25	**1.14**
		Projected Participation	575	600	650	700	725	**3,250**
Custom DLS & DR - SCI	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	**8.05**
		Winter Demand Reduction (MW)	1.61	1.61	1.61	1.61	1.61	**8.05**
		Projected Participation	20	20	20	20	20	**100**
Front of Meter Measures - SCI	*1.17*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - DI - LCI	*Sec 2.1, 2.2.6, 2.2.12, 2.3.3 to 2.3.8*	Energy Savings (MWh)	0.12	0.12	0.12	0.12	0.12	**0.58**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
MF - Common - DI - LCI	*3.1.1, 3.1.3, 3.6.1, 2.4.9, 2.3.1*	Energy Savings (MWh)	11.90	11.90	11.90	11.90	11.90	**59.50**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	1	1	1	1	1	**5**
MF - Tenant - Prescriptive - LCI	*2.3.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Prescriptive - LCI	*2.4.8*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Tenant - Custom - LCI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
MF - Common - Custom - LCI	*1.17 & 3.10*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	0	0	0	0	0	**0**
Air Conditioning - Level 1 <=5.4 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	2.69	2.69	2.69	2.69	2.69	**13.45**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Air Conditioning - Level 1 >5.4 < 20 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	28.18	28.18	28.18	28.18	28.18	**140.89**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**
Air Conditioning - Level 1 >=20 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	32.14	32.14	32.14	32.14	32.14	**160.71**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	20	20	20	20	20	**100**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Heat Pump - Level 1 <=5.4 Tn - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	5.33	5.33	5.33	5.33	5.33	**26.65**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	8	8	8	8	8	**40**
Heat Pump - Water & GeoT - LCI	*3.2.4*	Energy Savings (MWh)	9.60	9.60	9.60	9.60	9.60	**48.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Ductless Mini-Split HP – LCI	*3.2.5 & 3.2.6*	Energy Savings (MWh)	1.77	1.77	1.77	1.77	1.77	**8.86**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
PTAC - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	0.17	0.17	0.17	0.17	0.17	**0.83**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
PTHP - LCI	*3.2.1 & 3.2.2*	Energy Savings (MWh)	0.31	0.31	0.31	0.31	0.31	**1.55**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Room Air Conditioner- LCI	*3.2.9*	Energy Savings (MWh)	0.05	0.05	0.05	0.05	0.05	**0.24**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Smart Thermostat - LCI	*3.2.18*	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	**1.02**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
HVAC - Custom - LCI	*3.2*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Projected Participation	1	1	1	1	1	**5**
Circulating Pump (Mid Strm) - LCI	*3.3.5*	Energy Savings (MWh)	0.28	0.28	0.28	0.28	0.28	**1.41**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
HVAC - Maintenance - LCI	*3.2.7 & 3.2.8*	Energy Savings (MWh)	0.59	0.59	0.59	0.59	0.59	**2.96**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Furnace Fan (Retrofit or New to ECM) - LCI	*3.3.3*	Energy Savings (MWh)	0.20	0.20	0.20	0.20	0.20	**1.01**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Lighting Controls (Daylight & Occupancy) - LCI	*3.1.3*	Energy Savings (MWh)	529.86	529.86	529.86	529.86	529.86	**2,649.28**
		Summer Demand Reduction (MW)	0.09	0.09	0.09	0.09	0.09	**0.46**
		Winter Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.37**
		Projected Participation	5,000	5,000	5,000	5,000	5,000	**25,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Lighting Control (Network) - LCI	*3.1.3*	Energy Savings (MWh)	3,090.83	3,090.83	3,090.83	3,090.83	3,090.83	**15,454.16**
		Summer Demand Reduction (MW)	0.54	0.54	0.54	0.54	0.54	**2.68**
		Winter Demand Reduction (MW)	0.44	0.44	0.44	0.44	0.44	**2.18**
		Projected Participation	2,500,000	2,500,000	2,500,000	2,500,000	2,500,000	**12,500,000**
LED Linear - LCI	*3.1.1*	Energy Savings (MWh)	6,884.53	6,884.53	6,884.53	6,884.53	6,884.53	**34,422.67**
		Summer Demand Reduction (MW)	1.19	1.19	1.19	1.19	1.19	**5.97**
		Winter Demand Reduction (MW)	0.97	0.97	0.97	0.97	0.97	**4.86**
		Projected Participation	40,000	40,000	40,000	40,000	40,000	**200,000**
Exit Sign - LCI	*3.1.4*	Energy Savings (MWh)	25.23	25.23	25.23	25.23	25.23	**126.14**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	120	120	120	120	120	**600**
LED Fixture External - LCI	*3.1.1*	Energy Savings (MWh)	3,315.68	3,315.68	3,315.68	3,315.68	3,315.68	**16,578.40**
		Summer Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.54**
		Winter Demand Reduction (MW)	0.57	0.57	0.57	0.57	0.57	**2.86**
		Projected Participation	8,000	8,000	8,000	8,000	8,000	**40,000**
LED Fixture Internal - LCI	*3.1.1*	Energy Savings (MWh)	7,028.71	7,028.71	7,028.71	7,028.71	7,028.71	**35,143.57**
		Summer Demand Reduction (MW)	1.22	1.22	1.22	1.22	1.22	**6.09**
		Winter Demand Reduction (MW)	0.99	0.99	0.99	0.99	0.99	**4.96**
		Projected Participation	12,000	12,000	12,000	12,000	12,000	**60,000**
LED Lamp Mogul Base - LCI	*3.1.1*	Energy Savings (MWh)	197.12	197.12	197.12	197.12	197.12	**985.60**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.17**
		Winter Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.14**
		Projected Participation	500	500	500	500	500	**2,500**
Street & Area Lighting (Customer Owned) - LCI	*3.1.1*	Energy Savings (MWh)	7.56	7.56	7.56	7.56	7.56	**37.80**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	30	30	30	30	30	**150**
LED Reach in Refrig / Frzer Light - LCI	*3.1.5*	Energy Savings (MWh)	50.67	50.67	50.67	50.67	50.67	**253.34**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	200	200	200	200	200	**1,000**
Reach in Refrig / Frzer Occupancy Sensor - LCI	*3.5.15*	Energy Savings (MWh)	15.26	15.26	15.26	15.26	15.26	**76.32**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	200	200	200	200	200	**1,000**
Lighting - Other - LCI	*3.1*	Energy Savings (MWh)	600.00	600.00	600.00	600.00	600.00	**3,000.00**
		Summer Demand Reduction (MW)	0.10	0.10	0.10	0.10	0.10	**0.52**
		Winter Demand Reduction (MW)	0.08	0.08	0.08	0.08	0.08	**0.42**
		Projected Participation	6	6	6	6	6	**30**
Lighting - Custom - LCI	*1.17 & 3.1*	Energy Savings (MWh)	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	**15,000.01**
		Summer Demand Reduction (MW)	0.52	0.52	0.52	0.52	0.52	**2.60**
		Winter Demand Reduction (MW)	0.42	0.42	0.42	0.42	0.42	**2.12**
		Projected Participation	6	6	6	6	6	**30**
Linear Lamp - MS - LCI	*3.1.6*	Energy Savings (MWh)	1,444.15	1,444.15	1,444.15	1,444.15	1,444.15	**7,220.75**
		Summer Demand Reduction (MW)	0.32	0.32	0.32	0.32	0.32	**1.59**
		Winter Demand Reduction (MW)	0.21	0.21	0.21	0.21	0.21	**1.07**
		Projected Participation	70,000	70,000	70,000	70,000	70,000	**350,000**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
High/Low Bay Lamp - MS - LCI	*3.1.6*	Energy Savings (MWh)	2,636.15	2,636.15	2,636.15	2,636.15	2,636.15	**13,180.73**
		Summer Demand Reduction (MW)	0.58	0.58	0.58	0.58	0.58	**2.90**
		Winter Demand Reduction (MW)	0.39	0.39	0.39	0.39	0.39	**1.95**
		Projected Participation	9,000	9,000	9,000	9,000	9,000	**45,000**
LED Fixture - MS - LCI	*3.1.6*	Energy Savings (MWh)	742.71	742.71	742.71	742.71	742.71	**3,713.53**
		Summer Demand Reduction (MW)	0.16	0.16	0.16	0.16	0.16	**0.82**
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.55**
		Projected Participation	9,000	9,000	9,000	9,000	9,000	**45,000**
Lighting Controls - MS-LCI	*3.1.6*	Energy Savings (MWh)	1,198.11	1,198.11	1,198.11	1,198.11	1,198.11	**5,990.54**
		Summer Demand Reduction (MW)	0.26	0.26	0.26	0.26	0.26	**1.32**
		Winter Demand Reduction (MW)	0.18	0.18	0.18	0.18	0.18	**0.89**
		Projected Participation	20,000	20,000	20,000	20,000	20,000	**100,000**
Ref/Frzr -Reach In Special Doors (low/No Anti Swt) - LCI	*3.5.11*	Energy Savings (MWh)	2.06	2.06	2.06	2.06	2.06	**10.30**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
ECM Evap Fan Motor - LCI	*3.5.2*	Energy Savings (MWh)	14.17	14.17	14.17	14.17	14.17	**70.87**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Evap Fan Controls - LCI	*3.5.3*	Energy Savings (MWh)	8.18	8.18	8.18	8.18	8.18	**40.88**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Refrigerator - Reach In - LCI	*3.5.1*	Energy Savings (MWh)	2.68	2.68	2.68	2.68	2.68	**13.41**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Freezer - Reach In - LCI	*3.5.1*	Energy Savings (MWh)	23.32	23.32	23.32	23.32	23.32	**116.62**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	10	10	10	10	10	**50**
Refrigerated Case Cover - LCI	*3.5.9, 3.5.14 & 3.5.15*	Energy Savings (MWh)	3.96	3.96	3.96	3.96	3.96	**19.82**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	50	50	50	50	50	**250**
Anti Sweat Heater Control - LCI	*3.5.5*	Energy Savings (MWh)	3.36	3.36	3.36	3.36	3.36	**16.82**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Strip Curtain - LCI	*3.5.8*	Energy Savings (MWh)	0.19	0.19	0.19	0.19	0.19	**0.93**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Ice Machine - LCI	*3.7.1*	Energy Savings (MWh)	2.14	2.14	2.14	2.14	2.14	**10.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Beverage Vending Machine - Controls - LCI	*3.7.2*	Energy Savings (MWh)	1.88	1.88	1.88	1.88	1.88	**9.38**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Steam Cooker - LCI	*3.7.3*	Energy Savings (MWh)	26.38	26.38	26.38	26.38	26.38	**131.91**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.03**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Projected Participation	5	5	5	5	5	**25**
Fryer - LCI	*3.7.6*	Energy Savings (MWh)	5.94	5.94	5.94	5.94	5.94	**29.69**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Griddle - LCI	*3.7.9*	Energy Savings (MWh)	13.70	13.70	13.70	13.70	13.70	**68.49**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Hot Food Holding Cabinet - LCI	*3.7.7*	Energy Savings (MWh)	2.73	2.73	2.73	2.73	2.73	**13.63**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Combination Oven - LCI	*3.7.4*	Energy Savings (MWh)	23.41	23.41	23.41	23.41	23.41	**117.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Convection Oven - LCI	*3.7.5*	Energy Savings (MWh)	12.77	12.77	12.77	12.77	12.77	**63.84**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Dishwasher - LCI	*3.7.8*	Energy Savings (MWh)	18.82	18.82	18.82	18.82	18.82	**94.12**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.01**
		Projected Participation	5	5	5	5	5	**25**
Induction Cooktop - LCI	*3.7.10*	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Pre-Rinse Sprayer - LCI	*3.4.2*	Energy Savings (MWh)	92.03	92.03	92.03	92.03	92.03	**460.16**
		Summer Demand Reduction (MW)	0.03	0.03	0.03	0.03	0.03	**0.13**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.07**
		Projected Participation	50	50	50	50	50	**250**
Freezer Recycling - LCI	*2.4.3*	Energy Savings (MWh)	2.27	2.27	2.27	2.27	2.27	**11.36**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**15**
Refrigerator Recycling - LCI	*2.4.3*	Energy Savings (MWh)	104.14	104.14	104.14	104.14	104.14	**520.69**
		Summer Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.08**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.06**
		Projected Participation	138	138	138	138	138	**688**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Room Air Conditioner Recycling - LCI	*2.2.8*	Energy Savings (MWh)	2.64	2.64	2.64	2.64	2.64	**13.19**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	25	25	25	25	25	**125**
Dehumidifiers Recycling - LCI	*2.4.12*	Energy Savings (MWh)	9.21	9.21	9.21	9.21	9.21	**46.06**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.02**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	19	19	19	19	19	**94**
LV Refrigerator Recycling - LCI	*2.4.4*	Energy Savings (MWh)	0.98	0.98	0.98	0.98	0.98	**4.90**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**13**
Cooler Recycling - LCI	*2.4.6*	Energy Savings (MWh)	0.26	0.26	0.26	0.26	0.26	**1.30**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	3	3	3	3	3	**13**
EV Charging Cord - Level 2 - LCI	*MA TRM V11*	Energy Savings (MWh)	0.02	0.02	0.02	0.02	0.02	**0.11**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Clothes Washer - LCI	*2.4.8*	Energy Savings (MWh)	0.56	0.56	0.56	0.56	0.56	**2.79**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Clothes Dryer - LCI	*2.4.9*	Energy Savings (MWh)	0.37	0.37	0.37	0.37	0.37	**1.86**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Refrigerator - LCI	*2.4.1*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Water Heater - Heat Pump - LCI	*2.3.1*	Energy Savings (MWh)	0.46	0.46	0.46	0.46	0.46	**2.31**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**
Freezer - LCI	*2.4.2*	Energy Savings (MWh)	0.01	0.01	0.01	0.01	0.01	**0.05**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**
Dehumidifier - LCI	*2.4.11*	Energy Savings (MWh)	0.74	0.74	0.74	0.74	0.74	**3.70**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	5	5	5	5	5	**25**
Uninterruptible Power Supply (UPS) - LCI	*3.11.4*	Energy Savings (MWh)	5.68	5.68	5.68	5.68	5.68	**28.40**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	2	2	2	2	2	**10**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Custom - LCI	*1.17*	Energy Savings (MWh)	11,200.00	11,200.00	11,200.00	11,200.00	11,200.00	**56,000.00**
		Summer Demand Reduction (MW)	1.17	1.17	1.17	1.17	1.17	**5.83**
		Winter Demand Reduction (MW)	1.05	1.05	1.05	1.05	1.05	**5.27**
		Projected Participation	112	112	112	112	112	**560**
Custom - Compressed Air - LCI	*1.17 & 3.10*	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	**7,000.00**
		Summer Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	**0.86**
		Winter Demand Reduction (MW)	0.17	0.17	0.17	0.17	0.17	**0.86**
		Projected Participation	14	14	14	14	14	**70**
Custom - Refrigeration - LCI	*1.17 & 3.5*	Energy Savings (MWh)	1,400.00	1,400.00	1,400.00	1,400.00	1,400.00	**7,000.00**
		Summer Demand Reduction (MW)	0.14	0.14	0.14	0.14	0.14	**0.71**
		Winter Demand Reduction (MW)	0.11	0.11	0.11	0.11	0.11	**0.57**
		Projected Participation	14	14	14	14	14	**70**
Custom - Solar - LCI	*1.17*	Energy Savings (MWh)	10,820.58	10,820.58	10,820.58	10,820.58	10,820.58	**54,102.88**
		Summer Demand Reduction (MW)	2.88	2.88	2.88	2.88	2.88	**14.39**
		Winter Demand Reduction (MW)	0.41	0.41	0.41	0.41	0.41	**2.05**
		Projected Participation	9,400	9,400	9,400	9,400	9,400	**47,000**
Custom - CHP - LCI	*1.17 & 3.11.6*	Energy Savings (MWh)	15,000.00	15,000.00	15,000.00	15,000.00	15,000.00	**75,000.00**
		Summer Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	**8.97**
		Winter Demand Reduction (MW)	1.79	1.79	1.79	1.79	1.79	**8.97**
		Projected Participation	2	2	2	2	2	**8**
Custom - Bldg Improvements - LCI	*1.17 & Vol 2*	Energy Savings (MWh)	6,000.00	6,000.00	6,000.00	6,000.00	6,000.00	**30,000.00**
		Summer Demand Reduction (MW)	0.90	0.90	0.90	0.90	0.90	**4.51**
		Winter Demand Reduction (MW)	0.71	0.71	0.71	0.71	0.71	**3.54**
		Projected Participation	60	60	60	60	60	**300**
Custom - New Construction - LCI	*1.17 & Vol 2*	Energy Savings (MWh)	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	**5,000.00**
		Summer Demand Reduction (MW)	0.12	0.12	0.12	0.12	0.12	**0.61**
		Winter Demand Reduction (MW)	0.02	0.02	0.02	0.02	0.02	**0.12**
		Projected Participation	10	10	10	10	10	**50**
Custom - Audit & Education - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Virtual/Meter Data Commissioning - LCI	*1.17*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	10	10	10	10	10	**50**
Retrocommissioning - LCI	*1.17*	Energy Savings (MWh)	100.00	100.00	100.00	100.00	100.00	**500.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.01	0.01	**0.04**
		Projected Participation	1	1	1	1	1	**5**
Building Operations Training - LCI	*3.11.5*	Energy Savings (MWh)	500.00	500.00	500.00	500.00	500.00	**2,500.00**
		Summer Demand Reduction (MW)	0.07	0.07	0.07	0.07	0.07	**0.36**
		Winter Demand Reduction (MW)	0.04	0.04	0.04	0.04	0.04	**0.18**
		Projected Participation	10	10	10	10	10	**50**
Customer Concierge - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**

Measure [1]	2026 TRM Measure Number[5]	Metric	PY18	PY19	PY20	PY21	PY22	Total [4]
Energy Consultation - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Audits - LCI	*NA*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	10	10	10	10	10	**50**
Managed Charging	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	**0.07**
		Winter Demand Reduction (MW)	0.01	0.01	0.01	0.02	0.02	**0.07**
		Projected Participation	45	50	60	70	80	**305**
Storage	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.05	0.06	0.06	0.07	0.08	**0.32**
		Winter Demand Reduction (MW)	0.10	0.12	0.13	0.14	0.15	**0.64**
		Projected Participation	20	23	25	28	30	**126**
Custom DLS & DR - LCI	*CSP & 3.12.1*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	**10.73**
		Winter Demand Reduction (MW)	2.15	2.15	2.15	2.15	2.15	**10.73**
		Projected Participation	10	10	10	10	10	**50**
Front of Meter Measures - LCI	*1.17*	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Summer Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Winter Demand Reduction (MW)	0.00	0.00	0.00	0.00	0.00	**0.00**
		Projected Participation	1	1	1	1	1	**5**

1 Each measure should receive its own row in the table.

2 Energy Savings and Demand Reduction should be aggregate (not per-unit) compliance values (not lifetime). Express MW impacts at the system-level (inclusive of line losses).

3 Projected participation should use the same basis as the units shown in Table 8.

4 If rows need to be added to accommodate more than 3 measures, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

5 The Measure Number reflects the Company's primary planning assumptions, other sections of the applicable PA TRM or other Evaluation guidance (e.g. Interim Measure Protocols) may be used to support the Company's program reporting and evaluation results.

Table 10: Budget by Program

Program Name: [1]	Residential Energy Solutions Program						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$25,129**	**$24,977**	**$24,418**	**$22,059**	**$22,346**	**$118,928**
Incentives ($000) [2]	Rebates	$10,471	$10,561	$10,703	$8,723	$8,886	$49,345
	Upstream/Midstream Buydown	$0	$0	$0	$0	$0	$0
	Kits	$0	$0	$0	$0	$0	$0
	Direct Install Materials & Labor	$58	$58	$58	$58	$58	$290
	Braided Funding Support Labor	$415	$380	$380	$291	$291	$1,758
	Incentive Total	**$10,944**	**$11,000**	**$11,141**	**$9,072**	**$9,235**	**$51,392**
Non-Incentives ($000)	Program Design	$403	$172	$168	$166	$166	$1,075
	Administrative	$1,326	$1,420	$1,211	$1,201	$1,294	$6,453
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$10,458	$10,471	$10,009	$9,796	$9,816	$50,551
	Marketing	$1,235	$1,250	$1,239	$1,234	$1,236	$6,194
	EM&V	$668	$664	$649	$589	$597	$3,167
	AEPS Registration Support	$0	$0	$0	$0	$0	$0
	Other (Describe)	$95	$0	$0	$0	$0	$95
	Non-Incentive Total	**$14,185**	**$13,978**	**$13,276**	**$12,986**	**$13,110**	**$67,536**
Percent Incentives[3]		44%	44%	46%	41%	41%	43%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Program Name: [1]	Low Income Energy Efficiency Program						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$11,128**	**$10,826**	**$10,840**	**$10,767**	**$10,684**	**$54,246**
Incentives ($000) [2]	Rebates	$875	$875	$875	$818	$818	$4,261
	Upstream/Midstream Buydown	$0	$0	$0	$0	$0	$0
	Kits	$200	$200	$200	$200	$200	$1,000
	Direct Install Materials & Labor	$5,524	$5,524	$5,524	$5,524	$5,524	$27,620
	Braided Funding Support Labor	$130	$124	$124	$128	$128	$634
	Incentive Total	**$6,729**	**$6,723**	**$6,723**	**$6,670**	**$6,670**	**$33,514**
Non-Incentives ($000)	Program Design	$113	$46	$47	$47	$46	$298
	Administrative	$370	$372	$336	$337	$352	$1,767
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$2,976	$2,784	$2,830	$2,810	$2,719	$14,119
	Marketing	$626	$624	$627	$627	$624	$3,127
	EM&V	$287	$278	$278	$277	$274	$1,394
	AEPS Registration Support	$0	$0	$0	$0	$0	$0
	Other (Describe)	$27	$0	$0	$0	$0	$27
	Non-Incentive Total	**$4,399**	**$4,103**	**$4,118**	**$4,098**	**$4,014**	**$20,732**
Percent Incentives[3]		60%	62%	62%	62%	62%	62%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Program Name: [1]	C&I Energy Solutions Program - Small						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$24,331**	**$23,467**	**$23,369**	**$23,407**	**$23,499**	**$118,074**
Incentives ($000) [2]	Rebates	$4,880	$4,884	$4,892	$4,900	$4,908	$24,464
	Upstream/Midstream Buydown	$959	$959	$959	$959	$959	$4,795
	Kits	$0	$0	$0	$0	$0	$0
	Direct Install Materials & Labor	$6,265	$6,265	$6,265	$6,265	$6,265	$31,327
	Braided Funding Support Labor	$336	$309	$309	$314	$314	$1,581
	Incentive Total	**$12,440**	**$12,418**	**$12,425**	**$12,438**	**$12,446**	**$62,167**
Non-Incentives ($000)	Program Design	$312	$125	$127	$128	$129	$822
	Administrative	$1,030	$1,036	$922	$933	$1,004	$4,925
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$8,219	$7,691	$7,698	$7,707	$7,713	$39,028
	Marketing	$928	$921	$925	$928	$929	$4,632
	EM&V	$1,247	$1,202	$1,197	$1,199	$1,204	$6,049
	AEPS Registration Support	$81	$74	$74	$74	$74	$378
	Other (Describe)	$73	$0	$0	$0	$0	$73
	Non-Incentive Total	**$11,891**	**$11,050**	**$10,944**	**$10,969**	**$11,053**	**$55,907**
Percent Incentives[3]		51%	53%	53%	53%	53%	53%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Program Name: [1]	C&I Energy Solutions Program - Large						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$20,336**	**$19,717**	**$19,636**	**$19,661**	**$19,722**	**$99,071**
Incentives ($000) [2]	Rebates	$10,548	$10,552	$10,555	$10,559	$10,562	$52,775
	Upstream/Midstream Buydown	$482	$482	$482	$482	$482	$2,408
	Kits	$0	$0	$0	$0	$0	$0
	Direct Install Materials & Labor	$4	$4	$4	$4	$4	$18
	Braided Funding Support Labor	$290	$279	$279	$288	$288	$1,424
	Incentive Total	**$11,324**	**$11,316**	**$11,319**	**$11,332**	**$11,335**	**$56,626**
Non-Incentives ($000)	Program Design	$234	$94	$96	$96	$97	$616
	Administrative	$774	$780	$694	$702	$755	$3,705
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$6,046	$5,664	$5,665	$5,666	$5,667	$28,706
	Marketing	$742	$737	$740	$742	$743	$3,705
	EM&V	$1,042	$1,010	$1,006	$1,007	$1,010	$5,076
	AEPS Registration Support	$119	$116	$116	$116	$116	$582
	Other (Describe)	$55	$0	$0	$0	$0	$55
	Non-Incentive Total	**$9,012**	**$8,401**	**$8,316**	**$8,329**	**$8,387**	**$42,445**
Percent Incentives[3]		56%	57%	58%	58%	57%	57%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Program Name: [1]	Total Portfolio						
Cost Element		**PY18**	**PY19**	**PY20**	**PY21**	**PY22**	**Phase V Total**
Total Budget ($000)		**$80,924**	**$78,988**	**$78,262**	**$75,894**	**$76,251**	**$390,320**
Incentives ($000) [2]	Rebates	$26,773	$26,872	$27,024	$25,000	$25,174	$130,844
	Upstream/Midstream Buydown	$1,441	$1,441	$1,441	$1,441	$1,441	$7,204
	Kits	$200	$200	$200	$200	$200	$1,000
	Direct Install Materials & Labor	$11,851	$11,851	$11,851	$11,851	$11,851	$59,256
	Braided Funding Support Labor	$1,171	$1,092	$1,092	$1,020	$1,020	$5,396
	Incentive Total	**$41,436**	**$41,456**	**$41,608**	**$39,513**	**$39,686**	**$203,699**
Non-Incentives ($000)	Program Design	$1,063	$438	$438	$438	$438	$2,813
	Administrative	$3,501	$3,609	$3,163	$3,172	$3,405	$16,850
	EDC Delivery Costs	$0	$0	$0	$0	$0	$0
	CSP Delivery Fees	$27,700	$26,609	$26,202	$25,978	$25,915	$132,404
	Marketing	$3,532	$3,532	$3,532	$3,532	$3,532	$17,658
	EM&V	$3,243	$3,154	$3,131	$3,072	$3,086	$15,686
	AEPS Registration Support	$200	$190	$190	$190	$190	$960
	Other (Describe)	$250	$0	$0	$0	$0	$250
	Non-Incentive Total	**$39,488**	**$37,532**	**$36,654**	**$36,382**	**$36,564**	**$186,620**
Percent Incentives[3]		51%	52%	53%	52%	52%	52%

1 Each program should receive its own table. For additional programs, copy this table and change program name.

2 See 2026 TRC Order defintions of incentives.

3 The percent incentives must be 50% or greater. If this condition is met, cell I22 will turn green.

Table 11: Summary of EE&C Costs by Sector and Program

Sector	EE&C Program [1]	Cost Elements ($) [2]									Total Cost	Expected Acquisition Cost [3] ($/MWh)	Levelized Cost [4] ($/MWh)	Expected Acquisition Cost ($/MW)
		Incentives	*Program Design*	*Administrative*	*EDC Delivery Costs*	*CSP Delivery Fees*	*Marketing*	*EM&V*	*AEPS Registration Support*	*Other (Describe)*				
Residential Portfolio (incl. Low-Income)	*Residential Energy Solutions Program*	$51,392,196	$0	$0	$0	$50,551,043	$6,194,040	$3,167,406	$0	$0	$111,304,686	$381.20	$0.11	$2,136,622
	Low Income Energy Efficiency Program	$33,514,241	$0	$0	$0	$14,118,698	$3,127,209	$1,393,805	$0	$0	$52,153,953	$739.92	$0.14	$3,453,208
											$0			
											$0			
	Sector Total [5]	**$84,906,437**	**$0**	**$0**	**$0**	**$64,669,742**	**$9,321,249**	**$4,561,211**	**$0**	**$0**	**$163,458,639**	**$1,121**	**$0.25**	**$5,589,830**
Small C&I	*C&I Energy Solutions Program - Small*	$62,166,820	$0	$0	$0	$39,028,150	$4,631,768	$6,049,346	$377,812	$0	$112,253,896	$309.89	$0.08	$2,189,029
											$0			
											$0			
											$0			
	Sector Total	**$62,166,820**	**$0**	**$0**	**$0**	**$39,028,150**	**$4,631,768**	**$6,049,346**	**$377,812**	**$0**	**$112,253,896**	**$310**	**$0.08**	**$2,189,029**
Large C&I	*C&I Energy Solutions Program - Large*	$56,625,824	$0	$0	$0	$28,706,131	$3,704,512	$5,075,737	$582,283	$0	$94,694,487	$240.14	$0.07	$1,769,779
											$0			
											$0			
											$0			
	Sector Total	**$56,625,824**	**$0**	**$0**	**$0**	**$28,706,131**	**$3,704,512**	**$5,075,737**	**$582,283**	**$0**	**$94,694,487**	**$240**	**$0.07**	**$1,769,779**

1 List each EE&C program by name. Add rows as necessary, preserving formulas in totals rows.

2 List all cost elements for each program that can be directly identified as relating exclusively to the specific customer sector addressed in this table. Any cost elements that are applicable to multiple sectors, or are common across all sectors, are to be listed in Table 11 (relating to Common Costs). Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

3 The numerator in the acquisition cost calculation is the full EDC cost, free of any allocation. Acquisition costs are first-year.

4 The levelized cost of energy is the gross TRC costs divided by the discounted lifetime MWh savings

5 If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 12: Allocation of Common Costs to Applicable Customer Sector

Common Cost Element [1]	Total Cost ($)	Basis for Cost Allocation [2]	Sector Cost Allocation ($)		
			Residential (Including Low-Income)	Small C&I	Large C&I
Program Design	$2,812,500	Ratio of each programs specific delivery and marketing costs	$1,373,716	$822,334	$616,449
Administrative	$16,850,000	Ratio of each programs specific delivery and marketing costs	$8,220,551	$4,924,560	$3,704,889
Other (Describe)	$250,000	Ratio of each programs specific delivery and marketing costs, including external legal	$121,486	$73,474	$55,040
Totals	$19,912,500		$9,715,753	$5,820,368	$4,376,379
SWE Cost [3]	$4,000,000				

1 List all identified cost elements that are determined to be applicable to multiple customer sectors, or are common across all sectors. Because cost elements may vary for each EDC and program, the EDC should designate cost elements at its discretion, and the Commission will review and evaluate the prudence and reasonableness of all costs shown.

2 Provide a brief explanation of the methodology used to allocate each common cost element to the applicable customer sectors.

3 The Statewide Evaluator (SWE) costs are separate from the "2% rule" wherein EDCs have a budget ceiling that limits program spending to two percent of each EDC's 2006 annual revenue.

4 If rows need to be added to accommodate more than 4 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 13: Summary of Portfolio EE&C Costs

Portfolio	Total Sector Portfolio-specific Costs [1]	Total Common Costs [2]	Total of All Costs
Residential (Including Low-Income)	$163,458,639	$9,715,753	$173,174,392
Small C&I	$112,253,896	$5,820,368	$118,074,265
Large C&I	$94,694,487	$4,376,379	$99,070,866
Totals	$370,407,023	$19,912,500	$390,319,523

1 Cost figures are automatically carried over from the Sector Total rows of Table 11.

2 Cost figures are automatically carried over from the bottom row ("Totals") of Table 12. Does not include SWE cost.

Table 14: TRC Benefits Table (Gross)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year ($000)				TRC Benefits By Program Per Year ($000)				
Program	Program Year[2]	NTGR	Gross TRC[1]	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits[4]	Energy Benefits[5]	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Solutions Program	*PY18*	*1.0*	*1.07*	$9,927	$24,298.43	$14,185.18	$48,411	$17,801	$31,913	$2,468.00	-$325	$51,857
	PY19	*1.0*	*1.09*	$9,894	$26,630.17	$13,977.57	$50,502	$17,715	$34,916	$2,517.52	-$325	$54,823
	PY20	*1.0*	*1.04*	$9,884	$28,172.73	$13,276.37	$51,333	$17,679	$33,592	$2,580.37	-$325	$53,526
	PY21	*1.0*	*1.12*	$7,663	$22,475.46	$12,986.48	$43,125	$16,602	$29,457	$2,648.99	-$325	$48,383
	PY22	*1.0*	*1.09*	$7,663	$22,475.46	$13,110.20	$43,248	$16,337	$28,281	$2,726.36	-$325	$47,020
Residential Energy Solutions Program Total		***1.00***	***1.08***	$45,030	$124,052	$67,536	$236,618	$86,135	$158,158	$12,941	-$1,624	$255,609
Low Income Energy Efficiency Program	*PY18*	*1.0*	*1.09*	$6,621	$3,286.47	$4,399.41	$14,307	$3,342	$9,584	$2,676.48	$0	$15,602
	PY19	*1.0*	*1.14*	$6,617	$3,289.95	$4,103.23	$14,011	$3,291	$9,905	$2,729.91	$0	$15,926
	PY20	*1.0*	*1.16*	$6,617	$3,289.95	$4,117.61	$14,025	$3,396	$10,054	$2,784.52	$0	$16,234
	PY21	*1.0*	*1.18*	$6,576	$3,016.18	$4,097.57	$13,690	$3,402	$9,948	$2,840.36	$0	$16,190
	PY22	*1.0*	*1.21*	$6,576	$3,016.18	$4,014.34	$13,606	$3,426	$10,097	$2,897.45	$0	$16,420
Low Income Energy Efficiency Program Total		***1.00***	***1.15***	$33,007	$15,899	$20,732	$69,638	$16,855	$49,589	$13,929	$0	$80,373
C&I Energy Solutions Program - Small	*PY18*	*1.0*	*1.12*	$12,155	$49,412.03	$11,810.23	$73,377	$24,664	$59,555	($1,629.39)	-$81	$82,508
	PY19	*1.0*	*1.14*	$12,125	$50,020.27	$10,975.47	$73,120	$24,503	$60,736	($1,653.66)	-$81	$83,504
	PY20	*1.0*	*1.16*	$12,125	$50,405.88	$10,870.04	$73,401	$25,160	$61,927	($1,689.47)	-$81	$85,317
	PY21	*1.0*	*1.19*	$12,130	$50,401.01	$10,894.90	$73,426	$25,786	$63,172	($1,738.71)	-$81	$87,139
	PY22	*1.0*	*1.21*	$12,130	$50,401.01	$10,979.00	$73,510	$26,382	$64,423	($1,801.79)	-$81	$88,923
C&I Energy Solutions Program - Small Total		***1.00***	***1.17***	$60,663	$250,640	$55,530	$366,833	$126,496	$309,813	-$8,513	-$405	$427,391
C&I Energy Solutions Program - Large	*PY18*	*1.0*	*1.06*	$10,769	$53,918.02	$8,892.79	$73,580	$16,449	$66,046	($4,403.18)	-$381	$77,712
	PY19	*1.0*	*1.04*	$10,755	$56,650.42	$8,285.37	$75,691	$15,918	$67,388	($4,476.56)	-$381	$78,449
	PY20	*1.0*	*1.03*	$10,755	$58,462.82	$8,200.54	$77,419	$16,248	$68,742	($4,571.89)	-$381	$80,037
	PY21	*1.0*	*1.05*	$10,763	$58,454.57	$8,213.02	$77,431	$16,585	$70,153	($4,691.99)	-$381	$81,665
	PY22	*1.0*	*1.07*	$10,763	$58,454.57	$8,271.04	$77,489	$16,928	$71,546	($4,838.60)	-$381	$83,254
C&I Energy Solutions Program - Large Total		***1.00***	***1.05***	$53,806	$285,940	$41,863	$381,610	$82,128	$343,875	-$22,982	-$1,904	$401,116
Total[6]		***1.00***	***1.10***	**$192,507**	**$676,532**	**$185,660**	**$1,054,699**	**$311,613**	**$861,435**	**-$4,625**	**-$3,934**	**$1,164,489**

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 Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

3 Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

4 Capacity costs include generation, transmission, distribution, and capacity DRIPE.

5 Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPE components.

6 If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 14: TRC Benefits Table (Net)

Portfolio	NTGR & TRC Ratio			TRC Costs By Program Per Year ($000)				TRC Benefits By Program Per Year ($000)				
Program	Program Year[2]	NTGR	Net TRC[1]	Incremental Measure Cost		Program Administration Cost	Total TRC Costs	Capacity Benefits[4]	Energy Benefits[5]	Fossil Fuel and Water Benefits	O&M Benefits	Total TRC Benefits
				Paid by EDC	Paid by Participants							
Residential Energy Solutions Program	*PY18*	*0.72*	*0.85*	*$8,940*	*$15,901*	$14,185	$39,026	$9,756	$22,078	$1,469.39	-$300	$33,004
	PY19	*0.77*	*0.89*	*$8,910*	*$18,050*	$13,978	$40,938	$10,510	$24,868	$1,498.88	-$300	$36,578
	PY20	*0.74*	*0.83*	*$8,900*	*$19,474*	$13,276	$41,650	$10,059	$23,345	$1,536.25	-$300	$34,640
	PY21	*0.80*	*0.89*	*$6,677*	*$17,010*	$12,986	$36,674	$9,497	$21,733	$1,577.04	-$300	$32,507
	PY22	*0.78*	*0.83*	*$6,677*	*$17,010*	$13,110	$36,797	$8,843	$20,391	$1,623.02	-$300	$30,558
Residential Energy Solutions Program Total		***0.76***	***0.86***	$40,104	$87,446	$67,536	$195,086	$48,665	$112,415	$7,705	-$1,498	$167,286
Low Income Energy Efficiency Program	*PY18*	*0.81*	*0.94*	*$6,209*	*$2,625*	$4,399	$13,233	$2,518	$7,926	$1,975	$0	$12,419
	PY19	*0.82*	*0.98*	*$6,205*	*$2,629*	$4,103	$12,937	$2,484	$8,216	$2,014	$0	$12,714
	PY20	*0.82*	*1.00*	*$6,205*	*$2,629*	$4,118	$12,951	$2,562	$8,334	$2,055	$0	$12,950
	PY21	*0.81*	*1.01*	*$6,164*	*$2,483*	$4,098	$12,745	$2,565	$8,270	$2,096	$0	$12,931
	PY22	*0.80*	*1.03*	*$6,164*	*$2,483*	$4,014	$12,662	$2,568	$8,383	$2,138	$0	$13,089
Low Income Energy Efficiency Program Total		***0.81***	***0.99***	$30,947	$12,849	$20,732	$64,528	$12,697	$41,129	$10,277	$0	$64,103
C&I Energy Solutions Program - Small	*PY18*	*0.75*	*1.07*	*$12,113*	*$33,680*	$11,810	$57,603	$17,604	$44,691	($861.33)	-$50	$61,384
	PY19	*0.75*	*1.09*	*$12,084*	*$34,063*	$10,975	$57,122	$17,565	$45,564	($873.23)	-$50	$62,206
	PY20	*0.75*	*1.11*	*$12,084*	*$34,299*	$10,870	$57,252	$18,025	$46,445	($892.43)	-$50	$63,529
	PY21	*0.75*	*1.13*	*$12,088*	*$34,294*	$10,895	$57,277	$18,462	$47,365	($920.15)	-$50	$64,858
	PY22	*0.75*	*1.15*	*$12,088*	*$34,294*	$10,979	$57,361	$18,877	$48,296	($956.64)	-$50	$66,167
C&I Energy Solutions Program - Small Total		***0.81***	***1.11***	$60,457	$170,630	$55,530	$286,616	$90,534	$232,361	-$4,504	-$248	$318,144
C&I Energy Solutions Program - Large	*PY18*	*0.67*	*0.97*	*$10,759*	*$33,852*	$8,893	$53,504	$10,665	$44,225	($2,737)	-$233	$51,921
	PY19	*0.67*	*0.96*	*$10,747*	*$35,525*	$8,285	$54,557	$10,402	$45,117	($2,782)	-$233	$52,504
	PY20	*0.67*	*0.96*	*$10,747*	*$36,633*	$8,201	$55,580	$10,617	$46,017	($2,842)	-$233	$53,559
	PY21	*0.67*	*0.98*	*$10,755*	*$36,624*	$8,213	$55,592	$10,836	$46,954	($2,916)	-$233	$54,641
	PY22	*0.67*	*1.00*	*$10,755*	*$36,624*	$8,271	$55,650	$11,059	$47,883	($3,008)	-$233	$55,701
C&I Energy Solutions Program - Large Total		***0.67***	***0.98***	$53,762	$179,258	$41,863	$274,883	$53,578	$230,195	-$14,285	-$1,163	$268,326
Total [6]		***0.73***	***1.00***	**$185,271**	**$450,182**	**$185,660**	**$821,114**	**$205,474**	**$616,101**	**-$807**	**-$2,909**	**$817,859**

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 Program listings and corresponding Program Years are for illustrative purposes. Submit yearly projections for each program

3 Prepare and submit separate tables for gross and net TRC (see Table 14 Net and Table 14 Gross). NTGR should equal 1.0 for gross tables.

4 Capacity costs include generation, transmission, distribution, and capacity DRIPE.

5 Energy is inclusive of reduced AEPS compliance cost, arrearages, and energy DRIPE components.

6 If rows need to be added to accommodate more than 2 programs, ensure total formulas (orange highlighted cells) cover all new rows. Otherwise, do not edit formulas.

Table 15: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan

Sector	Total Discounted Lifetime Costs ($000)	Total Discounted Lifetime Benefits ($000) [3]	Present Value of Net[1] Benefits ($000)	Benefit-Cost Ratio (TRC Ratio)
Market Rate EE (exclusive of Low-Income)[2]	$689,445	$802,029	$112,585	1.2
Low-Income	$106,490	$107,716	$1,226	1.0
Solar PV	$184,356	$147,860	-$36,496	0.8
CHP	$53,614	$84,519	$30,905	1.6
Demand Response	$20,794	$22,366	$1,571	1.1
Total Portfolio	$1,054,699	$1,164,489	$109,790	1.1

1 "Net" refers to the arithmetic difference between the previous two columns. It does not refer to net verified savings. Calculate Present Value of Net Benefits and TRC ratio per the 2026 TRC Test Order (entered November 2024).

2 The June 18, 2025 Implementation Order disallowed the inclusion of low-income participation in non-low-income programs in the calculation of savings towards the low-income carve-out.

3 Includes only savings from measures installed and operable between June 1, 2026, and May 31, 2031, and excludes carryover of Phase IV savings.

EXHIBIT 2

FE PA Statement No. 1

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION FOR
APPROVAL OF THE PHASE V ENERGY AND CONSERVATION PLAN OF
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY

DOCKET NO. M-2025-3057327

Direct Testimony
of
Edward C. Miller

LIST OF TOPICS ADDRESSED

The EE&C Plan
Phase IV EE&C Targets and Spending Limitations
Summary of the Predecessor Companies' Phase IV EE&C Plans and Programs
Administration and Implementation of the Proposed Plan and Programs
The Use of Conservation Service Providers and the Company's Competitive Bidding/Contracting Process
Compliance with Statutory and Regulatory Requirements

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DIRECT TESTIMONY
OF
EDWARD C. MILLER

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Edward C. Miller, and my business address is 800 Cabin Hill Drive, Greensburg, PA 15601.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by FirstEnergy Service Company, which is a direct subsidiary of FirstEnergy Corp. ("FirstEnergy"), as Manager, Compliance and Development in the Energy Efficiency Department. I report to the Director, Energy Efficiency Implementation. I am responsible for compliance and development activities related to energy efficiency and conservation ("EE&C") programs for the FirstEnergy utilities in Ohio, Maryland, New Jersey, Pennsylvania, and West Virginia. This primarily involves the development of programs and filings to meet the FirstEnergy utilities' EE&C and/or peak demand reduction ("PDR") requirements and obligations.

Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

A. I hold a Bachelor of Science degree in Electrical Engineering from the University of Pittsburgh. For over seventeen years, I was employed by Allegheny Energy Service Corporation, the service company for Allegheny Energy Inc. ("Allegheny"), which merged in 2011 with FirstEnergy. While with Allegheny, I held various engineering, customer service, and management positions in Customer Services, Sales & Marketing, Customer Management, and Energy Efficiency. After FirstEnergy and Allegheny merged in 2011, I

was assigned my current position as Manager, Compliance and Development in FirstEnergy's Energy Efficiency Department.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN PROCEEDINGS BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION?

A. Yes. I have provided testimony before this Commission, as well as before the Public Utilities Commission of Ohio, the West Virginia Public Service Commission, the Maryland Public Service Commission, and the New Jersey Board of Public Utilities.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE RELEVANT TO THE DIRECT TESTIMONY YOU ARE NOW SPONSORING.

A. Between 2009 and the FirstEnergy-Allegheny merger in 2011, I was involved in the development of EE&C/PDR programs and filings for the utilities formerly owned by Allegheny in Pennsylvania, Maryland, and West Virginia. Since completion of the merger, I have been involved in the same activities for the FirstEnergy utilities in West Virginia, Maryland, New Jersey, Ohio, and Pennsylvania. I was significantly involved in the development of the Phase II, Phase III and Phase IV EE&C Plans of Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, the "Predecessor Companies"), each of which were approved by the Pennsylvania Public Utility Commission ("Commission").[1] I have the same responsibilities related to the EE&C

[1] The Predecessor Companies' Phase II EE&C Plans were approved at Docket Nos. M-2012-2334387 (Met-Ed), M-2012-2334392 (Penelec), M-2012-2334395 (Penn Power), and M-2012-2334398 (West Penn). The Predecessor Companies' Phase III EE&C Plans were approved at Docket Nos. M-2015-2514767 (Met-Ed), M-2015-2514768 (Penelec), M-2015-2514769 (Penn Power), and M-2015-2514772 (West Penn). The Predecessor Companies' Phase IV EE&C Plans were approved at Docket Nos. M-2020-3020820 (Met-Ed), M-2020-3020821 (Penelec), M-2020-3020822 (Penn Power) and M-2020-3020823 (West Penn).

Plan being proposed in this proceeding ("Phase V Plan" or "Proposed Plan"). In fulfilling my responsibilities, I collaborate with energy efficiency consultants and vendors who assist with program design, implementation and the evaluation, measurement, and verification ("EM&V") of EE&C/PDR programs.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company").[2] Further, rather than reiterating what is included in the Company's Proposed Plan in my testimony, any references to sections of the Proposed Plan are incorporated as if fully rewritten herein.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is to: (i) summarize the additional EE&C and PDR targets set for the Company by the Commission's Phase V Implementation Order[3] and the spending limitations for each company under Act 129;[4] (ii) summarize and sponsor the Proposed Plan; (iii) describe the development of the Proposed Plan; (iv) describe how the Company plans the administration and implementation of the Proposed Plan and its related programs; (v) describe the Company's competitive bidding/contracting process; and (vi) analyze whether the Proposed Plan complies with all statutory and regulatory requirements,

[2] By Order entered on December 7, 2023, at Docket Nos. A-2023-3038771, *et al*., the Commission approved the merger of the Predecessor Companies into FE PA, which became effective on January 1, 2024.
[3] *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Implementation Order entered June 18, 2025) ("Phase V Implementation Order").
[4] Act 129 of 2008 was signed into law on October 15, 2008, and became effective on November 14, 2008. Among other things, the Act created an EE&C Program, codified in the Pennsylvania Public Utility Code at Sections 2806.1 and 2806.2, 66 Pa.C.S. §§ 2806.1 and 2806.2.

including the Commission's Phase V Implementation Order and its 2026 Total Resource Cost ("TRC") Test Order.[5]

Q. PLEASE IDENTIFY THE OTHER WITNESS WHO WILL BE PROVIDING TESTIMONY IN THIS PROCEEDING.

A. Ms. Stephanie R. Zieger, an Analyst in Rates and Regulatory Affairs – Pennsylvania, will discuss the Company's proposed cost recovery mechanism that will be used to recover the costs incurred by the Company during the planning and implementation of the Company's Phase V Plan. She will also explain how the Company will recover final costs incurred under the Company's Phase IV Plan.

Q. HOW IS THE PHASE V PLAN ORGANIZED?

A. The Company's Phase V Plan, which is included as Attachment A to the Petition, is organized consistent with the filing format and template outlined by the Commission in its September 8, 2025 Secretarial Letter issued in Docket No. Docket No. M-2025-3052826. The organization of the Phase V Plan is set forth in the Table of Contents and addresses all topics identified in the Commission's template.

Q. WHAT WAS YOUR ROLE IN THE DEVELOPMENT OF THE PHASE V PLAN?

A. My role in the development of the Proposed Plan was to manage the creation of the Phase V EE&C programs and budgets; evaluate the cost-effectiveness of the Proposed Plan consistent with the Commission's requirements; and finalize the Proposed Plan's components to achieve the goals of Act 129 given the regulatory requirements, spending limits, and targeted reductions.

[5] *2026 Total Resource Cost Test Final Order*, Docket No. M-2024-3048998 (Order entered November 7, 2024) ("2026 TRC Test Order").

Q. WAS THE PROPOSED PLAN DEVELOPED UNDER YOUR DIRECTION, SUPERVISION, AND CONTROL?

A. Yes. The Proposed Plan was developed under my direction. To guide the development of the Proposed Plan, I primarily reviewed the requirements of the Commission's Phase V Implementation Order, the Commission's Order regarding the 2026 Technical Reference Manual ("TRM"),[6] and the 2026 TRC Test Order.

Q. PLEASE DESCRIBE FIRSTENERGY'S ENERGY EFFICIENCY GROUP AND ITS ROLE IN THE DEVELOPMENT OF THE PROPOSED PLAN.

A. The FirstEnergy Energy Efficiency group is made up of approximately 50 employees with a broad spectrum of skills. This group is responsible for ensuring compliance with all state EE&C and PDR requirements and the successful implementation of EE&C and PDR programs offered throughout the FirstEnergy footprint. They also are responsible for the EM&V of program results as well as the tracking and reporting of the same to management and as required by the various state regulatory agencies. A more detailed description of this group, as well as a management team organization chart, is included in Section 4.2 of the Phase V Plan.

The Compliance and Development team is a subgroup within the Energy Efficiency Group. It consists of internal FirstEnergy employees and is primarily responsible for the development of not only the Phase V Plan, but also other EE&C and PDR plans offered by the Company's sister utilities in other states. When practical, this team designs programs consistently throughout the FirstEnergy footprint to avoid market confusion and to create

[6] *2026 Technical Reference Manual Final Order,* Docket No. M-2023-3044491(entered September 12, 2024).

economies of scale in both program administration and EM&V activities. When designing EE&C and PDR programs, this group relies not only on its expertise and experience, but also on the experience and expertise brought by evaluators, the program implementation team, program implementers, consultants and interested stakeholders.

Q. PLEASE GENERALLY DESCRIBE THE COMPANY'S PROPOSED PLAN BEING FILED IN THIS PROCEEDING.

A. The Company's Phase V Plan is, in essence, an extension of the successful programs and measures included in the Predecessor Companies' Phase IV EE&C Plans, with the addition of new program measures and a revision of some existing programs and measures. There is one significant change between the Phase IV and Phase V Plans, which is the need to achieve the peak demand reduction target during daily Winter (January and February) and Summer (June, July and August) performance periods, through coincident peak savings from energy efficiency measures and demand response measures.

Q. WHAT WERE THE COMPANY'S OVERALL OBJECTIVES WHEN DEVELOPING THE PROPOSED PLAN?

A. When developing the Phase V Plan, the Company strove to design a plan that: (i) achieves all of the EE&C and PDR targets, including those for the low-income sector carve out; (ii) includes at least one program for each of the major customer segments; (iii) includes at least one comprehensive program for each of the residential sector and the non-residential sector; and (iv) balances costs with results. The Company's Phase V Plan accomplishes each of these objectives.

II. PHASE V EE&C TARGETS AND SPENDING LIMITATIONS

Q. DID THE COMMISSION ADOPT ADDITIONAL INCREMENTAL EE&C AND PDR TARGETS FOR THE COMPANY?

A. Yes. The Commission adopted new energy savings and coincident peak demand reduction targets for the Company. The targets for the period June 1, 2026 through May 31, 2031 ("Phase V Period") are set forth in the Commission's Phase V Implementation Order.

Q. WHAT ARE THE OVERALL MEGAWATT-HOUR ("MWH") AND MEGAWATT ("MW") REDUCTION TARGETS THAT THE COMPANY MUST ACHIEVE PURSUANT TO ACT 129 AND THE COMMISSION'S PHASE V IMPLEMENTATION ORDER?

A. The following table shows the MWh target, which represent the total incremental savings, and the MW target, which represents the required amount of coincident peak MW reductions, that are required to be met with energy efficiency or demand response measures by the Company for the Phase V Period.

EDC	Phase V Target MWh	Phase V Target MW
FE PA	1,097,605	191.0

Q. WHAT ARE THE ANNUALIZED SPENDING LIMITS FOR THE DEVELOPMENT AND IMPLEMENTATION OF THE PHASE V PLAN?

A. Act 129 specifies that "[t]he total cost of any plan required under this section shall not exceed 2% of the electric distribution company's total annual revenue as of December 31,

2006."[7] Per Act 129, the 5-year spending limit as established by the Commission for the Company based on this requirement is $390,320,135.[8]

Q. HOW MUCH HAS BEEN BUDGETED FOR THE COMPANY'S PROGRAMS?

A. The proposed budgets for each program included in the Company's Phase V Plan can be found in Appendix B, Table 10 of the Proposed Plan. The total portfolio budget for the Company is $390,319,523 and is also summarized in Appendix B, Tables 5 and 13 of Phase V Plan.

III. DEVELOPMENT OF THE PROPOSED PLAN

Q. PLEASE DESCRIBE GENERALLY HOW THE COMPANY'S PHASE V PLAN WAS DEVELOPED.

A. Sections 1.2 and 3.1 of the Phase V Plan describe how the FirstEnergy Plan development team ("EE&C Team") designed the Company's Phase V Plan. Generally, the EE&C Team reviewed the existing programs and measures in the Predecessor Companies' Phase IV Plans to assess implementation and performance to date. Programs and measures offered by other FirstEnergy affiliate utilities and non-FirstEnergy utilities were reviewed for consideration. Further, the EE&C Team reviewed the Energy Efficiency and Peak Demand Reduction Market Potential Study and the Demand Response Potential Study (collectively the Market Potential Studies ("MPS"),[9] the 2026 TRM, comments filed regarding the Commission's Tentative Implementation Order,[10] and consulted with its implementation

[7] 66 Pa.C.S. § 2806.1(m).
[8] Phase V Implementation Order at 34.
[9] *Act 129 Statewide Evaluator Energy Efficiency and Peak Demand Reduction Market Potential and Demand Response Potential Studies Secretarial Letter*, Docket No. M-2025-3052827 (served February 21, 2025).
[10] *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Tentative Implementation Order entered February 20, 2025).

team, implementation vendors, and the Company's energy efficiency consultant and independent EM&V contractor, all in an effort to identify additional opportunities. The EE&C Team considered the programs and measures and completed initial modeling, taking into account: (i) implementation experience and actual results through existing programs; (ii) program benefit and cost assumptions; (iii) input from stakeholders, consultants and vendors; (iv) the 2026 TRM; (v) the MPS; and (vi) other industry sources. Based on this analysis and evaluation, the EE&C Team selected the measures to be included in the Phase V Plan, estimated participation levels with corresponding program and measure savings results, and developed program budgets within the budget constraints established under Act 129's statutory 2% spending cap.

Q. PLEASE DESCRIBE THE PROCESS USED BY THE COMPANY DURING THE DEVELOPMENT OF THE PROPOSED PLAN TO INCORPORATE IDEAS FROM INTERESTED PARTIES.

A. Throughout the development of the Phase V Plan, the Company sought input and insight concerning potential program offerings through stakeholder meetings and informal discussions. In addition to regular meetings with Phase IV program implementers, the Company held stakeholder meetings on different aspects of the Proposed Plan design in July 2025 and September 2025. The Company also participated in numerous meetings with interested parties, current and potential Conservation Service Providers ("CSPs") and vendors. The Company further involved stakeholders and considered stakeholder input through consideration of stakeholder comments to the Tentative Implementation Order and outreach with both program allies and other interested parties. Input from this broad group of interested parties was factored into the various programs' design.

Q. DID THE COMPANY DISCUSS DEVELOPMENT OF THE PHASE V PLAN WITH INTERESTED STAKEHOLDERS?

A. Yes. During the development of the Phase V Plan, the Company discussed and sought feedback on the proposed EE&C programs from stakeholders through several methods. As noted above, stakeholder meetings discussing the Proposed Plan's development and program design were held in July 2025 and September 2025. At the July 2025 stakeholder meeting, the Company communicated its overall approach to develop the Phase V Plan, that it had started development and was in the process of researching program and measure opportunities, discussed potential changes, opportunities and strategies that were under consideration; input was also solicited from stakeholders.

At the September 2025 stakeholder meeting, the Company provided an update on the in-progress development of the Phase V Plan, presented a draft plan including the program component portfolio, discussed key changes, provided a listing of draft program components and measures and solicited input from stakeholders. The Company also participated in numerous meetings with interested parties, current and potential CSPs and vendors to discuss input regarding development of the Phase V Plan.

Q. WILL THE COMPANY CONTINUE TO UTILIZE THE STAKEHOLDER PROCESS IN PHASE V?

A. Yes. During the Phase V Period, the Company intends to conduct annual stakeholder meetings where the Company will review the performance, progress, and operation of the programs and will highlight any significant issues encountered and solicit stakeholder input. The Company also plans to continue to hold regular meetings with its Phase V

program implementers and to conduct outreach with both program allies and other interested parties on an ongoing basis during the Phase V Period.

IV. SUMMARY OF THE COMPANY'S PHASE V PLAN AND PROGRAMS

Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE PHASE V PLAN.

A. The Company's Phase V Plan includes a portfolio of EE&C programs, program components, and measures that are designed to achieve the specific consumption and peak demand reduction targets during the Phase V Period as established by the Commission in its Phase V Implementation Order. Like the Predecessor Companies' prior EE&C Plans, the proposed Phase V Plan includes a portfolio of EE&C programs targeted to a variety of customer segments, including: (i) residential (with programs specific to the low-income sector); (ii) small commercial and industrial ("C&I"), including government, non-profit, and institutional ("GNI") customers; and (iii) large C&I, also including GNI customers. In addition, the proposed Phase V Plan also includes new Daily Load Shifting ("DLS") and PDR program components for the Residential, Small Commercial and Industrial ("SCI") and Large Commercial and Industrial ("LCI") sectors to supplement the coincident peak demand reductions from the EE&C programs.

The Phase V Plan also includes Front of the Meter ("FTM") program components in the Residential, SCI and LCI sectors to target and potentially include FTM EE&C measures that enhance the efficiency of the energy delivery system, reduce demand during peak hours, and help mitigate growing resource adequacy concerns in the Commonwealth. The Phase V Plan is generally an extension and evolution of the programs and measures included in the Predecessor Companies' Phase IV Plans, with modifications to the programs, the elimination of program components and measures, and the addition of new

program components and measures such as DLS and PDR, and FTM. Also, like the Predecessor Companies' Phase IV Plans, the Phase V Plan continues the use of incentive level ranges. Under this approach, the Company has the ability to adjust rebate levels within the approved range as market conditions warrant, provided that these adjustments do not increase program costs beyond approved budgets.

Q. WHY DOES THE COMPANY BELIEVE THAT A STRATEGY TO CONTINUE A NUMBER OF THE PHASE IV PROGRAMS INTO PHASE V WILL BE SUCCESSFUL IN MEETING THE EE&C REDUCTION TARGETS?

A. The Predecessor Companies' Phase IV Plans are a comprehensive portfolio of proven and successful EE&C programs that offer a solid foundation on which to build the Phase V Plan. Continuing the Phase IV programs not only allows the Company to build upon the momentum gained during the Phase IV Period through program implementation, customer education, and marketing efforts, but also allows the Company to leverage the experience as well as the implementation practices, procedures, and systems that were put in place to support the operation of the programs. Leveraging the Phase IV programs also avoids the potential for market confusion and disruption that could result from unnecessarily changing program portfolios between phases.

Q. YOU INDICATED THAT THERE WERE MODIFICATIONS TO THE PHASE IV PROGRAMS AND CERTAIN MEASURES WERE EITHER ELIMINATED FROM OR ADDED TO THE PHASE V PLAN. WOULD YOU PLEASE

SUMMARIZE THE DIFFERENCES BETWEEN THE PREDECESSOR COMPANIES' PHASE IV PLANS AND THE PHASE V PLAN?

A. From a practical perspective, the significant changes between the Predecessor Companies' Phase IV Plans and the Phase V Plan are: (i) the shift of the residential and residential low-income Energy Efficiency Kits and School Education program offerings to marketing and outreach initiatives; (ii) the addition of DLS, PDR, and FTM program components; (iii) and the expansion of the Phase IV program offerings to include new program components and measures such as incentives targeting the conversion of resistive electric space and water heating to heat pumps, solar photovoltaic ("PV"), and combined heat and power projects to target these installations in alignment with MPS and the Company's targets per the Phase V Implementation Order.

Further, the Company's Phase V Plan shifts the Predecessor Companies' Phase IV Energy Management - Building Tune-up – LCI component to its Custom-LCI program component to better tailor this offering for LCI customers. In addition, the Company consolidated the Phase IV Residential Energy Efficient Homes and Residential Energy Efficient Products Programs into the new Residential Energy Solutions Program in order to support increased cross promotion of these offerings to customers to achieve greater participation. A summary listing of all key changes from the Predecessor Companies' Phase IV Plan programs to the Phase V Plan program offerings is included in Sections 3.2, 3.2.1, 3.3, and 3.4 of the Proposed Plan.

Q. WHAT RESIDENTIAL PROGRAMS IS THE COMPANY PROPOSING FOR PHASE V?

A. The Company is proposing a Residential Energy Solutions Program for residential customers. This program is summarized in FE PA Table 1, Appendix B, Table 6, and is fully described in Section 3.2 of the Phase V Plan. The EE&C program components are designed to address both educational and initial cost barriers tapping a variety of delivery channels and vendors to support customer engagement, education, and participation. The residential program includes direct or targeted program components that engage customers and serves as a gateway for other program offerings.

These cross-functional offerings serve the dual purpose of providing customers with energy efficiency education as well as information regarding other program services and opportunities in which they can participate. The program incorporates strategies to change behaviors and includes incentives to help offset the initial cost barrier to encourage the participation of all residential customers. The program also provides opportunities for prescriptive equipment (*e.g.* Products, Appliance Recycling, etc.) and direct install, so that customers who are unable or unwilling to undertake whole-home/comprehensive solutions are still able to participate and increase efficiency. Further, the program offers opportunities for customers interested in whole-home/comprehensive solutions (*e.g.* Comprehensive Audits & Retrofits), which encourage customers to consider a holistic approach to energy efficiency in their homes.

In addition to the EE&C program components, the Residential Energy Solutions Program also includes a DLS and PDR program component that supplements the coincident peak load reductions which result from EE&C programs with additional peak

load reductions during certain daily peak hours for both the Summer and Winter periods. These include a combination of daily load shifting strategies and event-based demand response. Initiatives include, but are not limited to, behavioral daily load shifting, behavioral demand response, and connected device load shifting and demand response. Connected device load shifting strategies include technologies such as, but are not limited to, connected thermostats, battery storage, and electric vehicles.

Q. DOES THE PHASE V PLAN INCLUDE PROGRAMS THAT ARE DESIGNED FOR RESIDENTIAL LOW-INCOME CUSTOMERS?

A. Yes. The Company is proposing a Low-Income Energy Efficiency Program under which educational, prescriptive, enhanced, and comprehensive services will be offered to give low-income households more control over their energy usage and spending. The Low-Income Energy Efficiency Program is also designed with progression from general to specific in an effort to make EE&C programs and services available to all low-income customers.

The Company will provide targeted outreach including education, giveaways, and/or quick home energy assessments. This will include no-cost direct install measures and customized home energy reports providing low-income customers with basic energy savings measures and/or energy efficiency education, recommendations, and information regarding other services upon which they can act. Additionally, some of the enhanced low-income customer program offerings (*e.g.*, appliance rebate and turn in, multifamily) will also be targeted to help identify new low-income customers, achieve additional energy savings opportunities, or promote energy efficiency in multifamily or other low-income homes.

The Company also plans to achieve additional new and incremental comprehensive electric energy savings through the Weatherization program component as part of the delivery of the Company's existing comprehensive Low-Income Usage Reduction Program ("LIURP"). This aspect of the Phase V Plan enhances and accelerates the deployment of services to LIURP-eligible households by providing additional outreach, measures, and services to achieve incremental or deeper savings or by serving additional homes. The Low-Income Energy Efficiency Program also includes a New Homes program component where the Company will promote the construction of new energy efficient housing for income-qualified customers. Details surrounding the proposed Low-Income Energy Efficiency Program and each of the low-income program components can be found in Section 3.2.1 of the Phase V Plan.

Q. ARE THE LOW-INCOME PROGRAMS SPECIFICALLY TARGETED TO LOW-INCOME CUSTOMERS?

A. Yes. In accordance with the Commission's Phase V Implementation Order,[11] savings counted towards the low-income target may only come from specific low-income programs or low-income verified participants in multifamily housing programs. The Company has designed the Low-Income Energy Efficiency Program and each of the low-income program components to meet this requirement. The Behavioral program component will continue to be specifically targeted to low-income customers and provide customized reports, just as was done under the Predecessor Companies' Phase IV Plans. Under the Products component, the Company plans to continue to provide an enhanced rebate to qualified low-income customers for certain measures, which would offset a greater portion of the

[11] Phase V Implementation Order at 68-69.

incremental cost for participation, while also targeting low-income customers through specific marketing and outreach activities.

Similar to the Predecessor Companies' Phase IV Plans, the Weatherization program component leverages the considerable expertise and existing infrastructure of LIURP contractors consisting of both Community Based Organizations ("CBOs") and private contractors, who specifically target low-income customers for participation. The Multifamily program component specifically targets multifamily buildings and low-income residents and is closely coordinated with the Weatherization program component to avoid duplicating efforts or services targeted to qualified low-income customers. Further, under the New Homes program component, the Company will work with the Pennsylvania Housing Finance Authority ("PHFA") and other entities to provide incentives for the construction of new energy efficient housing for qualified low-income customers.

Q. DOES THE COMPANY'S PHASE V PLAN INCLUDE SPECIFIC ENERGY EFFICIENCY MEASURES FOR HOUSEHOLDS AT OR BELOW 150% OF THE FEDERAL POVERTY INCOME GUIDELINES?

A. Yes. Act 129 requires that each EE&C Plan include specific energy efficiency measures for households at or below 150% of the federal poverty income guidelines in proportion to that sector's share of the total energy usage in the EDC's service territory.[12] The Company meets the Phase V Implementation Order requirement of 9.33% through the measures provided by the Low-Income Energy Efficiency Program. As explained in more detail in Section 9.1.3 of the Phase V Plan, the Company's Plan exceeds this requirement.

[12] 66 Pa.C.S. § 2806.1(b)(1)(i)(G).

Q. WOULD YOU PLEASE DESCRIBE THE OUTREACH ACTIVITIES THAT WILL BE IMPLEMENTED TO TARGET THE LOW-INCOME SECTOR?

A. The Company will develop marketing materials and complete outreach activities that are specifically designed to target low-income customers with education and awareness of low-income program offerings and to encourage these customers' participation. The Predecessor Companies developed extensive outreach activities during prior phases of the EE&C Program and the Company plans to expand upon these activities for the Phase V Period. In addition, the Company will contract with a program implementation CSP who will be tasked to perform specific outreach activities in coordination with the Company's LIURP. These outreach activities may include, but are not limited to, social networking, bill inserts, direct mail, calling campaigns, food pantry events, local pop-up tents, county/street fairs, appliance recycling events, local community events, and the Commission's "Be Utility Wise" events within the Company's service territory.

As discussed earlier, other outreach activities that target the low-income sector will be completed by the CBOs and private contractors who provide the Weatherization services and Multifamily program component, specifically targeting multifamily buildings with low-income customers, and working with the PHFA and other entities to target the construction of new energy efficient housing for low-income customers. The Company routinely discussed these outreach activities in stakeholder meetings and plans to expand this practice in the Phase V Period. Further, the Company will continue to look for new outreach activities to assist with identifying and targeting additional qualified low-income customers for the low-income program components.

Q. CAN YOU DESCRIBE THE PROGRAMS THE COMPANY IS PROPOSING FOR SMALL AND LARGE COMMERCIAL & INDUSTRIAL CUSTOMERS IN THE PHASE V PLAN?

A. The Company is proposing C&I Energy Solutions Programs for both the Small and Large, Commercial and Industrial Sectors. The C&I Energy Solutions Programs, Small and Large, are summarized in FE PA Table 1, Appendix B, Table 6 and are fully described in Sections 3.3 and 3.4 of the Phase V Plan. The EE&C program components are designed to provide customer engagement and education, incorporate energy controls and strategies to change behaviors, include incentives to address the initial cost barrier, and tap a variety of delivery channels and vendors that promote the participation of all C&I customers. C&I customers are also addressed through program components that provide a variety of opportunities, including prescriptive rebates, custom measures, building tune-up, whole building/comprehensive solutions, and energy management initiatives. The programs include specific opportunities that ensure access for small commercial customers and provide opportunities for single or multiple prescriptive and/or custom measures, so that customers who are unable or unwilling to undertake whole building/comprehensive solutions are still able to increase efficiency. Further, the programs include outreach and tailored program services that encourage customers to consider a holistic or structured approach to energy efficiency for those interested and able to participate in whole building/comprehensive solutions.

In addition to the EE&C program components, the C&I Energy Solutions Programs, Small and Large, also include DLS and PDR program components that supplement the coincident peak load reductions that result from EE&C programs with

additional peak load reductions during certain daily peak hours for both the Summer and Winter periods. The components include a combination of daily load shifting strategies and event-based demand response. Initiatives include connected device load shifting and demand response, as well as custom demand response tailored to customer opportunities. Connected device load shifting strategies include technologies such as, but not limited to, battery storage and electric vehicles.

Q. HOW DOES THE COMPANY PLAN TO FACILITATE ALTERNATIVE ENERGY PORTFOLIO STANDARDS ("AEPS") REGISTRATIONS FOR C&I PARTICIPANTS OF ITS ACT 129 PROGRAMS?

A. The Company plans to promote the availability of and support registrations for C&I participants of its Act 129 programs with eligible energy-efficiency projects. This will include collaborating and coordinating with the Pennsylvania Department of Environmental Protection ("DEP") and the AEPS program administrator to increase customer awareness and education and help facilitate customer registrations. Potential activities to help facilitate and support registrations include obtaining customer authorization to share and providing project information to the AEPS program administrator. See Section 4.4.3 of the Company's Phase V Plan for more information.

Q. HOW DOES THE COMPANY'S PHASE V PROGRAMS SERVE GOVERNMENT, NON-PROFIT, AND INSTITUTIONAL CUSTOMERS?

A. The Phase V Plan provides program services for GNI customers through the C&I Energy Solutions Programs, Small and Large. The C&I Energy Solutions, Small and Large programs include components and measures applicable to and targeted at serving GNI customers, including direct install, single and multiple prescriptive measures, custom

projects, and energy management services. Marketing and outreach will specifically target GNI entities within the Company's service territory depending upon the component or measure offered. These efforts will include the leveraging of existing Company relationships with GNI customers and employing experienced vendors who have expertise working with GNI accounts.

Q. HOW WILL THE COMPANY'S PHASE V PLAN COORDINATE WITH OTHER CONSERVATION PROGRAMS?

A. The Company and its CSPs will collaborate with other conservation program administrators (*e.g.*, DEP) to provide education, marketing and cross-promotion, and other assistance or support helping customers to understand incentives available to them in programs outside of the Company's Proposed Plan (*e.g.,* Inflation Reduction Act ("IRA") of 2022) for eligible energy efficiency measures across programs "braided funding."

The goal is to collaborate and coordinate with other program administrators in order to communicate and inform customers regarding rebates and other program opportunities and braided funding incentives. Further, this collaboration and coordination will educate customers, so they understand the program opportunities and incentives available to them, further encouraging customer participation while also leveraging other programs and braided funding opportunities in delivery of the Act 129 programs. Additionally, the Company has included measures in its Proposed Plan that provide the opportunity to co-fund audits or technical studies (e.g. IRA Home Energy Rebate program) as part of an incentive towards an overall eligible energy efficiency project.

V. IMPLEMENTATION OF PROGRAMS

Q. PLEASE EXPLAIN HOW THE PHASE V PLAN WILL BE ADMINISTERED AND IMPLEMENTED.

A. The Company will provide overall administration and oversight of its Phase V Plan, and it will utilize third party CSPs to perform various program implementation and support duties. Specific activities that the Company will oversee include: (i) the Phase V Plan implementation and performance; (ii) the execution of marketing campaigns; (iii) quality assurance/quality control activities; (iv) tracking and reporting activities; and (v) management of CSPs. The Company will utilize CSPs to provide program-related services, including program implementation, marketing, and EM&V. A more detailed discussion of the responsibilities of both the Energy Efficiency Group and the CSPs is set forth in Sections 4.2 and 4.3 of the Phase V Plan, respectively.

Q. PLEASE DESCRIBE THE COMPANY'S APPROACH TO IMPLEMENTING THE PHASE V PLAN.

A. The Company will rely on experienced CSPs, program allies, and other entities engaged in energy-efficiency to promote, deliver, and support effective implementation of the EE&C programs. Some CSPs will be contracted to fulfil all aspects of program implementation and delivery for certain program components while others will provide specific functions across multiple programs or program components. The Company's implementation strategy is more fully discussed in Sections 1.4, 1.7, and 4 of the Phase V Plan.

Q. IS IT POSSIBLE THAT THE PROGRAMS INCLUDED IN THE COMPANY'S PROPOSED PLAN MIGHT NEED TO BE ADJUSTED DURING THE PLAN PERIOD?

A. Yes, adjustments to programs may be necessary during the Phase V Period. Given that many of these programs have been in place throughout at least Phase IV, if not also throughout Phases I, II and III, the Company anticipated many of the potential contingencies surrounding the programs and factored these contingencies into the Phase V Plan designs. However, due to the five-year term of the Phase V Period, there may be uncertainties in the economy, such as the impact of tariffs and changing government policy, in the regulatory environment, in customer participation, and in technology that may require adjustments during Phase V. Adjustments may also be necessary as results evolve and as the Company receives feedback from customers, trade allies, consultants, CSPs, evaluators, interested stakeholders, and program managers.

Q. HOW WILL THE COMPANY MAKE ADJUSTMENTS TO PROGRAMS DURING PHASE V?

A. As discussed in Section 4.1.4 of the Proposed Plan, the Company will actively monitor the progress of each program component towards its goals, individually and for the program and portfolio collectively, identifying performance issues, gaps, and opportunities for improvement. The Company leverages the tracking and reporting processes it has established to obtain timely data and closely monitor the progress of each program component.

Review meetings are performed at least monthly both internally and with CSPs. In addition, evaluation activities will also inform how well the programs are moving toward

the achievement of goals and provide an additional basis upon which any recommendations for adjustments to programs are made. Sections 4.1.2, 4.1.3, and 4.1.4 of the Phase V Plan further discuss potential steps the Company may take to identify and manage risks and corrective actions it may take, including program adjustments, to improve program performance and help meet its Phase V targets.

While many steps and actions can be performed within approved program budgets and designs, the Company has included in its proposed Phase V Plan the ability to make minor budget and measure changes to improve its ability to timely react to program performance issues and leverage successful program components, as well as to support program continuation and increased customer participation and achieving greater benefits from the programs.

More specifically, to target increased participation in certain programs, additional resources or budgets may be necessary, such as outreach and marketing to increase customer awareness and engagement of trade allies. Conversely, it may be possible to reduce budgets allocated to other programs and shift funds to the programs that are needed to meet its goals. To support an improved ability to achieve its goals, the Company reserves the right to reallocate up to 10% of the total Program budget between sectors and programs.

The ability to make incremental adjustments to the program budgets provides an improved opportunity for the Company to sustain program operations and momentum and avoid market disruptions, leverage overperforming programs, or drive market activity where needed. This flexibility also provides the ability to sustain programs that are nearing exhaustion of approved budgets prior to the end of the Phase when time constraints may not otherwise permit the Company to pursue a formal budget transfer.

The opportunity for the Company to make swift and efficient budget adjustments will enable increased program participation by customers and trade allies without the need to wait for approval through a months-long formal regulatory process. The result is a more realistic opportunity for the Company to achieve its goals for the Proposed Plan in a more cost-effective manner.

In addition, to timely and efficiently respond to market conditions and maintain or improve program performance while supporting its ability and efforts to achieve its goals, the Company reserves the ability to add or revise the conditions of a measure or to eliminate a measure based on evaluation guidance or results, such as, but not limited to, TRM changes, Guidance Memos, Interim Measure Protocols ("IMP"), process or impact evaluations, and cost-effectiveness results. This flexibility allows the Company to avoid providing incentives for a measure that is no longer supported, as well as to revise the conditions of a measure based on market changes, such as if the ENERGYSTAR program changes or is discontinued. It also provides the Company with the ability to add a measure such as due to the adoption of a measure through the PA TRM or IMP.

To the extent that the Company makes any budget or measure changes as discussed above, the Company will include a discussion detailing any such changes in its semi-annual reports. If additional adjustments are necessary, the Company will seek all required approvals either through the Commission's expedited review process established for Phase

II,[13] Phase III,[14] Phase IV,[15] and extended for Phase V,[16] or through an amendment to the Phase V Plan.

VI. CSPs AND THE COMPETITIVE BIDDING PROCESS

Q. PLEASE EXPLAIN HOW THE CSPs WILL BE SELECTED.

A. The Company will use a competitive bidding process to select all CSPs that provide consultation, design, administration and management, or advisory services to the Company, with the exception of its Tracking and Reporting system vendor. The Company will adhere to the vendor selection requirements set forth in the Commission's Phase V Implementation Order and the Company's Act 129 Conservation Service Provider Contracts Request for Proposal ("RFP") Procedure for the Company's Phase V EE&C Plan that was approved by Secretarial Letter issued September 8, 2025.

Every CSP contract will be contingent upon Commission approval of both the contract and the applicable programs that are the subject of the contract. RFPs have been distributed to all qualified CSPs registered on the Commission's website, and the Company is making and will continue to make an effort to acquire bids from minority or other special category businesses.

[13] *Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887, at 114-18 (Implementation Order entered June 10, 2011) ("Phase II Implementation Order").
[14] *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864, at 118 (Implementation Order entered June 19, 2015) ("Phase III Implementation Order").
[15] *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228, at 94-96 (Implementation Order entered June 18, 2020) ("Phase IV Implementation Order").
[16] Phase V Implementation Order at 200-205.

Q. WHY IS THE COMPANY NOT SELECTING ITS TRACKING AND REPORTING SYSTEM VENDOR FOR PHASE V THROUGH A COMPETITIVE BIDDING PROCESS?

A. In accordance with the Phase V Implementation Order,[17] EDCs may forego the competitive bidding process with individual vendors, such as tracking database services, if the value of contracts for that vendor's work is not more than 1% of the Phase V budget. The Plan budget for the T&R contract is less than 1% of the Phase V budget. The Company plans to leverage its existing T&R system for Phase V, which contains historic data and contains established processes, interfaces and reports, and would require significant efforts and cost to change vendors.

Q. HAS THE COMPANY SELECTED THE CSPs AND OTHER VENDORS THAT WILL BE ASSISTING WITH THE IMPLEMENTATION OF THE PHASE V PLAN?

A. Thus far, the Company has selected ADM Associates, Inc. as its EM&V CSP for Phase V. The RFP for that contract was issued on September 10, 2025, and the Company selected ADM Associates, Inc. as the winning bidder in October 2025. The EM&V CSP contract was filed with the Commission on November 26, 2025. As of the submission of this testimony, no other CSPs have been selected. A RFP was issued for the C&I Program components on October 24, 2025, and the Company plans to issue a RFP for the Residential Program components in December 2025. The Company expects to complete the CSP selection process for its Residential and C&I program implementation CSPs in early 2026 (conditioned on Commission approval of the CSP contracts and related programs), so as to

[17] *Id.* at 226.

enable a timely transition, start up and implementation of the programs and measures once Phase V begins.

VII. COMPLIANCE WITH STATUTORY AND REGULATORY REQUIREMENTS

Q. IS THE COMPANY'S PHASE V PLAN DESIGNED TO MEET THE ENERGY AND PEAK DEMAND REDUCTION TARGETS IDENTIFIED IN THE COMMISSION'S PHASE IV IMPLEMENTATION ORDER?

A. Yes, the Proposed Plan is designed to meet the energy and peak demand reduction targets, including the low-income carve out, as established in the Commission's Phase V Implementation Order. Appendix B, Tables 2 and 3 of the Phase V Plan show the projected MWh and MW savings, respectively, for the Company. Further, as explained in Section 9.1.3 of the Phase V Plan, low-income participation in the Small and Large C&I Energy Solutions Multifamily program components is targeted towards meeting the low-income savings carve out and provides specific energy efficiency measures for households at or below 150% of the federal poverty income guidelines, and is in excess of the proportion required for that sector's share of the total energy usage in the Company's service territory, as required by 66 Pa.C.S. § 2806.1(b)(1)(i)(G).

Q. IS THE COMPANY'S PHASE V PLAN DESIGNED TO ACHIEVE AT LEAST 15% OF THE CONSUMPTION REDUCTION AND PEAK DEMAND REDUCTION TARGETS AND IN EACH PROGRAM YEAR?

A. Yes. The aforementioned Appendix B, Tables 2 and 3 of the Proposed Plan also provide the projected energy and peak demand savings for each program year as a percentage of the Company's targets. It also illustrates that the Phase V Plan is designed to meet at least 15% of the energy and peak demand reduction targets each year.

Q. IS THE COMPANY'S PHASE V PLAN DESIGNED TO ACHIEVE AT LEAST 75% OF THE PEAK DEMAND REDUCTION TARGET IN EACH SEASON?

A. Yes, Appendix B, Table 4 of the Proposed Plan provides the total projected peak demand savings for each season and illustrates that the Phase V Plan is designed to achieve at least 75% of the peak demand reduction target in each season.

Q. DOES THE COMPANY'S PROPOSED PLAN ACHIEVE THE OVERALL TRC COST-BENEFIT THRESHOLD?

A. Yes. Appendix B, Table 1 of the Phase V Plan shows the projected TRC results on a portfolio basis. The successful implementation of the Company's Phase V Plan is projected to be cost-effective at the portfolio level under the PA TRC test having a benefit-cost ratio greater than 1.0. Specifically, the Company's Phase V Plan has a TRC ratio of 1.1. Additional details are provided in Appendix B, Tables 1, 14 and 15 of the Proposed Plan.

Q. HOW WERE THE TRC RESULTS CALCULATED?

A. Each of the TRC values was calculated consistent with the methodology prescribed by the Commission in the 2026 TRC Test Order. Section 8.0 of the Proposed Plan provides more detail on the cost effectiveness methodology.

Q. DOES THE COMPANY'S PHASE V PLAN INCLUDE BOTH RESIDENTIAL AND NON-RESIDENTIAL COMPREHENSIVE PROGRAMS?

A. Yes. As more fully discussed across Sections 3.2, 3.2.1, 3.3, and 3.4 of the Phase V Plan, the Company's Plan includes comprehensive programs and measures for both residential and non-residential customers. Section 3.1.7 further provides the Company's definition of

a comprehensive program, and Appendix B, Table 8 classifies individual residential and low-income measures as comprehensive.

In general, the Phase V Plan incorporates both short- and long-term energy saving opportunities for customers, including multiple prescriptive measures, custom measures, direct install, comprehensive measures and projects, and whole home/whole building solutions and energy saving initiatives. More specifically, the Company offers comprehensive measures to residential customers such as heat pumps and heat pump water heaters as well as whole house treatments through the Residential Energy Solutions Program and the Low-Income Energy Efficiency Program.

The Residential Energy Solutions Program includes incentives toward home audits with additional incentives for comprehensive measures and home retrofits as well as for efficient new home construction. The Low-Income Energy Efficiency Program includes Multifamily, Weatherization, and New Construction components, which also targets comprehensive measures and home retrofits as well as efficient new home construction.

Similarly, the Company offers comprehensive measures to the non-residential sector through the Multifamily, Prescriptive, Custom, and Energy Management components in the C&I Energy Solutions, Small and Large Programs. The Multifamily component, consistent with its Residential counterpart, targets comprehensive measures and home retrofits. The Prescriptive component provides the opportunity for incentives for multiple comprehensive measures such as heat pumps and heat pump water heaters. The Custom component provides incentives for custom building improvements, process improvements, and efficient new construction. The Energy Management component provides a holistic or structured approach to improving the overall operation and energy

performance of buildings and building systems by retrofitting, maintaining, adjusting, and optimizing the systems within the building and the implementation of complementary energy savings measures.

Collectively, the proposed programs promote and support comprehensive measures and whole home/whole building/comprehensive solutions and structured approaches to reducing energy consumption and enhancing energy efficiency that provide deep and long-lasting energy savings across all sectors.

Q. DOES THE COMPANY'S PHASE V PLAN INCLUDE A VARIETY OF MEASURES THAT ARE PROVIDED EQUITABLY TO ALL CUSTOMER CLASSES?

A. Yes. Based on the programs and measures selected and included in the Company's Phase V Plan, as listed in Appendix B, Table 8, there is at least one energy efficiency program and a broad portfolio of program components and measures that will be provided to every customer class.

Q. DOES THE PROPOSED PLAN COMPLY WITH ALL STATUTORY AND REGULATORY REQUIREMENTS?

A. Yes. The Phase V Plan: (i) is designed to achieve the Phase V energy and peak demand reduction targets as established in Act 129 and the Commission's Phase V Implementation Order with a budget no greater than the 2% statutory spending cap; (ii) is designed to achieve the low-income carve out as established in the Commission's Phase V Implementation Order; (iii) is designed to achieve at least 15% of the energy and peak demand reduction targets during each year of the Phase V Period; (iv) includes a mix of measures projected to acquire at least 75% of the proposed peak demand reduction target

in each season; (v) includes at least one program for each customer class; (vi) includes both residential and non-residential comprehensive programs; and (vii) passes the TRC test on an overall portfolio basis.

Further, as Company Witness Zieger explains, the Phase V Plan includes Section 1307 cost recovery mechanisms, which reflect program acquisition costs (i.e., for program administration, management, and incentives) that are being reasonably allocated to and recovered from the customer classes receiving the direct benefit of measures supported by the programs.

VIII. CONCLUSION

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does. However, I reserve the right to supplement my direct testimony, if necessary.

VERIFICATION

I, Edward C. Miller, Manager, Compliance and Development in the Energy Efficiency Department at FirstEnergy Corp, hereby state that the facts set forth in the foregoing FirstEnergy Pennsylvania Electric Company Statement No. 1 are true and correct to the best of my knowledge, information and belief and that I expect to be able to provide the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: January 28, 2026

Edward C. Miller

EXHIBIT 3

FE PA Statement No. 1R

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION FOR
APPROVAL OF THE PHASE V ENERGY AND CONSERVATION PLAN OF
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY

Docket No. M-2025-3057327

Rebuttal Testimony
of
Edward C. Miller

LIST OF TOPICS ADDRESSED

Participation and Savings Projections, Limitations and Thresholds
Program Components
Cost-Effectiveness
Participation Targets
Tracking and Reporting

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REBUTTAL TESTIMONY
OF
EDWARD C. MILLER

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Edward C. Miller, and my business address is 800 Cabin Hill Drive, Greensburg, PA 15601.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by FirstEnergy Service Company, which is a direct subsidiary of FirstEnergy Corp. ("FirstEnergy"), as Manager, Compliance and Development in the Energy Efficiency Department. I report to the Director, Energy Efficiency Implementation. I am responsible for compliance and development activities related to energy efficiency and conservation ("EE&C") programs for the FirstEnergy utilities in Ohio, Maryland, New Jersey, Pennsylvania, and West Virginia. This primarily involves the development of programs and filings to meet the FirstEnergy utilities' EE&C and/or peak demand reduction ("PDR") requirements and obligations.

Q. DID YOU PREVIOUSLY SUBMIT TESTIMONY IN THIS PROCEEDING?

A. Yes, I submitted Direct Testimony (FE PA Statement No. 1) in support of the Phase V EE&C Plan proposed in this proceeding ("Phase V Plan," "Proposed Plan," or "Plan").

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of the FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company").

Q. PLEASE BRIEFLY DESCRIBE THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS PROCEEDING.

A. I will respond to certain issues raised in the Direct Testimony submitted by the other parties' witnesses, specifically: (1) the Direct Testimony of Stacy L. Sherwood (OCA Statement No. 1) submitted on behalf of the Office of Consumer Advocate ("OCA"); (2) the Direct Testimony of Jim Grevatt (CAUSE-PA Statement No. 1) submitted on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"); (3) the Direct Testimony of Jeaneen Zappa (KEEA Statement 1) submitted on behalf of Keystone Energy Efficiency Alliance ("KEEA"); and (4) the Direct Testimonies of Angela Vitulli (OSBA Statement No. 1) and Daniel Kaufman (OSBA Statement No. 2) on behalf of the Pennsylvania Office of Small Business Advocate ("OSBA").

II. GENERAL COMMENTS ABOUT ISSUES AND RECOMMENDATIONS RAISED BY THE PARTIES

Q. DO YOU HAVE ANY GENERAL COMMENTS ABOUT THE OTHER PARTIES' ISSUES AND RECOMMENDATIONS RAISED IN THEIR DIRECT TESTIMONY?

A. Yes, I have three broad observations arising from comments in the other parties' Direct Testimony.

First, several parties make recommendations advocating for results that were not considered or factored into the Commission's process establishing the targets, acquisition costs, and requirements for Phase V, which were derived from both the Demand Response Potential Study ("DR Potential Study") and the Energy Efficiency and Peak Demand Reduction Market Potential Study ("EEPDR Potential Study") (collectively, the "Market

Potential Studies" or "MPSs"),[1] which were adopted in the Commission's Implementation Order.[2] The parties' recommendations include that the Commission require the Company to limit or meet certain thresholds of savings from specific program offerings or to add specific program offerings.

Second, the parties recommend changes that would require the Company to provide additional evidence of certain programs' ability to achieve the targets in its approval, or prior to approval.

Third, the parties make various recommendations that, if adopted, would expand the requirements for Phase V beyond those established in the Implementation Order or would require additional administrative requirements that were not contemplated in the Commission's process establishing the targets, acquisition cost and requirements for Phase V.

The critical flaw with most of the parties' recommendations is that they are not supported by any in-depth study, evaluation, or analysis on the impact that these recommendations will have on the Plan or individual program savings, costs, acquisition cost, or cost-effectiveness calculations. Because the Company's Phase V Plan is subject to the budget cap established under Act 129, the Company cannot simply incorporate proposed changes to the proposed EE&C programs and measures in the Phase V Plan without a thorough analysis of their impact.

If the Company accepted all the parties' recommendations, the result could be a Phase V Plan that may not achieve the Company's required savings targets and other

[1] *Act 129 Statewide Evaluator Energy Efficiency and Peak Demand Reduction Market Potential and Demand Response Potential Studies Secretarial Letter*, Docket No. M-2025-3052827 (served February 21, 2025).
[2] *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826 (Implementation Order entered June 18, 2025) ("Implementation Order").

requirements, may not be cost effective, and/or may exceed the budget cap under Act 129. The Company's Phase V Plan is a carefully balanced portfolio that offers a broad variety of EE&C programs and measures to meet all the Company's Phase V requirements within the prescribed two percent (2%) budget cap.

Once one of the Company's programs is modified to add, eliminate, or materially change measures or other requirements, then the entire portfolio is disrupted and, consequently, so too is FE PA's ability to meet all the Phase V requirements. Additionally, recommendations that involve the Company proposing a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Minor Plan Change Order on Act 129 Energy Efficiency and Conservation Program[3] and as affirmed in the Commission's Phase V Implementation Order,[4] raises additional concerns regarding the ability of the Company to meet its targets due to the lengthy timing associated with completing, obtaining approval, and implementation of any required Plan changes. Not to mention, such recommendations fail to consider the budgetary impacts in light of the costs attendant with pursuing a plan change.

Additionally, another important consideration is that the Company bears significant compliance risk if it fails to meet the required energy savings and peak demand reduction targets. The parties who are proposing recommendations to the Company's Plan will not be the ones to bear significant civil penalties if the Company fails to achieve those targets. Therefore, it is crucial that any changes to the Company's proposed Plan be well-founded,

[3] Energy Efficiency and Conservation Program, Docket No. M-2008-2069887 (Order entered June 10, 2011) ("Minor Plan Change Order").
[4] Energy Efficiency and Conservation Program, Docket No. M-2025-3052826 at pg. 202 (Implementation Order entered June 18, 2025) ("Phase V Implementation Order").

based on reliable data, analysis and cost-effectiveness studies, and not disrupt the well-balanced portfolio of programs the Company has proposed through its Plan as necessary to achieve the Phase V requirements.

III. REBUTTAL TO SPECIFIC ISSUES AND RECOMMENDATIONS

Q. PLEASE DESCRIBE RECOMMENDATIONS THAT REQUIRE THE COMPANY TO LIMIT, OR REQUIRE A CERTAIN LEVEL OF SAVINGS FROM SPECIFIC PROGRAM OFFERINGS OR ADD SPECIFIC PROGRAM OFFERINGS.

A. Several parties recommend that the Commission mandate that the Company limit or eliminate the penetration of measures in the Plan, establish artificial thresholds for contribution of savings or adopt additional program requirements. Such specific recommendations include:

- OCA Statement 1 at 13: recommends that "[c]ommercial lighting should be limited to 20% of total savings, with gradual decline over the phase."
- OCA Statement 1 at 26: recommends eliminating streetlighting (a commercial lighting measure) from the Plan.
- CAUSE-PA Statement 1 at 39: recommends that the Company "revises the forecast measure quantities" to be consistent with CAUSE-PA's recommendation [in its comments to the Tentative Order] so that it "achieve no less than 25% of the low-income savings goal through comprehensive whole-home program measures … specifically through heat pumps, heat pump water heaters, and building insulation and air sealing measures."
- OCA Statement 1 at 11-12: recommends that "[s]hort lived savings should be limited to 25% of total savings."

- OCA Statement 1 at 36: recommends that Home Energy Report (Residential Behavioral and Low-Income Behavioral program components) savings should be limited to 10% of the portfolio and recommends that limitations should be imposed on customer eligibility based on usage.
- OCA Statement 1 at 26: recommends that the Company should establish a moderate income component in the Residential Energy Solutions Program, with increased incentives for customers between 151-250% of Federal Poverty Level.

The Commission should reject these proposed limitations or requirements as they are: (i) inconsistent with the goal setting processes for Phase V upon which the Company's targets are based; (ii) unsupported by analysis; and (iii) fail to consider the impacts on the acquisition cost, energy and demand savings contributions or cost effectiveness of the Plan.

Q. WHY DO THESE LIMITATIONS OR REQUIREMENTS CREATE A PROBLEM?

A. As stated earlier in my Rebuttal Testimony, these limitations or requirements stray from the Commission's goal setting process set forth in its Implementation Order, upon which the Company's targets and acquisition cost are based. Additionally, these limitations or requirements primarily focus on energy savings and ignore the impact on demand savings. More specifically, the Commission's goal setting process relied upon the comprehensive MPS to determine the potential energy and demand savings of measures and their acquisition cost based on the allowable budgets under Act 129. These studies were relied upon by the Commission in proposing the Company's targets as part of the Commission's Tentative Implementation Order and were subject to comments by the parties, which the Commission considered in its Implementation Order issued on June 18, 2025, establishing

the energy savings and demand reduction targets and other requirements for Phase V. In other words, the Statewide Evaluator ("SWE") did not analyze or include constraints on or required thresholds for savings from program measures, such as those recommended by the parties in the MPS. As such, the targets and acquisition costs established by the Commission do not include them. Therefore, it would be inappropriate for the Commission to adopt them now.

Adopting any new limitations or requirements on programs, measures or the amount of energy savings contributions that were not considered through the goal setting process and adopted in the Implementation Order would introduce significant risk to the ability of the Company to meet its mandated energy and demand targets within the allowable budget, exposing the Company to the prospect of severe penalties.[5]

Q. PLEASE EXPLAIN YOUR CONCERN REGARDING THE IMPACT OF THESE RECOMMENDED LIMITATIONS OR REQUIREMENTS ON DEMAND SAVINGS.

A. The Company has extensive experience implementing EE&C and PDR programs, including, but not limited to, programs to achieve both energy savings and coincident peak demand reduction targets under prior phases of Act 129. This experience includes developing and implementing program portfolios with measures that achieve both energy savings *and* demand reduction targets within the allowable budget. While all energy efficiency measures contribute to achieving incremental annual energy savings, some measures contribute more than others to achieving demand reduction targets. Achieving the demand reduction targets requires consumer participation in a smaller subset of

[5] *See* 66 Pa. Code § 2806.1(f)(2).

measures that, due to the fact that peak demand reduction is measured during the coincident peak hours, have load profiles that meet or exceed the kilowatt ("kW") per kilowatt-hour ("kWh") ratios and acquisition cost assumptions associated with the targets. In other words, while any energy efficiency measure can be leveraged to meet the energy savings target, actual participation in a subset of measures is required to meet the demand reduction target.

Recommendations that cap energy savings in specific programs or measures, including, but not limited to, Commercial Lighting, Solar PV and Combined Heat and Power ("CHP") projects, would undermine the ability of the Company to meet its energy savings and demand reduction targets within the allowable budget because those programs provide good energy and demand savings at a low acquisition cost. Similarly, recommendations that require certain levels of energy savings from measures, including, but not limited to, comprehensive whole-home program measures and other long-lived measures that have a higher acquisition cost, would also undermine the ability of the Company to meet its energy savings and demand reduction targets within the allowable budget.

Q. PLEASE DESCRIBE RECOMMENDATIONS THAT REQUIRE THE COMPANY TO PROVIDE ADDITIONAL EVIDENCE OF THE PROGRAMS' ABILITY TO ACHIEVE TARGETS PRIOR TO ITS PHASE V APPROVAL.

A. Several parties recommended that the Commission require the Company to provide additional information prior to approval of its Phase V Plan. These recommendations relate to the DLS and PDR program offerings, Small C&I Lighting Savings, CHP projections, and cost-effectiveness of Solar Photovoltaic projects.

Q. WHAT RECOMMENDATIONS SPECIFICALLY APPLY TO THE DR PROGRAMS?

A. The OSBA recommended that "FirstEnergy should provide further evidence that the [DR] targets are achievable prior to the Commission approving the Plan," and further recommended "that different incentive levels be specified and tested as the program is rolled out to understand how different incentives affect participant recruitment and retention."[6] The OCA recommended that DLS and PDR efforts be removed from the portfolio prior to approval[7] and suggested that the DR ramp up period is not adequate.[8]

Q. DO YOU AGREE WITH THESE RECOMMENDATIONS BY OSBA?

A. No. In developing the Plan, the Company met with and solicited input from experienced demand response providers. This input included information regarding projected participation by year and ramp up, projected demand reductions and incentive structures and amounts. Additionally, the Company also reviewed the DR Potential Study which explicitly considered achievable demand reductions and the ramp up period, to ensure that its projections were reasonable. In fact, the Company's Plan projections for DLS and PDR are well below the amounts in the DR Potential Study that informed the demand reduction targets. The following table compares the Plan and DR Potential Study projections for connected devices.

[6] OSBA Statement No. 2 at 9.
[7] OCA Statement No. 1 at 32.
[8] *Id.* at 29.

Technology	Proposed Plan MW Total (Avg Summer & Winter)[1]	DR Potential Study: FirstEnergy PA Realistic Achievable Potential (RAP) (MW)	DR Potential Study: FirstEnergy PA Maximum Achievable Potential (MAP) (MW)	DR Potential Study: Potential Study Table
Managed Charging	0.7	7.8	21.95	80-83
Thermostats	7.3	8.7	17.1	59
Storage	2.1	6.18	9.85	89-90
TOTAL	**10.1**	**22.7**	**48.9**	

[1] FE-PA, Appendix B Table 9

Critically, the record in this proceeding is devoid of any evidence or analysis concerning the impact of removing, limiting, or altering these program offerings from the Company's Plan, or allocating the budgets from them elsewhere. Without such evidence, the potential impact of the parties' recommendations on the Company's ability to achieve its DR targets within its allowable budget is unknown.

In summary, the Company considered the conclusions of the MPS that the Commission relied upon to establish the demand reduction targets and also consulted closely with experienced DR providers to design and develop its proposed DLS and DR program components. The Company's data-driven projections and incentive levels reflect this detailed input.

Q. PLEASE DESCRIBE THE OTHER RECOMMENDATIONS REQUIRING ADDITIONAL PROGRAM INFORMATION FOR APPROVAL OF THE COMPANY'S PHASE V PLAN.

A. Several parties made recommendations that would require the Company to provide more evidence or additional support for program elements prior to Commission approval of the Plan or the start of Phase V, summarized as follows:

- OSBA Statement No. 1 at 2: recommends that FE PA provide more information concerning the achievability of Small C&I lighting savings projections prior to the start of Phase V.

- OSBA Statement No. 2 at 13: recommends that the Company "should provide further evidence that its CHP projections are feasible before the Commission approves the Plan."
- OSBA Statement No. 2 at 3 and 13: requests the Commission mandate that the Company "[e]xplain why its proposed Solar PV program is not cost-effective and, if possible, take steps to improve cost-effectiveness."

Q. PLEASE EXPLAIN YOUR CONCERN WITH THE RECOMMENDATIONS REQUIRING ADDITIONAL PROGRAM INFORMATION.

A. The Company considered input and information from multiple sources to develop its program projections to meet its targets in its Phase V Plan. These sources included but were not limited to: (1) the Company's implementation team; (2) the Company's energy efficiency consultant, who is also its current evaluation, measurement and verification CSP; (3) the Company's Phase IV results; and (4) the MPS.

The input the Company received concerning the small commercial and industrial lighting program recognized the importance of lighting for engaging and achieving participation by small business customers in energy efficiency program opportunities. In other words, lighting is recognized as a key component of, or a steppingstone for, participation in program opportunities. Commercial and Industrial lighting is also a recognized source of good demand savings at a lower acquisition cost. The Company finalized its projections following the consideration of many factors and an assessment of the reasonableness of the Company's projections among its sectors and program components, while simultaneously balancing meeting its energy and demand savings targets and other requirements. The table below compares the Company's projection for

lighting in the small commercial and industrial sector with the results of the EEPDR Potential Study.

	FE-PA Plan Projection (GWh)	EEPDR MPS Table 22 (GWh)	FE_PA Plan as % of MPS
Small C&I Lighting	160.7	250.2	64%

The OSBA relied upon the 2023 Non-Residential Baseline study ("Baseline Study"), which informed the EEPDR Potential Study, to challenge the Plan savings associated with small C/I lighting savings as optimistic, indicating that the Baseline Study found that 60% of all commercial lighting has already been converted.[9] However, the Baseline Study also found that "[d]espite the growth of LEDs, linear fluorescent bulbs still make up the largest share of the lighting load,"[10] and that "[l]inear fluorescent fixtures still make up about 40% of the Indoor General Service units, as well as almost 50% of the wattage."[11]

In summary, the Company's Plan projection of 160.7 gigawatt hours ("GWh") is significantly below the EEPDR Potential Study program potential of 250.2 GWh for small commercial and industrial lighting, and the proposed requirement to provide additional evidence or support should be rejected.

With regard to the Company's projections for CHP projects, the Company also considered the longer time associated with the development and implementation of these types of custom projects, similar to other large custom projects, and carefully finalized its

[9] OSBA Statement No. 1 at 10.
[10] Demand Side Analytics, *Pennsylvania Act 129 2023 Non-Residential Baseline Study* at 65. (Feb. 2024). *Available at*: https://www.puc.pa.gov/media/2884/2023_pa_non-residential_baseline_study.pdf (last accessed January 24, 2026).
[11] *Id*. at 71.

projections while also considering many factors assessing the reasonableness of the Company's projections among its sectors and program components, and among other custom projects included in its Plan, while balancing meeting its energy and demand savings targets and other requirements. The table below compares the Company's projection for CHP projects with the results of the EEPDR Potential Study.

	FE-PA Plan Projection (GWh)	EEPDR MPS Table 39 (GWh)	FE_PA Plan as % of MPS
CHP	100.0	121.5	82%

Recognizing that CHP projects take time to develop and implement, as noted above, like other custom projects, the Company is actively pursuing development of CHP and other custom project pipelines for inclusion in its Phase V Plan. The Company currently has several potential CHP project leads, a CHP project and other custom projects in its pipeline for Phase V. Therefore, the recommendation that the Company should provide additional evidence or support for its CHP projections has no basis in fact and should be rejected.

Relative to OSBA's recommendation that the Commission require the Company to explain why its proposed Solar PV program is not cost-effective, Act 129 *and* the Implementation Order require the Company's Plan *in its entirety* be cost effective.[12] Indeed, the Implementation Order expressly states, in relevant part, that "... while cost-effectiveness is always a priority, an individual program can be implemented **without being cost-effective, provided the EE&C plan as a whole is cost-effective."**[13]

Solar PV is explicitly considered an eligible measure under Act 129 and the EEPDR Potential Study and was recognized for its energy and demand savings and low acquisition

[12] 66 Pa.C.S. § 2806.1(b)(I) ("The electric distribution company shall demonstrate that the **plan** is cost effective using a total resource cost test approved by the commission and provides a diverse cross section of alternatives for customers of all rate classes.") (emphasis added).
[13] Phase V Implementation Order at 40 (emphasis added).

costs in the Commission's goal setting process. The Company's Plan is cost effective as a whole, consistent with Act 129 and Commission requirements. Regarding the cost-effectiveness analysis of this measure, the Company notes that its incremental cost and operations and maintenance cost assumptions, and the Company's assumed phaseout of federal tax credits, as contributing factors to its cost-effectiveness results. The Commission should therefore reject the OSBA's recommendation.

Q. DO YOU AGREE WITH THE RECOMMENDATIONS THAT EXPAND REQUIREMENTS BEYOND THOSE ESTABLISHED IN THE IMPLEMENTATION ORDER OR CALL FOR ADDITIONAL ADMINISTRATIVE REQUIREMENTS?

A. Several parties provide recommendations for tracking and reporting requirements, or call for additional administrative requirements, including, but not limited to, the following:

- OSBA Statement No. 1 at 2: recommends the Company set "small C&I targets for small business participation based on number of unique customers served rather than aggregate measures installed," and includes such data in its tracking and reporting processes that the Company "will plan, track, and report on projected and actual resources dedicated to the Multifamily (MF) sector as a subset of resources …," and that "MF expenditure and participation rates should be tracked and reported separately from small businesses versus multi-family buildings participating in the small C&I program."
- CAUSE-PA Statement No. 1 at 57: recommends the Commission reject the Company's Plan and require the Company to revise its filing to provide "a revised Table 9 that reflects actual measure-level savings and participation

estimates" and for the Company to submit with its revised Plan a supplemental health and safety protocol and reporting framework" including several specific reporting metrics.

- CAUSE-PA Statement No. 1 at 58: recommends the Commission direct the Company to "file a report of its actions and results along with its first annual report in Phase V and with each subsequent annual report" regarding coordination between Act 129, LIURP, other home repair, weatherization, and energy efficiency programs serving low-income customers.
- KEEA Statement No. 1 at 13: recommends that the Company incorporate an assessment that aligns with the Healthy Home Evaluator evaluations from the Building Performance Institute, and that contractor requirements should include Healthy Home Evaluator certification.
- KEEA Statement No. 1 at 16-17: recommends that "EDCs should be required to include in their annual report with the PUC a summary of their outreach activities to each sector."
- KEEA Statement No. 1 at 17: recommends that "EDCs conduct a survey to track awareness of Act 129 programs and to publicly share the findings and use this information as a basis for further consideration of marketing coordination."

The Commission should reject these recommendations for multiple reasons.

First, several of the proposed requirements were included in comments to the Commission's Tentative Implementation Order. In response to comments regarding adding additional tracking and reporting requirements to the EDCs' plans, the Commission established templates for the EDCs to follow for the filing and directed the SWE regarding

the development of templates for the reporting of the EDC Plans for Phase V. The use of these standard templates provides consistency on a state-wide basis in the information and data that is provided in both the EDC plans and reports supporting their review and any additional analysis associated with the EDCs' plans.

The Company's proposed Plan was completed in compliance with the Commission's Phase V Energy Efficiency and Conservation Plan Template issued by Secretarial Letter dated September 8, 2025 (Docket No. M-2025-3052826).[14] In addition, the Commission's Implementation Order includes numerous references regarding Commission direction to the SWE regarding development of the "EDC Annual Report Template" for Phase V, as noted above, many of which are responsive to the comments provided to the Company's Plan. The Company believes that all recommendations regarding tracking and reporting requirements for Phase V are more appropriately addressed on a state-wide basis through the SWE's development of the "EDC Annual Report Template," as envisioned by the Commission in its Implementation Order, and grafting on additional or different requirements that would apply only to FE PA for its Phase V Plan are inappropriate and should not be addressed in a piecemeal fashion.

This ensures the continued consistency in the EDC Annual Reports providing information to all stakeholders across the state and avoids disrupting or creating inconsistencies and confusion with tracking and reporting requirements and the information being presented. The Company recommends rejection of all tracking and reporting recommendations to the Company's Plan and recommends instead that these

[14] Implementation of Act 129 of 2008 - Phase V Energy Efficiency and Conservation Plan Template, Docket No. M-2025-3052826 (Secretarial Letter dated Sept. 8, 2025).

recommendations be addressed as part of SWE's development of the "EDC Annual Report Template."

Second, in response to recommendations that require additional administrative requirements, adopting any new requirements for the Company or the programs that were not considered through the goal setting process and adopted in the Implementation Order raises concerns regarding the ability of the Company to meet its mandated energy and demand targets within the allowable budget, exposing the Company to the risk of severe penalties. Accordingly, the Company recommends that the Commission reject these recommendations.

Q. DO YOU HAVE ANY ADDITIONAL COMMENTS THAT YOU WOULD LIKE TO PROVIDE IN RESPONSE TO THE PARTIES' DIRECT TESTIMONY?

A. Yes. I would like to respond to comments regarding the Company's Plan for Front of the Meter ("FTM") measures and a comment that raises concerns with the Company's projections for Low Income ("LI") New Homes ("New Construction").

Q. WHAT COMMENTS ON THE COMPANY'S PLAN FOR FTM MEASURES THAT YOU WOULD LIKE TO RESPOND TO?

A. Several parties provided comments regarding the Company's proposed FTM program components. These comments can be summarized as follows:

- OCA Statement No. 1 at 33: recommends that "[t]he Company should be assessing for system efficiencies that promote energy savings and demand reductions in its delivery system, without being incentivized by the Act 129 funds. If the opportunities arise, then the Company should request a change to its Plan."

- OSBA Statement No. 2 at 3 and 14-16: provides that "[i]f FirstEnergy adds FTM measures to the Phase V Plan, it will propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Minor Plan Change Order" and "[t]he assignment of costs to the correct class should be a condition for the Commission's approval of the Plan."
- CAUSE-PA Statement 1 at 10: recommends "the Commission reject FE's FTM proposal outright because it will not cause any new benefits for ratepayers other than those that are already in the works in the Company's distribution system plans."

I disagree with these recommendations. In developing the Company's proposed Plan, the Company identified specific potential FTM projects, such as, but not limited to, the replacement of and upgrades to energy delivery equipment (*e.g.*, substation equipment upgrades, distribution equipment upgrades, reconductoring projects) through its Long Term Infrastructure Improvement Plan ("LTIIP"), which was approved for 2025 through 2029;[15] *e.g.*, Conservation Voltage Reduction ("CVR"); efficiency upgrades to Company buildings, and installation of battery storage systems, control equipment, and solar PV projects that are not associated with an existing retail meter; that it proposes to consider and evaluate for inclusion in the Company's Plan. Many projects completed under the Company's capital budget, outside of Act 129, such as its LTIIP, are primarily designed and completed for reliability and resiliency purposes and are not selected, prioritized or evaluated for energy or demand savings.

[15] *See Petition of FirstEnergy Pennsylvania Electric Company for Approval of its Third Long-Term Infrastructure Improvement Plan*, Docket No. P-2024-3050269 (Order entered Dec. 19, 2024).

Including potential FTM measures under the Company's proposed Plan will add additional evaluation of energy and demand savings into the process of designing and implementing FTM projects, and therefore, support continuing and increasing awareness of the benefits of energy efficiency and demand reductions into the Company's operations in support of improving resource adequacy in the State. Additionally, some of these measures are no different than measures that could be implemented at a customer's facility, such as substation and distribution upgrades, and as such are recognized as being able to produce viable savings.

Further, the Demand Study evaluated the use of battery storage as a measure to reduce peak demands, supporting the viability of this measure to produce demand reductions. Through the FTM program components, the Company plans to engage its personnel involved in the design and operations of its energy delivery system to provide energy efficiency awareness and promote the implementation of energy efficient equipment throughout the term of Phase V, realizing the benefits of energy efficiency measures that are installed FTM.

Additionally, FTM projects are effectively the same as other custom projects that are included in the Company's Plan in that the specific measures that are installed and their energy savings are not known in advance and that the quantification of energy and demand savings will involve specific protocols and data requirements to evaluate, measure and verify the energy savings. Recognizing this and that the Commission established a 10% limit on the amount of energy savings that can be included towards its targets, the Company plans to work with its personnel involved in the design and implementation of potential FTM projects, its evaluation, measurement and verification CSP, and the Statewide

Evaluator to identify or establish the appropriate protocols and data requirements necessary to quantify the energy savings of specific FTM projects that the Company pursues under the FTM program components based on their specific measures and measure characteristics.

Furthermore, the budgets included in the Company's Plan are related to the EE&C Team's engagements, as discussed above, and for EE&C administrative activities (*e.g.*, tracking and reporting, evaluation, measurement and verification) associated with including FTM in the Company's Plan, and do not include providing incentives or other funding for the implementation of FTM measures. In fact, the Company's budget for the FTM components is less than one half of one percent of its total Phase V budget. In addition, the Company plans to assign its costs associated with FTM measures consistent with common rate-making practices, including, but not limited to, direct charging where applicable or allocations based on customer counts or sales. In the event that the Company identifies FTM measures for which it would propose to use Act 129 funding to pay for, in whole or in part, the Company would propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders or the expedited review process outlined in the Commission's Order on Act 129 Energy Efficiency and Conservation Program[16] and as affirmed in the Commission's Phase V Implementation Order.[17]

[16] *See Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887 (Order entered June 10, 2011) ("Minor Plan Change Order").
[17] *See Phase V Implementation Order* at 202.

Q. WHY SHOULD THE COMMISSION APPROVE THE COMPANY'S PROPOSED FTM PROGRAM COMPONENT?

A. The Company appreciates the Commission's recognition of the opportunity for and importance of FTM measures in supporting system resource adequacy and the advantageous acquisition costs associated with FTM measures under Act 129.[18] In the development of the proposed FTM program component, the Company considered and included the following components to support its approval:

- The program design includes an implementation plan to engage Company personnel involved in the design and operation of its energy delivery system to provide energy efficiency awareness and promote implementation of energy efficiency measures, and to consider and process FTM projects the same as other custom projects.
- The budget is limited to the EE&C's Team engagement and other EE&C administrative activities associated with including FTM projects in the Company's Plan.
- The assignment of costs and savings to specific customer classes is based on well-accepted rate making principles.
- The commitment to adhere to the ten percent (10%) limitation on the amount of savings that can be included towards its energy savings targets.

The elements outlined above further the goal of achieving system reliability benefits associated with FTM measures and help to mitigate acquisition cost concerns associated

[18] *See Phase V Implementation Order* at 79 (Stating FTM measures like conservation voltage reduction can be low-cost, high-yield EE&C plan components and can help combat growing resource adequacy concerns in the Commonwealth." And "the inclusion of FTM measures should assuage EDCs' concerns about the assumed acquisition costs that informed their Phase V goals.).

with the Company's Phase V targets and other requirements as envisioned by the Commission.

Q. WHAT COMMENTS ON THE COMPANY'S PROJECTIONS FOR LI NEW CONSTRUCTION WOULD YOU LIKE TO RESPOND TO?

A. The OCA asserts that the Company's Phase V estimate of participation in LI New Construction "is higher than past performance suggests is reasonably achievable".[19] However, this opinion does not appear to take into consideration factors that likely impacted the new home construction industry during the Phase IV period, such as the effect of the COVID-19 pandemic, various economic factors and conditions, and unique or prevailing market trends in the housing industry related to demand for new homes. Further, it does not appear that this opinion considered the increased incentives in the Plan for this program component in Phase V, making it difficult—if not impossible—and inappropriate, to compare the Company's projections for Phase V to the Phase IV results. OCA's recommendation is therefore unsupported and should be rejected.

IV. CONCLUSION

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does. However, I reserve the right to supplement, modify, amend, or correct my rebuttal testimony if necessary or appropriate.

[19] OCA Statement No. 1 at 21.

VERIFICATION

I, Edward C. Miller, Manager, Compliance and Development in the Energy Efficiency Department at FirstEnergy Corp, hereby state that the facts set forth in the foregoing FirstEnergy Pennsylvania Electric Company Statement No. 1R are true and correct to the best of my knowledge, information and belief and that I expect to be able to provide the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: January 27, 2026

Edward C. Miller

EXHIBIT 4

FE PA Statement No. 2

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DOCKET NO. M-2025-3057327

Direct Testimony
of
Stephanie R. Zieger

LIST OF TOPICS ADDRESSED

Phase IV Final Cost Collection

Phase V Cost Recovery Mechanism and Initial Rates

Program Cost Reconciliation Process

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DIRECT TESTIMONY
OF
STEPHANIE R. ZIEGER

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Stephanie R. Zieger. My business address is 2800 Pottsville Pike, Reading, Pennsylvania, 19605.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by FirstEnergy Service Company as an Analyst in Rates and Regulatory Affairs - Pennsylvania.

Q. WHAT ARE YOUR RESPONSIBILITIES AS AN ANALYST IN PENNSYLVANIA RATES AND REGULATORY AFFAIRS?

A. Generally, the Pennsylvania Rates and Regulatory Affairs Department provides regulatory support for FirstEnergy Corp.'s wholly-owned Pennsylvania operating company, FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company"), which consists of the following rate districts: Met-Ed Rate District, Penelec Rate District, Penn Power Rate District, West Penn Rate District, and The Pennsylvania State University Rate District which is a sub-part of the West Penn Rate District. I support the development, preparation, and presentation of the FE PA's retail electric rates and related rules and regulations, ensuring uniform administration and interpretation in all its rate-related matters.

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I earned a Master of Science degree in Applied Statistics from West Chester University. Prior to that, I was awarded Bachelor of Science degrees in both Mathematics and

Economics from Elizabethtown College. My work experience is more fully described in Appendix A attached to this testimony.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I am testifying on behalf of FE PA. My testimony applies to all rate districts, unless otherwise stated. Further, rather than reiterating what is included in FE PA's Phase V Energy Efficiency and Conservation Plan ("Phase V Plan") in my testimony, any references to sections of the Plan are incorporated as if fully rewritten herein.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is to explain FE PA's proposed cost recovery mechanism that will be used to recover the costs incurred by the Company during the planning and implementation of the Company's Phase V Plan, which is required by Act 129[1] and the Pennsylvania Public Utility Commission's ("Commission") Phase V Implementation Order.[2] I will also explain how the proposed rates estimated for the first year of the Phase V Plan were determined and how FE PA will recover final costs incurred under its Energy Efficiency and Conservation ("EE&C") Plans that are currently in effect during the Phase IV Period[3] of the Commission's EE&C Program ("Phase IV Plans").[4]

[1] Act 129 of 2008, 66 Pa.C.S. §§ 2806.1-2806.2 ("Act 129").
[2] *Energy Efficiency and Conservation Program*, Docket No. M-2025-303052826 (Order entered June 18, 2025) ("Phase V Implementation Order").
[3] Phase IV of the Commission's EE&C Program is in effect for the five-year period starting on June 1, 2021 and ending on May 31, 2026 ("Phase IV Period").
[4] Phase IV EE&C Plans were required by Act 129 and the Commission's Implementation Order issued at Docket No. M-2020-3015228.

Q. HAVE YOU PREPARED EXHIBITS TO ACCOMPANY YOUR DIRECT TESTIMONY?

A. Yes. The following exhibits, which I will explain in detail later in my testimony, were prepared by me or under my direction, supervision and control:

FE PA Exhibit SRZ-1: FE PA Phase V EE&C-C Rider;

FE PA Exhibit SRZ-2: Illustrative EE&C-C Rider Rates.

II. FINAL RECONCILIATION OF PHASE IV RIDER COSTS

Q. HOW IS FE PA RECOVERING COSTS INCURRED UNDER ITS PHASE IV PLANS?

A. The costs associated with the development and implementation of the Phase IV Plans are currently recovered through each rate district's Phase IV Energy Efficiency and Conservation Charge Rider ("EE&C-C Rider"). These recovery mechanisms were approved by the Commission in the Phase IV Plan proceedings at Docket Nos. M-2020-3020820 (Met-Ed), M-2020-3020821 (Penelec), M-2020-3020822 (Penn Power), and M-2020-3020823 (West Penn) (collectively, the "Predecessor Companies' Phase IV Plans").

Q. DOES THE COMPANY PLAN TO MAINTAIN THE EXISTING PHASE IV EE&C-C RIDER BEYOND THE END OF THE PHASE IV PERIOD?

A. No, the Company plans to terminate the Phase IV EE&C-C Rider at the end of the Phase IV Period, which ends on May 31, 2026. Therefore, a process is required to permit full recovery of Phase IV costs, as certain costs will either not be known by May 31, 2026, or will continue to accrue after Phase IV comes to an end. Therefore, FE PA proposes that an additional adjustment be included in the Company's Phase V recovery mechanism to

account for these remaining Phase IV costs. I will discuss this adjustment for Phase IV costs in more detail later in my testimony.

Q. PLEASE PROVIDE EXAMPLES OF THE TYPES OF PHASE IV COSTS THAT WILL CONTINUE TO ACCRUE POST-COMPLETION OF PHASE IV.

A. The Company will incur a variety of Phase IV-related costs after May 31, 2026, including costs to close out Phase IV program delivery, for evaluation, measurement and verification ("EM&V") of program results, consulting costs related to EM&V analysis, and the development of final reports to the Commission.

III. PHASE V COST RECOVERY MECHANISM

Q. PLEASE DESCRIBE THE COST RECOVERY MECHANISM THAT FE PA IS PROPOSING TO USE TO RECOVER ITS PHASE V PLAN COSTS.

A. As permitted by Act 129 and 66 Pa.C.S. § 1307, FE PA is proposing the implementation of an EE&C-C Rider to recover Phase V-related costs ("Phase V EE&C-C Rider"). The Phase V EE&C-C Rider is, with the minor exceptions I note later in my testimony, virtually identical to the Phase IV EE&C-C Rider that is currently in effect to recover costs incurred under the Predecessor Companies' Phase IV Plans. A copy of the proposed *pro forma* tariff supplement for the Phase V EE&C-C Rider for FE PA is attached to my testimony as Exhibit SRZ-1. Detail regarding the calculation of the rates included in the Phase V EE&C-C Rider is provided in FE PA Exhibit SRZ-2, which is also attached to my testimony.

Q. HOW DOES THE PROPOSED PHASE V EE&C-C RIDER DIFFER FROM THE PHASE IV EE&C-C RIDER?

A. There are two differences between the Phase IV and Phase V EE&C-C Rider designs. The proposed Phase V Plan consists of one consolidated FE PA plan, which will be comprised of one rate per customer class that is uniform among the rate districts. For Phase IV, each rate district had a unique Phase IV Plan, thus the EE&C-C Rider rates were calculated separately for each customer class of each rate district.

The other change is that PJM Interconnection LLC ("PJM") Forward Capacity Market revenues are no longer eligible to be included as a credit in the rate calculation. Therefore, they have been removed from the proposed tariff language in the Phase V Plan EE&C-C Rider (Exhibit SRZ-1).

Q. WAS A COLLABORATIVE HELD TO DISCUSS THE PROPOSED CONSOLIDATED PHASE V EE&C-C RIDER RATES?

A. Yes, as agreed to in the 2023 FE PA Consolidation Settlement,[5] FE PA held a collaborative meeting with the Joint Applicants on November 4, 2025 to discuss the impact of consolidation on the Company's proposed Phase V Plan.

Q. PLEASE DESCRIBE THE PHASE V EE&C-C RIDER.

A. In the Phase V EE&C-C Rider, the Phase V EE&C-C rates are expressed as a price per kilowatt hour ("kWh") for the Residential, Commercial, and Street Lighting customer classes. The Industrial customer class will be billed based upon the individual customer's

[5] See *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company*, Docket Nos. A-2023-3038771, *et al.* (Final Order entered December 7, 2023) ("Consolidation Settlement").

Peak Load Contribution ("PLC") kilowatt ("kW"). The Phase V EE&C-C rates will be calculated separately for the Residential, Commercial, Street Lighting, and Industrial customer classes. As previously indicated, Exhibit SRZ-1 is a copy of the proposed *pro forma* tariff supplement for the Phase V EE&C-C Rider for the FE PA rate districts. The first page of the rider sets forth the Phase V EE&C-C rates, as well as the rate schedules that comprise the Residential, Commercial, Street Lighting, and Industrial customer classes. The remaining pages of the rider set forth: (i) the rate formula that is used to calculate the rates; (ii) a description of how the Phase V EE&C-C rates are developed; and (iii) a description of how revenues billed under the Phase V EE&C-C Rider will be reconciled to actual costs as they are incurred.

Q. PLEASE LIST THE RATE SCHEDULES THAT ARE INCLUDED IN EACH CUSTOMER CLASS.

A. The Residential customer class rate schedule is Rate RS. The rate schedules for the Commercial customer class include Rate GS-Small, Rate GS-V, Rate GS-Medium, Rate H, Rate MS, Rate PNP, Outdoor Area Lighting Service, and Private Outdoor Lighting Service. The rate schedules for the Industrial customer class include Rate GS-Large, Rate GP, Rate TP, Schedule 44, and Schedule 46. Finally, the rate schedules for the Street Lighting customer class include LED Street Lighting Service, Street Lighting Service-ME, High Pressure Sodium Vapor Street Lighting Service, Municipal Street Lighting Service, Ornamental Street Lighting Service, Rate Schedules 51 through 58, and Rate Schedule 71.

Q. ARE THERE ANY CUSTOMERS WHO WILL NOT PAY THE PHASE V EE&C-C RIDER RATES?

A. Yes, customers taking service under the Met-Ed Rate District's or Penelec Rate District's Borderline Service rate schedule will not pay the Phase V EE&C-C Rider charge. These rate schedules are only available to public utility companies for resale in adjacent service territories under reciprocal agreements between the other public utilities and either Met-Ed or Penelec Rate Districts. These public utilities are ineligible for any of the energy efficiency or peak demand reduction programs proposed in the Company's Phase V Plan. Therefore, no Phase V EE&C-C Rider charge will be applied to Borderline Service customers.

Q. WHAT WAS THE BASIS FOR DETERMINING THE RATE SCHEDULES THAT WOULD BE INCLUDED WITHIN THE COMPANY'S CUSTOMER CLASSES?

A. The Phase V EE&C-C Rider rate schedule groupings by Residential, Commercial, Street Lighting, and Industrial customer classes are the same as the customer class groupings that are currently in place in the Company's Phase IV EE&C-C Rider in the Commission-approved tariff. Additionally, the customer classes in the Phase V EE&C-C Rider are aligned with the specific costs within the Phase V Plan budget.

Q. FOR WHAT PERIOD OF TIME WOULD THE PHASE V EE&C-C RIDER FOR THE COMPANY BE EFFECTIVE?

A. The Company proposes that the Phase V EE&C-C Rider become effective for service rendered on or after June 1, 2026 and continue through May 31, 2031.

Q. HOW DOES THE COMPANY INTEND TO COLLECT PHASE V RELATED COSTS THAT WILL NOT BE COLLECTED BY MAY 31, 2031?

A. Assuming future phases of the Commission's EE&C Program, the Company would propose true up of Phase V costs as a component of cost recovery. Should there be no additional phases of the Commission's EE&C Program, the Company reserves the right herein to request, through a separate filing, approval from the Commission to extend the Phase V EE&C-C Rider beyond the end of Phase V in order to collect any remaining Phase V costs and/or to recover any remaining costs through another surcharge mechanism.

Q. WILL THE PHASE V EE&C-C RIDER AND THE ASSOCIATED PHASE V EE&C-C RATES BE BYPASSABLE FOR CUSTOMERS WHO OBTAIN GENERATION SERVICE FROM A SUPPLIER RATHER THAN FROM THE COMPANY'S DEFAULT SERVICE?

A. No. Except for the Met-Ed and Penelec Rate District Borderline Service customers that I previously discussed, all customers will pay the Phase V EE&C-C Rider rate, regardless of the source of the customer's generation service. The Phase V EE&C-C Rider and applicable EE&C-C rates will be applied to each kWh (or PLC kW for the Industrial customer class) delivered during a billing month to customers served under the rate schedules identified as part of either the Residential, Commercial, Street Lighting, or Industrial customer classes.

Q. HOW ARE THE PHASE V EE&C-C RIDER RATES STRUCTURED?

A. Section 7 of the Company's Phase V Plan describes the structure and mechanics of the Phase V EE&C-C Rider. Generally, the Phase V EE&C-C Rider rates billed to the

Residential, Commercial, Street Lighting, and Industrial customer classes consist of three principal components. The first is the EECc, or "current cost," component. The second is the reconciliation component, or "E" factor, for Phase V costs. The third is a second "E" Factor (E2) for collection of Phase IV related costs not collected through the Phase IV EE&C-C Rider.

Q. PLEASE DESCRIBE THE EECc COMPONENT.

A. The EECc component represents the recovery of estimated costs to be incurred during the Annual Computation Period, or "Computational Period," in which the Phase V EE&C-C rates will be in effect for each customer class. As shown on the second and third page of FE PA Exhibit SRZ-1, the EECc component is customer class specific. The costs included in each customer class's EECc rate are identified as EEC_{Exp1}, EEC_{Exp2}, and EEC_{Exp3}.

EEC_{Expl} represents customer class-specific costs that will be associated with the customer class's specific EE&C programs as approved by the Commission. These costs will also include an allocated portion of any indirect costs, such as EE&C Plan marketing costs, that will be incurred by FE PA.

EEC_{Exp2} represents an allocated portion of administrative start-up costs incurred by FE PA in connection with the development of the Phase V Plan and related programs in response to the Commission's orders and guidance in its Phase V Implementation Order. These costs are incurred to design, create, and obtain Commission approval of the Phase V Plan and include, but are not limited to, consultant costs, outside legal fees, and other direct and indirect costs associated with the development and implementation of the Phase V Plan in compliance with the Commission directives.

EEC_{Exp3} represents the costs allocated to FE PA for the funding of the Commission's statewide evaluator contract. These costs are not subject to the 2% spending cap imposed by Act 129.

Q. PLEASE DESCRIBE THE E-FACTOR COMPONENT OF THE PHASE V EE&C-C RATES.

A. The E-factor component of the Company's Residential, Commercial, Street Lighting, and Industrial customer class-specific Phase V EE&C-C rates represents a reconciliation of actual Phase V EE&C program costs incurred by customer class to actual Phase V EE&C revenues billed by customer class on a monthly basis. For FE PA, this monthly reconciliation by specific customer class will result in either an over-collection of costs by customer class (revenues billed, excluding Pennsylvania Gross Receipts Tax ("GRT"), greater than actual costs) or an under-collection by customer class (revenues billed, excluding GRT, less than actual costs). The E-factor component will be applied on a customer class-specific basis.

Q. WILL THE INITIAL PHASE V EE&C-C RATES BY CUSTOMER CLASS INCLUDE A RECONCILIATION OR E-FACTOR COMPONENT?

A. No. Because this is a new rider, the initial Phase V EE&C-C rates will not include an initial Phase V E-factor component. The first time the Phase V E-factor component will be included as part of the determination of the Phase V EE&C-C Rider rates will be in the Company's annual filing that will be submitted to the Commission on or before May 1, 2027 for rates to be effective June 1, 2027. The Phase V E-factor component then will be included in each subsequent Phase V EE&C-C Rider filing.

Q. PLEASE DESCRIBE THE SECOND E-FACTOR (E^2).

A. The second E-factor component (E^2) is a reconciliation adjustment for the collection of Phase IV-related costs that were not collected through the Phase IV EE&C-C Rider. Because of timing, this adjustment will be made for purposes of determining both the Phase V EE&C-C Rider rates that are being proposed as part of the Phase V Plan to be effective on June 1, 2026, and the subsequent Program Year rider rates that will be effective on June 1, 2027. The E^2 over- or under-collection will continue to be collected at the rate district level.

Q. PLEASE DESCRIBE HOW THE RECONCILIATION OF FINAL PHASE IV COSTS WILL BE PERFORMED.

A. Because the rider filings are generally filed with the Commission on May 1st of each year to be in effect on June 1st of that same year, the Phase IV costs will be reconciled in two distinct steps. The first step will reconcile the total actual recoverable Phase IV Plan expenditures incurred through March 31, 2026 to the actual Phase IV Plan revenues collected through March 31, 2026. Because the Phase IV EE&C-C Rider will end on May 31, 2026, the result of the Phase IV reconciliation through March 31, 2026 will appear as a separate component of the Phase V EE&C-C Rider, which will go into effect on June 1, 2026. The second step will account for all actual Phase IV revenues and expenses that are realized during the period April 1, 2026 through March 31, 2027 in a final reconciliation. The final over/under collection that results from this reconciliation will also be included as a separate component of the Phase V EE&C-C Rider rate calculation that will be effective on June 1, 2027.

Q. HOW WILL THE COMPANY INCLUDE ACTUAL COSTS INCURRED THROUGH MARCH 31, 2026 IN THE PROPOSED RATES INCLUDED IN THIS PROCEEDING?

A. The Company does not have the actual data available through March 31, 2026 as of the time of this filing. Therefore, the Company will provide an update to the reconciliation in connection with the compliance filing by May 1, 2026 for rates to be effective on June 1, 2026.

Q. HOW OFTEN WILL THE PHASE V EE&C-C RIDER RATES BY CUSTOMER CLASS BE CHANGED?

A. The Company anticipates that the Phase V EE&C-C Rider rates will be changed annually on June 1st of each year. However, the Phase V EE&C-C Rider includes a provision that allows the Company to seek interim revisions to the Phase V EE&C-C Rider rates should the Company determine that the rates, if left unchanged, would result in material over- or under-collection of all recoverable costs incurred or expected to be incurred by customer class.

Q. WHAT INFORMATION WILL THE COMPANY PROVIDE WHEN SEEKING TO CHANGE THE PHASE V EE&C-C RATES?

A. In its annual submissions to the Commission, the Company will provide the following information in the derivation of the calculated Phase V EE&C-C Rider rates:

1. A reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs for the Phase V EE&C-C reconciliation period, as adjusted for removal of GRT Because this is a new rider, this information is not being provided

in support of the Phase V EE&C-C Rider rates being proposed for the period June 1, 2026 through May 31, 2027. Such reconciliations will be provided starting in Program Year 2 for rates to be effective June 1, 2027.

2. Any adjustment to the forecasted Phase V EE&C-C Rider revenues anticipated to be billed during April and May of the applicable program year, as adjusted for the removal of GRT. Because this is a new rider, this information is not being provided in support of the Phase V EE&C-C Rider rates being proposed for the period June 1, 2026 through May 31, 2027. Such adjustments will be provided starting in Program Year 2.

3. The Phase V EE&C budget estimate for the forthcoming Phase V EE&C-C computational period by rate class.

4. A reconciliation adjustment for any remaining Phase IV EE&C costs that were not collected by the end of the Phase IV Period. This adjustment will only be included in the initial Phase V EE&C-C Rider rates that will become effective on June 1, 2026 and the subsequent Phase V EE&C-C Rider rates that will be in effect for the period June 1, 2027 through May 31, 2028.

Q. WILL THE COMPANY FILE ANY REPORTS RELATED TO THE PHASE V EE&C-C RIDER WITH THE COMMISSION?

A. Yes. As stated in the Company's Phase V EE&C-C Rider, an annual report that is consistent with 66 Pa.C.S. § 1307(e) and sets forth the actual revenues and costs incurred will be filed with the Commission by April 30th of each year. This report will be provided by customer class and will be subject to annual review and audit by the Commission.

IV. INITIAL PHASE V EE&C-C RIDER RATES

Q. IS THE COMPANY PROPOSING SPECIFIC EE&C-C RIDER RATES IN THIS PROCEEDING?

A. Yes. The first page Exhibit SRZ-1 has the applicable Residential, Commercial, Street Lighting, and Industrial Phase V EE&C-C Rider rates that would become effective June 1, 2026. These estimated rates are based on the budgeted costs by customer class for the period June 1, 2026 through May 31, 2027 – costs that are subject to review and approval in this proceeding. The specific calculation of the estimated Phase V EE&C-C Rider rates for each of the rate districts is set forth in Exhibit SRZ-2.

Q. ARE ANY OF THE PROJECTED COSTS INCLUDED IN THE INITIAL EE&C-C RIDER RATES BEING RECOVERED THROUGH BASE RATES?

A. No.

V. CONCLUSION

Q. ARE YOU FAMILIAR WITH THE REQUIREMENTS FOR RECONCILABLE ADJUSTMENT CLAUSES AS SET FORTH IN 66 PA.C.S. § 1307?

A. Yes, I am.

Q. IN YOUR OPINION, DOES THE PHASE V EE&C-C RIDER, AS DESCRIBED IN YOUR TESTIMONY, MEET THE REQUIREMENTS FOR A RECONCILABLE

ADJUSTMENT CLAUSE TARIFF MECHANISM AS SET FORTH IN 66 PA.C.S. § 1307?

A. Yes, the Company's Phase V EE&C-C Rider meets the requirements of 66 Pa.C.S. § 1307, as well as the provisions included in the Commission's Phase V Implementation Order and Act 129.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does. However, I reserve the right to supplement my direct testimony, if necessary.

Resume: Education and Experience of Stephanie R. Zieger

Education:

2012	Bachelor of Science Degrees in Mathematics and Economics – Elizabethtown College, Elizabethtown, Pennsylvania
2016	Master of Science Degree in Applied Statistics – West Chester University, West Chester, Pennsylvania

Experience:

05/12 – 05/15	Assistant Program Underwriter – AmWINS Program Underwriters – Camphill, PA
06/15 – 08/15	Corporate Performance Improvement Intern – Exelon Generation – Kennett Square, PA
08/14 – 12/15	Graduate Assistant – Applied Statistics Program, West Chester University – West Chester, PA
12/15 – Present	Rates Analyst IV – Rates & Regulatory Affairs – Pennsylvania – FirstEnergy Service Corporation

Prepared and presented testimony in the following rate-related cases:

Docket Nos.	*Case Name*
ER20020146	Jersey Central Power & Light Company Base Rate Case

Assisted in development and preparation in the following cases:

Pennsylvania Public Utility Commission Cases:

Docket Nos.	*Case Name*
R-2016-2537349	Metropolitan Edison Company Base Rate Case
R-2016-2537352	Pennsylvania Electric Company Base Rate Case
R-2016-2537355	Pennsylvania Power Company Base Rate Case
R-2016-2537359	West Penn Power Company Base Rate Case
R-2024-3047068	FirstEnergy Pennsylvania Electric Company Base Rate Case

State of New York Public Service Commission Cases:

Docket Nos.	*Case Name*
17-E-0685	Pennsylvania Electric Company Minor Rate Filing
22-E-0668	Pennsylvania Electric Company Minor Rate Filing

ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER

An Energy Efficiency and Conservation ("EEC") Charge ("Phase V EE&C-C") shall be applied to each Billing Unit during a billing month to Customers served under this Tariff, with the exception of those served under Borderline Service rates.

Residential, Commercial, and Street Lighting Customer Class rates will be calculated to the nearest one-thousandth of a cent per kWh. Industrial Customer Class rates will be calculated to the nearest one-hundredth of a dollar per kW PLC. The Phase V EE&C-C rates shall be calculated separately for each Customer Class according to the provisions of this rider.

For service rendered June 1, 2026 through May 31, 2027, the Phase V EE&C-C rates billed by Customer Class are as follows:

Met-Ed				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, MS, OALs	SLS, LED SLS	GS-L, GP, TP
Charge	0.216 cents per kWh	0.268 cents per kWh	0.060 cents per kWh	$1.02 per kW PLC

Penelec				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, H, OALs	HPS SLS, Municipal SLS, LED SLS	GS-L, GP, TP
Charge	0.249 cents per kWh	0.440 cents per kWh	0.057 cents per kWh	$0.95 per kW PLC

Penn Power				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-S, GS-S(GSDS), GS-M, PLS, OALs, GS-V, PNP	SV, LED SLS	GS-L, GP, TP
Charge	0.230 cents per kWh	0.300 cents per kWh	(0.014) cents per kWh	$0.51 per kW PLC

West Penn				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, OALs	51:58, 71, LED SLS	GS-L, GP, TP, 44, 46
Charge	0.235 cents per kWh	0.351 cents per kWh	0.054 cents per kWh	$0.94 per kW PLC

PSU	
Customer Class	Industrial
Rate Schedule	GP
Charge	$0.94 per kW PLC

ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER (continued)

The Phase V EE&C-C rates by Customer Class shall be calculated in accordance with the formula set forth below:

$$EE\&C\text{-}C = \{[EEC_C - E - E^2] / S\} \times [\ 1 / (1 - T)]$$

$$EEC_C = EEC_{Exp1} + EEC_{Exp2} + EEC_{Exp3}$$

Where:

$EE\&C\text{-}C$ = The charge in cents or dollar per Billing Unit by Customer Class as defined by this rider applied to each Billing Unit for the Rate Schedules identified in this rider.

EEC_C = The Energy Efficiency and Conservation Costs by Customer Class incurred and projected to be incurred by the Company for the EE&C-C Computational Period calculated in accordance with the formula shown above.

EEC_{Exp1} = Costs incurred and projected to be incurred associated with the Customer Class specific Phase V EE&C Programs as approved by the Commission for the Phase V EE&C-C Computational Period by Customer Class. The direct costs associated with specific programs are charged to the specific programs. EECExp1 costs also include an allocated portion of any indirect costs incurred associated with all the Company's Phase V EE&C programs for the Phase V EE&C-C Computational Period. Such indirect cost shall be allocated to each customer class based on the ratio of class-specific approved budgeted administrative program costs to total plan-specific approved budgeted administrative program costs.

EEC_{Exp2} = Incremental administrative start-up costs incurred by the Company through May 31, 2026 in connection with the development of the Company's Phase V EE&C Programs in response to the Commission's order and guidance at Docket No. M-2025-3057327. These costs to design, create, and obtain Commission approval for the Company's Phase V EE&C Programs include, but are not limited to, consultant costs, legal fees, and other direct and indirect costs associated with the development and implementation of the Company's Phase V EE&C Programs in compliance with Commission directives. The direct incremental administrative start-up costs associated with specific programs are charged to the specific programs. EEC_{Exp2} costs also include an allocated portion of any indirect incremental administrative start-up costs. Such indirect costs shall be allocated to each customer class based on the ratio of class-specific approved budget budgeted administrative program costs to total plan-specific approved budgeted administrative program cost.

ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER (continued)

EEC_{Exp3} = An allocated portion of the costs the Company incurs and projects to incur to fund the Commission's statewide evaluator contract which shall be excluded in the final determination of the Act 129 limitation on the Company's Phase V EE&C Program costs. Such costs shall be allocated to each customer class based on the ratio of class-specific approved budgeted program costs to total approved budgeted program costs.

E = The cumulative over or under-collection of Phase V EE&C costs by Customer Class that result from the billing of the Phase V EE&C-C rates (an over- collection is denoted by a positive E and an under-collection by a negative E).

E^2 = Phase IV EE&C final reconciliation over or under-collection of EEC costs for each Rate District, by Customer Class, that results from the billing of the Phase IV EE&C-C rates through March 31, 2026 (an over- collection is denoted by a positive E and an under- collection by a negative E), and any expenses to finalize any measures installed and commercially operable on or before May 31, 2026; expenses to finalize any contracts; other Phase IV administrative obligations; and any remaining Phase IV EE&C revenues after March 31, 2026.

S = The Company's projected Billing Units (kWh sales delivered to all Customers in the specific customer class or kW PLC demand for the Industrial Customer Class).

T = The Pennsylvania gross receipts tax rate in effect during the billing month expressed in decimal form as reflected in the Company's base rates.

All capitalized terms not otherwise defined in this rider shall have the definitions specified in the Definitions of Terms section of this Tariff. For the purpose of this rider, the following additional definitions shall apply:

1. Phase V EE&C-C Computational Period – The 12-month period from June 1 through May 31.

2. Phase V EE&C-C Initial Reconciliation Period – June 1, 2026 through March 31, 2027 for the initial period of the rider.

ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER (continued)

3. Phase V EE&C-C Reconciliation Period – The 12-month period ending March 31 each year thereafter, except for the Initial Reconciliation Period, for the duration of this rider.

4. Peak Load Contribution ("PLC") – A Customer's contribution to the Company's transmission zone normalized summer peak load, as estimated by the Company in accordance with PJM rules and requirements.

5. Phase IV EE&C – The energy efficiency plan that terminates on May 31, 2026. Revenues and EE&C Costs will continue to accrue past the termination date. A final reconciliation of the remaining balance will be included in the June 1, 2027 Phase V EE&C-C rate calculation as a separate line item.

The Company will submit to the Commission by May 1 of each year starting May 1, 2027: (1) a reconciliation between actual Phase V EE&C-C revenues and actual Phase V EE&C-C costs for the Phase V EE&C-C Reconciliation Period, except for the Phase V EE&C-C Initial Reconciliation Period, as adjusted for removal of gross receipts tax; (2) any adjustment to the forecasted Phase V EE&C-C revenues anticipated to be billed during April through May of that year, as adjusted for removal of gross receipts tax; (3) the Phase V EE&C program cost estimate for the forthcoming Phase V EE&C-C Computational Period by Customer Class; and (4) Phase IV EE&C final reconciliation over or under- collection of EEC costs by Customer Class that results from the billing of the Phase IV EE&C-C rates and remaining Phase IV EE&C costs. There shall also be a final reconciliation of amounts to be collected or refunded after May 31, 2031.

Upon determination that the Phase V EE&C-C rates, if left unchanged, would result in material over or under-collection of all recoverable costs incurred or expected to be incurred by customer class, the Company may request that the Commission approve one or more interim revisions to the Phase V EE&C-C rates to become effective thirty (30) days from the date of filing, unless otherwise ordered by the Commission.

The Company shall file an annual report of collections under this rider by April 30th of each year starting April 30, 2027 until the conclusion of this rider.

At the conclusion of the duration of this rider, the Company is authorized to recover or refund any remaining amounts not reconciled at that time under such mechanism as approved by the Commission.

Application of the Phase V EE&C-C rates shall be subject to annual review and audit by the Commission.

FirstEnergy Pennsylvania Electric Company's Phase V Energy Efficiency and Conservation Charge ("EE&C-C") C-Factor Rates
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Description	FE PA Residential Customer Class (1)		FE PA Commercial Customer Class (2)		FE PA Street Lighting Customer Class (3)		FE PA Industrial Customer Class (4)		FE PA Total (5)
1	Projected Program Costs for the period June 1, 2026 through May 31, 2027 subject to 2% cap	$ 36,257,025		$ 24,264,647		$ 66,748		$ 20,335,635		$ 80,924,055
2	Incremental administrative start-up costs	380,832		254,868		701		213,599		850,000
3	Statewide Evaluator Costs (June 1, 2026 through May 31, 2027)	358,430		239,876		660		201,034		800,000
4	Total Projected Program Costs for the period June 1, 2026 through May 31, 2027 subject to 2% cap	$ 36,996,287		$ 24,759,391		$ 68,109		$ 20,750,268		$ 82,574,055
5	The cumulative over/(under) collection of Phase V EE&C costs (beginning June 2027)	-		-		-		-		-
6	Total to be collected June 1, 2026 to May 31, 2027 (Line 4 - Line 5)	$ 36,996,287		$ 24,759,391		$ 68,109		$ 20,750,268		$ 82,574,055
7	Billing Units for June 1, 2026 - May 31, 2027 (page 2, line 5)	19,115,351,825	kWhs	10,745,921,734	kWhs	86,109,751	kWhs	34,798,573	kWs	
8	Phase V - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (Line 6 / Line 7)	$ 0.00194	per kWh	$ 0.00230	per kWh	$ 0.00079	per kWh	$ 0.60	per kW	
9	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	1.062699		1.062699		1.062699		1.062699		
10	**Proposed Phase V EE&C-C Rates Effective June 1, 2026 (Line 8 x Line 9)**	**$ 0.00206**	**per kWh**	**$ 0.00245**	**per kWh**	**$ 0.00084**	**per kWh**	**$ 0.63**	**per kW**	

(A) Pennsylvania's Act 129 of 2008 states that the maximum annual cost recovery for Energy Efficiency and Conservation Programs cannot exceed 2% of the electric distribution company's total annual revenue as of December 31, 2006.
(B) For purposes of the Industrial class rate calculation, the billing unit is equal to the Peak Load Share in kWs.
(C) All costs and revenue estimates are current budgets, and subject to modification at a future date. The Statewide Evaluator Cost utilized is the estimate based on the expense to be incurred for Phase V.

11	Percentage of Projected Program costs to allocate admin start-up and SWE costs	44.80%		29.98%		0.08%		25.13%		100.00%

Projected Met-Ed Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Description	Met-Ed Residential Customer Class (1)		Met-Ed Commercial Customer Class (2)		Met-Ed Street Lighting Customer Class (3)		Met-Ed Industrial Customer Class (4)		Met-Ed Total (5)
1	Phase IV over/(under) collection through October 31, 2025	(558,345)		(620,213)		6,543		(3,615,483)		$ (4,787,498)
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	5,911,222,263	kWhs	2,911,355,240	kWhs	28,697,930	kWhs	9,842,614	kWs	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	$ 0.00009	per kWh	$ 0.00021	per kWh	$ (0.00023)	per kWh	$ 0.36733	per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	1.062699		1.062699		1.062699		1.062699		
5	**Phase IV EE&C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)**	**$ 0.00010**		**$ 0.00023**		**$ (0.00024)**		**$ 0.39**		
6	**FE PA Proposed Phase V EE&C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)**	**$ 0.00206**		**$ 0.00245**		**$ 0.00084**		**$ 0.63**		
7	**Total ME Rate:**	**$ 0.00216**	**per kWh**	**$ 0.00268**	**per kWh**	**$ 0.00060**	**per kWh**	**$ 1.02**	**per kW**	

Projected Penelec Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Description	Penelec Residential Customer Class (1)	Penelec Commercial Customer Class (2)	Penelec Street Lighting Customer Class (3)	Penelec Industrial Customer Class (4)	Penelec Total (5)
1	Phase IV over/(under) collection through October 31, 2025	(1,721,174)	(5,964,739)	8,296	(2,726,803)	$ (10,404,420)
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	4,290,591,308 kWhs	3,244,208,078 kWhs	32,483,313 kWhs	8,918,755 kWs	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	$ 0.00040 per kWh	$ 0.00184 per kWh	$ (0.00026) per kWh	$ 0.30574 per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	1.062699	1.062699	1.062699	1.062699	
5	**Phase IV EE&C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)**	**$ 0.00043**	**$ 0.00195**	**$ (0.00027)**	**$ 0.32**	
6	**FE PA Proposed Phase V EE&C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)**	**$ 0.00206**	**$ 0.00245**	**$ 0.00084**	**$ 0.63**	
7	**Total PN Rate:**	**$ 0.00249 per kWh**	**$ 0.00440 per kWh**	**$ 0.00057 per kWh**	**$ 0.95 per kW**	

Projected Penn Power Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Description	Penn Power Residential Customer Class (1)	Penn Power Commercial Customer Class (2)	Penn Power Street Lighting Customer Class (3)	Penn Power Industrial Customer Class (4)	Penn Power Total (5)
1	Phase IV over/(under) collection through October 31, 2025	(379,609)	(466,557)	3,009	255,480	$ (587,677)
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	1,698,301,712 kWhs	896,583,834 kWhs	3,261,779 kWhs	2,190,459 kWs	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	$ 0.00022 per kWh	$ 0.00052 per kWh	$ (0.00092) per kWh	$ (0.11663) per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	1.062699	1.062699	1.062699	1.062699	
5	**Phase IV EE&C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)**	**$ 0.00024**	**$ 0.00055**	**$ (0.00098)**	**$ (0.12)**	
6	**FE PA Proposed Phase V EE&C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)**	**$ 0.00206**	**$ 0.00245**	**$ 0.00084**	**$ 0.63**	
7	**Total PP Rate:**	**$ 0.00230 per kWh**	**$ 0.00300 per kWh**	**$ (0.00014) per kWh**	**$ 0.51 per kW**	

Projected West Penn Rate District Phase V Energy Efficiency and Conservation Charge ("EE&C-C") E-Factor Rates
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Description	West Penn Residential Customer Class (1)	West Penn Commercial Customer Class (2)	West Penn Street Lighting Customer Class (3)	West Penn Industrial Customer Class (4)	West Penn Total (5)
1	Phase IV over/(under) collection through October 31, 2025	(1,995,239)	(3,697,011)	6,085	(3,992,967)	$ (9,679,132)
2	Customer Class Projected Kilowatt-Hours ("kWh") Delivered or Peak Load Contribution Kilowatt ("kW") for June 1, 2026 - May 31, 2027	7,215,236,543 kWhs	3,693,774,582 kWhs	21,666,728 kWhs	13,846,745 kWs	
3	Phase IV - EE&C-C Rates Before Pa Gross Receipts Tax Gross-Up Factor (-Line 1 / Line 2)	$ 0.00028 per kWh	$ 0.00100 per kWh	$ (0.00028) per kWh	$ 0.28837 per kW	
4	Pa Gross Receipts Tax Gross-Up Factor [1 / (1-T) with T = 5.90% Pa Gross Receipts Tax in Base Rates]	1.062699	1.062699	1.062699	1.062699	
5	**Phase IV EE&C-C E-Factor Rates Effective June 1, 2026 (Line 3 x Line 4)**	**$ 0.00029**	**$ 0.00106**	**$ (0.00030)**	**$ 0.31**	
6	**FE PA Proposed Phase V EE&C-C C-Factor Rates Effective June 1, 2026 (Page 1, Line 10)**	**$ 0.00206**	**$ 0.00245**	**$ 0.00084**	**$ 0.63**	
7	**Total WP Rate:**	**$ 0.00235 per kWh**	**$ 0.00351 per kWh**	**$ 0.00054 per kWh**	**$ 0.94 per kW**	

FirstEnergy Pennsylvania Electric Company
Phase V Energy Efficiency and Conservation Charge ("EE&C-C") Rates
Projected Billing Units by Rate District and Customer Class
For the Rate Period June 1, 2026 through May 31, 2027

Line No.	Rate District	Residential Projected kWh	Commercial Projected kWh	Streetlighting Projected kWh	Industrial Peak Load Contribution (kW)
		(1)	(2)	(3)	(4)
1	Met-Ed Rate District	5,911,222,263	2,911,355,240	28,697,930	9,842,614
2	Penelec Rate District	4,290,591,308	3,244,208,078	32,483,313	8,918,755
3	Penn Power Rate District	1,698,301,712	896,583,834	3,261,779	2,190,459
4	West Penn Rate District	7,215,236,543	3,693,774,582	21,666,728	13,846,745
5	**Total**	**19,115,351,825**	**10,745,921,734**	**86,109,751**	**34,798,573**

VERIFICATION

I, Stephanie R. Zieger, Analyst in the Rates and Regulatory Affairs – Pennsylvania at FirstEnergy Service Company, hereby state that the facts set forth in the foregoing FirstEnergy Pennsylvania Electric Company Statement No. 2 are true and correct to the best of my knowledge, information and belief and that I expect to be able to provide the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: January 28, 2026

Stephanie R Zieger

Stephanie R. Zieger

EXHIBIT 5

FE PA Statement No. 2R

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION FOR
APPROVAL OF THE PHASE V ENERGY AND CONSERVATION PLAN OF
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY

DOCKET NO. M-2025-3057327

Rebuttal Testimony
of
Stephanie R. Zieger

LIST OF TOPICS ADDRESSED

Phase V EE&C-C Streetlighting Customer Class

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REBUTTAL TESTIMONY
OF
STEPHANIE R. ZIEGER

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Stephanie R. Zieger. My business address is 2800 Pottsville Pike, Reading, Pennsylvania 19605.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed written direct testimony and exhibits on behalf of FirstEnergy Pennsylvania Electric Company ("Company"), which have been designated as FE PA Statement No. 2 and Exhibits SRZ-1 and SRZ-2.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my Rebuttal Testimony is to respond to certain issues raised in the Direct Testimony of Stacy L. Sherwood (OCA Statement No. 1), submitted on behalf of the Office of Consumer Advocate ("OCA"); specifically, her statements pertaining to the Phase V EE&C-C Rider surcharge for the streetlighting customer class.

II. RESPONSE TO OCA STATEMENT NO. 1

Q. OCA WITNESS SHERWOOD PROPOSES THAT THE COMPANY ELIMINATE STREETLIGHTING MEASURES AS PART OF ITS PORTFOLIO AND "SINCE THE STREETLIGHTING MEASURES WILL NO LONGER BE OFFERED, THE COMPANY SHOULD NO LONGER ASSESS A STREETLIGHTING SURCHARGE RELATED TO ACT 129, AS THOSE CUSTOMERS DO NOT

HAVE AN AVENUE TO PARTICIPATE IN THE PROGRAMS." (OCA St. No. 1 at 16.) DO YOU AGREE WITH MS. SHERWOOD'S PROPOSAL?

A. No. The Company's proposed Phase V Plan contains streetlighting measures, so there will still be a Phase V streetlighting rate to recover these program costs. Cost causation requires the costs incurred to be recovered from the same customer class that benefited from the programs provided.

Q. IF STREETLIGHTING PROGRAM COSTS ARE REMOVED FROM THE PHASE V PLAN, WILL THERE BE ANY OUTSTANDING PHASE IV PROGRAM COSTS TO RECOVER?

A. Yes. As described on page 11 of my Direct Testimony (FE PA Statement No. 2), the second E-factor component ("E^2") is a reconciliation adjustment for the collection of Phase IV related costs that were not collected through the Phase IV EE&C-C Rider. The E^2 over- or under-collection will continue to be collected for the streetlighting customer class for one year, beginning on June 1, 2026, and ending on May 31, 2027. After that year, any remaining over- or under-collection related to Phase IV streetlighting will be rolled into the Commercial customer class. Accordingly, retention of the streetlighting rate is also necessary and appropriate for this reason.

III. CONCLUSION

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does. However, I reserve the right to supplement, modify, amend, or correct my Rebuttal Testimony if necessary or appropriate.

VERIFICATION

I, Stephanie R. Zieger, Analyst in the Rates and Regulatory Affairs – Pennsylvania at FirstEnergy Service Company, hereby state that the facts set forth in the foregoing FirstEnergy Pennsylvania Electric Company Statement No. 2R are true and correct to the best of my knowledge, information and belief and that I expect to be able to provide the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: January 27, 2026

Stephanie R Zieger

Stephanie R. Zieger

OCA St. 1

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY FOR APPROVAL OF ITS PHASE V ENERGY EFFICIENCY AND CONSERVATION PLAN	**)**	**DOCKET NO. M-2025-3057327**

PUBLIC, REDACTED VERSION

DIRECT TESTIMONY

OF

STACY L. SHERWOOD

ON BEHALF OF
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

January 16, 2026

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I. INTRODUCTION

Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?

A. My name is Stacy L. Sherwood. I am a Principal with Energy Futures Group ("EFG"). Our office is located at 10298 Route 116, Hinesburg, Vermont 05461. EFG provides expert consulting services in the design and evaluation of programs and policies that promote investments in efficiency, renewable energy, distributed resources, and strategic electrification.

Q. ON WHOSE BEHALF ARE YOU APPEARING?

A. I am presenting testimony on behalf of the Pennsylvania Office of Consumer Advocate ("OCA").

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. On November 26, 2025, FirstEnergy Pennsylvania Electric Company ("FE" or "Company") filed a *Petition of FirstEnergy Pennsylvania Electric Company for Approval of its Phase V Energy Efficiency and Conservation Plan* ("Plan"). EFG was retained by the OCA to assist in the review of FE's Plan. I will address the cost-effectiveness, program design, the Plan's compliance with the Pennsylvania Public Utility Commission's ("Commission") Phase V Implementation Order, and the reasonableness of the overall Plan.

Q. PLEASE DESCRIBE YOUR QUALIFICATIONS, WORK EXPERIENCE, AND EDUCATIONAL BACKGROUND.

A. I have more than 15 years of experience in the energy sector, related specifically to the review and development of energy efficiency and demand response programs, as well as experience with automated metering infrastructure, cryptocurrency, and revenue requirements. I have reviewed electric and natural

gas efficiency programs in Arkansas, Connecticut, Iowa, Kentucky, Maryland, Ontario, and Pennsylvania. I hold a Bachelor's Degree in Accounting, Business, and Economics from McDaniel College. My qualifications are summarized in my resume, which is provided in Attachment A.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS ON UTILITY ISSUES?

A. Yes. On behalf of the OCA, I have testified regarding prior Act 129 Plans for PPL Electric Utilities and Duquesne Light Company in Phases III and IV. I also have testified in numerous other cases before the Commission and other state commissions, as listed in my resume.

Q. HAVE YOU REVIEWED THE PHASE V PLAN?

A. Yes. I have reviewed the material filed in the Company's Plan, including the Direct Testimony of Edward C. Miller and the Direct Testimony of Stephanie R. Zieger. I have also reviewed the Company's responses to Interrogatories from the Coalition for Affordable Utility Services and Energy Efficiency ("CAUSE-PA"), Office of Small Business Advocate ("OSBA") and the OCA.

Q. PLEASE DESCRIBE THE MAIN COMPONENTS OF THE COMPANY'S PLAN.

A. FE's Plan includes four efficiency programs, including the Residential Energy Solutions Program, Low Income Energy Efficiency Program, C&I Energy Solutions Program – Small, and C&I Energy Solutions Program - Large, designed to reduce energy consumption by 1,119,031 MWh over the five-year Plan and peak demand by 292 MW in the summer and 261 MW in the winter.[1] Overall, the Plan will cost $390,319,523 million over the five years (excluding

[1] Company Plan, Appendix C FE PA Table 1: Program Savings by Program Year, 6.

Statewide Evaluator ("SWE") costs), which is equivalent to spending 2% of FE's 2006 revenue, with annual Plan budgets ranging from $76.5 million to $80.9 million.

The majority of the Plan's programs are a continuation of Phase IV programs, with the following key modifications:

- Transitioned energy efficiency kits and school education from a program to outreach and marketing.
- Added program component to co-fund ASHRAE Level 2 audits to support the Inflation Reduction Act Home Efficiency Rebates ("IRA HER").[2]
- Added Residential and Commercial daily load-shifting ("DLS") and peak demand reduction ("PDR").
- Added a Front-of-Meter ("FTM") component to both the Residential and Commercial portfolios.

As part of the Phase V Commission Implementation Order, the Commission established consumption reduction targets, peak demand reduction targets, and low-income consumption reduction targets for each electric distribution company ("EDC"). Additionally, each EDC's Phase V plan is limited to an annual budget of 2% of their 2006 revenues.[3] Table 1, below, compares the Company's proposed Plan with the Commission's Final Phase V targets and spending limits.

[2] An ASHRAE Level 2 Energy Audit is a detailed analysis of a building's energy use, identifying specific energy conservation measures (ECMs) with cost-benefit analysis.

[3] As briefly highlighted in the OCA Comments submitted in response to the Implementation Order for Phase V at docket M-2025-3052826, the current budget cap has remained unchanged for more than 20 years and no longer reflects inflation, the increased cost of implementing comprehensive measures, or the need to address health and safety issues that prevent homes from participating. Consequently, the buying power of the funds has eroded, contributing to a significant decline in achieved energy savings over time.

Table 1 Phase V Target Compliance

	Consumption Reduction (MWh)	Peak Demand Reduction (MW)	Low-Income Consumption Reduction (MWh)	Five Year Total Budget
Phase V Targets	1,097,605	191	86,913	$390,320,135
FE Proposed Plan	1,119,031	292.894	88,086	$390,319,523

Q. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.

A. The Company's Plan, as currently designed, appears to carry significant risk of failing to achieve cost-effectiveness and failing to achieve the consumption and demand reduction targets that the Commission established. The limited budget and savings surplus, combined with the absence of Phase IV carryover savings, raises concerns about whether the Plan will deliver benefits that outweigh its costs if the Plan is not implemented **exactly** as designed. The current plan design is lacking and is unreasonable because of its reliance on incorrectly forecasted participation, reliance on short lived savings, saturated markets, and still to be determined program designs, which has been outlined in this testimony. As proposed by the Company, I would recommend the Commission deny the Plan and require the Company to revise its Plan for review to address these concerns. As part of those revisions, I recommend that the Company make the following adjustments:

- Short-lived energy savings should be limited to 25% of the total Phase V savings.
- The Plan should include more granular details at the measures level to allow parties to sufficiently review whether all customers contributing to the surcharge are

able to participate. This includes providing grouping of measures for small business customers and identifying pathways addressing certain industries such as agriculture or data centers. The Company should provide this level of detail in future Act 129 plans provided to the Commission.

- The residential lighting and street lighting markets have matured and are highly saturated. The Plan should cease investment in those measures. The funding associated with residential lighting should be reallocated to support weatherization measures in the residential portfolio. The funding allocated to street lighting should be reallocated to commercial weatherization measures.
- Commercial lighting should be limited to 20% of the total portfolio savings, with investment gradually declining over the Phase to reduce investment in commercial lighting.
- Home Energy Reports should only be provided to customers that exceed 7.72 kWh of energy usage per square foot per year for market-rate customers, and to income-qualified customers that exceed 6,000 kWh per year.[4] Overall savings from Home Energy Reports should be limited to less than 10% of the total portfolio percentage of the portfolio. This should be applied to both

[4] Market-rate customers are those will receive a rebate not based upon income eligibility.

the Residential Energy Solutions Program ("RESP") and the Low Income Energy Efficiency Program ("LIEEP") behavioral components.

- The Company should track participation of Home Energy Report recipients to assess whether and which programs there may be cross-participation. FE should use this information to inform future reports to encourage cross-participation in the other residential programs.
- The Company should clarify which International Energy Conservation Code ("IECC") was used to develop the savings for the New Homes components of the RESP and LIEEP. If the Company did not use the 2021 IECC, then it should update its projections for both saving and forecasted participation to reflect the more stringent baseline.
- The Company should provide in its rebuttal testimony how it plans to achieve increased levels of participation in the LIEEP New Homes component in Phase V compared to the Phase IV participation levels, given the increase in baseline.
- To address residential program barriers, the Company should establish a $1 million budget for health and safety measures, outlining the requirements for the use of that funding to move forward deferred programs. The Company should also establish a moderate-income

component in the RESP, providing increased incentives for customers between 151-250 percent of the Federal Poverty Level Guidelines. The Company should explore using some funds from rebates to pilot an interest rate buy-down initiative, to minimize the barrier of upfront costs associated with the adoption of energy efficiency measures for both residential and small commercial customers. In lieu of a pilot program, the Company should explore opportunities to partner its customers with, and educate its customers on, energy efficiency financing opportunities.

- The Company should remove its Daily Load Shifting and Peak Demand Reduction component from its Residential and Commercial portfolios until it is able to secure a Conservation Service Provider that can provide additional details concerning the program parameters, rules, incentives, and reasonable projections for participation and savings for the Commission's consideration.
- The Company should not fund its Front-of-Meter initiative and should instead allocate that funding toward the $1 million fund for health and safety remediation.
- The Company should include in its Plan measures that proactively integrate Act 129 program opportunities for commercial and industrial customers during the

interconnection and economic development process, particularly for large customers such as data centers.

Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

A. Following this introductory section, my testimony is divided into ten sections: Reasonableness of Plan, Lighting, Home Energy Reports ("HER"), Moderate Income Program, New Homes, Addressing Residential Program Barriers, Residential and Commercial DLS and PDR, Front-of-Meter Component, Interconnections and Data Centers, and Conclusions.

II. REASONABLENESS OF PLAN

Q. HAVE YOU DETERMINED THE COMPANY'S PLAN TO BE COST-EFFECTIVE AND BENEFICIAL TO CONSUMERS?

A. The Plan, as proposed by FE, is projected to have a gross cost-effective Total Resource Cost ("TRC") of 1.10, indicating that for every dollar spent, there is a $1.10 in benefits recognized from the programs. This indicates that the benefits outweigh the costs of the Plan, which is particularly important given the Company's estimate that there will be no carryover savings from Phase IV. A ratio closer to 1.0 indicates fewer benefits available to offset potential variations from the Plan design, including changes in program administrative costs, deviations from forecasted participation levels, or the need to adjust incentives in response to shifts in demand and incremental costs. Plans are rarely implemented exactly as designed, which is why the Commission allows flexibility in incentive levels as well as minor and major Plan modifications throughout a phase. Accordingly, it is reasonable to question whether the proposed Plan will ultimately be delivered in a cost-effective manner.

To assess program reasonableness, the Commission should consider the Plan's design, prior program performance, changes to program design and marketing efforts, and broader market impacts. One way to do that is to consider the net-to-gross impacts, which account for free ridership, spillover, and market efforts. Together, these elements help determine the extent to which the Plan drives energy and demand savings in the market. After adjusting for net-to-gross impacts, the Plan is forecasted to achieve a TRC of 0.996. This indicates that the cost of the Plan when accounting for net-to-gross impacts **does not exceed** the benefits calculated in the TRC test. As a result, if administrative costs increase beyond expectations or customer participation falls below forecasted levels, the Plan's cost-effectiveness would likely be adversely affected.

I recognize that the Implementation Order directs the targets to be assessed using gross verified savings.[5] However, due to my concerns regarding the design of the program as outlined in the remainder of this testimony, coupled with program performance in Phase IV to date, the net TRC should be considered in assessing whether it is reasonable to believe that the Plan will be cost-effective once implemented. Some of my concerns include the Plan's heavy reliance on savings on saturated markets for savings, unrealistic forecasted participation and savings in certain programs, and limited operational information on new program components.

While the Plan put forward by FE is designed to be cost-effective, I have serious concerns as to whether it will be cost-effective when implemented and whether the benefits will outweigh the ratepayers' investment. The remainder of my testimony will highlight recommendations to ensure that investment of

[5] Implementation Order at 222.

ratepayer dollars into Act 129 is prudent and promotes energy efficiency programs and measures designed to transform the market. If the Commission were to approve FE's Phase V Plan as currently proposed, I do not believe that the portfolio would be cost-effective nor deliver the benefits that it should to ratepayers.

Q. DO YOU BELIEVE THAT THE PLAN IS REASONABLE?

A. No, I do not. In my review of the Plan, I do not believe that the Company has done its due diligence in developing a plan that will reasonably deliver cost-effective energy savings and demand reductions when implemented. As a result, I recommend that the Commission decline to adopt the Plan as proposed and, instead, require FE to make significant changes before approval.

As currently proposed, the Plan fails to consider real world situations, continues to incentivize measures well beyond market transformation, and is not innovative in a way that will ensure continued success of the Act 129 programs in the future and provide savings for participants and non-participants. The Plan is focused on incentivizing measures that have already been widely adopted and that deliver short term savings, rather than diversifying to include longer-lived, comprehensive measures. The PUC's own consumer-facing materials describe Act 129 programs as providing opportunities for consumers to *take energy efficiency and conservation to the next level*, which implies moving beyond baseline measures toward deeper, ongoing efficiency adoption.[6]

There exists a lack of information on how the programs will operate until the Company has secured its conservation service provides ("CSPs") and can

[6] "Energy Efficiency & Conservation Information for Your Home," Pennsylvania Public Utilities Commission, https://www.puc.pa.gov/General/consumer_ed/pdf/EEC_Home-FS.pdf?utm_source=chatgpt.com.

finalize the design of new and existing programs. Finally, while the Company has identified risks associated with the programs, I do not believe that they have adequately addressed those risks, nor have they sufficiently provided evidence of how program components will perform better than historical participation, given there is no significant change in marketing or design from Phase IV.

The Commission's establishment of a first-year savings target, rather than lifetime savings, has resulted in the EDCs focusing on obtaining short-lived savings, such as lighting and home energy reports, to meet its goal. While the short-lived savings from those initiatives are a low-cost investment, it should not serve as the mechanism to achieve a significant portion of the Plan's target. Rather it should be coupled with a portfolio designed to promote more costly measures with lower adoption rates, such as weatherization, to create a cost-effective portfolio that provides long-lived, persistent benefits. For FE, 38 percent of the energy savings forecasted for Phase V is from energy savings measures with a maximum life of 2 years.[7] As a result, a significant portion of these savings will not persist through the end of Phase V, and **none** will remain two years after the conclusion of Phase V. If the Company continues to focus a significant portion of its portfolio on short-lived savings, there will be minimal benefits to ratepayers, particularly non-participants, since it provides little benefits outside of the two years. Thus, short-lived savings make it more difficult to provide a cost-effective portfolio in the next Phase, when the low-cost measures are no longer available due to a mature and saturated market, resulting in the Company needing to invest more to obtain harder-to-reach and

[7] This is based on the savings from lighting and home energy reports within the Plan reported Pa PUC Table 9.

lower cost-effective savings. Short-lived saving should comprise no more than 25% of the total Phase V savings so that there are continued benefits for both participants and non-participants after the conclusion of Phase V, to increase the level of persistent savings beyond the phase while balancing low-cost savings.

Q. DO YOU HAVE ANY OVERARCHING RECOMMENDATIONS FOR THE PLAN?

A. Yes, the Company seems to have provided a Plan based on how it will market the programs to customers. For example, if you are a residential customer, the Company offers a suite of programs for residential customers to participate in and if they are income-qualified, they can participate in the Resource Constrained programs. While this categorization is beneficial for customers seeking programs and measures, it is not an efficient way to evaluate the Plan to ensure it meets the policy and targets established for Phase V. The lack of detail at the measure level, including the lack of a breakdown regarding which measures are available for certain industries or small business customers, makes it difficult to evaluate whether the Plan is reasonable and whether it sufficiently provides an opportunity for all ratepayers paying the surcharge to participate in the programs. This includes providing grouping of measures for small business customers and identifying pathways addressing certain industries such as agriculture or data centers. Going forward, I recommend that the Company provide any future Act 129 plans with this granular level of detail, similar to the other Act 129 EDCs.

III. LIGHTING

Q. WHAT ROLE DOES LIGHTING HAVE IN FE'S PHASE V PLAN?

A. The Company's Plan is projected to have approximately 29% of its energy savings, or more than 320,000 MWh, come from lighting measures. The level of annual investment and savings from lighting remains the same throughout Phase V. Table 2 provides a summary of the costs and savings associated with the lighting savings related to residential, commercial, and street lighting.

Table 2 Phase V Lighting Savings.[8]

	Savings (MWh)	Percent of Portfolio
Residential	3,969	0.4%
Commercial	314,416	28.1%
Street Lighting	2,564	0.2%
Total	320,949	28.7%

Q. WHY IS THE LEVEL OF SAVINGS FROM LIGHTING MEASURES CONCERNING?

A. While the measures are highly cost-effective at a gross level, the lighting market has matured and is highly saturated. The Act 129 programs have successfully transformed the market into one where consumers are likely to install LED lighting absent program intervention, indicating that incentives are no longer necessary to encourage market activity and can lead to the reduced recognition of savings as existing LEDs are replaced with new LEDs. As a result of the market transformation, one would expect the elimination of measures or even a

[8] FirstEnergy Pa PUC Table 9.

decline in lighting measures incentivized over the phase. Instead, FE is projecting the same level of savings annually from lighting in all three areas.

Q. WHAT EVIDENCE IS AVAILABLE TO SUPPORT A MATURE RESIDENTIAL LIGHTING MARKET?

A. Residential lighting is widely viewed as a market that has largely achieved transformation, particularly following the adoption of updated federal minimum efficiency standards for general service lamps. This is supported by the 2023 Pennsylvania Statewide Act 129 Residential Baseline Study, which found that LED lighting accounts for approximately 59 percent of all residential sockets statewide, with LEDs occupying 44 percent of sockets in the average Pennsylvania home, representing roughly a doubling since the 2018 baseline study.[9] LED penetration was found to be nearly universal, with approximately 99 percent of homes containing at least one LED bulb, indicating a highly saturated and largely transformed residential lighting market.[10]

While residential LED lighting is still included in the Technical Reference Manual ("TRM"), direct replacement assumes a measure life of two years, recognizing the transformation of the market and decreasing the longevity of savings. Furthermore, the Market Potential Study ("MPS") assumed "virtually no potential for residential lighting, despite EDCs still pursuing significant lighting savings in Phase IV."[11]

Q. WHAT EVIDENCE IS AVAILABLE TO SUPPORT A MATURING COMMERCIAL LIGHTING MARKET?

[9] NMR Group's 2023 Pennsylvania Statewide Act 129 Residential Baseline Study, accessible at https://www.puc.pa.gov/media/2883/2023_pa_residential_baseline_study.pdf
[10] *Id*. at 7.
[11] Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study, Pennsylvania Statewide Evaluation, February 7, 2024, https://www.puc.pa.gov/pcdocs/1867286.pdf, page 9.

A. The state's Non-Residential Baseline Study noted that the commercial lighting market has matured significantly in the past decade. Indeed, "the percent of sites with LEDs jumped from 60 percent in 2018 to 82 percent in 2023. By count, LED technologies represent 60 percent of commercial lighting statewide and 40 percent of the total installed wattage."[12] Since that study was completed, there were two additional years of the commercial programs influencing the lighting market, further fueling concerns that there is a risk of LED-to-LED replacements which will reduce the savings recognized by the program. To this latter point, the Company indicated that it would rely on customers and contractors to attest that the existing lighting technology being replaced is not an LED and that the Company will perform random inspections.[13] However, there are often risks associated with reliance on self-reporting and the percentage and frequency of inspection is unknown.

Q. WHAT EVIDENCE IS AVAILABLE TO SUPPORT A MATURE STREET LIGHTING MARKET?

A. In its most recent rate case, the Commission approved FE's request for the creation of the LEDC Rider to support its Streetlight Conversion Program, to replace non-LED streetlights with LED streetlights. The Company requested this rider, as it recognized that the streetlight market had transformed to LEDs. The Company indicated as much in this statement in its rate case:

> Technology advancements have led to increased LED adoption across the US and globally. In 2018, the Department of Energy ("DOE") indicated approximately 50% of US street/roadway lights had converted to LED, roughly doubling since 2016…The Company's primary fixture vendor has indicated an approaching end to SV

[12] Ibid.
[13] Company response to OCA 1-6.

> [Sodium Vapor] fixture manufacturing. The associated SV fixture parts are becoming scarcer as the supporting supply chains have shifted to serve the LED market or ceased operation.[14]

The surcharge is designed to recover the remaining net asset value of non-LED fixtures, as the cost of installation of the LEDs will be included in the LED rates.

Q. WHAT IS YOUR RECOMMENDATION REGARDING LIGHTING IN THE PHASE V FE PLAN?

A. As mentioned above, the lighting markets for residential and streetlighting have matured and indicate that program intervention is not necessary for customers to adopt LEDs. Therefore, I recommend that the Company eliminate residential lighting and street lighting measures as part of its portfolio and invest those funds in longer-lived savings, such as HVAC and weatherization measures on the residential and commercial sides respectively. Additionally, since the streetlighting measures will no longer be offered, the Company should no longer assess a streetlighting surcharge related to Act 129, as those customers do not have an avenue to participate in the programs.

For the commercial lighting savings, given that the market is still maturing, the portfolio should focus lighting efforts on 20 percent or less of the commercial savings, declining annually over Phase V, to acknowledge the maturation of the commercial lighting market. The funds that were previously allocated to commercial lighting should be refocused to support commercial envelope weatherization measures, such as air sealing and insulation, as well as HVAC equipment upgrades. While commercial weatherization measures

[14] Direct Testimony of Mark S. Kehl, Before the Pennsylvania Public Utility Commission, Docket No. R-2024-3047068, FE PA Statement No. 6, page 9 lines 3 -13.

are typically more costly, they provide longer-lived savings, and the additional investment can be offset by the less-costly savings provided by commercial lighting in Phase V.

IV. HOME ENERGY REPORTS

Q. PLEASE DESCRIBE THE HOME ENERGY REPORTS.

A. The Company plans to continue providing Home Energy Reports ("HERs") in Phase V to its customers through the Residential Energy Solutions Program ("RESP") and the Low Income Energy Efficiency Program ("LIEEP). Over five years, the HERs represent 30 percent of the total residential portfolio savings, and 32 percent of RESP and 22 percent of LIEEP portfolios. Due to the behavioral nature of the HERs, the savings resulting from this effort are short-lived, cannot be transferred between owners, and vary based upon usage and house size.

Q. DO YOU HAVE CONCERNS WITH SIGNIFICANT RELIANCE ON "HERS" FOR RESIDENTIAL SAVINGS?

A. Yes. While I can understand the attractiveness of offering the reports because they tend to be highly cost effective, HER savings are behavioral in nature and do not result in permanent physical improvements to customer homes, which means that these savings require ongoing program expenditures to sustain and do not provide the same long-term certainty as equipment-based or building envelope measures; measures such as heat pumps and insulation have 15-year measure lives, providing an opportunity for greater lifetime savings. Moreover, due to the lack of physical improvements, HER savings do not persist across homeowners or tenants when occupancy changes within a housing unit.

In addition, the per-household energy savings associated with behavioral measures are generally modest relative to comprehensive efficiency upgrades. As a result, HER programs typically have a limited ability to meaningfully reduce household energy burden, particularly for customers facing high fixed energy costs or inefficient building conditions. Behavioral savings also tend to be driven disproportionately by higher-usage customers, which may affect how program benefits are distributed across income groups.

Q. WHAT IS THE PORTFOLIO-LEVEL IMPLICATIONS OF INCREASED RELIANCE ON BEHAVIORAL SAVINGS SUCH AS "HER"?

A. From a portfolio perspective, increased reliance on behavioral savings concentrates a larger share of residential savings in measures with shorter effective lives and modest per-participant savings. This concentration increases portfolio risk relative to portfolios with a higher share of long-lived, equipment-based savings and reduces flexibility if savings underperform or decay more rapidly than anticipated.

National best practice on energy efficiency portfolio design emphasizes the importance of balancing short-lived measures with longer-lived measures that deliver durable savings over time. Research by the American Council for an Energy-Efficient Economy ("ACEEE") notes that portfolios overly oriented toward short-term savings may inadvertently prioritize measures that are cost-effective on a first-year basis, but that provide less cumulative value if lifetime savings are not explicitly considered.[15] Given the fixed budgets associated with Act 129 programs, greater reliance on HER savings may therefore limit the extent to which program resources are directed toward more comprehensive

[15] American Council for an Energy-Efficient Economy (ACEEE), *Measuring and Valuing Lifetime Energy Savings in Policy and Planning*, Report U1902 (2019).

residential strategies, such as building envelope improvements and residential heat pump technologies. Phase V presents an opportunity to leverage near-term behavioral savings while beginning to rebalance the residential portfolio toward more durable strategies that provide longer-lived savings and greater long-term value for ratepayers.

Q. WHAT IS YOUR RECOMMENDATION FOR INCLUSION OF "HER" IN THE RESIDENTIAL PORTFOLIO?

A. It appears that the Company is breaking the HERs into five cohorts of customers and only providing the reports for the course of one year.[16] This methodology reduces the decaying savings after the first year and follows the assumptions in the MPS that cohorts should cease receiving reports after two years.[17] I applaud the Company's effort to reduce the decaying savings. I also see an opportunity for the Company to further maximize the value of the HER, by tracking participation from those receiving HERs to its other programs and using this to cross-promote other Act 129 programs that drive more permanent savings through measure installation.[18] Therefore, should the Commission approve a Phase V plan that includes HER reporting, I would recommend that the Company begin tracking whether HER recipients are participating in other residential programs and that the Company use that information to influence the content of the HER.

The HER that is provided under the LIEEP and RESP components should be limited to customers with high usage based on square footage rather than providing the reports to all residential customers during Phase V. As noted

[16] Company response to OCA 1-2 Attachment A.
[17] Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study, Pennsylvania Statewide Evaluation, February 7, 2024, https://www.puc.pa.gov/pcdocs/1867286.pdf, page 10.
[18] Company response to OCA 2-2.

above, those customers drive the savings recognized under behavioral programs. This can also serve as an opportunity to promote the other LIEEP and RESP components, which will hopefully drive comprehensive and long-lived savings. Focusing the report on high usage customers will drive the best savings for HER and the excess funds that result from limiting the HERs should be invested in the other LIEEP and RESP components.

For LIEEP, HER should be limited to customers with usage that qualifies for the Company's Low Income Usage Reduction Program ("LIURP"), which applies to income-qualified customers with annual usage exceeding 6,000 kWh. For RESP, this should be limited to customers that use 7.7 kWh per square foot per year.[19] This is equivalent to 150% of the average home's energy usage in Pennsylvania per the United States' Energy Information Administration's Residential Energy Consumption Survey ("RECS") Dashboard.[20] From a portfolio perspective, total savings from HER should not exceed 10% of the portfolio energy savings, to limit the level of short-lived savings in the portfolio.

V. NEW HOMES

Q. PLEASE SUMMARIZE THE NEW HOME COMPONENTS OF THE PLAN.

A. The Company's plan has two New Home components, one for market-rate customers and another for low-income customers. These programs are designed to "achieve modeled energy savings of 15 percent above the current adopted

[19] The threshold of 7.7 kWh per square foot per year was determined using the residential average site consumption per household of 10,248 kWh multiplied by 150% to ensure it encompassed high usage electric baseboard customers which are recognized as 125% of average electric users. Then the energy usage was divided by 1,991 which is the total RECS total square footage per housing unit for Pennsylvania.

[20] U.S. Energy Information Administration, Residential Energy Consumption Survey Dashboard for Pennsylvania, https://experience.arcgis.com/experience/cbf6875974554a74823232f84f563253.

building codes (i.e., 2018 International Energy Conservation Code ("IECC")) to qualify."[21] The new homes can also receive additional incentives if they achieve ENERGY STAR Certification. The incentives are available to homes with or without a natural gas connection.

Q. DO YOU HAVE CONCERNS WITH THE NEW HOME COMPONENTS?

A. Yes, I have the following concerns:

1. The 2026 Pennsylvania TRM adopted the 2021 IECC; and
2. The number of homes forecasted under the LIEEP New Home Component is higher than past performance suggests is reasonably achievable.

The 2026 TRM has assumed the baseline for new construction to be the 2021 IECC. It is unclear from the Company's response to OCA 1-8 whether the Company's savings for the New Home components are based on the 2018 or the 2021 IECC. If the former, the Company should update its savings assumptions and consider whether it is able to achieve the same forecasted level of participation. If the latter, the Company should explain how it expects to sustain similar or higher participation levels in the New Homes components, given the more stringent baseline and the likely adjustment period needed for builders to adapt to the new requirements.

Finally, the forecasted level of participation for the LIEEP New Home component is significantly greater than Phase IV participation on an annual basis and raises the concern of whether the forecasted low-income energy savings from that component will be realized to meet the carve out. In Phase V, [BEGIN CONFIDENTIAL] [redacted]

[21] Company response to OCA 1-8.

[redacted][END CONFIDENTIAL] The proposed Phase V performance is higher than that experienced in Phase IV, see Table 3 below, during which only PY 13 produced a similar number of units to the Phase V annual forecasted participation. The Company's forecast for enrollment in the New Homes component appears overly optimistic, as the projected participation levels exceed what past program performance suggests is reasonably achievable. This raises concerns that the Plan may overstate expected savings and understate the challenges associated with achieving the forecasted targets.

Table 3 Phase IV LIEEP New Home Component Performance.[22]

	PY 13	PY 14	PY 15	PY 16
Units	49	18	26	38
Savings (MWh)	110	62	64	120

Q. WHAT IS YOUR RECOMMENDATION FOR THE NEW HOME COMPONENTS?

A. The Company should clarify which baseline is assumed for the New Home component. If the Company assumed the 2018 IECC baseline, it should update its projections based on the 2021 IECC baseline as part of its rebuttal testimony. If the Company assumed the 2021 IECC baseline, it must justify its forecasted participation levels in light of the more stringent baseline taking effect in PY 18. Furthermore, the Company should either provide a plan to support the increased participation of the LIEEP New Home component or refine its forecasted level of participation and savings to reflect a reasonable level of participation.

[22] Company response to CAUSE-PA 1-8 Attachment A.

VI. ADDRESSING RESIDENTIAL PROGRAM BARRIERS

Q. DID THE COMPANY ASSESS BARRIERS ASSOCIATED WITH THE RESIDENTIAL PROGRAMS?

A. The Company recognized that upfront costs and health and safety issues serve as significant barriers in the residential programs. However, it does not appear that the programs have been designed in any manner to address these barriers and to facilitate equitable access to the residential programs.

Q. WHAT PROGRAM ELEMENTS DO YOU BELIEVE THE PROGRAM SHOULD INCLUDE TO ADDRESS BARRIERS?

A. The cost barrier for adoption of energy efficiency measures can be addressed through financing offerings and increased incentives for moderate-income customers. Additionally, allotting funding for health and safety barriers, particularly for low-income households, can allow for more energy efficiency projects to move forward.

Q. WHAT IS YOUR RECOMMENDATION RELATED TO FINANCING?

A. One option would be for the Company to consider offering incentives in the form of an interest rate buy-down with a lender or financial institution to lower the overall cost for a participant that needs to finance an energy efficiency project. The incentive dollars are used to reduce interest rates, for example from 7% to 0.99%. This reduces the upfront costs by extending the payments over time and lowers the amount of interest incurred by the customer. This could be offered through a pilot program to see if changing how the incentive is provided can drive participation in a similar way as an upfront rebate. Some utilities offer the interest rate buy-down in conjunction with rebates or individually. In Connecticut, the utilities are currently offering a limited time offer where they

are reducing interest rates from 6.99-7.99% to 0.99% to increase participation in their residential heat pump program.[23] While the program is offered through the Connecticut Green Bank, the buy-down of the interest rate is provided by funding through the utilities' energy efficiency programs.

Recognizing that this could divert funds from the upfront rebates that customers may prefer and that Act 129 funds are limited, there are other options to bridge the financing barrier without changing the rebate mechanism. The Company should look to partner with community development financial institutions and community banks to develop financing opportunities, promote the state's energy efficiency loan programs such as the Homeowner's Energy Efficiency Loan Program and Keystone Energy Efficiency Program, and encourage its program vendors to provide alternative financing options, such as HVAC vendors that may be able to partner with a credit card institution to provide 0 percent financing for measures such as heat pumps and insulation. Financing barriers are not limited to the residential sector and should be considered for small commercial customers as well. The Company should dedicate funds to explore and develop financing pathways to complement its program offerings. Such funds could come from front-of-meter component effort discussed in Section 8 below.

Q. PLEASE EXPLAIN WHY MODERATE-INCOME CUSTOMERS MAY FACE BARRIERS?

A. As currently designed, the Plan includes rebates for market-rate customers and for income-eligible customers, the latter of which receive increased incentives

[23] 0.99% Smart-E Loan Special Heat Pump Offer, Connecticut Green Bank, https://www.ctgreenbank.com/smart-e-heat-pump-special/.

to overcome the financial barrier to adopt energy efficiency measures.[24] Income-eligible customers are defined under Act 129 as households with annual incomes at or below 150 percent of the Federal Poverty Income Guidelines ("FPL"). Depending on the resource, there are assistance services that consider low-income households up to 250 percent of FPL to be eligible, recognizing that these households still face similar financial barriers including limited access to capital and competing priorities.

Research on Asset Limited, Income Constrained, Employed ("ALICE") households, including work by CLEAResult, documents that these "working poor" customers often experience affordability challenges similar to low-income households, despite being ineligible for income-qualified programs.[25] Without a targeted approach for these customers, the residential portfolio may underserve a meaningful segment of customers and miss opportunities to achieve durable, cost-effective savings. In addition, recent federal initiatives, such as the U.S. Department of Energy's Home Energy Rebate programs established under the Inflation Reduction Act, explicitly recognize the need for tiered incentive structures that provide enhanced support for both low- and moderate-income households.[26] These examples demonstrate that differentiated incentive approaches can be used to bridge the gap between low-income and standard market-rate programs while maintaining program integrity and cost-effectiveness.

[24] Market-rate customers are those will receive a rebate not based upon income eligibility.
[25] CLEAResult, *Reaching Moderate-Income and ALICE Households with Energy Efficiency Programs*, which documents affordability and access barriers faced by households above traditional low-income thresholds.
[26] U.S. Department of Energy, *Home Energy Rebate Programs (HOMES and HER)*, which establish tiered incentive structures for low- and moderate-income households under the Inflation Reduction Act.

Q. WHAT IS YOUR RECOMMENDATION TO ADDRESS BARRIERS FOR MODERATE-INCOME CUSTOMERS?

A. A moderate-income approach could complement existing low-income programs by targeting customers who are not eligible for the low-income carve-out but face similar barriers to participation, without diluting resources intended for income-eligible households. Such an approach could help broaden access to energy efficiency measures while maintaining compliance with Act 129 requirements. Such an approach could also target customers with annual household incomes between 150 percent and 250 percent FPL to avoid overlapping with the low-income carve out. These approaches could be implemented on a pilot basis and evaluated for cost-effectiveness and participation outcomes before broader adoption.

FE should develop a moderate-income component that has increased rebate options for measures offered under its RESP component. This will expand demand for the program and can provide access to customers that may have previously been unable to participate, or barriered, due to upfront costs. This would also be in line with the moderate-income program design proposed by PPL Electric Utilities and Duquesne Light Company's Phase V Plans. The impact to the program would be minimal, as it should not be overly administratively burdensome and would not impact the cost-effectiveness, while also increasing participation and savings.

Q. WHAT IS YOUR RECOMMENDATION RELATED TO HEALTH AND SAFETY BARRIERS?

A. In Section 4.4.4 of the Company's Plan, FE acknowledges that health and safety issues can arise when work is performed in customer homes and that these

issues may prevent energy efficiency projects from moving forward. In its response to CAUSE-PA 1-23, the Company indicates that 848 projects in Phase IV received an audit but did not receive a full array of measures due to health and safety concerns. FE does not specify the nature of these issues or assess whether relatively minor, targeted investments could have allowed the projects to proceed. Given the limited resources available to address health and safety barriers for budget-constrained households and the significant bill-reduction and energy-saving benefits associated with weatherization measures, establishing a dedicated health and safety budget would help ensure that the projects are not deferred.

The Company should allocate $1 million towards health and safety measures in Phase V and develop guidelines on when and how health and safety funding is utilized. The guidelines should address the maximum funds allocated per home and the types of measures that can be funded.

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO ADDRESS BARRIERS.

A. The Company should revise its Plan to include the following:

- Allocate funds to provide an interest rate buy-down opportunity to eliminate barriers to up-front costs. This could be interest rate buy-down for residential customers, as well as small commercial customers.
- Establish partnerships and market financing opportunities for energy efficiency measures.
- Develop a moderate-income component for households up to 250% of the FPL, with increased incentives between

the levels provided for the limited income and market-rate components.

- Allocate $1 million in Phase V to address health and safety barriers that will allow for a project to move forward to install energy efficiency measures. The Company should develop guidelines on when to apply health and safety funds for consistent application.

VII. RESIDENTIAL AND COMMERCIAL DAILY LOAD SHIFTING AND PEAK DEMAND REDUCTION COMPONENTS

Q. PLEASE EXPLAIN THE RESIDENTIAL AND COMMERCIAL DAILY LOAD SHIFTING AND PEAK DEMAND REDUCTION COMPONENTS PROPOSED BY THE COMPANY.

A. The Company is proposing Daily Load Shifting ("DLS") and Peak Demand Reduction ("PDR") programs for both its residential and commercial customers. For both sectors, the DLS and PDR will focus on targeting demand reductions during the more than 400 eligible hours outlined by the Commission as peak periods.[27] For residential and commercial customers, eligible measures include:

- Managed Electric Vehicle ("EV") Charging
- Storage
- Thermostat DLS
- Thermostat Demand Response

[27] Summer is defined as the months of June, July, and August, including non-Holiday weekends, during the hours of 2 pm to 6 pm. Winter is defined as the months of January and February, including any non-Holiday weekends, during the hours of 7 to 9 am and 6 to 8 pm. 2026 TRM, Volume 1, page 10.

In addition, residential customers can participate in a behavioral demand response program and commercial customers can participate in a customer DLS and DR program effort.

Q. DO YOU HAVE ANY CONCERNS WITH THE COMPONENTS AS PROPOSED?

A. Yes, I have several concerns. First, the Plan presents limited details about how the DLS and PDR will operate, how participants will be enrolled, and which types of marketing will be utilized to support the successful implementation of the Company, as the Company asserts it is unable to do so until it has selected CSP for these programs. The forecasted savings and annual participation do not seem reasonable given the lack of a "ramp up period" and the Commission defined seasons for demand reductions.

While the Company has provided maximum incentive levels for the program in Appendix B, there are no details on an upfront/first-year incentive compared to an annual participation incentive. There are also no defined rules surrounding event opt-outs, methods for opting into a program, and what happens when a PJM emergency occurs versus a regular event for a PDR event. It's difficult to determine if the program forecast and design are reasonable with the lack of details provided by the filing and subsequent follow-up through interrogatories. Second and most importantly, the forecasted participation and savings are extremely concerning and would indicate that the achievement of the forecasted targets is unreasonable. The first year of these programs are in PY 18. PY 18 begins in June 2026, which also aligns with the start of the summer demand response seasons (June through August). PY 18 does not reflect any ramp up to allow for marketing of the program and enrollment. Rather, the Company seems

to believe that it will achieve a full season of summer DLS in first three months of Phase V, as indicated in Table 4, which shows significant participation in PY 18 and a slight increase in subsequent years.

[BEGIN CONFIDENTIAL] [redacted]

[redacted]

[redacted]

[redacted]

[END CONFIDENTIAL]

A ramp-up period is typically included in forecasting when a new program begins, restarts, or a vendor has changed to allow for time the vendors to scale operations to meet program demand and to raise program awareness with customers to encourage signs ups and equipment installations, when necessary. Not including a ramp up period can result in under-delivered program performance, which can lead to confusion over whether the program failed to be implemented properly or if there is not enough demand to meet targeted levels. Ultimately, ramp up periods allow programs to reach success by eliminating overstated projections and missed target achievements. Given that most of these programs are new or have not been implemented in almost five years, the Company should provide a forecast that allows the vendor to come online, ramp up their efforts, market the program, and allow for any market/program modifications needed to achieve demand reductions.

Q. WHAT DO YOU RECOMMEND THAT THE COMPANY DO TO IMPLEMENT A SUCCESSFUL DLS AND PDR?

A. I recommend that the Company remove the DLS and PDR components from its Plans until it has secured a CSP to provide additional information on the program parameters, rules, incentives, and reasonable projections for participation and savings. As currently proposed, the components seem neither reasonable nor clearly defined in terms of customer interaction. Thus, the company should remove or redesign the program to ensure realistic, cost-effective, and verifiable outcomes, protect ratepayer dollars, maintain credibility with the Commission, and focus resources on programs that reliably reduce energy use and peak demand. Removing the DLS and PDR from the portfolio until further details are available would only impact the Commission's requirement that an EDC achieve 75 percent of its proposed response target in each season. As shown in Table 4 below, the removal of the DLS and PDR results in the winter season only achieving 73% of its goal. To accommodate that adjustment, the Company should add to its portfolio measures that will produce an additional 4 MW of winter demand savings.

Table 4 Phase V Seasonable Demand Savings

	Phase V Total	
	Summer MW	Winter MW
Coincident Reduction from EE - Residential	79.4	55.0
Coincident Reduction from EE - Non- Residential	125.3	84.3
Daily Load Shifting - Residential	13.3	20.0
Daily Load Shifting - Non-Residential	4.3	4.4
Total	222.4	163.7
Phase V Demand Reduction Target	191	
Percentage of Goal in Season As Proposed	116%	86%
Percentage of Goal in Season Without DLS	107%	73%

VIII. FRONT-OF-METER COMPONENT

Q. PLEASE EXPLAIN THE FRONT-OF-METER COMPONENT THAT IS INCLUDED IN THE COMPANY'S PLAN.

A. The Front-of-Meter ("FTM") is a component included in each the RESP and the C&I Energy Solutions Programs, both Small and Large. It is not included in the LIEEP. This component is not projected to provide energy savings or demand reductions throughout Phase V. Rather, the Company plans to allocate $31,340 per year, up to $156,700 throughout Phase V, to target potential measures to include to enhance the efficiency of the energy delivery system and help mitigate resource adequacy needs, with the costs allocated evenly across the customer classes.[30] The Company foresees that this effort will support finding potential savings through the Company's Long Term Infrastructure Improvement Plan ("LTIIP") and Operation and Maintenance Plans.

Q. DO YOU RECOMMEND THAT THE COMPANY MAKE THIS INVESTMENT AS PART OF ITS PLAN?

A. No, I do not. The Company should be assessing for system efficiencies that promote energy savings and demand reductions in its delivery system, without being incentivized by the Act 129 funds. If the opportunities arise, then the Company should request a change to its Plan, through the Commission established process, and provide forecasted energy savings, demand savings, participation, costs, and incentives. This funding allocated by the Company for this effort should be reallocated to remedy health and safety issues.

[30] Company response to CAUSE-PA 1-39.

IX. ENERGY EFFICIENCY AT POINT OF INTERCONNECTION

Q. DO YOU BELIEVE THERE ARE MISSED OPPORTUNITIES FOR THE ACT 129 PROGRAMS?

A. Yes. After reviewing the Company's interconnection process, it appears that the Company could be missing out on an opportunity to promote energy efficiency and its Act 129 programs at the time of interconnection. When the Company assesses the capacity and system needs for a new customer, it should also consider whether the design of the facility is energy efficient and if there are potential opportunities for demand reduction, demand response, and interruptible load. There are a few ways that this opportunity can be highlighted for customers looking to interconnect. First, the Company could develop pathways for customers that it may have frequent interest from, such as data centers. Second, even without a pathway, the Company should be establishing a connection between the Act 129 program staff/account managers and the potential customer. Third, the Act 129 program staff can work with the Company's economic development team or its region/state's economic development team to make them aware of the Act 129 opportunities. By including energy efficiency at this step of the process, it will allow for the EDC to ensure that there are limited to no missed opportunities to have efficient homes and businesses within its service territory. The Company should commit to include proactively integrating Act 129 programs opportunities for commercial and industrial customers during the interconnection and economic development process, particularly for large customers such as data centers.

X. CONCLUSIONS

Q. PLEASE PROVIDE A SUMMARY OF YOUR RECOMMENDATIONS FOR THE COMPANY'S PLAN.

A. The Company's Plan, as currently designed, appears to carry significant risk of failing to achieve cost-effectiveness and the consumption and demand reduction targets established by the Commission. The limited budget and savings surplus, combined with the absence of Phase IV carryover savings, raises concerns about whether the Plan will deliver benefits that outweigh its costs if it is not implemented **exactly** as designed. The current plan design is lacking and is unreasonable because of its reliance on incorrectly forecasted participation, reliance on short-lived savings, saturated markets, and still-to-be-determined program designs, which has been outlined in this testimony. I recommend that the Commission deny the Company's proposed Plan and require the Company to revise its Plan for review to address these concerns. As part of those revisions, I recommend that the Company make the following adjustments:

- Short-lived energy savings should be limited to 25% of the total Phase V savings.
- The Plan should include more granular details at the measures level to allow parties to sufficiently review whether all customers contributing to the surcharge are able to participate. This includes providing grouping of measures for small business customers and identifying pathways addressing certain industries such as agriculture or data centers. The Company should provide this level

of detail in future Act 129 plans provided to the Commission.

- The residential lighting and street lighting markets have matured and are highly saturated. The Plan should cease investment in those measures. The funding associated with residential lighting should be reallocated to support weatherization measures in the residential portfolio. The funding allocated to street lighting should be reallocated to commercial weatherization measures.
- Commercial lighting should be limited to 20% of the total portfolio savings, with investment gradually declining over the Phase to reduce investment in commercial lighting.
- Home Energy Reports should only be provided to customers that exceed 7.72 kWh of energy usage per square foot per year for market-rate customers and income-qualified customers that exceed 6,000 kWh per year. Overall savings from Home Energy Reports should be limited to less than 10% of the total portfolio. This should be applied to both the Residential Energy Solutions Program ("RESP") and the Low Income Energy Efficiency Program ("LIEEP") behavioral components.
- The Company should track participation of Home Energy Report recipients to assess whether and which programs

there may be cross-participation. The Company should use this information to inform future reports to encourage cross-participation in the other residential programs.

- The Company should clarify which International Energy Conservation Code ("IECC") was used to develop the savings for the New Homes components of the RESP and LIEEP. If the Company did not use the 2021 IECC, then it should update its projections for both saving and forecasted participation to reflect the more stringent baseline.
- The Company should provide in its rebuttal testimony how its plans to achieve an increased level of participation in the LIEEP New Homes component in Phase V from the Phase IV participation levels, given the increase in baseline.
- To address residential program barriers, the Company should establish a $1 million budget for health and safety measures, outlining the requirements for the use of that funding to move forward deferred programs. The Company should establish a moderate-income component in the RESP, providing increased incentives for customers between 151-250 percent of the Federal Poverty Level Guidelines. The Company should explore using some funds from rebates to pilot an interest rate buy-down initiative to minimize the barrier of upfront

costs associated with the adoption of energy efficiency measures for both residential and small commercial customers. In lieu of being a pilot, the Company should explore opportunities to partner and educate its customers on energy efficiency financing opportunities

- The Company should remove its Daily Load Shifting and Peak Demand Reduction component from its Residential and Commercial portfolios until it is able to secure a Conservation Service Provider that can provide additional details concerning the program parameters, rules, incentives, and reasonable projections for participation and savings for the Commission's consideration.
- The Company should not fund its Front-of-Meter initiative and instead allocate that funding toward the $1 million fund for health and safety remediation.
- The Company should commit to including engagement of Act 129 programs during the interconnection and economic development process.

Q. WITH THE PROPOSED CHANGES YOU HAVE RECOMMENDED, DO YOU BELIEVE THAT THE COMMISSION SHOULD APPROVE THE PLAN?

A. Yes, as long as the revisions result in reasonable efforts to achieve a cost-effective portfolio that meets the Commission consumption and peak demand reduction targets.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

ATTACHMENT A

QUALIFICATIONS OF
STACY L. SHERWOOD

Stacy Sherwood
Principal

ENERGY FUTURES GROUP

Stacy has over 15 years of experience in the energy industry, specializing in energy efficiency (EE), demand response (DR), automated metering infrastructure (AMI), cost recovery, and renewable energy. Stacy has testified or provided comments before 11 public service commissions on AMI, EE, protections for cryptocurrency related load growth, and reasonableness of revenue increases. Throughout her career, Stacy has evaluated various electric and natural gas EE and DR plans; potential studies; evaluation, measurement, and verification reports; environmental justice impacts, and riders for cost recovery. Since 2021, Stacy has immersed herself in Connecticut's energy goals and policy, serving as the Lead Technical Consultant on behalf of the Connecticut Energy Efficiency Board. Recently, she has begun providing support to jurisdictions on establishing a cost-benefit framework to evaluate distributed energy resources (DERs) and identifying safeguards related to large loads, such as data centers and cryptomining.

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EXPERIENCE

Principal
Energy Futures Group, Hinesburg, VT
2024 - Present

Managing Consultant
Energy Futures Group, Hinesburg, VT
2021 - 2023

Senior Analyst
Exeter Associates, Inc., Columbia, MD
2015 - 2021

Assistant Director of Energy, Analysis, and Planning Division
Maryland Public Service Commission, Baltimore, MD
2013 - 2015

Regulatory Economist II
Maryland Public Service Commission, Baltimore, MD
2011 - 2013

Regulatory Economist I
Maryland Public Service Commission, Baltimore, MD
2009 - 2011

EDUCATION

McDaniel College
B.A., Business Administration, Economics, Accounting/Economics
2009

SELECT PROJECTS

Connecticut Energy Efficiency Board
2021 - Present

Lead Technical Consultant on the oversight of the state's electric and gas residential energy efficiency programs. Work closely with the state's utilities to develop, implement, and evaluate cost-effective program designs and goals for the Three-Year Conservation and Load Management Plan.

Pennsylvania Office of Consumer Advocate
2015 - 2021, 2023 - Present

Reviewed and commented on potential studies utilized to develop energy efficiency and demand response targets for Phases III, IV, and IV of the Act 129 Energy Efficiency and Conservation (EE&C) Program. Provided written testimony on utility EE&C five-year plans.

Earthjustice
2025

Authored *Review of Large Load Tariffs to Identify Safeguards and Protections for Existing Ratepayers* (January 28, 2025), which summarized research on tariff mechanisms and language to limit negative impacts of new data center and cryptocurrency loads on a service territory's existing customers.

Natural Resources Defense Council
2021 - 2022

Filed testimony before the Kansas Corporation Commission to support the adoption of energy efficiency programs for the first time in the Evergy service territory. Worked with parties to negotiate program design and implementation, as well as the performance incentive mechanism.

Louisiana Public Service Commission
2020 - 2021

Filed testimonies evaluating the reasonableness of automated metering infrastructure implementation plans by Concordia Electric Cooperative, Inc., Southwest Louisiana Electric Membership Corporation, and Point Coupee Electric Membership Corporation.

(continued on next page)

SELECT PROJECTS (continued)

Arkansas Attorney General's Consumer Utility Rate Advocacy Division 2018 - 2020
Drafted a dedicated limited income EE program strawman implemented on a pilot basis by the electric and natural gas utilities.

Arkansas Attorney General's Consumer Utility Rate Advocacy Division 2017 - 2021
Participated in Parties Working Collaboratively (PWC) group regarding the electric and natural gas EE programs. Provided comments on three-year plans, annual progress reports, and evaluation, measurement, and verification reports.

Maryland Public Service Commission Staff (2009 - 2015)
Developed templates and directed work groups related to the implementation of the electric and natural gas EmPOWER Maryland EE and DR programs. Evaluated the semi-annual reports and three-year plans filed by the utilities and submitted comments regarding plan recommendations before the Maryland Public Service Commission.

PUBLICATIONS

Sherwood, Stacy. 2025. *Review of Large Load Tariffs to Identify Safeguards and Protections for Existing Ratepayers*. Earthjustice. https://energyfuturesgroup.com/wp-content/uploads/2025/01/Review-of-Large-Load-Tariffs-to-Identify-Safeguards-and-Protections-for-Existing-Ratepayers-Report-Final.pdf.

EXPERT TESTIMONY

Before the Kentucky Public Service Commission, Case No. 2025-00045. *In the Matter of Electronic Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates*, June 16, 2025, on behalf of Sierra Club. Testified regarding the proposal to allow a regulatory asset to cover post-in-service costs related to generating station construction.

Before the Georgia Public Service Commission, Docket Nos. 56002 and 56003. *In Re: Georgia Power Company's 2025 Integrated Resource Plan and Georgia Power Company's 2025 Application for the Certification, Decertification, and Amended Demand-Side Management Plan*, May 2, 2025, on behalf of Georgia Interfaith Power & Light and Southface Energy Institute. Testified regarding the reasonableness of the proposed DSM plan and to support additional energy efficiency and demand savings as part of the Integrated Resource Plan.

Before the Pennsylvania Public Utilities Commission, Docket No. M-2024-3048418. *Petition of UGI Utilities, Inc. – Gas Division for Approval of its Phase II Energy Efficiency and Conservation Plan*, February 2025, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Public Service Commission of Wisconsin, Case No. 6630-CE-317. *Application of Wisconsin Electric Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the South Oak Creek Combustion Turbine Project in the City of Oak Creek, Milwaukee County, Wisconsin*, February 2025, on behalf of Clean Wisconsin. Testified on increased need for energy efficiency in the Wisconsin Electric Power Company service territory. (Ongoing).

Before the Public Service Commission of Wisconsin, Case No. 6630-CE-316. *Application of Wisconsin Electric Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Paris Reciprocating Internal Combustion Engines Project, Consisting of Seven Natural Gas-Fired Reciprocating Internal Combustion Engines Generating up to 128 MW Total at the Lakeshore Capacity Improvement Project Regulator Station in the Town of Paris, Kenosha County, Wisconsin*, December 2024, on behalf of Clean Wisconsin. Testified on increased need for energy efficiency in the Wisconsin Electric Power Company service territory. (Ongoing).

EXPERT TESTIMONY (continued)

Before the Kentucky Public Service Commission, Case No. 2024-00115. *In the matter of Electronic Application of Kentucky Power Company For: (1) Approval to Expand its Targeted Energy Efficiency Program; (2) Approval of a Home Energy Improvement Program and a Commercial Energy Solutions Program; (3) Authority to Recover Costs and Net Lost Revenues, and to Receive Incentives Associated with the Implementation of its Demand Side Management/Energy Efficiency Programs; (4) Approval of Revised Tariff D.S.M.C.; (5) Acceptance of its Annual DSM Status Report; and (6) All Other Required Approvals and Relief*, May 2024, on behalf of Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society. Testified on the reasonableness of the proposed demand side management programs and cost recovery mechanism.

Before the Public Service of South Carolina Docket No. 2023-388-E. *In the matter of Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order*, April 2024, on behalf of the South Carolina Conservation League, Southern Alliance for Clean Energy, and Vote Solar. Testified regarding impact of rate increase on customer energy burden and the benefits of energy efficiency to offset rate impact.

Before the Commonwealth of Virginia State Corporation Commission Case No. PUR-2023-000169. *Petition of Appalachian Power Company for approval to continue a rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to § 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, March 2024, on behalf of the Appalachian Voices. Testified regarding reasonableness of proposed Plan.

Before the Public Service Commission of the State of Missouri, File No. EO-2023-0136. *In the matter of Union Electric Company d/b/a Ameren Missouri's 4th Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA*, March 2024, on behalf of the National Resources Defense Council. Testified regarding reasonableness of proposed Plan.

Before the Pennsylvania Public Utilities Commission, Docket No. M-2023-3043230. *Petition of UGI Utilities, Inc. – Electric Division for Approval of its Energy Efficiency and Conservation Plan*, September 2023, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Commonwealth of Kentucky before the Public Service Commission, Case No. 2022-00424. *In the Matter of Electronic Tariff Filing of Kentucky Power Company for Approval of a Special Contract Under Its Economic Development Rider and Demand Response Service Tariffs with Cyber Innovation Group, LLC.*, on behalf of the Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council. Testified on the merits of providing an economic development discount rate to a proposed crypto mining facility as it relates to ratepayer risk.

Before the Commonwealth of Kentucky before the Public Service Commission, Case No. 2022-00387. *In the Matter of Electronic Tariff Filing of Kentucky Power Company for Approval of a Special Contract with Ebon International, LLC.*, on behalf of the Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. Testified on the merits of providing an economic development discount rate to a proposed crypto mining facility as it relates to ratepayer risk.

Before the Commonwealth of Kentucky before the Public Service Commission, Case No. 2022-00037. *In the Matter of Electronic Tariff Filing of Kentucky Utilities Company for Approval of an Economic Development Rider Special Contract with Bitiki-KY, LLC.*, on behalf of Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Kentucky Resources. Testified on the merits of providing an economic development discount rate to a proposed crypto mining facility as it relates to ratepayer risk.

Before the State of Maine Public Utilities Commission, Docket No. 2022-0025. *Versant Power Request for Approval of a Distribution Rate Change – 307*, December 2022, for Maine Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Kansas Corporation Commission, Docket No. 22-EKME-254-TAR. I*n the Matter of the Application of Evergy Kansas Metro, Inc., Evergy Kanasas South, Inc. and Evergy Kansas Central, Inc. for Approval of its Demand-Side Management Portfolio Pursuant to the Kansas Energy Efficiency Investment Act ("KEEIA"), K.S.A. 66-1283*, June 2022, for Natural Resources Defense Council. Testified regarding reasonableness of the proposed Plan and its compliance with the KEEIA Act.

EXPERT TESTIMONY (continued)

Before the Louisiana Public Service Commission, Docket No. U-35877. *Pointe Coupee Electric Membership Corporation Application to Acquire and Install an Automated Metering System and Request for Cost Recovery and Related Relief*, February 2021, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020818. *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase IV Plan*, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020830. *Petition of PECO Energy Company for Approval of its Energy Efficiency and Conservation Phase IV Plan*, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020824. *Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase IV Plan*, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Louisiana Public Service Commission, Docket No. U-35707. *Southwest Louisiana Electric Membership Corporation. Application for Approval to Acquire and Install an Automated Metering System and Request for Cost Recovery and Related Relief*, December 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020919. *Pennsylvania Public Utility Commission v. Audubon Water Company*, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020256. *Pennsylvania Public Utility Commission v. City of Bethlehem – Water Department*, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Louisiana Public Service Commission, Docket No. U-35456. Concordia Electric Cooperative Inc. *Application for Certification of a Replacement Advanced Metering System and Approval of Related Financing*, November 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3019612. *Pennsylvania Public Utility Commission v. Reynolds Disposal Company,* October 2020, for the Pennsylvania Office of Consumer Advocate. Participated in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3010955. *Pennsylvania Public Utility Commission v. City of Lancaster – Sewer Fund*, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008208. *Pennsylvania Public Utility Commission v. Wellsboro Electric Company*, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008209. *Pennsylvania Public Utility Commission v. Valley Energy, Inc*, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

EXPERT TESTIMONY (continued)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008212. *Pennsylvania Public Utility Commission v. Citizens' Electric Company of Lewisburg, PA*, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009559. *Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Wastewater Division*, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009567. *Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Water Division*, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008947. *Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc. Water Division*, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008948. *Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc. Wastewater Division*, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3006904. *Pennsylvania Public Utility Commission v. The Newtown Artesian Water Company (Supplement No. 136 to Tariff Water – Pa. P.U.C. No. 9)*, March 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3006814. *Pennsylvania Public Utility Commission v. UGI Utilities, Inc – Gas Division (Utility Code 123100, Filed Tariff Gas- Pa. P.U.C. Nos. 7 and 7S)*, January 2019, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of its proposed consolidated natural gas energy efficiency plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2018-3004144. *Petition of UGI Utilities, Inc. – Electric Division for Approval of its Energy Efficiency and Conservation Plan*, August 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001307. *Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Wastewater (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52)*, April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001306. *Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Water (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52)*, April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. P-2015-2497267. *Petition of Duquesne Light Company for Approval of its Smart Meter Procurement and Installation Plan*, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the inclusion of additional costs related to the Plan's implementation.

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2477174. *Petition of UGI Utilities, Inc. – Electric Division for Approval of Phase II of its Energy Efficiency and Conservation Plan*, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

EXPERT TESTIMONY (continued)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515642. *Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase II Plan*, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515375. *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase II Plan*, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Public Utilities Commission of Rhode Island, Docket No. 4595. *Newport Water Division – Rate Application to Collect Additional Revenues of $1,304,595 for a Total Cost of Service of $20,151,440*, December 2015, on behalf of the Division of Public Utilities and Carriers. Testified regarding reasonableness of the overall rate revenue increase.

Before the Maryland Public Service Commission, Case No. 9311. *In the Matter of the Application of Potomac Electric Power Company for an Increase in its Retail Rates For the Distribution of Electric Energy*, April 2013, on behalf of the Maryland Public Service Commission Staff. Testified regarding the inclusion of advanced metering infrastructure meters and energy advisor and engineer positions in rates.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan	: : : : :	Docket No. M-2025-3057327

VERIFICATION

I, Stacy L. Sherwood, hereby state that the facts set forth in my Direct Testimony, OCA Statement No. 1, are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect 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).

DATED: January 16, 2026

Signature: Stacy L. Sherwood
Stacy L. Sherwood

Consultant Address: Energy Futures Group
10298 Route 116
Hinesburg, VT 05461

Petition of FirstEnergy Pennsylvania Electric Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan	: : : : :	Docket No. M-2025-3057327

LIST OF TESTIMONY AND EXHIBITS FOR THE EVIDENTIARY RECORD OF THE OFFICE OF CONSUMER ADVOCATE

The Office of Consumer Advocate (OCA) intends to move for the admission of the following evidence into the evidentiary record in the above-captioned proceeding:

DIRECT TESTIMONY

OCA Statement 1	Public and Confidential Versions of the Direct Testimony of Stacy L. Sherwood, with Attachment A and Verification.

ADDITIONAL EVIDENCE

OCA Hearing Exh. 1	List of Evidence to be Admitted into the Evidentiary Record by the Office of Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

OFFICE OF SMALL BUSINESS ADVOCATE'S
ADMITTED
TESTIMONY AND EXHIBITS

The Office of Small Business Advocate ("OSBA") admitted the enclosed testimony and exhibits, as evidence into the evidentiary record, at the Evidentiary Hearing, held on January 29, 2026, in the above-captioned proceeding:

- Direct Testimony and Exhibits of Daniel Kaufman, labelled OSBA Statement No. 2, with associated Exhibit IEc-2-1, and Exhibit IEc-2-2, with signed Verification of Daniel Kaufman.
  .

Date: January 29, 2026

COMMONWEALTH OF PENNSYLVANIA

January 16, 2026

The Honorable Alphonso Arnold
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan / Docket No. M-2025-3057327

Dear Judge Arnold:

Enclosed please find the Direct Testimony and Exhibits of Daniel Kaufman, labelled OSBA Statement No. 2, with associated Exhibit IEc-2-1, and Exhibit IEc-2-2, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-referenced proceeding.

As evidenced by the enclosed Certificate of Service, all known parties will be served, as indicated.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures
cc: PA PUC Secretary Matthew L. Homsher (Cover Letter & Certificate of Service Only)
Angela Vitulli
Emma Grazier
Daniel Kaufman
Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

DIRECT TESTIMONY & EXHIBITS

of

DANIEL J. KAUFMAN

On Behalf of the

Pennsylvania Office of Small Business Advocate

Topics:

Design and cost-effectiveness of demand response, solar PV, combined heat and power, and front of the meter programming for Small C&I

Date Served: January 16, 2026

Date Submitted for the Record: _____

DIRECT TESTIMONY OF DANIEL J. KAUFMAN

1. INTRODUCTION AND OVERVIEW

Q. Mr. Kaufman, please state your name and briefly describe your qualifications.

A. My name is Daniel Kaufman and I am a Principal at Industrial Economics, Incorporated ("IEc"), a consulting firm located at 2067 Massachusetts Avenue, Cambridge, MA 02140. I am appearing in this proceeding on behalf of the Pennsylvania Office of Small Business Advocate ("OSBA").

I have twenty years of experience in energy efficiency and clean energy program evaluation. I specialize in evaluating technology innovation, demonstration, pilot, and market transformation programs, and in analyzing program benefits, costs, and return on investment. I have served as a principal investigator for relevant contracts for the Department of Energy ("DOE"), the New York State Energy Research and Development Authority ("NYSERDA"), the Massachusetts Department of Energy Resources, the California Energy Commission ("CEC"), and the California Air Resources Board. I am currently providing expert support on behalf of the New Hampshire Office of the Consumer Advocate in the Public Utilities Commission's Investigation into Distributed Generation. I am also currently working on evaluations of multiple NYSERDA programs and projects, including grid modernization projects that aim to improve energy delivery systems, improve distributed energy resources (DER) interconnection, and unlock grid capacity. I have evaluated large-scale renewable energy projects and programs for NYSERDA and the U.S. Environmental Protection Agency, and developed and implemented peer-reviewed methods to assess the market potential of renewable energy and grid integration technologies for the CEC. For the U.S. Small Business Administration, I have evaluated programs that engage and support small businesses across multiple sectors. For the World Bank Group, I have evaluated programs that support small and medium enterprises in adopting clean and efficient technologies and sustainable business practices.

I obtained a B.A. degree with a double major in Economics and Politics, *magna cum laude*, from Brandeis University in 2005 and an M.A. degree in International Economics and

Finance from Brandeis International Business School in 2006. My resume is contained in Exhibit IEc-1.

Q. Have you previously testified before the Commission?

A. No.

Q. What is the purpose of this testimony?

A. I was retained by the OSBA to review the Act 129 Phase V Energy Efficiency and Conservation Plan ("Phase V EE&C Plan" or "Phase V Plan") proposed by FirstEnergy Pennsylvania Electric Company ("FirstEnergy" or "the Company"), and to evaluate whether the Company's program design is consistent with sound regulatory and economic principles, and would be beneficial, on net, to small business customers. My testimony focuses on programming designed to reduce peak demand, as well as solar PV, combined heat and power, and front-of-the-meter programming. My colleague Angela Vitulli has submitted testimony focused on traditional energy efficiency programming.

Q. Summarize your current conclusions and recommendations.

A. I recommend that the Commission approve the Proposed Phase V EE&C Plan for Daily Load Shifting (DLS) and Peak Demand Reduction (PDR), Combined Heat and Power (CHP), Solar PV, and Front of the Meter (FTM) with the addition of the following improvements. The Commission should mandate the following:

- **FirstEnergy will provide evidence that its DLS/PDR targets are achievable.** The Company's Plan does not specify how many small business customers have "connected devices" – an important subcomponent under the Company's DLS/PDR program component. The Plan also does not specify how customers will be identified and recruited, how often FirstEnergy expects customers to override control of their connected devices, nor does it explain assumptions about customer opt-out and fatigue. These are critical determinants of participation and success.

- **FirstEnergy will clarify the incentive structure for DLS and PDR** to address the uncertainties raised in Section 2 of my testimony.

- **FirstEnergy will not provide incentives to participants that use diesel and other fossil fuel backup generators during demand reduction events.** I elaborate on this issue in Section 2 of my testimony.

- **FirstEnergy will prepare Interim Measure Protocols for review and approval by the Statewide Evaluator (SWE) and conduct regular reviews of its DLS and PDR programs.** DLS and winter PDR are new and untested in Pennsylvania. The Company's proposed program is responsive to the Commission's Order and provides opportunities for innovation and experimentation, with the potential to generate significant benefits for small business customers. Success hinges on program design, including (but not limited to) customer targeting, outreach and enrollment, opt-outs, and strategies to mitigate customer fatigue. These strategies can be tested and refined over time. To support continuous learning and improvement, I recommend that the Commission require FirstEnergy to conduct quarterly reviews to collect customer feedback and analyze the relevant data in the Company's tracking system (e.g., customer participation, opt-out rates, summer and winter peak load reductions). I recommend conducting these reviews in addition to the traditional evaluations conducted by the Company's evaluation contractor.

- **FirstEnergy will provide evidence that its CHP targets are achievable** by addressing the uncertainties raised in Section 3 of my testimony.

- **FirstEnergy will explain why its proposed Solar PV program is not cost-effective and, if possible, take steps to improve cost-effectiveness.** I discuss this topic in further detail in Section 3 of my testimony.

- **If FirstEnergy adds FTM measures to the Phase V Plan, it will propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Minor Plan Change Order on Act 129 Energy Efficiency and Conservation Program** and as affirmed in the Commission's Phase V Implementation Order. I address this topic in Section 4 of my testimony.

- **If FirstEnergy adds FTM measures to the Phase V Plan, it will assign costs associated with specific FTM measures to the correct rate class(es), consistent with common ratemaking practices.** I discuss this topic in Section 4 of my testimony.

Q. How is your testimony organized?

A. My testimony is organized by program component:

- Section 2: DLS and PDR
- Section 3: Solar PV and CHP
- Section 4: FTM

Within each section, I address the following topics: First, I summarize the design of the proposed program. Second, I summarize the Company's experience implementing similar programs in previous Phases (except DLS and PDR, which are new program components). Third, I discuss how likely the Company is to achieve the targets stated in its Plan. Fourth, I summarize the costs and benefits to ratepayers (particularly small business customers) of the proposed program. Fifth, I discuss measuring and reporting considerations, if any, for each program area.

2. DAILY LOAD SHIFTING AND PEAK DEMAND RESPONSE

Q. Provide an overview of the Company's proposed demand response program, specifically the DLS and PDR component.

A. FirstEnergy's DLS and PDR component aims to supplement the coincident peak load reductions that result from traditional energy efficiency programming with additional peak load reductions during daily peak hours for both the summer and winter periods. The DLS and PDR component for small and large C&I customers includes two subcomponents: Connected Devices and Custom. Each subcomponent is designed to deliver load reductions on a daily and/or peak day event basis.

- For the **Connected Devices** subcomponent, participating C&I customers with program eligible connected devices will allow for the control, cycling, and/or optimization of their enrolled equipment during the PA Act 129 summer and winter

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

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

The DLS and PDR component for Residential customers also includes Connected Devices, but the other subcomponent is **Behavioral** (instead of Custom). The Behavioral subcomponent will engage residential customers to reduce load during peak load hours on a daily and/or peak day event basis during PA Act 129 summer and winter peak load periods through messaging and education. Messaging and education for residential customers may include bill alerts, time-of-use (TOU) rate education, and TOU rate and EV coaching so that customers with electric vehicles can better understand the value of switching to TOU rates. Customers will be able to opt-out of the program at any time.

The program component is slated to launch starting summer 2026.

Q. How could participating small business customers benefit from the Company's proposed demand response program?

A. Potential benefits to participating small C&I customers include: energy bill savings, financial incentives, and potentially other benefits. As discussed below, small C&I customers have multiple options to participate in FirstEnergy's demand response program component and capture these benefits. Over time, demand response is expected to benefit all ratepayers through avoided capacity costs and other system-level benefits.

Q. What are the potential costs to small business customers?

A. Potential costs to participating small C&I customers include operational disruptions, technology and infrastructure requirements, and behavioral or cultural changes.

Q. Does FirstEnergy have recent experience serving small businesses with demand response programming?

A: No. This is not a reflection on the Company, but rather the different requirements across Act 129 Phases I through V. Demand response programming was included in Phase I, excluded from Phase II, included in Phase III, and excluded from Phase IV. As such, FirstEnergy (and the other EDCs) do not have recent experience implementing demand response programs. Moreover, demand response programming in Phase V is fundamentally different from prior phases. Major differences include, *inter alia*, winter peak demand and daily dispatch on non-holiday weekdays during peak season.

Q. Is the Plan clear with respect to incentives for demand response?

A: Not entirely. The Plan states that incentive strategies for DLS and PDR may include "initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year."[1] Table 8: Eligible Measures includes demand response incentives for small C&I customers for a managed charging device ($250), energy storage device ($1,000), and smart thermostats installed on electric cooling and/or heating systems ($50),[2] all subject to "meeting program technical, connectivity, control,

[1] FE Phase V Plan, pages 50-51.

[2] Elsewhere in Table 8, a $75 rebate is listed for a smart thermostat, without the demand response requirements. It is unclear whether the $75 rebate can be summed with the $50 rebate.

functionality and participation or other program requirements." For Custom, Table 8 shows that the Company will provide $20,000 in incentives to small C&I customers "with AMI, sufficient usage and usage history who are able to shift and/or reduce energy usage on a daily, scheduled or event basis during Act 129 summer and winter peak load periods in response to educational or behavioral messaging, operational changes, process or equipment adjustments, controls or other strategies or specialized approaches adopted by the customer and meeting participation, evaluation or other program requirements." It is unclear how the incentives shown in Table 8 correspond to the "initial enrollment incentives after enrollment and or annual participation or performance incentives after each performance year" referenced earlier in the Plan.

Q. Are the proposed incentive amount reasonable?

A: Possibly, but uncertainty about what is being proposed in the Plan – and how the market will respond – make this question difficult to answer affirmatively. For energy efficiency programs, I would typically compare the incentive value to the incremental measure cost. However, the Company states, "For the DLS and PDR component of this program, the proposed level of incentives is primarily based on the experience of the Company and its affiliates, and input from experienced CSPs. The component does not have any known incremental measure costs and as such does not involve any sharing of incremental costs between participants and the Company."[3] As such, this type of comparison is not possible.

Putting aside incremental costs, a critical question for demand response programs is whether the incentives will be sufficient to enroll participants and prevent customer fatigue. I am skeptical that the incentive amounts in Table 8: Eligible Measures for managed charging, battery storage, and smart thermostats are sufficient if these are the only incentives. As noted in my previous response, it is possible that participants will receive additional incentives for enrollment, participation, and/or annual performance. However, the value of these additional incentives (if any) is not specified in the Plan. I recommend that different incentive levels be specified and tested as the program is rolled out to understand how different incentives affect participant recruitment and retention.

Q. Do you see any possible risks or adverse effects from incentivizing demand response?

[3] FE Phase V Plan, page 51.

A: Yes. In the *Phase V Demand Response Potential Study*, Pennsylvania's Statewide Evaluator reported, "Much of the C&I DR registered at PJM and acquired by the EDCs in prior Act 129 phases involves significant curtailment of energy intensive operations or activation of behind-the-meter generators (typically diesel-powered)."[4] In Phase V, Act 129 peak demand reductions will not be recognized in the PJM market and therefore are not directly transferrable to Phase V programming. Still, in the absence of Pennsylvania-specific data for the Phase V program design, PJM data can provide a rough proxy for how C&I customers might respond to demand events. PJM's demand response data for the 2024/2025 Delivery Year shows that 1,057.6 MW of the 7,215.5 nominated MW in the PJM market (14.7 percent) used onsite generation. Of the 1,057.6 MW, 84.1 percent used diesel and 15.9 percent used natural gas, gasoline, oil, propane or waste products.[5]

Diesel and other fossil fuels create significant local air pollution and have negative environmental impacts. Furthermore, as the Commission noted in its Phase V Implementation Order, battery storage is a growing opportunity for peak demand management.[6] This provides a cleaner alternative to customers who wish to use backup power during a peak demand event. As such, I recommend that the Commission exclude diesel and other fossil fuel backup generators from receiving incentives under the PDR program.

Q. Are you confident that FirstEnergy's proposed DLS and PDR program will achieve the targets in the Plan?

A: I am cautiously optimistic. First, as my colleague Angela Vitulli discusses in her testimony, FirstEnergy has a good track record of implementing their Phase IV Plan, including for small C&I customers. This track record gives me confidence in the Company's ability to implement EE&C plans for small C&I customers. Second, to the extent that FirstEnergy starts by targeting customers who already have eligible devices, it will be able to start achieving load reductions without requiring those customers to purchase new equipment.

[4] Demand Side Analytics, *Phase V Demand Response Potential Study.* Prepared for the Pennsylvania Public Utility Commission, page 51. February 2025.

[5] 2024 State of the Market Report for PJM, Table 6-14 and Table 6-15.

[6] Pennsylvania Public Utility Commission, Energy Efficiency and Conservation Program Implementation Order, Order, M-2025-3052826, page 118. June 18, 2025.

As the Commission observed in its Final Implementation Order, "connected thermostats, a key piece of load control equipment, have already been purchased and installed through Phase III and Phase IV EE&C rebates."[7] Although this does not guarantee that these customers will participate in demand response programs, it removes an initial hurdle of purchasing new equipment.

Third, the Company's Phase V Plan seems to assume that only a small fraction of small C&I customers, 20 participants per year, will participate in the Custom DLS and DR subcomponent. Although the Plan does not break out the number of SC&I participants for Connected Devices, the breakout for the Custom subcomponent suggests that FirstEnergy is being realistic about small C&I participation. Similarly, the Plan assumes a modest reduction by small C&I customers, which further suggests that the Company is being realistic. Overall, the Company is targeting 21.0 MW in portfolio demand savings from Daily Load Shifting: 16.7 MW residential, 2.1 MW small C&I, and 2.3 MW large C&I.[8] The balance of demand savings in the Plan, 172.0 MW, comes from coincident demand reduction from energy efficiency initiatives.

However, the Company's Plan does not provide information that I would need to be fully confident that FirstEnergy will achieve its targets. The Plan does not specify how many small business customers currently have connected devices (including smart thermostats, electric vehicle chargers, and energy storage), how customers will be identified and recruited, the enrollment process, the frequency of communication with participating customers, or how often FirstEnergy expects customers to override control of their connected devices. It also does not explain assumptions about customer opt-out and fatigue. FirstEnergy should provide further evidence that the targets are achievable prior to the Commission approving the Plan.

Q. Is the Company's proposed demand response programming cost-effective?

A: Yes, based on the information available in the Plan. The projected benefit-cost ratio for the Demand Response program is 1.1, which indicates that the program is cost-effective (Table

[7] Final Order, page 132.

[8] FE Phase V Plan, Table 3.

15).[9] However, Table 15 does not disaggregate the Demand Response program by customer segment. As a result, I cannot confirm that demand response programming specific to small C&I customers is cost-effective.

Q. Are you confident in FirstEnergy's ability to measure and evaluate its DLS and PDR component?

Not entirely. For the Connected Devices subcomponent, the Plan states that the Company will use AMI and/or device data analytics to evaluate the usage reduction during peak load events. The Plan states that the Custom Demand Response and Connected Device "measurement methodologies will reflect SWE guidance documents, industry practice and available data supporting load reduction impact assessments."[10] The Company indicates that it will use "selected indicators to verify periodically that planned energy savings and demand reductions are on track, and will take corrective actions, such as changing marketing, program delivery and/or incentive channels or amounts as appropriate."[11]

This seems reasonable at a high level, but crucial details still need to be worked out. For example, as the Commission noted in its Implementation Order, measuring impacts from DLS programs is challenging because there are no adjacent non-event days to use as a baseline.[12] Furthermore, the Commission acknowledged that "the demand response measures in the 2026 TRM do not provide sufficient guidance to EDCs, CSPs, and evaluation contractors regarding the measurement of daily load shifting program impacts," further stating: "If one or more EDC elects to propose a daily load-shifting program in its Phase V EE&C plan, we will direct the SWE to update the Pennsylvania Evaluation Framework with specific M&V guidance for the type(s) of programs proposed. EDCs are also encouraged to prepare Interim Measure Protocols for review and approval by the SWE at any time to promote alignment on estimation techniques."[13]

[9] FE Phase V Plan, Table 15.

[10] FE Phase V Plan, page 91.

[11] Ibid.

[12] Final Implementation Order, page 94.

[13] Final Implementation Order, page 157.

The Company's Plan also discusses the need to monitor and adapt the program over time. Specifically, "The Company anticipates adjusting implementation of the various subcomponents throughout the term of Phase V to improve performance based on actual results. Such changes may include but are not limited to adjusting enrollments, marketing, customer engagement, program approaches or terms and incentives."[14] To this end, I recommend that the Commission require FirstEnergy to conduct quarterly reviews to collect customer feedback and analyze the relevant data in the Company's tracking system (e.g., customer participation, opt-out rates, summer and winter peak load reductions). The reviews should emphasize learning and adaptive management, with the purpose of integrating near real-time analysis into program design and implementation. This "near real-time" evaluation approach has been used effectively in other states.[15] I recommend conducting these reviews in addition to the traditional evaluations conducted by the Company's evaluation contractor.

3. SOLAR PV AND COMBINED HEAT AND POWER

Q. Provide an overview of the Company's proposed Solar PV and CHP programming.

A. FirstEnergy's proposed Plan includes Solar PV and CHP measures within both its small and large C&I Custom program components. The Company's Residential program includes an HVAC and Solar component.

Q. Does FirstEnergy have recent experience serving small C&I customers with Solar PV and CHP?

A: Yes. The market potential study for Phase V explains that solar projects have historically accounted for a small share of reported program savings, but in the second half of Phase IV, there was an increase in the number of participating and planned PV projects. In contrast, actual CHP project development for Phase IV has been significantly below the

[14] FE Phase V Plan, page 105.

[15] For example, see Archie Kinnane, D. Nilsson, and Emmet Blau, *Real-Time Results, Real-Time Strategy: Creating a Process for Continuous, Data-Driven Feedback on a Residential Energy Efficiency Program in New York State.* 2025 International Energy Program Evaluation Conference. https://www.iepec.org/wp-content/uploads/2025/09/Nilsson_Dana.pdf. September 2025.

achievable CHP potential results from the Phase IV market potential study. These trends generally hold true across the EDCs, including but not limited to FirstEnergy.[16]

Q. Are you confident in the Company's ability to achieve the solar PV targets in its Plan?

A. Yes, the targets are generally aligned with the market potential study while adjusting for potential headwinds to solar PV in the coming years. FirstEnergy's Plan targets total savings of 116,153.73 MWh from Solar PV across its Residential, SC&I, and LC&I programs; of this, 11,511.25 MWh, 9.91 percent, comes from the SC&I sector.[17] The 116,153.73 MWh is 92.0 percent of the potential solar PV savings, 126,200 MWh, identified in the market potential study for Phase V.[18] During discovery, the Company stated that it considered the current policy environment and economic conditions when developing the solar PV projections in its Plan, and adjusted both the participation projections and incentives accordingly. Specifically, the Company stated, "Due to the uncertainty with the availability of Federal tax credits and changing Federal policies, as well as the concern of higher costs, the Company sought to target participation among other program measures as well as to establish an incentive range for potentially impacted measures that would allow the Company to increase its incentives to help offset the loss of tax credits and promote adoption of energy efficient equipment and technologies by reducing the customer's incremental costs." The Company further states that these adjustments "were completed through an iterative comprehensive review of the participation and measure assumptions on a measure-by-measure basis."[19]

Q. Are you confident in the Company's ability to achieve the CHP targets in its Plan?

A: Not entirely. The Company's Plan targets a total of 100,000 MWh in savings from CHP, of which 25,000 MWh, 25 percent, comes from the small C&I sector.[20] The 100,000 MWh

[16] NV5 and Brightline Group, Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report.

[17] FE Phase V Plan, Appendix B, Table 9: Estimated Savings and Participation.

[18] NV5 and Brightline Group, Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report, Table 6: Act 129 EE Potential GWh Savings by EDC, Year, and Component.

[19] FE PA Response to OSBA Interrogatory Set 2, No. 001.

[20] FE Phase V Plan, Appendix B, Table 9: Estimated Savings and Participation.

is 97.2 percent of the potential savings identified in the market potential study (121,500 MWh).[21] Focusing on the small C&I sector, the projected 25,000 MWh in savings is based on just three projects, [22] which implies average savings of 8,333.33 MWh per project over five years (25,000 divided by 3), or 1,666.67 MWh per year (8,333.33 divided by 5 years). While this may be possible, implementing CHP projects with three small business customers that can each generate over 1,000 MWh in average annual savings is not necessarily probable. Success will depend on the facility's total energy requirements, the ability of a CHP system to meet the facility's energy needs, and the ability to overcome upfront costs and technical barriers, among other factors. The EDCs' history with CHP suggests that these projects are complex and somewhat sporadic. If the Company has already built a pipeline of small businesses who are strong candidates for CHP projects, this would provide assurance that the targets are feasible. However, this is not addressed in the Company's Plan. FirstEnergy should provide further evidence that its CHP projections are feasible before the Commission approves the Plan.

Q. Is the Company's proposed Solar PV program cost-effective?

A. No, it is not cost-effective. FirstEnergy's proposed Plan (Appendix B, Table 15: Portfolio Summary of Lifetime Costs and Benefits) shows the Present Value of Net Benefits is *negative* $36,496,000 for Solar PV, and the benefit-cost ratio is 0.8. The negative present value and the benefit-cost ratio of less than 1.0 indicate that the Solar PV program is not cost-effective. The reason for this is unclear. During discovery, the Company indicated that its cost-effectiveness analysis for solar included an adjustment to the incremental cost to reflect a phaseout of federal tax credits. [23] These adjustments may have contributed to the negative cost-effectiveness results for solar, but a more fulsome explanation would help clarify the reasons and would help to identify what changes, if any, the Company could make to improve the cost-effectiveness of its Solar PV program. FirstEnergy should address this before the Commission approves the Plan.

[21] NV5 and Brightline Group, Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report, Table 6: Act 129 EE Potential GWh Savings by EDC, Year, and Component.

[22] FE Phase V Plan, Appendix B, Table 9: Estimated Savings and Participation.

[23] FE PA Response to OSBA Interrogatory Set 2, No. 001.

Q: Is the Company's proposed CHP program cost-effective?

A: Yes. CHP has a benefit-cost ratio of 1.6,[24] which indicates that the program is cost-effective. Although CHP savings have been challenging to acquire, the program acquisition cost is low.

Q: Do you have any measurement or reporting concerns for Solar PV or CHP?

A: No, I do not have any measurement or reporting concerns.

4. FRONT OF THE METER

Q: Please provide an overview of the Company's proposed FTM program.

A: The Company's Plan includes an FTM component. The Company's EE&C team will coordinate with Company personnel involved in the operation, design and budgeting process for its energy delivery system to identify and promote implementation of FTM measures that provide energy savings or demand reductions. Possible examples include, but are not necessarily limited to, Conservation Voltage Reduction ("CVR") programs. In addition, the Company has a Long-Term Infrastructure Improvement Plan ("LTIIP") that includes FTM-related capital investment to the Company's energy delivery system. Through engagement with the Company personnel responsible for the LTIIP, the Company's EE&C team plans to identify and review opportunities for implementation of energy efficient equipment for consideration as a measure to target through the FTM program component."[25] In discovery, the Company also observed that the Commission recognized CVR as an FTM measure.[26]

Q: What are the Company's savings targets for FTM?

A: The Company's Plan does not currently include any savings targets. As noted in the Company's Plan, "While the Phase V Plan was designed to achieve the Company's goals with no energy savings or demand reductions from FTM measures, the Company intends to identify and promote energy efficiency and demand reductions through Company and

[24] FE Phase V Plan, Table 15: Portfolio Summary of Lifetime Costs and Benefits of EE&C Plan.

[25] FE PA Response to CAUSE-PA Interrogatory Set 1, No. 038

[26] FE PA Response to CAUSE-PA Interrogatory Set 1, No. 041

other project developer initiatives implemented during the course of Phase V supporting achieving energy savings and system load relief."[27]

During discovery, the Company stated that if it identifies and promotes FTM measures, and claims any resultant savings towards compliance with its Act 129 savings requirements, it will also use Act 129 funding to pay for all or part of the cost of such measures, subject to" the following: "the Company would propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Minor Plan Change Order on Act 129 Energy Efficiency and Conservation Program and as affirmed in the Commission's Phase V Implementation Order." This should be a condition for the Commission's approval of the Plan.[28]

During discovery, the Company stated that as part of engaging with Company personnel involved in the operation and design of its energy delivery system, the EE&C Team will obtain all required information necessary (e.g., equipment settings, specifications, metering data, etc.) needed to evaluate, measure and verify the energy and demand. The EE&C Team will also engage its independent EM&V CSP" to support all data requirements and analysis completed in accordance with applicable evaluation guidance.[29]Savings will be apportioned to the FTM measures included in the Company's proposed Plan.[30]

Q: Do you have any observations about the FTM budget?

A: Yes. The Company's Plan, Section 3.1.6, states, "The Phase V Plan budget includes the costs associated with the Company's EE&C department identifying, promoting, and coordinating with the implementation of applicable Company and other project developer initiatives." During discovery, the Company stated, "The Company has projected total costs of $31,340 per year [$156,700 over five years] as part of the budgets included in its Proposed Plan related to the EE&C Team's engagement with Company personnel… and

[27] FE Phase V Plan, Section 3.1.6.

[28] FE PA Response to CAUSE-PA Interrogatory Set 1, No. 039

[29] FE PA Response to CAUSE-PA Interrogatory Set 1, No. 042

[30] FE PA Response to OSBA Interrogatory Set 2, No. 003

for EE&C administrative activities (e.g. tracking and reporting, evaluation, measurement and verification) associated with including front-of-the meter ("FTM") measures in the Company's Proposed Plan." The costs were equally allocated to the residential, small commercial and industrial and large commercial and industrial sectors in the Company's Proposed Plan budgets. However, the Company stated in discovery that, "The equal allocation of costs across customer sectors in the Company's proposed Plan budget was an assumption used to create the budgets recognizing that actual savings will vary among sectors based on specific FTM measures. The Company plans to assign its costs associated with specific FTM measures consistent with common ratemaking practices, including, but not limited to, direct charging, where applicable, or allocations based on customer counts or sales."[31] The assignment of costs to the correct class should be a condition for the Commission's approval of the Plan.

Q. Does this conclude your direct testimony?

A. Yes, it does.

[31] FE PA Response to OCA Interrogatory Set 3

EXHIBIT IEc-2-1

RESUME

FOR

DANIEL J. KAUFMAN

IEc

DANIEL KAUFMAN — PRINCIPAL

Daniel Kaufman has over 20 years of experience providing energy-related strategic planning, economic analysis, policy analysis, and program evaluation services on a range of topics including distributed energy resources (DERs), energy efficiency programming, large-scale renewables, and grid modernization. With a strong background in finance and economics, he analyzes the cost-effectiveness of energy programs to inform investment decisions. Mr. Kaufman has provided energy-related consulting services to utilities, state and federal agencies, and international organizations, including the Massachusetts Department of Energy Resources, New York State Energy Research and Development Authority, New Hampshire Office of the Consumer Advocate, Colorado Energy Office, Northwest Energy Efficiency Alliance, California Energy Commission, US Department of Energy, US Environmental Protection Agency, US Small Business Administration, and the World Bank. He has presented his peer-reviewed work to the National Academy of Sciences, American Council for an Energy Efficient Economy, and International Energy Program Evaluation Conference.

Education

Master of Arts in International Economics and Finance, Brandeis School of Business and Economics (2006)
Bachelor of Arts, *magna cum laude*, in Economics and Politics, Brandeis University (2005)

Project Experience

For the **NEW HAMPSHIRE OFFICE OF THE CONSUMER ADVOCATE (NH OCA)**, providing expert support for the NH Public Utilities Commission's Investigation into Distributed Generation in NH (Docket No. IR 25-031). A key issue is ensuring that the current net metering tariff, and any potential future revisions, balance the interests of customer-generators with those of non-net-metered customers by maximizing any net benefits while minimizing negative cost shifts. The current docket builds on previous efforts in NH to understand the benefits and costs of distributed generation and alternative net metering tariffs. Mr. Kaufman conducted a rapid review of previous studies and testimony on net metering policy in NH, reviewed the responses submitted by the utilities and other parties for the current proceeding, and developed and submitted comments on OCA's behalf. Mr. Kaufman's comments address issues including the value of battery storage, benefits and costs of distributed energy resources in NH, cost shifting across customer classes, and a proposed pilot study on battery storage and time of use rates.

For **NYSERDA**, developed a suite of in-depth case studies on the results of NYSERDA's investments to improve energy delivery systems, improve DER interconnection, and modernize New York State's power grid, including economic, environmental, reliability, and technology transfer benefits. For example, the *Central Hudson's Grid Modernization Investments* case study quantifies and monetizes energy cost savings, reliability improvements, and avoided GHG emissions; analyzes the net societal benefit of NYSERDA's investment; and calculates the return on NYSERDA's and the utility's investment. The *Interconnection Technical Working Group* case study uses New York Department of Public Service data, and interviews with utilities and DER project developers, to evaluate improvements in DER hosting capacity and reductions in DER interconnection time and cost. *Micatu's Real-Time Voltage Sensors* and *Tagup Demonstrations* evaluate product development, commercialization, investment, operational efficiency, and reliability outcomes resulting from grid monitoring and predictive analytics technologies.

For the **MASSACHUSETTS DEPARTMENT OF ENERGY RESOURCES (DOER)**, managed an impact assessment of the Enterprise Energy Management System, a $10 million program designed to provide real-time energy monitoring data

for publicly owned buildings throughout Massachusetts. Estimated energy and GHG reductions, energy cost savings, and cost effectiveness based on both actual and projected building energy consumption data and energy prices. A key focus was to understand how building managers will use EEMS to identify and implement energy-saving opportunities in response to training and outreach provided by DOER.

For the **CONNECTICUT ENERGY EFFICIENCY BOARD**, as a subcontractor to ERS, provided evaluation services for the Connecticut utilities' Strategic Energy Management (SEM) program. Led a literature review and interviews with SEM stakeholders and experts across the country to identify best practices for SEM programs, and contributed to an evaluation design for measuring *ex-ante* and *ex-post* savings estimates. The resulting *SEM Best Practices Report* identifies best practices for data acquisition and for evaluating such a program in Connecticut.

For the **CALIFORNIA AIR RESOURCES BOARD**, directed a study to evaluate the benefits of economic innovations resulting from AB 32, the State's landmark Global Warming Solutions Act. Developed a comprehensive catalogue of AB 32-related policies, and innovations spurred by AB 32, and developed a suite of case studies based on in-depth market research, interviews and survey research with industry stakeholders, and quantitative analysis of energy and non-energy benefits. Each case study includes an in-depth assessment of how AB 32 policies, programs, and incentives supported the innovation. For example, the Small-Scale Energy Storage case study examined how California's support for solar PV adoption, battery storage technology development, net metering policies, and customer incentives facilitated the adoption of small-scale energy storage systems. The Solar Thermal Technology in the Food and Beverage Processing Industry case study analyzed the potential use of solar thermal technology to provide industrial heat. Key study findings were featured in the AB 32 2022 Scoping Plan Update.

For the **CALIFORNIA ENERGY COMMISSION (CEC)**, developed metrics, methods, and tools for *Measuring Innovation Progress to Guide Future Investments* in clean energy and energy efficiency technologies designed to benefit the ratepayers of three California investor-owned utilities. Created methods and tools to capture benefits stemming from the CEC's Electric Program Investment Charge (EPIC). In addition, he led a prospective analysis, informed by expert elicitation, of EPIC-funded renewable energy/grid integration technology adoption, avoided system-level costs, and social welfare benefits through 2045.

For the **US DEPARTMENT OF ENERGY (DOE)**, co-managed a retrospective benefit-cost analysis of Building America, a large-scale residential efficiency program. Analyzed energy savings, energy cost savings, and non-energy impacts (e.g., improved health due to reduced emissions) of selected technologies demonstrated by the program. The evaluation presents net economic benefits, environmental benefits, health benefits, and knowledge benefits for the selected technologies, and includes a variety of benefit-cost analyses, including the program's return on investment, net present value, and benefit-cost ratio. Findings showed that Building America's efforts reduced energy costs and improved environmental health by a combined $875 million over the past 10 years, at a total program cost of $162 million – a 30.2% internal rate of return on DOE funding.

For the **US EPA**, managed an evaluation of the RE-Powering America's Land Initiative, which promotes renewable energy (RE) development on contaminated lands (CLs). Such projects often include the installation of solar on capped landfills and other brownfields properties. Assessed the Initiative's role in moving the market toward greater consideration of RE projects on CLs; current market barriers to siting RE projects on CLs; the usefulness of the Initiative's resources, tools, and knowledge products in addressing the barriers; and cost implications of siting RE projects on CLs vs. undisturbed lands. Developed a "process roadmap" that illustrates barriers that can arise in each step of the process (and potential solutions) from the perspective of developers, agencies, and other parties.

For **NYSERDA**, designed and directed a large-scale survey to assess the impacts of NYSERDA-funded demonstration projects and subsequent replication projects. Surveyed projects in sectors including energy resources, on-site power production, buildings, manufacturing, and transportation. Used survey results and project data to: (1) estimate energy savings, cost savings, sales, and other impacts resulting from NYSERDA-funded demonstrations

and replication projects; (2) characterize the number, scale, and type of replication projects; (3) identify factors that helped or hindered replication; (4) assess the cost-effectiveness of NYSERDA's R&D demonstration portfolio; and (5) evaluate participant satisfaction with NYSERDA's R&D Program. Developed an innovative "contribution index" based on survey responses to estimate net-to-gross ratio for each project.

For **UNITED ILLUMINATING/AVANGRID**, as a subcontractor to Metabolic Consulting, assisted the Business Sustainability Challenge program to develop a measurement and communications framework. Tasks included: building a framework and data management plan; standardizing reporting and communications about the program; measuring initial outcomes; and preparing the program for scalability and replicability. Developed a robust measurement framework and data management plan.

For **CONCORD MUNICIPAL LIGHT PLANT (CMLP)**, provided consulting services, as a subcontractor to Optimal Energy, to develop a strategic plan that can deliver on the municipality's ambitious decarbonization goals while maintaining CMLP as a financially healthy business. The team facilitated a goal-setting process to reflect business and environmental concerns and developed quantitative targets for each goal. Identified strategic initiatives that can achieve CMLP's goals (e.g., strategic electrification, energy efficiency programs, utility scale storage, etc.), conducted research into models used by other utilities, developed case studies on promising models/examples, and conducted financial analysis of select initiatives. Developed a "balanced approach" to meet GHG targets with non-emitting PPAs, REC purchases, and a phased set of strategic initiatives, while maximizing CMLP's revenue and net operating income, and controlling rate impacts. Results significantly informed CMLP's Strategic Plan 2018-25.

For **NATURAL RESOURCES CANADA (NRCAN), OFFICE OF ENERGY EFFICIENCY**, provided strategic planning to assist NRCan in in the development of a comprehensive, data-driven approach to energy efficiency programming focused on the built environment, informed by the experience of the US DOE's Building Technologies Office, and underscored by NRCan's efforts to coordinate cross-border programming with DOE. Assisted NRCan in adapting BTO's "ecosystem" programmatic approach to implement the continuum of R&D, market stimulation, and codes and standards approaches to drive down energy use intensity of buildings and their components. The study provided recommendations to strengthen internal and external communication, knowledge sharing, and collaboration.

For **NYSERDA**, directing IEc's measurement and evaluation support for seven building decarbonization projects funded by the Innovative Market Strategies (IMS) program. IMS funded projects to test novel, replicable, and scalable approaches to decarbonize New York State buildings. IEc is assessing the value proposition, market scale-up potential, successes, barriers, and lessons learned for each project. Mr. Kaufman is leading the evaluation of a project that engages trusted community institutions (e.g., churches) in building electrification, clean heating/cooling retrofits, and envelope/shell retrofits. Analyzing the energy savings, GHG reductions, and energy cost impacts of the projects. Interviewing the participating institutions and their partners to understand how demonstrations of energy retrofits can showcase benefits, build trust, and inspire more building retrofits throughout the community.

For **NYSERDA**, managing studies of programs designed to advance building decarbonization solutions (Retrofit NY), clean heating/cooling installations (Clean Heat Connect), and large-scale renewables (Build Ready). For RetrofitNY, examining how NYSERDA worked to adopt the Energiesprong approach from the Netherlands to New York State's multifamily affordable housing stock, market evolution, program successes and barriers, and lessons learned about decarbonizing the State's existing building stock. For Clean Heat Connect, examined what resources (and trusted messengers) best assist contractors in promoting electrification through heat pump installations. Conducted in-depth interviews with manufacturers, distributors, and contractors, and deployed a large web-based contractor survey. For Build Ready, documented the program's successes and barriers, and conducted desk research of similar programs to identify promising strategies to overcome barriers and strengthen program processes.

For **NYSERDA**, conducted market research to inform NYSERDA's efforts to support the siting of large-scale renewable energy projects. Conducted a review to document successful siting policies in other jurisdictions in order

to identify promising approaches that could be tailored for New York State. Facilitated focus groups with residents in proposed host site communities for large-scale renewable energy projects to obtain feedback on outreach messages, compensation structures, and outreach strategies. Based on the focus group results, IEc made several specific recommendations on outreach and community compensation, which the Office of Renewable Energy Siting incorporated into the State's Host Community Benefit program.

For the **US SBA**, directed an evaluation of the Community Advantage pilot program. Community Advantage provides loans of up to $250,000 and aims to fill a gap between SBA's Microloan program and its traditional 7(a) program. A key feature of the program is that SBA works with mission lenders who may offer their borrowers technical assistance and business counseling in addition to financing. This study analyzed the impact of technical assistance and business counseling and the economic outcomes achieved by borrowers, the factors affecting loan performance, and good practices that may be transferable to SBA's other lending programs. The analysis used SBA program data on lenders/borrowers, technical assistance, credit scores, employment data, and detailed loan data. Interviews with program lenders and borrowers provided context for the program data.

For the **US EPA**, co-managed an evaluation of the Climate Showcase Communities (CSC) program. EPA awarded $20 million to 50 local and tribal governments across the US. to pilot innovative, cost-effective, and replicable models of GHG reductions. The CSCs implemented a range of programs involving energy production, residential and commercial energy efficiency, waste management, transportation, and land use. The evaluation focused on environmental, economic, and sustainability of outcomes; replications of CSC projects by other communities; the cost-effectiveness of the program; and the usefulness of CSC tools and resources.

Select Reports and Publications

Case Studies of Central Hudson's Grid Modernization Investments, Micatu's Real-Time Voltage Sensors, Shared Mobility Network, NYSERDA's Workforce Development Program, Tagup Demonstrations, and *Interconnection Technical Working Group,* prepared for NYSERDA, July 2020 – September 2024.

Measuring Innovation Progress to Guide Future Investments, prepared for the California Energy Commission, December 2020.

Evaluation of Building America and Selected Building Energy Codes Program Activities, prepared for the US Department of Energy, March 2018.

Select Speaking Engagements

International Energy Program Evaluation Conference 2025. Panelist, Fueling the Future: Evaluating R&D and Climate Investments. "Measuring and Evaluating the Development Impacts of Climate Investments." Denver, Colorado. October 7, 2025.

International Energy Program Evaluation Conference: Energy Optimization: Evaluation for a Clean & Equitable Future. Panelist, Resiliency and Investments in the Modern Grid. San Diego, California. November 3, 2022.

The National Academies of Sciences, Engineering, and Medicine. Assessment and Advancement of Science in the Bureau of Ocean Energy Management's Environmental Studies Program. Presenter, Update on "Evaluating Connections: BOEM Environmental Studies and Assessments." Public Meeting. July 19, 2021.

Behavior, Energy & Climate Change Conference 2019. Panelist, Electrification Session. "Analyzing and Leveraging Social Networks to Transform Markets." Sacramento, California. November 18, 2019.

International Energy Policy & Programme Evaluation Conference. Presenter, "Do Policies Deliver? Research and Innovation Schemes" Seminar. Vienna, Austria. June 25, 2018.

EXHIBIT IEc-2-2

REFERENCED INTERROGATORY RESPONSES

FE PA Response to CAUSE-PA Interrogatory Set 1, No. 038

FE PA Response to CAUSE-PA Interrogatory Set 1, No. 039

FE PA Response to CAUSE-PA Interrogatory Set 1, No. 041

FE PA Response to CAUSE-PA Interrogatory Set 1, No. 042

FE PA Response to OCA Interrogatory Set 3

FE PA Response to OCA Interrogatory Set 3

FE PA Response to OSBA Interrogatory Set 2, No. 001

FE PA Response to OSBA Interrogatory Set 2, No. 001

FE PA Response to OSBA Interrogatory Set 2, No. 003

FE PA Response to OSBA Interrogatory Set 2, No. 003

OSBA

WORKPAPERS

For

OSBA Statement No. 2

DIRECT TESTIMONY OF DANIEL KAUFMAN ***

- Exhibit IEc-3 Kaufman work papers

***** OSBA Workpapers are in excel format <u>ONLY</u>; therefore, will be served via electronic means <u>ONLY</u>, and will be served simultaneous to service of OSBA Statement No. 2, Direct Testimony & Exhibits of Daniel Kaufman <u>ONLY</u>*****

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

VERIFICATION

I, Daniel J. Kaufman, hereby state that the facts set forth in the Direct Testimony and Exhibits, labelled OSBA Statement No. 2, with associated Exhibits IEc-2-1 and IEc-2-2, are true and correct to the best of my knowledge, information, and belief, and that I expect 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: January 15, 2026

Daniel J. Kaufman

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: January 16, 2026

/s/ Steven C. Gray
Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	: : : :	Docket No. M-2025-3057327

DIRECT TESTIMONY OF JIM GREVATT

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA (CAUSE-PA)

January 16, 2026

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PREPARED DIRECT TESTIMONY OF JIM GREVATT

I. INTRODUCTION

Q. Please state your name, title, and employer.

A. My name is Jim Grevatt. I am a Managing Consultant at Energy Futures Group, located at 10298 Route 116, Hinesburg, VT 05461.

Q. Please describe Energy Futures Group.

A. EFG is a clean-energy consulting firm headquartered in Hinesburg, Vermont, with offices in New York. EFG designs, implements, and evaluates programs and policies to promote equitable investments in efficiency, renewable energy, other distributed resources, and strategic electrification, with a significant focus on the sufficiency of programs that specifically benefit lower income households and vulnerable communities. EFG staff have delivered projects on behalf of energy regulators, government agencies, utilities, and advocacy organizations in forty states, eight Canadian provinces, and several countries in Europe.

EFG brings to its work a unique combination of technical, economic, program, and policy expertise. EFG staff have critically evaluated hundreds of efficiency and renewable energy programs, playing key roles in developing many that have subsequently won awards for excellence. Recent work involves efficiency program portfolios and policies in each of the fifteen highest-ranking states on the American Council for an Energy-Efficient Economy (ACEEE) State Energy Efficiency Scorecard, as well as in Ontario, Manitoba, and British Columbia. EFG staff have provided expert witness testimony on efficiency programs, integrated resource planning, and related policy issues in regulatory proceedings in twenty states and five Canadian provinces.

Q. Please summarize your professional and educational experience.

A. I have worked in the energy efficiency industry since 1991 in a wide variety of roles. Prior to joining EFG, I served as the Director of Residential Energy Services at Efficiency Vermont and the District of Columbia Sustainable Energy Utility. In both of those roles I oversaw planning and delivery of programs for residential customers including those serving income-qualified households. I also served as the Manager of Energy Services at Vermont Gas Systems, managing both residential and commercial energy efficiency programs. I have extensive hands-on experience conducting hundreds of energy audits for Vermont's Low-Income Weatherization Assistance Program and Vermont Gas Systems' DSM programs.

In my current role as Managing Consultant at EFG, I have advised regulators, utilities and other energy efficiency program administrators, environmental organizations, and low-income and affordable housing advocates in over twenty states and Canadian provinces, and I have provided expert witness testimony in fourteen of those jurisdictions. My work, including as an expert witness in litigated proceedings in South Carolina[1] and West Virginia[2] among others, frequently focuses on the disproportionate energy burdens experienced by lower income households and the sufficiency of utility programs to address those burdens. For example, I co-authored an Energy Efficiency Action Plan for the Southeast Florida Regional Climate Change Compact which provided recommendations to county governments for local and regional actions to increase the

[1] See Direct Testimony of Jim Grevatt on behalf of S.C. Coastal Conservation League, Southern Alliance for Clean Energy, and Voter Solar, Application of Duke Energy Progress, LLC for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order, Docket No. 2022-254-E, S.C. Pub. Serv. Comm'n (Dec. 1, 2022), https://dms.psc.sc.gov/Web/Dockets/Detail/118289.

[2] See Direct Testimony of Jim Grevatt on behalf of West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia, Application of Appalachian Power Company and wheeling Power Company for Review of Energy Efficiency and Demand Response Programs and Approval of Rider Rates, Case No. 24-0332-E-P, W.Va. Pub. Serv. Comm'n (July 10, 2024), https://www.psc.state.wv.us/scripts/WebDocket/ViewDocument.cfm?CaseActivityID=625266&NotType=WebDocket.

availability of energy efficiency for vulnerable communities in that region.[3] I received a B.F.A. from the University of Illinois. My resume, attached as Appendix A, provides additional detail regarding my professional and educational experience.

Q. Have you previously testified in any proceeding before the Pennsylvania Public Utilities Commission?

A. Yes, I have testified on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) in Docket Nos. P-2014-2459362[4], M-2020-3020820, M-2020-3020821, M-2020-3020822, M-2020-3020823, M-2020-3020818, and M-2020-3020830. I have also testified before utility commissions in Colorado, Florida, Illinois, Iowa, Indiana, Kentucky, Maryland, Nevada, North Carolina, South Carolina, Vermont, Virginia, and West Virginia, as well as in the Canadian provinces of British Columbia and Manitoba.

Q. On whose behalf are you testifying in this case?

A. I am testifying on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to offer observations on the portfolio of energy efficiency programs that FirstEnergy Pennsylvania Electric Company (FirstEnergy or FE PA or the Company) proposes in hopes that I may inform the Commission's consideration of the Company's petition. The Company's Petition for Approval of a Phase V Energy Efficiency and Conservation

[3] Russell Paez, et al., Energy Efficiency Action Plan (Oct. 21, 2022), https://southeastfloridaclimatecompact.org/wp-content/uploads/2022/12/Energy-Efficiency-Action-Plan_Final2022.pdf.

[4] I have testified on behalf of CAUSE-PA in Docket No. P-2014-2459362, which includes both the proceedings regarding the Petition of Philadelphia Gas Works for Approval of Demand Side Management Plan for FY 2016-2020 and the Petition of Philadelphia Gas Works for Approval of Demand Side Management Plan for FY 2025-2029.

Plan (Phase V Plan) was filed on November 26, 2025 with the Pennsylvania Public Utility Commission (Commission). The Phase V Plan was filed pursuant to the requirements of Act 129 and the Commission's Implementation Order for Phase V of the Act 129 Energy Efficiency and Conservation Program (Implementation Order), entered on June 18, 2025, at Docket No. M-2025-3052826. Specifically, I discuss the sufficiency of the Company's approach to programs that are intended to reduce the energy bills of those customers who lack the financial means to make investments in energy efficiency, i.e. low-income households. Throughout this testimony, the term "low income" as applied to persons or households will refer to those individuals and/or households whose income is at or below 150% FPL, consistent with the Commission's definition of that term.[5]

Q. What are your principal observations about the Company's filing?

A. My principal observations are as follows:

1. The Company states that "[t]he Phase V Plan is generally an extension of the programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures, and revisions to some existing program offerings and measures."[6] It further states that it "will leverage the existing program implementation processes that were developed and proven effective during prior phases of the Commission's EE&C Program."[7] The Company claims that its Plan "includes a broad

[5] Phase V Implementation Order at 53-54. There are many households with income above this threshold that also lack adequate means to invest in energy efficiency measures for their home; however, for the purposes of this testimony, I am applying the definition of low income utilized by the Public Utility Commission for the purposes of establishing a low income program sector.

[6] Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan (Petition), p. 10.

[7] Petition, p. 15.

portfolio of programs and measures, including a comprehensive program for both the residential and the non-residential customer sectors."[8]

2. The Company identifies four specific Programs: the Residential Energy Solutions Program; the Low Income Energy Efficiency Program; The C&I Energy Solutions Program – Small; and the C&I Energy Solutions Program – Large. Each program has multiple sub-programs and delivery channels, and the Company states that each is an "umbrella program." For example, it states that "[t]he Residential Energy Solutions program is an umbrella program that engages customers through multiple program components to provide energy efficiency and energy usage education and awareness."[9]
3. The Company describes the Low-Income Energy Efficiency Program (LIEEP) as "an umbrella program that includes multiple program components, delivery channels, and vendors."[10] LIEEP is comprised of subcomponents that the Company says include:
    a. Products: promotes the purchase and installation of select efficient residential products, and to turn in and recycle qualifying, inefficient, operating appliances, with enhanced incentives for income-qualified customers.
    b. HVAC: incentivizes the installation of qualifying energy efficient space and water heating heat pump equipment in coordination with other state or federal conservation programs.
    c. Braided Funding Audits: co-funds audits or technical studies as part of an incentive towards an overall project including installation of qualifying measures in coordination with other state or federal conservation programs.

[8] FirstEnergy Proposed Phase V EE&C Plan (Plan), p. 15 of 157.
[9] Plan, p. 39 of 157.
[10] Plan, p. 58 of 157.

d. Behavioral: educates income-qualified customers on their home energy usage and provides customized recommendations.

e. Multifamily: provides energy efficiency education to multifamily building owners and tenants through energy assessments and provides recommendations for energy efficiency improvements. The program component provides direct installation of measures and financial incentives towards the installation of building and common area energy savings opportunities.

f. New Homes: provides incentives to builders of income-qualified housing for achieving energy efficiency savings and targets through a combination of building shell and appliance and equipment upgrades.

g. Weatherization: includes WARM Plus, WARM Extra Measures, Low-Income Outreach & Assessment and LIURP Lookback.

4. Despite the multiple delivery channels on offer, the Company fails to provide sufficient information in its filing to demonstrate whether FE intends to provide its low-income customers with deep-saving efficiency measures. The Company has not provided sufficient information to determine, for example, how many heat pumps, heat pump water heaters, or insulation measures it expects to install. Instead, it simply lumps these and likely other measures into the category "WARM Plus" and WARM Extra Measures" with no specific information about the measures and quantities upon which its estimated savings are based – it simply refers to the entirety of TRM Vol 2. The Company indicates that "[t]he Company's saving assumption for the WARM Plus measure is at a project level and represents a blended average of all eligible weatherization measures and does not include

specific weatherization measure level estimates."[11] Similarly, the Company's filing shows that multifamily common area measures are forecast to contribute 24% of total low-income savings, but it does not specify what those measures and quantities are other than to provide TRM references to lighting and controls and laundry equipment.[12] The Commission's Plan Template requires EDC's to "include tables with estimated total MWh and MW totals per year and document the estimated savings contribution by measure, or measure category" and I do not believe that "MF-Common-DI" or "WARM Plus" constitute measure categories. Rather, they describe delivery channels without specifying types of measures and quantities of each. The Company's failure to provide specific measure level detail obscures analysis of its Plan.

5. FE claims that its "Residential, Low-Income and Commercial and Industrial Energy Solutions programs are comprehensive programs that targets [sic] long-lasting energy savings through comprehensive and whole home whole building solutions."[13] However, for the low income program this is not supported by the evidence the Company provides, which shows that nearly 20% of the forecast LI savings are attributed to various forms of appliance recycling, 22% of the savings are attributed to short-lived Behavior and Customer Engagement programs, and nearly 24% are attributed to multifamily common area direct install measures.[14] Another 8% of the LI savings are forecast to come from multifamily tenant direct install measures with no detail provided about the quantities of the various potential measures.

[11] FirstEnergy Response to CAUSE-PA Set 1, No. 055 (a), (All cited discovery responses are attached hereto at Appendix B).
[12] Plan, Appendix B, Table 9: Estimated Savings and Participation.
[13] Plan, p. 36 of 157.
[14] Plan, Appendix B, Table 9: Estimated Savings and Participation.

6. The measures the Company has installed for low-income customers so far in Phase IV show clearly that it would take a fundamental change in strategy for it to provide low-income customers with significant electricity and bill savings opportunities. In Phase IV to date the Company has only provided incentives for a total of four heat pumps (including ductless mini-splits) and has supported only 233 attic insulation jobs. Nearly 40% of the reported low-income savings have come from energy efficiency kits, an additional 15% come from residential lighting, 15% from Home Energy Reports, 6% from appliance recycling, and another 6% from air purifiers. In contrast, only 1% comes from heat pump water heaters and less than ½ of 1% come from air sealing and attic insulation.[15] Unfortunately, the Company fails to provide any evidence that it will vary its approaches from Phase IV.

7. The Company states that "Front of the Meter (FTM) measures are included in the Residential, SCI and LCI sectors of the Phase V Plan"[16] and that "[w]hile the Phase V Plan was designed to achieve the Company's goals with no energy savings or demand reductions from FTM measures, the Company intends to identify and promote energy efficiency and demand reductions through Company and other project developer initiatives implemented during the course of Phase V supporting achieving energy savings and system load relief."[17] The Plan states that "[t]he Phase V Plan budget includes the costs associated with the Company's EE&C department identifying, promoting, and coordinating with the

[15] FirstEnergy Response to CAUSE-PA Set 1, No. 008, Attachment A.
[16] Plan, p. 18 of 157.
[17] Plan, p. 35 of 157.

implementation of applicable Company and other project developer initiatives" [18] but is silent as to how any FTM improvements will be funded.

Q. What are your recommendations to the Commission regarding approval of the Company's Act 129 Phase V Filing?

A. I recommend the following:

1. Reject FirstEnergy's Plan as filed, and instead order the Company to revise its filing so that 1) it provides a revised Table 9 that reflects actual measure-level savings and participation estimates rather than opaque bundles that do not indicate what the underlying measure quantities are forecast to be, and 2) it revises the forecast measure quantities to be consistent with CAUSE-PA's recommendation that it "achieve no less than 25% of the low-income savings goal through comprehensive whole-home program measures" – specifically through heat pumps, heat pump water heaters, and building insulation and air sealing measures that will provide substantive, long lasting energy savings to participating households. I further recommend the Commission monitor the quantity of these deep-savings measures funded by the Company's EE&C programs annually and provide further direction to FE to increase installation of these measures if it does not meet its forecast participation. Such monitoring is consistent with the Commission's direction to the Bureau of Technical Utility Services to "work with the SWE to develop reporting requirements for comprehensive program offerings and whole-home, comprehensive measures for the EDCs' low-income programs in Phase V."[19]

[18] Plan, p. 35 of 157.

[19] Phase V Implementation Order at 72.

2. I recommend the Commission direct the Company to submit with its revised Plan a supplemental health and safety protocol and reporting framework that includes the following:
    a. A description of protocols and processes for addressing health and safety issues, including clear criteria for making referrals to LIURP or outside agencies vs. addressing the health and safety issues within the Act 129 programs.
    b. A project tracking approach and tool to allow the Company to track when repairs are made and by whom, and to follow up by installing energy efficiency measures that had been deferred.
    c. Reporting metrics, for inclusion in the Company's annual report, which include at minimum the number of deferred jobs due to health and safety issues, the number of referrals for remediation through other programs, the number of remediated jobs handled through Act 129, and the measures installed as a result of the remediation.
    d. A process flow chart that illustrates the customer journey from audit through health and safety remediation through installation of energy efficiency measures.
3. I recommend the Commission direct FE to take the steps necessary to develop the seamless coordination practices I describe on pp. 46-51, and to require FE to file a report of its actions and results along with its first annual report in Phase V and with each subsequent annual report.
4. I recommend the Commission reject FE's FTM proposal outright because it will not cause any new benefits for ratepayers other than those that are already in the works in the Company's distribution system plans.

I discuss these and other recommendations in detail below.

II. BACKGROUND OF ACT 129 PROGRAMMING

Q. Please summarize the low-income energy savings requirements for Phases I, II, III, and IV of Act 129.

A. Act 129 requires that each Electric Distribution Company (EDC) include in its Energy Efficiency and Conservation (EE&C) Plan specific energy efficiency measures for low-income households in proportion to that sector's share of the total energy usage in a given service territory.[20] In Phase II, the Commission added a requirement that each EDC obtain a minimum of four-and-a-half percent (4.5%) of its overall consumption reduction requirements from the low-income sector.[21] To meet the low income consumption reduction target, the Commission allowed EDCs to include all savings achieved through dedicated low-income programs, as well as a portion of savings achieved through non-low income programs based on estimated low income participation.[22]

In Phase III, the Commission increased the low-income consumption reduction requirement to five-and-a-half percent (5.5%) of the overall electric consumption savings achieved.[23] The Commission required that "[s]avings counted towards the 5.5% target may only come from specific low-income programs or low-income verified participants in multifamily housing programs."[24] In other words, for Phase III, deemed savings from non-low-income programs were no longer permitted to be counted for compliance with the low income consumption reduction target. In addition to the specific savings carve-out and elimination of the prior deemed savings policy, the Commission further directed that "low-income savings should

[20] 66 Pa. C.S. §2806.1(b)(1)(i)(G).
[21] Phase II Implementation Order at 55, Docket No. M-2012-2289411.
[22] Id. at 58.
[23] Phase III Implementation Order at 69, Docket No. M-2014-2424864.
[24] Id. at 69.

primarily come from measures that are directly provided to low-income households" – as opposed to upstream rebates or other indirect programming.[25]

In Phase IV, the Commission increased the percentage of total consumption reduction it required the legacy FirstEnergy EDCs to achieve from the low income sector to 5.8%, and maintained its requirement from Phase III that low income savings be derived from programs "solely directed at low-income customers or low-income-verified participants in multifamily housing programs."[26] Notably, however, while the 5.8% savings requirement was higher in terms of the percentage of overall savings, the actual MWh savings requirement from the low-income customer segment was lower in Phase IV than in Phase III because the overall portfolio savings targets were lower.[27]

In Phases II, III, and IV of Act 129, the Commission allowed EDCs to carry over savings achieved in the prior phase that exceeded the overall portfolio and low income consumption reduction targets and apply carried over savings toward savings targets in the subsequent phase.[28] The Commission's permissive carryover policy allowed EDCs to rely on carryover savings to meet their portfolio and low-income savings targets, resulting in EDCs dramatically underspending EE&C program budgets intended to help Pennsylvanians access energy efficiency and conservation measures. The results of Phase III illustrate the impact of the Commission's carryover policy. EDCs ended Phase III with carryover savings averaging 28% toward their respective Phase IV low income savings targets while over $149 million dollars intended to be utilized to help

[25] Phase III Implementation Order at 69.
[26] Phase IV Implementation Order at 28, Docket No. M-2020-3015228.
[27] Id. at 36.
[28] Phase II Implementation Order at 58-60, Docket No. M-2012-2289411; Phase III Implementation Order at 83-86, Docket No. M-2014-2424864; Phase IV Implementation Order at 42-45, Docket No. M-2020-3015228.

Pennsylvanians save energy went unspent.[29] While it is critical that funds be spent wisely, leaving these funds unspent robs utility customers of vital opportunities to better manage their household costs through increased energy efficiency.

Q. Please summarize the low income energy savings requirements for Phase V of Act 129.

For Phase V, the Commission set the percentage of total consumption reduction it requires each EDC to achieve from the low income sector to targets ranging from 6.7% to 7.9%, representing 7.5% of the statewide MWh savings target in aggregate.[30] The Commission derived these percentages by "allocating 13% of each EDC's Act 129 budget to programs solely directed at low-income customers or low-income-verified participants in multifamily housing programs."[31] The Commission maintained the requirement from Phases III and IV that "[s]avings from non-low-income programs, such as general residential programs, would not be counted toward these targets."[32]

Phase V total portfolio savings targets for each EDC are lower than they were in Phase IV.[33] As such, although the Phase V low income savings targets are higher as a percentage of overall portfolio savings, the actual MWh savings requirement is again lower in Phase V than it was in Phase IV for all EDCs except for Duquesne Light Company, which had its low-income savings target increased slightly, by 367 MWh.[34]

[29] SWE Final Annual Report Act 129 Program Year 16 (2025) at 8; SWE Phase III Final Report at 50.
[30] Phase V Implementation Order at 69.
[31] Id.
[32] Phase V Implementation Order at 55.
[33] Compare Id. at 48; Phase IV Implementation Order at 18.
[34] Phase V Implementation Order at 55, 68.

During Phase IV, on December 7, 2023, the Commission approved the consolidation of four EDCs – Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company – into rate districts of a single EDC, FirstEnergy Pennsylvania Electric Company.[35] In its Phase V Implementation Order, the Commission acknowledged that "Phase V will be the first phase for which the four legacy FirstEnergy EDCs will implement programs as the consolidated FirstEnergy EDC."[36] As such, the Commission set a single Phase V consumption reduction target and low income savings target for FirstEnergy across its consolidated service territory.[37] For Phase V, the Commission set FirstEnergy's low income savings target at 86,913 MWh, representing 7.9% of the Company's overall portfolio consumption reduction target.[38] Significantly, this is the lowest low-income target for FirstEnergy since the PUC introduced the low-income target requirement in Phase II:

[35] Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience, Order entered December 7, 2023, at Docket Nos. A-2023-3038771, -792, -793, -794, -795, -807, -808.

[36] Phase V Implementation Order at 213.

[37] Id. at 48, 55, 68.

[38] Id. at 55, 68; 48 (86,913 MWh is 7.9% of the final 1,097,605 MWh Phase V portfolio savings target for FirstEnergy).

Table 1: FirstEnergy Low Income Target in Each Phase[39]

Phase	Low-Income Target
Phase II	49,032 MWh
Phase III	109,033 MWh
Phase IV	89,015 MWh
Phase V	86,913 MWh

In its implementation Order, the Commission also directed the Bureau of Technical Utility Services to "work with the SWE to develop reporting requirements for comprehensive program offerings and whole-home, comprehensive measures for the EDCs' low-income programs in Phase V."[40] Further, the Commission capped the amount of energy savings achieved during Phase IV that EDCs can carry over and apply toward their Phase V overall and low-income targets to 20% of the Phase V targets.[41] The Commission made clear, however, "that EDCs can, and should, design their Phase V plans to meet their Phase V goals without the use of any carryover, as the EEPDR Potential Study indicates Phase V goals are achievable without carryover."[42]

[39] Phase II Implementation Order at 24, 54, Docket No. M-2012-2289411; Phase III Implementation Order at 63, Docket No. M-2014-2424864; Phase IV Implementation Order at 34, Docket No. M-2020-3015228; Phase V Implementation Order at 55, Docket No. M-2025-3052826. Phase II, III, and IV numbers are the total of the low-income targets for the four legacy FirstEnergy EDCs.

[40] Phase V Implementation Order at 72.

[41] Id. at 84, 241.

[42] Id. at 85.

III. THE NEED FOR LOW-INCOME ENERGY EFFICIENCY

Q. What level of income qualifies a household as "low income"?

A. Generally, the Commission considers a "low income" customer to be any residential customer whose income is at or below 150% of the Federal Poverty Level (FPL).[43] With some exceptions, most utility assistance programs require households to have income that is not greater than 150% FPL to qualify.[44] Act 129 specifically mandates that EDCs' EE&C Plans contain specific energy efficiency measures for households at or below 150% FPL.[45] FirstEnergy customers at or below 150% FPL would be eligible for the company's Low-Income Energy Efficiency Program, outlined in its proposed Phase V EE&C Plan, and are eligible for the Low-Income Energy Efficiency Program under the company's existing consolidated Phase IV EE&C Plan for the four legacy FirstEnergy EDCs.[46]

As a baseline, a family of four with a household income at or below 150% FPL has a maximum gross annual income of $48,225 ($4,018/month).[47] Table 2 provides a breakdown of household income by the 2025 FPL and household size:

Table 2: 2025 Federal Poverty Levels by Household Size and Annual Income[48]

Household/Family Size	50%	100%	150%	175%	200%	250%
1	$7,825	$15,650	$23,475	$27,388	$31,300	$39,125
2	$10,575	$21,150	$31,725	$37,013	$42,300	$52,875
3	$13,325	$26,650	$39,975	$46,638	$53,300	$66,625
4	$16,075	$32,150	$48,225	$56,263	$64,300	$80,375
5	$18,825	$37,650	$56,475	$65,888	$75,300	$94,125

[43] See 52 Pa. Code § 54.72 (Defining low-income customers for the purposes of EDC Universal Service programs and reporting).
[44] See e.g. FirstEnergy, Fifth Amended Joint Universal Service & Energy Conservation Plan, *2024-2028* at 38.
[45] 66 Pa.C.S. 2806.1(b)(1)(i)(G).
[46] FirstEnergy Proposed Phase V EE&C Plan at 57; FirstEnergy Consolidated Phase IV EE&C Plan at 59.
[47] See US Dept. of Health & Human Services, HHS Poverty Guidelines for 2025, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.
[48] Id.

Q. How many low-income customers does FirstEnergy have?

A. Like other large regulated public utilities in Pennsylvania, FirstEnergy must track its low-income customer population in two ways: "*estimated low-income customers*" and "*confirmed low-income customers.*"[49] The "estimated low-income" customer number is derived using local census data, scaled against residential customer counts in a given geographic area, to approximate the percentage of low-income households in a utility's service territory.[50] The "confirmed low-income" number is a count of those customers for whom the Company has obtained information that would reasonably indicate that the customer's income is at or below 150% of the federal poverty level (FPL).[51] In the Commission's 2024 Universal Service Report, data for the four legacy FirstEnergy EDCs were reported separately.[52]

In 2024, the four legacy FirstEnergy EDCs reported 1,806,010 total residential customers, of which 426,858 (23.6%) were estimated low-income and 226,028 (12.5%) were confirmed low-income.[53]

Table 3: FirstEnergy Companies Low-Income Customer Counts[54]

EDC	Residential Customers	Confirmed Low-Income		Estimated Low-Income	
Met-Ed	520,972	62,531	12.0%	103,874	19.9%
Penelec	500,409	77,298	15.4%	135,790	27.1%
Penn Power	150,253	16,976	11.3%	32,453	21.6%
West Penn	634,376	69,223	10.9%	154,741	24.4%
Total	***1,806,010***	***226,028***	**12.5%**	***426,858***	**23.6%**

[49] See Pa. PUC, BCS, 2024 Report on Universal Service Programs & Collections Performance (2024 Universal Service Report), at 5-7, available at: https://www.puc.pa.gov/media/3771/2024-universal-service-report-final.pdf. .
[50] Id. at 7.
[51] Id. at 2.
[52] Id.
[53] Id. at 5-7.
[54] Id. at 5-7.

For all 2024 participants in universal service programs statewide, average annual household income for electric customers was $22,362.[55] The average electric CAP household (two persons) had an income of $16,031, which placed these households' incomes at approximately 78% of FPL (for two persons) for 2024, and 76% for 2025.[56] In other words, the average income of households that are eligible to participate in the low-income programs is roughly half of the qualifying income level. Electric customers who received LIURP services in 2024 had average annual household incomes of $21,580.[57]

Q. How does the cost of energy impact low-income households?

A: To contextualize the impact of energy costs on low-income households, it is helpful to understand the relative energy burden shouldered by low-income ratepayers as compared to other Pennsylvanians. A household's energy burden is the percentage of household income required to pay for energy services.[58] According to the U.S. Department of Housing and Urban Development a household is considered cost-burdened if its total housing costs – *including utility costs* – are more than 30% of the household's total income.[59] According to formal Commission policy, to be considered affordable, a household's combined energy burden (electric and gas) should not exceed 6% of household income for those with incomes between 0-50% FPL, or 10% of household income for those with income between 51-150% FPL.[60] But across Pennsylvania, households with income at or below 150% FPL spend as much as 30% of their income on energy costs alone.[61] By

[55] 2024 Universal Service Report at 48.
[56] Id. at 51.
[57] Id. at 48.
[58] 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Final Policy Statement and Order, Docket No. M-2019-3012599, (Final Policy Statement entered Nov. 5, 2019) at 3.
[59] U.S. Census Bureau, Nearly Half of Renter Households Are Cost-Burdened, Proportions Differ by Race, available at: https://www.census.gov/newsroom/press-releases/2024/renter-households-cost-burdened-race.html.
[60] 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Final Policy Statement and Order, Docket No. M-2019-3012599, (Final Policy Statement entered Nov. 5, 2019).
[61] See Fisher, Sheehan & Colton, The Home Energy Affordability Gap: Pennsylvania (April 2023).

comparison, the Bureau of Consumer Services (BCS) estimates that the energy burden of Pennsylvania's residential customers as a whole (exclusive of those enrolled in a Customer Assistance Program (CAP)) is roughly 4%.[62] The overwhelming energy burdens on low-income households leave families with insufficient funds to pay for housing, water costs, food, medicine, childcare, and other basic needs and pose significant obstacles for low-income families to afford their monthly bills and stay connected to essential energy services in their homes.

Home energy prices are higher than they have been in a decade, and are projected to continue rising.[63] Energy insecurity resulting from high energy burdens impacts roughly 1 in 4 Pennsylvania households.[64] According to the United States Census Bureau's Household Pulse Survey, roughly 24.4% of Pennsylvania households were unable to afford their home energy bills in 2024, compared to 23% nationwide.[65] Nearly 1 in 20 Pennsylvania households have past-due energy utility debt, with an average overdue balance exceeding $1,200, far above the national average of $789.[66] According to the Energy Information Administration (EIA) Residential Energy Consumption Survey (RECS), 33.6% of United States residents reported experiencing energy insecurity; 24.6% reported reducing or forgoing food or medicine to pay for energy costs; and

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[62] Energy Affordability for Low-income Customers, Docket No. M-2017-2587711, Order, at 8 (Jan. 17, 2019)

[63] National Energy Assistance Directors Association, Winter Heating Costs Expected to Jump 9.2%, Putting Millions of Families at Risk, (Dec. 12, 2025), available at: https://neada.org/wp-content/uploads/2025/12/winterheatingdec25PR.pdf.

[64] US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (Aug. 20 – Sept. 16, 2024), https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042. Energy insecurity is the inability to adequately meet home energy needs. There are three dimensions to energy insecurity: economic (disproportionately high energy costs (burden) as percentage of income); physical (housing deficiencies / inefficiencies); and coping (strategies to cope with economic and physical hardships associated with energy insecurity). See Columbia Univ. Ctr. on Global Energy Policy, Energy Insecurity in the United States, https://www.energypolicy.columbia.edu/publications/energy-insecurity-in-the-united-states/.

[65] US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (April 9-29 2024), available at: https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042.

[66] The Century Foundation, Fueling Debt: How Rising Utility Costs are Overwhelming American Families (Nov. 17, 2025) https://tcf.org/content/commentary/fueling-debt-how-rising-utility-costs-are-overwhelming-american-families/.

12.2% reported leaving their homes at unhealthy temperatures because they could not afford to pay for energy.[67] Energy insecurity is more pronounced for low-income Black families. EIA's RECS data revealed that 52% of Black and African American households experience energy insecurity, compared to 23.2% of white households.[68] These disparities are driven in large part by inequities in housing quality and, in turn, home efficiency.

According to a recent study of the National Energy Assistance Directors Association and the Center for Energy Poverty and Climate, in February 2024, 51.9% of households with income under $50,000 reported at least one month where they reduced or went without food, medicine, and other basic needs in order to pay an energy bill.[69] In addition, 34% kept their home at a temperature that felt unsafe or unhealthy in order to save money on energy bills.[70] The data reviewed in the study found that, far and away, the greatest increase in energy insecurity in 2024 was among households with children.[71] As recent research and data have continually shown, vulnerable low-income families simply cannot afford the cost of energy services.

Q. Is there other evidence that the Company's low-income customers struggle to afford electricity service?

A. Yes. The Commission's Universal Service Reports show that the Company's confirmed low-income customers are terminated for nonpayment at **more than quadruple the rate** of residential customers overall. In 2024, the termination rate for the Company's residential

[67] United States Energy Information Administration, 2020 Residential Energy Consumptions Survey, Table HC11.1 Household energy insecurity, 2020 available at: https://www.eia.gov/consumption/residential/data/2020/hc/pdf/HC%2011.1.pdf.
[68] U.S. Energy Information Admin., In 2020, 27% of U.S. households had difficulty meeting their energy needs - U.S. Energy Information Administration (EIA), available at: https://www.eia.gov/todayinenergy/detail.php?id=51979.
[69] Nat'l Energy Assistance Dir. Assoc. (NEADA), Center for Energy Poverty & Climate, Energy Hardship Report, slide 10 (April 2024), available at: https://neada.org/wp-content/uploads/2024/04/neadahardshipreportAPR24.pdf.
[70] Id.
[71] Id.

customers across its four rate districts was 5.0%, but for confirmed low-income customers the termination rate was 21.6%.[72]

Table 4: FirstEnergy Companies Termination Rates[73]

EDC	Residential Customers	Confirmed Low-Income
Met-Ed	6.8%	28.7%
Penelec	5.4%	19.9%
Penn Power	4.3%	21.5%
West Penn	3.5%	17.2%
TOTAL	**5.0%**	**21.6%**

Confirmed low-income customers are also more likely to be payment troubled. Despite making up only 12.5% of residential customers, confirmed low-income customers make up 60.4% of payment arrangements and 65.4% of payment troubled customers (defined as failing to maintain at least one payment arrangement).[74]

Table 5: FirstEnergy 2024 Low Income Statistics[75]

	Confirmed Low-Income (CLI) Customers	% Payment Arrangements CLI	% Payment Troubled CLI
Met-Ed	12.0%	58.2%	63.3%
Penelec	15.4%	63.6%	68.2%
Penn Power	11.3%	62.7%	69.0%
West Penn	10.9%	59.0%	64.0%
TOTAL	**12.5%**	**60.4%**	**65.4%**

[72] 2024 Universal Service Report at 11-12. Across the four legacy FirstEnergy EDCs, a total of 91,163 residential customers (5.0%) and a total of 48,833 confirmed low-income customers (21.6%) had their electric service terminated in 2024.
[73] Id.
[74] Id. at 6, 8, 10. In 2024, across the four legacy FirstEnergy EDCs, a total of 74,852 confirmed low-income customers had payment arrangements, 60.4% of the 123,944 residential customers who had payment arrangements. 1,469 confirmed low-income customers were payment troubled, 65.4% of the 2,245 residential customers who were payment troubled.
[75] Id. at 6, 8, 10.

Q. What are the consequences of utility termination for low-income households?

A. Utility termination has severe, destabilizing impacts on low-income households. Involuntary loss of electricity has a deep and lasting impact on the health and well-being of an entire household – as well as the community. The loss of electric service can often mean that a household is unable to use their primary heating source in the winter, even if that heating source is non-electric. When a household is unable to use a primary or secondary heating system, they often resort to dangerous and/or high-cost heating, cooking, and lighting alternatives – such as the use of alternate fuels or portable generators – which can increase the risk of carbon monoxide poisoning and home fires.

The loss of electric service can also have a significant impact on the ability of vulnerable populations to manage medical conditions and is particularly dangerous for certain groups – including seniors, families with young children, and individuals with a disability – each of whom are more likely than other residential households to experience poverty and income insecurity.[76] Furthermore, utility insecurity and resulting payment trouble is increasingly recognized as a predictor of first-time homelessness.[77] Involuntary loss of electric service is often a contributing factor leading to family separation through the child welfare system.[78]

[76] Charlie Harak, Olivia Wein, NCLC, Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to Save Lives Now (Sept. 29 2022), at 5-6, available at: https://www.nclc.org/resources/report-protecting-seriously-ill-consumers-from-utility-disconnections-what-states-can-do-to-save-lives-now/.

[77] Colin Middleton, Kim Boynton, David Lewis & Andrew M. Oster, The Value of Utility Payment History in Predicting Homelessness, PLOS (Oct. 9, 2023), available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0292305.

[78] Comments of Cynthia Figueroa, Commissioner, Philadelphia Dept. of Human Services, *Review of Universal Service and Energy Conservation Programs*, Docket No. M-2017-2596907 (submitted Aug. 8, 2017).

Q. Does the Company's customer assistance program (CAP) alleviate these struggles?

A. CAP helps; however, CAP only reaches a small percentage of eligible customers and is insufficient to remediate high energy burdens for the highest usage customers. In 2024, only 68,545 of the Company's customers were enrolled in CAP – this is just 30.3% of confirmed low-income customers and 16.0% of estimated low-income customers.[79]

Table 6: 2024 First Energy Monthly Average CAP Enrollment[80]

EDC	Number of CAP Customers	Percent of Confirmed Low-Income	Percent of Estimated Low-Income
Met-Ed	18,163	29.0%	19.8%
Penelec	24,354	31.5%	19.9%
Penn Power	5,321	31.3%	17.4%
West Penn	20,707	29.9%	17.0%
Total	***68,545***	***30.3%[81]***	***16.0%[82]***

Thus, between 69.7% to 84.0% of low-income customers are not enrolled in CAP and are charged the full residential rate.

Further, CAP customers have a limited annual CAP credit (the difference between the CAP rate and the full residential tariff rate). Customers that expend their maximum CAP credit before the end of the year must pay the full tariff rate until the credit resets the following January.[83] FE implemented its maximum CAP credit policy in December 2024 and only started tracking exceedances in March 2025.[84] In the first nine months (March-December 2025), 14,040 CAP

[79] 2024 Universal Service Report at 56.
[80] Id.
[81] 68,545 CAP customers represent 31.0% of the four FirstEnergy EDCs' 220,816 confirmed low-income customers. See Table 3, above.
[82] 81,479 CAP customers represent 18.7% of the four FirstEnergy EDCs' 436,497 estimated low-income customers. See Table 3, above.
[83] First Energy, Fifth Amended Joint Universal Service & Energy Conservation Plan, 2024-2028 at 14.
[84] FirstEnergy Response to CAUSE-PA Set 4, No. 001.

customers exceeded their maximum CAP credit limits.[85] Of those customers 2,616 received termination notices within 90 days of exceeding their maximum CAP credits.[86]

Q. What is the relationship between energy efficiency and CAP?

A. CAP costs are recovered through a rider assessed to all residential customers; thus, lowering energy costs for CAP participants helps reduce their CAP credits, which, in turn, helps reduce terminations and brings down the cost of service for other ratepayers.[87] The Commission has acknowledged the financial savings potential available through low-income energy efficiency improvements, stating in its 2026 TRC Test Final Order that:

> *Utilities can realize financial savings from their low-income EE programs. The efficient technologies installed by EE programs often result in reduced energy bills for participants, which can decrease the likelihood that customers will experience difficulties paying their utility bills. In turn, utilities may realize reduced costs associated with arrearages and late payments, uncollectible bills and bad debt write-offs, service terminations and reconnections, bill-related customer calls, and the bill collections process.*[88]

Energy efficiency enables CAP customers to reduce their usage and thereby reduce the amount of CAP credit utilized each month. Providing comprehensive and effective EE&C programing to CAP customers helps them to afford their bill and helps control costs for all ratepayers. The greater the energy savings in each participating household, the greater the cost savings in reduced CAP expenditures will be for the customer base as a whole.

Q. What is the relationship between poverty and home energy efficiency?

A. Energy insecurity is rooted in the interconnection of poverty and housing deficiencies.[89] Low-income consumers are far more likely to live in aging, inefficient, and potentially unsafe

[85] FirstEnergy Response to CAUSE-PA Set 4, No. 001, Attachment A.
[86] FirstEnergy Response to CAUSE-PA Set 4, No. 002, Attachment A.
[87] FirstEnergy Pennsylvania Electric Company Tariff Pa. PUC No. 1 (Supp. 26) at 185.
[88] 2026 TRC Test Final Order at 56.
[89] Hernandez, Diana, Energy Insecurity and Health: America's Hidden Hardship, Health Affairs Health Policy Brief, June 29, 2023. https://www.healthaffairs.org/do/10.1377/hpb20230518.472953/.

housing.[90] Low-income consumers are more likely to live in housing with poor quality insulation or no insulation at all.[91] Many low-income households are unable to afford the costs of repairs and improvements necessary to stem high consumption as a result of inefficiencies or other factors in their homes. As a result, households that experience energy insecurity spend 26.5% more per square foot on energy costs than households that do not experience energy insecurity.[92] Remediating housing deficiencies, such as health and safety barriers, is thus critical to ensuring the effective delivery of energy efficiency improvements to low-income households.

Further, the intersection of poverty and racism produces a pronounced disparity in energy burdens across low-income communities of color, driven primarily by historic inequities in housing and community investment.[93] Census tracts with higher concentrations of Black households have disproportionately high energy use intensity, reflective of the greater energy inefficiency of housing in these areas.[94] Housing in predominantly Black neighborhoods is less energy efficient than housing in predominantly white neighborhoods because of the legacy of

[90] American Council for an Energy-Efficient Economy, Study: One in Four Low-Income Households Spend Over 15% of Income on Energy Bills (Sep. 11, 2024) https://www.aceee.org/press-release/2024/09/study-one-four-low-income-households-spend-over-15-income-energy-bills.
[91] Nat'l Energy Assistance Directors' Ass'n (NEADA), Energy Hardship Report at 16 (Aug. 2024). https://neada.org/wp-content/uploads/2024/08/August-Summer-Hardship-Report-Final.pdf.
[92] U.S. Energy Information Administration, U.S. Energy Insecure Households were Billed More for Energy Than Other Households (May 30, 2023). https://www.eia.gov/todayinenergy/detail.php?id=56640.
[93] Stephens, H., Donoghoe, M., and Perry, A.M., How Extreme Heat Threatens Black Renters, and What Policymakers Can do to Fix It (Sept. 6, 2023) https://www.brookings.edu/articles/how-extreme-heat-threatens-black-renters-and-what-policymakers-can-do-to-fix-it. see also Carolyn B. Swope, Diana Hernández, Housing as a Determinant of Health Equity: A Conceptual Model, SOCIAL SCIENCE & MEDICINE, vol. 243 (Dec. 2019), https://www.sciencedirect.com/science/article/pii/S0277953619305659.
[94] Hernandez, Diana, *Energy* Insecurity and Health: America's Hidden Hardship, Health Affairs Health Policy Brief, June 29, 2023. https://www.healthaffairs.org/do/10.1377/hpb20230518.472953/.

discriminatory housing and development policies, such as redlining, which drove decades of disinvestment.[95]

Q. Does the Company's Low Income Usage Reduction Program (LIURP) satisfy the need for low income energy efficiency programming?

A. LIURP is a vital program, but it cannot, by itself, satisfy the need for low income energy efficiency programing. While there are substantial similarities between Act 129 and LIURP, each of the two programs provides distinct and important benefits to low-income households. Specifically, Act 129 programs allow any low-income household to access energy efficiency measures without being subject to the LIURP minimum usage threshold. This benefit is particularly important for low-income residents in multifamily buildings and small single family homes, who may have relatively high usage but may not meet the usage threshold to qualify for LIURP.[96] LIURP, on the other hand, is specifically designed to target the very highest users to help reduce collections and universal service costs.[97] But even for those low-income customers who meet LIURP's usage threshold, LIURP on its own is unable to meet the need for low income energy efficiency services across FirstEnergy's service territory under the current program budget. In its April 2024 LIURP Needs Assessment, the four legacy FirstEnergy companies reported a total of 329,126 potential LIURP participants with incomes at or below 150% FPL.[98] Under FirstEnergy's current LIURP budget, with 5,140 total projected participants per year across the four rate districts, it would take over 64 years to treat every potential participant.[99] Act 129

[95] Benjamin Goldstein, Tony G. Reames, & Joshua P. Newell, Racial Inequity in Household Energy Efficiency and Carbon Emissions in the United States: An Emissions Paradox, 84 ENERGY RESEARCH & SOCIAL SCIENCE at 5 (2022). https://www.sciencedirect.com/science/article/pii/S2214629621004552.
[96] Id. at 24 (First Energy generally requires a minimum annual usage threshold of 6,000 kWh).
[97] See Id. at 23; see also 52 Pa. Code § 58.1.
[98] First Energy, Fifth Amended Joint Universal Service & Energy Conservation Plan, 2024-2028 at 33.
[99] Id. at 34.

provides critical additional funds to help meet the need for low income energy efficiency in FirstEnergy's service territory.

While it is critical that the two programs work in close coordination to effectively leverage impact, the Company must be careful that coordination between Act 129 and LIURP programs does not compromise the integrity of the distinct program budgets. I understand from counsel that Act 129 requires that EDC's respective Act 129 low-income expenditures be *in addition to* LIURP expenditures.[100] It is thus critical that the integrity of each program be maintained – even as we move to harmonize the two programs to streamline services and delivery to low-income consumers.

IV. PHASE V LOW-INCOME PROGRAMS

A. Comprehensive Savings Opportunities for Low-Income Customers

Q. Please summarize the Company's low-income offerings in its proposed Phase V Plan.

A. The Company states that the Low-Income Energy Efficiency Program (LIEEP) "is an umbrella program that includes multiple program components, delivery channels, and vendors." [101] It says that the subcomponents include Products, HVAC, Braided Funding Audits, Behavioral, Multifamily, New Homes, and Weatherization.[102] However, while this framework portrays a comprehensive approach to promoting a wide range of measures, this conclusion is not supported by the evidence the Company provides in its filing. As I mentioned earlier, the Company plans to obtain nearly 20% of the forecast LI savings from various forms of appliance recycling, 22% of the savings from short-lived Behavior and Customer Engagement

[100] 66 Pa. C.S. § 2806.1(b)(i)(G).
[101] Plan, p. 58 of 157.
[102] Id. pp. 58-60 of 157.

programs, and nearly 24% from multifamily common area direct install measures.[103] Another 8% of the LI savings are forecast to come from multifamily tenant direct install measures with no detail provided about the quantities of the various potential measures. Overall, the evidence points to a focus on shallow savings that fail to provide real bill reductions for participants.

Q. What do you mean by the term "shallow savings"?

A. I use this, and the contrasting term "deep savings" because I find that the use of the term "comprehensive" in the context of Act 129 has, over time, been assigned differing definitions in the multiple EDC plan filings to the extent that it has lost all meaning. In the FIO, the Commission states, "We note that the EE&C programs have matured enough so that EDCs can increase their focus on more comprehensive measures, which tend to require longer implementation timeframes."[104] The Commission has set out a list of measures it deems "comprehensive" in the EE&C Plan template.[105] However, as used in several of the EDC's Phase V EE&C plans, including FirstEnergy's proposed Phase V Plan, "comprehensive" seems to indicate only the availability of many different measures. For example, as used in the Plan it seems possible that a single measure could be considered to be comprehensive – which makes no sense given the definition of the word: "of large scope; covering or involving much; inclusive."[106] I do not see how a single measure would be comprehensive without regard for how it is bundled together with other measures that, in combination, produce significant electricity and bill savings for participants. Therefore, I suggest this term be discarded in favor of the terms "shallow savings" to describe measures and projects that have a small effect in reducing energy use and "deep savings" to describe measures

[103] Plan, Appendix B, Table 9: Estimated Savings and Participation.
[104] Phase V Implementation Order at 11.
[105] See Final Phase V EE&C Plan Template Tables – Excel Workbook, Table 8 Addendum.
[106] See dictionary definition at: https://www.dictionary.com/browse/comprehensive.

and projects that have a significant effect in reducing overall energy use, especially when those savings are expected to last for ten to fifteen years or more. I define a shallow measure as a measure that provides only a small amount of savings compared to overall household electricity use – effectively a measure that will not in and of itself materially reduce energy burdens for participating households.

Q. Can you provide an example of a shallow saving measure?

A. Yes. For example, in the 2026 TRM a Tier 1 advanced power strip is estimated to save around 74 kWh per year.[107] Compared with the average low-income FirstEnergy customer's annual electricity use of over 13,000 kWh[108] for customers with electric heat, this power strip provides only shallow savings – roughly 0.56% of total electricity use. This modest amount of savings will not substantively reduce the energy burden of households who receive one, in contrast with a "most efficient" heat pump that the Company estimates will save nearly 1,500 kWh per installation[109] That would cause roughly a 12% annual savings for the same average customer – over 20 times the savings that the smart strip would cause. Combining a heat pump installation with a heat pump water heater and building insulation and air sealing could save even more, dramatically reducing household energy costs.

Here, I use the term "average" low-income customer as a quick reference, but it would be incorrect and unreasonable to assume that "average" is representative of the electricity use of most low-income customers. By definition, some customers would use less, but some would use more – potentially far more – than average. Consider a customer who has electric heat and uses 25%

[107] 2026 TRM Vol. 2, p. 170, specific use unspecified.
[108] FirstEnergy Response to CAUSE-PA Set 1, No. 002, Attachment A.
[109] Plan, Appendix B, Table 9: Estimated Savings and Participation.

more than the average low-income electric heating customer. This customer would only see a bill reduction of 0.45% from the same advanced power strip – a savings that would hardly be noticeable in comparison to the large bills the household would receive. For low-income customers who use more electricity than average, the relative benefit provided by such shallow measures would be small, though the need for savings would be much greater.

Q. What does the Company's "Customer Engagement" measure consist of?

A. The Company says that its Customer Engagement measure

> *includes both Welcome Kits and In-Home assessments. The Welcome Kits are intended to provide approximately 90 kWh of annual electric savings from measures including, but not limited to: Weather Stripping, Caulking, Outlet Gaskets, Advanced Power Strips and Air Handler Filter Whistles. The In-Home assessments are anticipated to provide approximately 120 kWh of annual electric savings from direct installation of measures such as, but not limited to: LED lighting, LED Nightlights, Water Heater Temperature Setback, Low Flow Faucet Aerators, Low Flow Shower Heads, and Outlet Gaskets….The Company's proposed Phase V EE&C Plan's projection of 4,189.77 MWh assumes a 50/50 take rate in Welcome Kits and In-Home Assessments, with the savings assumptions based on the PA Phase V Technical Reference Manual (TRM).*[110]

In other words, Customer Engagement is a combination of rebranded energy efficiency kits and shallow saving measures that are directly installed through in-home assessments. This is a clear example of the Company's prioritization of shallow saving measures over measures that will materially reduce energy use.

[110] FirstEnergy Response to CAUSE-PA Set 1, No. 054.

Q. Does the Company provide information about the level of emphasis it will place on deep savings measures such as heat pumps, heat pump water heaters, and building insulation and air sealing measures?

A. No. The Company says that LIEEP will provide "whole home or building measures or projects, and structured approaches to reducing energy consumption and enhancing energy efficiency that provide long-lasting, usage reductions." [111] However this claim is not supported by the vague evidence the Company provides. The Company does not provide estimated quantities of the specific measures that are associated with whole home efficiency projects that provide long-lasting usage reductions. The Company has not provided sufficient information to determine, for example, how many heat pumps, heat pump water heaters, or insulation measures it expects to install. Instead, it simply lumps these and likely other measures into the categories "WARM Plus" and "WARM Extra Measures" with no specific information about the measures and quantities upon which its estimated savings are based – it simply refers to the entirety of TRM Vol 2.[112] FirstEnergy's plan filing provides no way to assess whether it will really prioritize such measures, or if it is merely paying lip service to its vulnerable customers.

[111] Plan, p. 60 of 157.
[112] Plan, Appendix B, Table 9: Estimated Savings and Participation.

Q. FE says that "[t]he Phase V Plan is generally an extension of the programs and measures included in the Predecessor Companies' Phase IV Plans with the addition of new program offerings and measures."[113] Does Phase IV provide any indication of what to expect in Phase V if it is indeed an extension of the Phase IV low-income program?

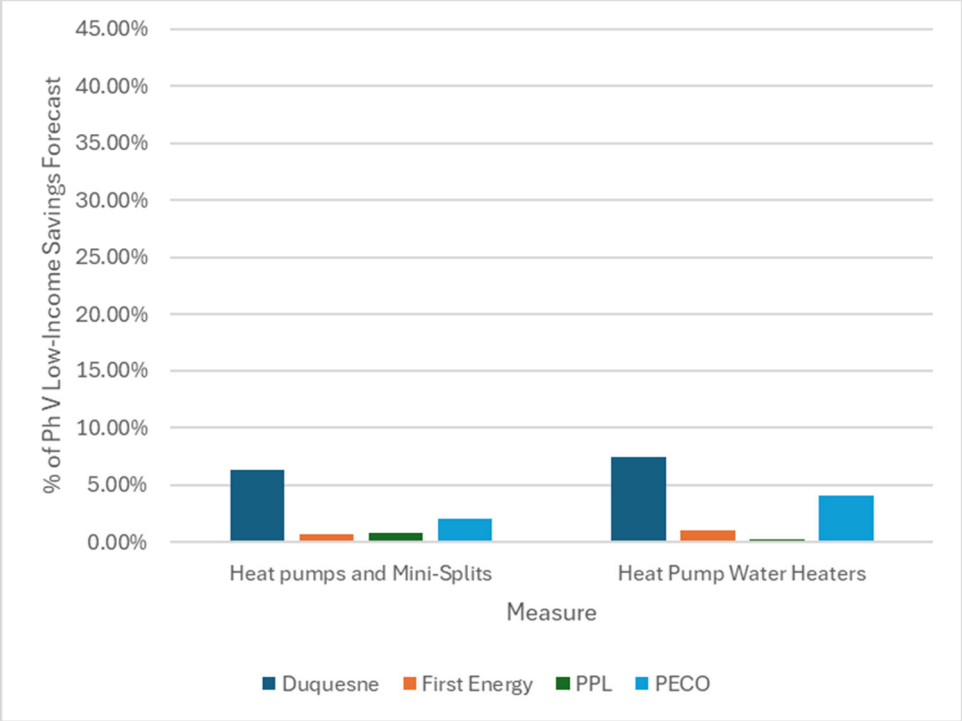
A. I have reviewed data provided by the Company in response to discovery from CAUSE-PA in order to consider this question. [114] My conclusion is that if Phase V is similar to Phase IV there will be very little investment in deep-savings measures and projects that will last for ten, fifteen, or even twenty years or more and that have a significant effect in reducing energy use for participants. If consistent with Phase IV the vast majority of FE's low-income savings will, instead, come from "shallow savings" measures and projects that have a small effect in reducing energy use for individual customers. For example, in Phase IV to date roughly 40% of low-income savings come from a variety of energy efficiency kits. 15% come from residential lighting measures and over 6% come from appliance recycling. In contrast, less than ¼% comes from air sealing homes, less than ¼% comes from attic insulation, and less than 1/100% of the low-income savings reported for Phase IV to date come from heat pumps.[115] With this evidence I see no reason the Commission should accept that FE will be focused on long-lived measures in Phase V.

[113] Petition, p. 10.
[114] FirstEnergy Response to CAUSE-PA Set 1, No. 008, Attachment A, and No. 044, Attachment A.
[115] FirstEnergy Response to CAUSE-PA Set 1, No. 008, Attachment A.

Q. Given the lack of evidence that you describe can you still estimate the portion of FE's savings that might come from deep-saving measures, including heat pumps, heat pump water heaters, and building air sealing and insulation?

A. I have attempted to do so, using Phase IV results as a guide for filling in the blanks in the Phase V data included in the Company's Plan. For example, Figure 1 compares the expected savings for low-income customers from heat pumps and heat pump hot water heaters. As you can see, Duquesne, PPL, and PECO forecast only a small amount of savings from these deep saving measures. If FE's Phase V performance is consistent with what it has done in Phase IV it will be at the bottom of the pack, along with PPL.

Figure 1: Heat Pump and Heat Pump Water Heater Contribution to Low-Income Savings[116]

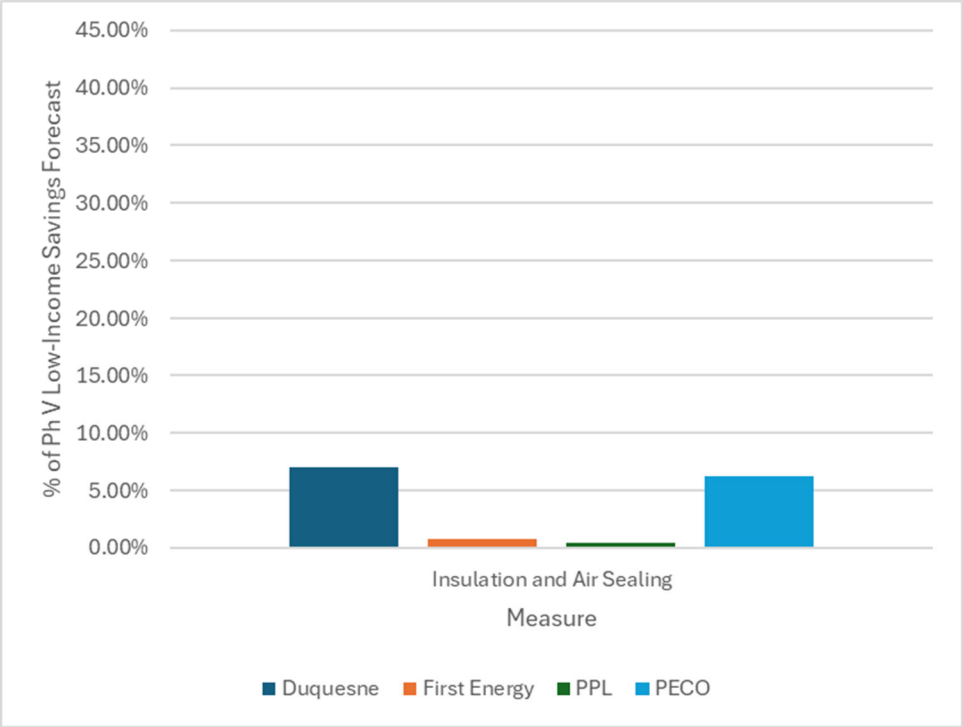


[116] Duquesne Light Phase V EE&C, Docket No. M-2025-3057325, Duquesne Response to CAUSE-PA II-20, (attached hereto to at Appendix B); PPL from Proposed Phase V EE&C Plan, Docket No. M-2025-3057329, Table 9; PECO from Proposed Phase V EE&C Plan, Docket No. M-2025-3057328, Table 21. Residential Low-Income

Q. Does FE provide evidence of the amount of air sealing and building insulation savings it forecasts to achieve for low-income households?

A. Unfortunately, it does not. The Company's data is opaque in this regard, as discussed above. However, as for heat pumps and heat pump water heaters, I have attempted to forecast what its emphasis might be if relatively consistent with its Phase IV results. This estimate is illustrated below in Figure 2. Consistent with other deep savings measures I expect the Company to complete very few building shell improvements through LIEEP, based on the little evidence it provides.

Figure 2: Insulation and Air Sealing Contribution to Low-Income Savings[117]



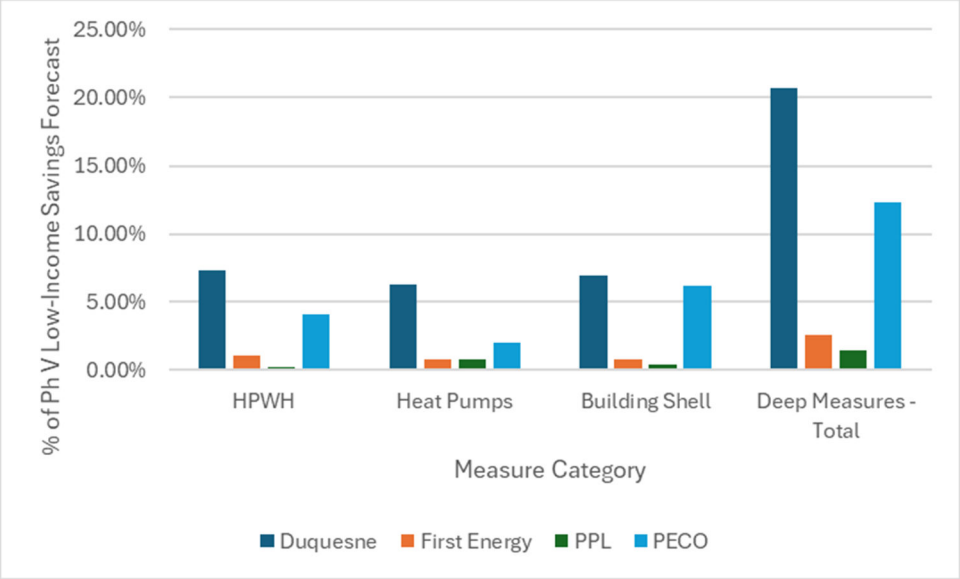
Subprogram Estimated Savings and Participation. FirstEnergy from Proposed Phase V EE&C Plan, Appendix B, Table 9, with WARM Plus and WARM Extra Measures allocated to measure categories based on Phase IV results.

[117] Duquesne Light Phase V EE&C, Docket No. M-2025-3057325, Duquesne Response to CAUSE-PA II-20; PPL from Proposed Phase V EE&C Plan, Docket No. M-2025-3057329 Table 9; PECO from Proposed Phase V EE&C Plan, Docket No. M-2025-3057328, Table 21. Residential Low-Income Subprogram Estimated Savings and Participation. FirstEnergy from Proposed Phase V EE&C Plan, Appendix B, Table 9, with WARM Plus and WARM Extra Measures allocated to measure categories based on Phase IV results.

Q. Have you also estimated the combined impact of the Company's forecast of heat pumps, heat pump water heaters, and building air sealing and insulation measures?

A. The results of this estimation are shown in Figure 3. Importantly, my estimation of FE's savings that will be attributed to deep measures is de minimis, based on the limited data provided by the Company. Even if I have underestimated what FE intends to achieve for deep savings it is impossible to see how it would be close to adequate, and in any case will not come close to meeting the needs of the Company's low-income customers.

***Figure 3:** Deep-Saving Measures Contribution to Low-Income Savings*[118]



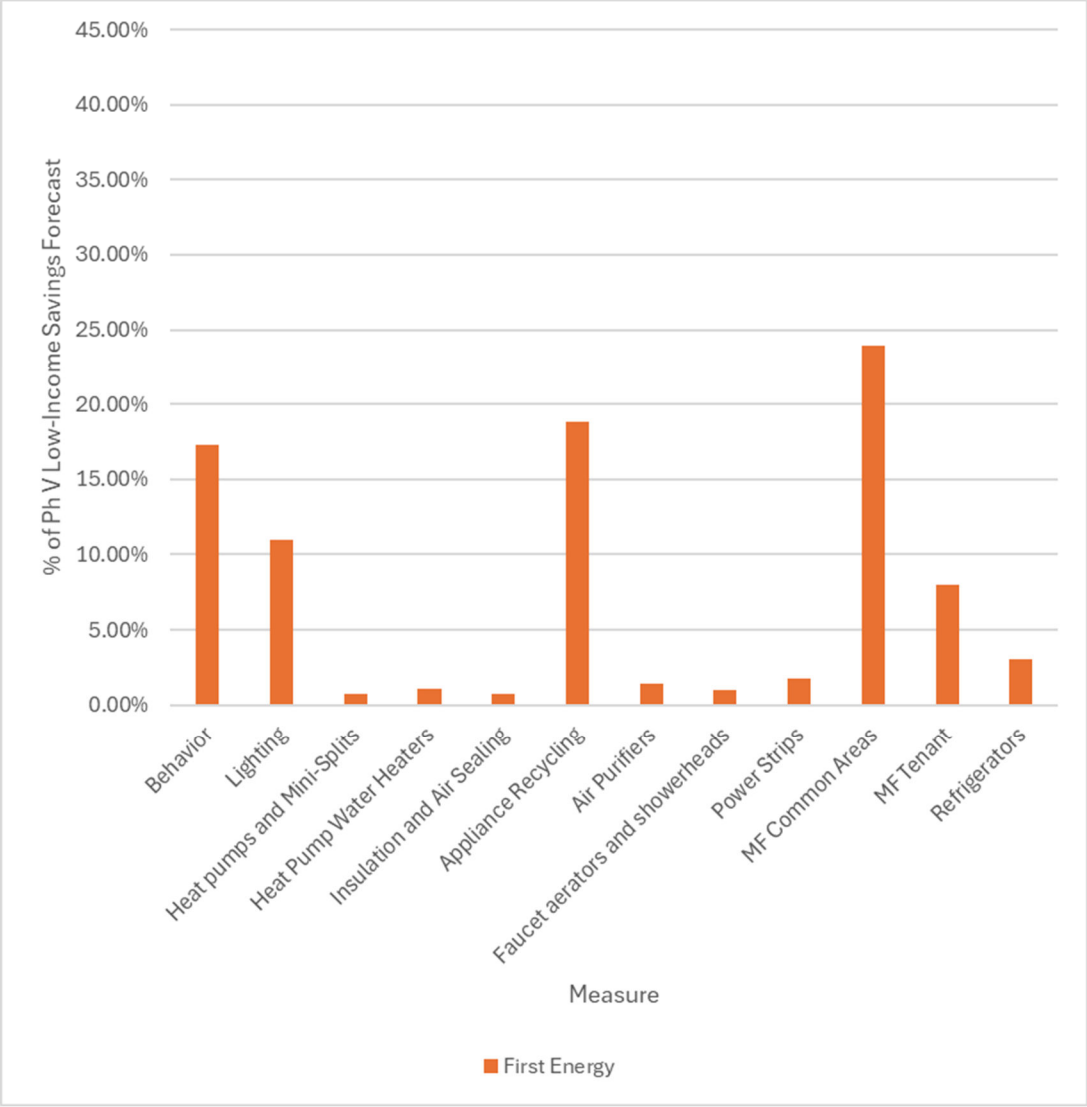
Q. With such a minimal focus on deep savings measures where will the Company obtain its required low-income savings?

A. As far as I can ascertain from the limited data it provides, FE plans to obtain the vast majority of its savings from shallow savings measures, including behavioral savings, lighting, and

[118] Duquesne Light Phase V EE&C, Docket No. M-2025-3057325, Duquesne Response to CAUSE-PA II-20; PPL from Proposed Phase V EE&C Plan, Docket No. M-2025-3057329, Table 9; PECO from Proposed Phase V EE&C Plan, Docket No. M-2025-3057328, Table 21. Residential Low-Income Subprogram Estimated Savings and Participation: FirstEnergy from Proposed Phase V EE&C Plan, Appendix B, Table 9, with WARM Plus and WARM Extra Measures allocated to measure categories based on Phase IV results.

appliance recycling. Multifamily common areas provide the single most savings of any category, although the Company does not indicate how much of these savings are expected to come from any particular measures. Figure 4 shows the contribution that various measures, including those for which I developed estimates based on Phase IV results, are forecast to provide towards FE's low-income savings goal.

Figure 4: Overall Measures Contribution to Low-Income Savings[119]



[119] FirstEnergy from Plan, Appendix B, Table 9, with WARM Plus and WARM Extra Measures allocated to measure categories based on Phase IV results.

Q. Does the Company Plan to promote some of these shallow measures through the Products subcomponent of LIEEP?

A. It appears that the Company plans to promote a range of measures through the Products subcomponent, though the information provided in the Plan is not sufficient to determine the quantity of measures and savings that would be obtained through this channel. I note that the Company states that for low-income customers "higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, select measures are provided at no additional cost and enhanced incentives are provided on other select measures to reduce the initial cost to income-qualified customers." [120] I agree that higher upfront cost is a barrier, but given the extreme poverty of so many of the Company's customers it is not clear to me that providing an enhanced incentive that does not fully cover the cost to the low-income customer will garner much uptake. I recommend the Commission direct the Company to cover the full cost of measures targeted to low-income customers, consistent with the approach used in the potential study in determining program potential, which assumed the program would cover 100% of cost for low-income customers.[121]

Q. Do low-income efficiency programs in other jurisdictions focus on deep-savings measures?

A. Consider the EmPOWER Maryland limited-income energy efficiency programs as implemented on behalf of the utility companies by Maryland's Department of Housing and Community Development (DHCD). In its 2024-2026 program plan, DHCD described its core single family energy efficiency program:

[120] Plan, p.63 of 157.

[121] Pennsylvania Energy Efficiency and Peak Demand Reduction Market Potential Study Report, p. iii. https://www.puc.pa.gov/pcdocs/1867286.pdf.

> *The Whole Home Efficiency program originated as LIEEP in 2012 and has been DHCD's comprehensive energy program for individual households since then. Through this program, participants receive comprehensive energy retrofits directly from a pre-selected and qualified Network Partner. Network Partners can be private home improvement contractors as well as non-profits and local governments. They are selected through competitive bidding procedures that ensure high quality of services at the best prices. Network Partners receive extensive training from DHCD and have national credentials. They communicate with the clients, conduct comprehensive home energy audits, identify all eligible measures and programs, and install the eligible measures for each participant.*[122]

Participants in this core program were forecast to experience an average energy savings of over 2,000 kWh per year.[123] Importantly, this is an average – many customers will save considerably more than this, and it is because DHCD places a strong emphasis on comprehensive installation of deep-saving measures to provide substantive bill relief to participating households.

Q. Is FE's low-income savings portfolio sufficient to meet the needs of its low-income customers?

A. No – in fact it is far from my what I would consider to be a reasonable portfolio plan. In its comments on the Commission's Tentative Implementation Order, CAUSE-PA recommended the Commission "[r]equire the EDCs to achieve no less than 25% of the low-income savings goal through comprehensive whole-home program measures."[124] Instead, based on FE's Phase IV performance, I estimate that FE's proposed plan would only achieve on the order of 2½% of low income savings from deep-saving measures, with the result that even the Company's low-income

[122] EmPOWER Maryland Limited Income Program 2024-2026 Program Plan, p. 50 (underline added). https://webpscxb.psc.state.md.us/DMS/case/9705. ML 311369.
[123] EmPOWER Maryland Limited Income Program 2024-2026 Program Plan, Table ES-1, 2024-2026 Forecast Metrics, p. 82. https://webpscxb.psc.state.md.us/DMS/case/9705. ML 304379.
[124] Phase V Tentative Implementation Order, Joint Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN), (Comments filed August 18, 2025), Docket No. M-2025-3052826, p. 19.

customers who are able to participate in the programs will continue to face unaffordable energy bills.

Q. Do you recommend the Commission approve FirstEnergy's Plan as filed?

A. No. I recommend the Commission reject the Plan, and instead order the Company to revise its filing so that: (1) it provides a revised Table 9 that reflects actual measure-level savings and participation estimates rather than opaque bundles that do not indicate what the underlying measure quantities are forecast to be, and (2) it revises the forecast measure quantities to be consistent with CAUSE-PA's recommendation that it "achieve no less than 25% of the low-income savings goal through comprehensive whole-home program measures." These deep measures should come specifically through heat pumps, heat pump water heaters, and building insulation and air sealing measures that will provide substantive, long lasting energy savings to participating households. I further recommend the Commission monitor the quantity of these deep-savings measures funded by the Company's EE&C programs annually and provide further direction to FE to increase installation of these measures if it does not meet its forecast participation. Such monitoring is consistent with the Commission's direction to the Bureau of Technical Utility Services to "work with the SWE to develop reporting requirements for comprehensive program offerings and whole-home, comprehensive measures for the EDCs' low-income programs in Phase V."[125]

B. Low Income Multifamily Opportunities

Q. How does the Company say it will approach providing energy efficiency to low-income multifamily properties?

[125] Phase V Implementation Order at 72.

A. The Company says the

> *Multifamily program component provides energy efficiency education to multifamily building owners and tenants through energy assessments that examine major end uses including appliances, lighting, and HVAC systems, including building systems and building shell, and provides recommendations for energy efficiency improvements. The program component provides direct installation of measures and financial incentives towards the installation of building and common area energy savings opportunities including prescriptive equipment replacement and custom retrofit projects, including but not limited to, insulation, air sealing, duct sealing, heat pumps, heat pump water heaters and appliances. Workshops providing energy education to tenants may also be conducted to target additional participation or energy savings opportunities.* [126]

Q. Does the Company indicate what the cost share will be for participating property owners and tenants of multifamily properties?

A. Unfortunately, the Company does not provide any specific information in its filing. Rather, it says that

> *All program components except Product rebates and Multifamily, are provided at no additional cost to income-qualified customers. Customers and/or landlords will have to pay the balance of equipment and installation costs not covered by the rebate/incentives for the Products and Multifamily program components.* [127]

In order to gain market acceptance and participation in the multifamily sector, I recommend that FE expeditiously develop and disseminate clear information to multifamily property managers regarding the measures and incentives that will be available to them to improve the energy efficiency of their properties.

Q. Does the Company address the opportunity to co-fund ASHRAE Level 2 audits for multifamily?

[126] Plan, p. 59 of 157.
[127] Id. p. 64 of 157.

A. The Company indicates that its LIEEP program includes a "Braided Funding Audits" subcomponent that "provides the opportunity to co-fund audits or technical studies as part of an incentive towards an overall project including installation of qualifying measures in coordination with other state or federal conservations programs in which audit services are provided (e.g.., DEP's IRA programs) for participation"[128] However, as with the potential cost sharing requirements for the low income multifamily program the Company does not provide specific estimates of the cost share that will be required of property owners. While I recognize that details are still emerging on DEP's programs, it will be critical for the Company to establish expectations around audit cost sharing as soon as possible in order to engender interest in program participation from the multifamily sector.

Q. Does the need for transparency extend beyond the cost share for audits?

A. Absolutely. By definition, the purpose of affordable multifamily properties is to maintain housing affordability for vulnerable households. To do this, property managers require transparency and predictability when contemplating building improvements. Capital expenditures and other investments must be reliably known to avoid untenable risk for such properties. Therefore, in order to make program participation a viable and attractive option for multifamily properties the Company should develop measure offers including cost sharing requirements as soon as practicable.

[128] Id. p. 58 of 157.

Q. Does the Company require property owner approval when tenants want to participate in the Company's energy efficiency programs?

A. Yes, the Company says that it "requires landlord agreement before the energy audit is scheduled."[129] The Company also states that it requires landlord approval for measures "provided under the Residential Energy Solutions Program, Comprehensive Audits and Multifamily program components, the Low-Income Energy Efficiency Program, Weatherization and Multifamily program components, and those provided under master metered Multifamily program components." [130] I understand the Company may be averse to scheduling an audit and later having the landlord refuse the service, but I am concerned that the ability of low-income tenants to receive a share of the available energy efficiency benefits may be hampered by landlord disinterest. I urge the Company to review its protocols with the Phase V CSP and seek to identify any additional measures or delivery mechanisms that would allow tenants to benefit even when landlord approval is not forthcoming.

C. Daily Load Shifting

Q. Does the Company indicate whether it will provide enhanced incentives for low-income customers participating in its daily load shifting (DLS) program?

A. It does not appear to discuss this. I assume that low-income customers can participate the same as any other eligible residential customer, but I do not see it propose anything different for low-income customers.

[129] FirstEnergy Response to CAUSE-PA Set 1, No. 020.
[130] FirstEnergy Response to CAUSE-PA Set 2, No. 015.

Q. What does the Company say it will provide for general residential customers?

A. The Company indicates that the DLS component will promote "load shifting and demand reductions by customers through behavioral changes and incentives for the control of connected devices."[131] It also says that "the Company's Proposed Plan includes prescriptive rebate opportunities for smart thermostats across all customer sectors."[132] I recommend the Company provide incentives equal to the full cost of smart thermostats for low-income customers to ensure they are able to benefit from the DLS program.

D. Addressing Health and Safety Barriers

Q. Does the Company describe its proposed approach to remediation of health and safety barriers for low-income customers?

A. In its Plan the Company says it

> *plans to coordinate with and refer participants to its LIURP or other external programs for possible eligible remediation of health and safety issues that arise in the delivery of its low-income program offerings if applicable. In addition, while the Company did not explicitly budget for health and savings remediation due to budget constraints, the Company may include health and safety remediations, if necessary, subject to available program budgets and determination that the expenditures will produce justifying meaningful energy savings to the participant.*[133]

It states further that it will "work with their universal service program administrators to develop and maintain a list of available housing rehabilitation providers that the implementation CSP will provide to households when these issues cannot be remediated through the Company's programs."[134] However, this does not present a clear picture, as the Company also says that its

[131] Plan, p. 19 of 57.
[132] FirstEnergy Response to CAUSE-PA Set 1, No. 043.
[133] Plan, p. 135 of 157.
[134] Id. pp. 63-64 of 157.

"Low-Income Energy Efficiency Program does not use LIURP funds to provide health and safety remediation."[135] My takeaway from these various statements is that the company may refer low-income households to its LIURP program where that program may be better positioned to address health and safety issues, it may refer the household to outside organizations to seek assistance, or it may address health and safety using Act 129 funds. It is not entirely clear how such decisions are made or whether they are applied consistently, though FE also says that "Health and safety measures are completed if air sealing and insulation are part of the weatherization project." [136]

Q. Does the Company provide any information about how common it is for customers to be deferred due to health and safety concerns?

A. The Company responded to CAUSE-PA that from 06/01/2021 through 11/30/2025 there were 848 Phase IV jobs for low-income customers that did not receive the full array of measures and 285 jobs where shell measures were delayed due to the need for structural repairs.[137] Unfortunately the Company states further that its "tracking system does not have the ability to report the number of customers who had health and safety issues remediated through the use of EE&C funds" [138] nor does it "track referrals to housing services providers for remediation of health and safety issues."[139]

Q. Does the Company indicate how much it budgets in its Act 129 programs for health and safety measures?

A. Regarding health and safety in Phase IV FE says that "[n]o funding was explicitly budgeted for remediation of health and safety issues in the Phase IV Plan budget. Rather, the Company

[135] FirstEnergy Response to CAUSE-PA Set 1, No. 024 (b).
[136] FirstEnergy Response to CAUSE-PA Set 1, No. 017 (a).
[137] FirstEnergy Response to CAUSE-PA Set 1, No. 023.
[138] FirstEnergy Response to CAUSE-PA Set 1, No. 024 (a).
[139] FirstEnergy Response to CAUSE-PA Set 1, No. 024 (c).

budgets for completion of weatherization projects inclusive of Health and Safety remediation."[140] It further indicates that roughly between half a million and a million dollars annually were spent on health and safety measures between PY14 and PY17[141] and that "[h]ealth and safety investments are capped at up to 50% of the total weatherization project cost." [142]

Q. Is your impression that the Company's approach to health and safety remediation is sufficient to ensure the ability of its programs to safely install deep savings energy efficiency measures?

A. It does not appear sufficient to me on the basis of the 848 jobs that did not receive the full array of measures and 285 jobs where shell measures were delayed due to the need for structural repairs. This high number of deferrals may also be a fundamental reason that the Company in Phase IV has installed so few deep savings measures such as heat pumps and insulation and air sealing. Without tracking deferred jobs, the Company is unable to ensure that efficiency measures are later installed when repairs have been made. Conducting so many audits where no deep savings measures are installed does not serve the Company's customers well. While I recognize the efforts the Company is making to address health and safety measures, it seems apparent to me that improvements need to be made in its processes.

Q. What do you recommend?

A. I recommend the Commission direct the Company to submit with its revised Plan a supplemental health and safety protocol and reporting framework that includes the following:

[140] FirstEnergy Response to CAUSE-PA Set 1, No. 017 (b).
[141] FirstEnergy Response to CAUSE-PA Set 1, No. 017 (c).
[142] FirstEnergy Response to CAUSE-PA Set 1, No. 017 (d).

a. A description of protocols and processes for addressing health and safety issues, including clear criteria for making referrals to LIURP or outside agencies vs. addressing the health and safety issues within the Act 129 programs.

b. A project tracking approach and tool to allow the Company to track when repairs are made and by whom, and to follow up by installing energy efficiency measures that had been deferred.

c. Reporting metrics on the number of deferred jobs due to health and safety issues, the number of referrals for remediation through other programs, the number of remediated jobs handled through Act 129, and the measures that were installed as a result of the remediation.

d. A process flow chart that illustrates the customer journey from audit through health and safety remediation through installation of energy efficiency measures.

E. Program Coordination

Q. Does FE discuss its proposed approach for coordinating services to low-income customers across LIURP and Act 129, as well as with other energy efficiency programs that may be available to its customers?

A. Yes. For example, the Company says that it "plans to achieve additional new and incremental electric energy savings through coordination with the Company's existing comprehensive Low-Income Usage Reduction Program...by providing additional measures and services to achieve deeper savings in addition to the LIURP services or by serving additional homes."[143] Coordinating the use of both LIURP and Act 129 funds to install more measures in

[143] Plan, p. 17 of 157.

eligible low-income households will provide more energy saving benefits than either program alone is likely to be able to provide, and will do so with less hassle for the customer.

Q. Does the Company discuss its proposed approach to coordination with low-income programs implemented by other organizations?

A. The Company says that it will work with the LIEEP CSP to "ensure efficient program referrals and/or leveraging contractors and coordination providing services with the Company's LIURP and PCAP programs, NGDCs or other providers, the Department of Community and Economic Development (DCED) Weatherization Assistance Program, and/or other conservation programs."[144] Conceptually I support a high level of program coordination, but saying it intends to coordinate and implementing effective, collaborative processes for doing so are not necessarily the same thing. It will be critical for best practice program delivery for the Company to work hard with partners to enact effective coordination processes that effectively leverage program dollars, reduce administrative costs, streamline service delivery, and improve bill savings for participants.

Q: Why is it important for FE's Act 129 programs to be closely coordinated with other home repair, weatherization, and energy efficiency programs serving low-income households in its service territory?

A: Effective coordination between energy efficiency, home repair, and weatherization programs is essential to achieve whole-home energy savings for low-income households in FE's service territory. Many low-income homes face significant home repair needs, such as deteriorated building envelopes, moisture intrusion, or deferred maintenance, that limit the effectiveness of

[144] Plan, p. 62 of 157.

stand-alone energy efficiency measures.[145] Partnering with home repair and weatherization programs provides a critical opportunity for FE to leverage non-Act 129 funding streams to enable deeper and more effective energy efficiency interventions under its Phase V Plan across its service territory. Coordination with non-Act 129 repair programs could be a critical tool to increasing achievement of durable, cost-effective energy savings in housing stock with high levels of need.

Q: What has the Commission said regarding coordination and deeper savings in Act 129 Phase V?

A. In the Phase V Implementation Order, the Commission emphasized the importance of improved coordination between Act 129 programs and other energy efficiency, weatherization, and home repair initiatives, including the strategic use of stacked or braided funding, to overcome barriers that prevent delivery of effective energy efficiency interventions.[146]

Q. In your view what would effective coordination look like?

A. In my view, effective coordination planning is done with the key objectives front and center, and effective coordination implementation tracks and reviews key performance metrics to ensure that those objectives are met. I suggest that FirstEnergy minimize participation challenges by taking a "general contractor" approach to coordinating services, including by offering: 1) unified applications; 2) multi-partner audit data collection through a shared audit done for all parties by a single CSP; 3) health and safety remediation in the context an overall job; and 4) jointly funded measure installations to maximize savings and minimize scheduling conflicts, overhead expenses, and transactions costs. FE should collaborate with other partners, including

[145] Martín, C., et al., Catalyzing a Movement to Produce Greater Public, Private, and Civil Resources to Improve Housing Conditions Through Home Repair Programs, Joint Center for Housing Studies of Harvard University (Aug. 2024) at 4, 8, https://www.jchs.harvard.edu/research-areas/working-papers/catalyzing-movement-produce-greater-public-private-and-civil.

[146] Phase V Implementation Order at 158.

NGDCs, the Weatherization Assistance Program, home preservation programs, DEP, and others to develop unified processes and shared objectives for delivering the best services possible to customers, as measured by ease of participation and magnitude of benefits. FE's stated intentions and its current practice of leveraging Act 129 funds to increase benefits for LIURP participants are a good start, but more is needed to coordinate at the level needed to drive greater benefit to individual households and to the programs as a whole – helping to ultimately reduce duplicative application, audit, and other program delivery and administrative costs.

Q. Does the Company keep track of the various referrals that it makes, and that other parties make to it, to effectively project manage the jobs that may come out of the referrals?

A. No, which suggests that homes receiving major repairs through home repair programs are not systematically identified, prioritized, or sequenced for complementary energy efficiency upgrades under Act 129. FE indicates that its "tracking system does not have the ability to report the number of customers who had health and safety issues remediated through the use of EE&C funds."[147] It further indicates that it "does not currently track referrals to housing services providers for remediation of health and safety issues." [148]

Q. What is your recommendation to the Commission?

A. I recommend the Commission direct FE to take the steps necessary to develop the seamless coordination practice I just described, and to require FE to file a report of its actions and results along with its first annual report in Phase V and with each subsequent annual report. Specifically, to ensure meaningful collaboration with local programs, the Commission should

[147] FirstEnergy Response to CAUSE-PA Set 1, No. 024 (a).
[148] FirstEnergy Response to CAUSE-PA Set 1, No. 024 (c).

require FE to work with potential partners to adopt concrete coordination mechanisms. At a minimum, the Company should be directed to:

- **Establish formal referral protocols** with major home repair and weatherization program administrators in its service territory;
- **Develop data-sharing agreements** that allow for timely identification of eligible homes and information regarding completed repairs and associated energy savings;
- **Define clear scopes of work and sequencing standards** identifying which types of repairs FE will refer to local repair and weatherization agencies as well as the order in which such measures will be addressed;
- **Create a process flow chart** illustrating the customer journey from audit through health and safety remediation through installation of energy efficiency measures;
- **Develop and implement data tracking tools and protocols** to allow the Company to track deferred jobs, when repairs are made and by whom, and to follow up by installing energy efficiency measures that had been deferred including follow up procedures to keep customers from falling through the cracks;
- **Dedicate staff capacity and administrative resources** responsible for managing coordination efforts;
- **Establish a rhythm for project coordination check-ins** with parties that are managing coordinated programs, and come to agreement on future joint development of common applications, jointly funded measures installations, etc., and;
- **Report regularly on coordination outcomes,** including the number of referrals made, services delivered, and the role of coordination in enabling deeper energy efficiency savings.

Absent such requirements, FE's coordination efforts are unlikely to advance beyond the limited and informal practices reflected in the Phase IV record, and the opportunity to leverage existing public investments to support deeper and more equitable energy efficiency outcomes for low-income households in its service territory will remain unrealized.

F. Front-of-the-Meter Savings Proposal

Q. Does FE propose any front-of-the-meter (FTM) savings for Phase V?

A. While it does not provide any description of proposed FTM measures or programs, the Company states that "[t]he Phase V Plan budget includes the costs associated with the Company's EE&C department identifying, promoting, and coordinating with the implementation of applicable Company and other project developer [FTM] initiatives." [149] FE's vague reference to FTM programming does not comply with the Commission's requirement to "Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan. Include the expected contribution to portfolio MWh and MW savings and disclose all non-Act 129 funding sources the EDC plans to leverage for FTM measure installation"[150] in that it provides no specific information about what it proposes any FTM projects would be. In response to discovery from CAUSE-PA the Company indicated that it would "identify opportunities for CVR implementation during the Phase V period" and "the Company's Energy Efficiency and Conservation (EE&C) team will identify and review opportunities for implementation of energy efficient equipment for consideration as a measure to target through the FTM program component."

[149] Plan, p. 35 of 157.
[150] See Final Phase V EE&C Plan Template, Section 3.1.6.

Q. Did the Company provide a budget for FTM expenditures in its Act 129 Plan?

A. While the budget was not transparent in the Plan, the Company responded to discovery, stating that it "has projected total costs of $31,340 per year as part of the budgets included in its Proposed Plan related to the EE&C Team's engagement with Company personnel as noted in the Company's response to CAUSE-PA Set 1, No. 38 and for EE&C administrative activities (e.g. tracking and reporting, evaluation, measurement and verification) associated with including front-of-the meter (FTM) measures in the Company's Proposed Plan."[151] Clearly, this level of expenditure will not cause any savings to occur that were not already in the works in the Company's distribution system plans. In my view Act 129 funding should only be used when it results in savings for customers that would not otherwise occur. In the case of FE, it appears that Company simply wants funding approval so that it can report the savings that are already occurring.

Q. Are savings methodologies for FTM measures widely uniform and accepted across the industry?

A. Not at all. In fact, as FE knows full well since it participated in the work group, the Maryland Commission recently accepted a work group recommendation that "CVR impacts should be excluded from the goal-setting process after the 2024-26 program cycle."[152] This decision was made, in part, because the independent evaluator proposed that the CVR savings methodologies were out of date and recommended

> *the Commission consider ordering new CVR studies and industry research to update the assumptions and calculations to ensure consistency across utilities and reflect the current state of the Maryland electric appliance fleet and industry*

[151] FirstEnergy Response to CAUSE-PA Set 1, No. 039 (a).
FirstEnergy Response to CAUSE-PA Set 1, No. 038.

[152] EmPOWER Conservation Voltage Reduction Working Group Report, August 1, 2024, p. 5. https://webpscxb.psc.state.md.us/DMS/case/9705. ML 311369.

> *practice. The Loper Team appreciates that there are challenges associated with new studies as it does represent a considerable undertaking in both costs and coordination between utilities. Given the signal-to-noise issues inherent in CVR modeling, a new impact evaluation would need to have sufficient statistical power and experimental rigor to justify replacing prior assumptions.* [153]

Q. If the Company achieves up to 10% of its portfolio required savings from FTM measures would there be any implications for customer-sited behind the meter savings?

A. Absolutely. FTM savings will displace program savings that provide direct benefits to customers. This is especially concerning with respect to customers who do not qualify for low-income programs, but who nevertheless struggle to meet their energy costs. Reducing program savings that directly benefit such customers by replacing them with FTM measures should not be allowed – especially when the FTM measures are not-defined and are not accompanied by robust EM&V plans that ensure the legitimacy of the savings. Before approving the use of limited Act 129 funds for a vaguely described optional FTM measure, the Commission should require FE to demonstrate that there is a reasonable likelihood that, in the context of Act 129, any FTM measures would be a good use of ratepayer funds that would generate new benefits for customers. Any proposal for inclusion of FTM measures should be vetted with the Statewide Evaluator prior to being put before the Commission. I recommend the Commission reject FE's FTM approach.

V. PHASE V EE&C RIDER

Q: Has FE changed its cost recovery mechanism for Phase V?

A: For Phase IV and prior phases, each of the four FE companies (Met-Ed, Penelec, Penn Power, and West Penn Power), had a unique Phase IV Plan, and the EE&C-C Rider rates were calculated separately for each customer class of each rate district.[154] For Phase V, following

[153] Id.
[154] FirstEnergy St. 2 at 5.

consolidation of the former FirstEnergy Companies, FE has proposed a consolidated EE&C Plan and a consolidated EE&C-C Rider with one rate per customer class that is uniform among the rate districts.[155]

Q: What is the effect of the consolidated EE&C-C Rider on residential customers?

A: The consolidated EE&C-C Rider will have minor impacts on residential customers in each rate district, with customers in the West Penn district paying slightly more and customers in the Met Ed, Penn Power, and Penelec districts paying slightly less. Table 7 shows the estimated difference between the Phase IV and Phase V residential riders by rate district.

Table 7: Estimated EE&C Charge per Month

	Phase IV Per kWh[156]	Phase V Proposed Per kWh[157]	Difference Per kWh	Difference Per 1,000 kWh
Met-Ed	$0.00210	$0.00206	$(0.00004)	$(0.04)
Penelec	$0.00286	$0.00206	$(0.00080)	$(0.80)
Penn Power	$0.00228	$0.00206	$(0.00022)	$(0.22)
West Penn	$0.00186	$0.00206	$0.00020	$0.20

The monthly impacts are not estimated to be prohibitive on a per bill basis.[158] However, aggregated across all residential customers, this could shift substantial costs between residential customers in FE's rate districts. It is thus even more important to ensure equitable distribution of services among the former territories. While I do not oppose FE's proposal to maintain a consolidated budget and rider for its Phase V EE&C Plan, I recommend that FE continue to track

[155] Id.
[156] FirstEnergy Supplement No. 23 to Electric Pa P.U.C. No. 1 Fourth Revised Page 194.
[157] FirstEnergy St. 2, Ex. SRZ-2.
[158] See FirstEnergy Response to CAUSE-PA Set 1, No. 002, and No. 003, Attachment A. The average monthly usage for FE's residential and low-income customers varies depending on the month and ranges anywhere from approximately 500 kWh to approximately 2,000 kWh.

and report its EE&C Plan spending and performance on the district level and include this information in its semi-annual and annual reports.

Q. Do you see potential benefits for customers from the consolidation?

A. Yes. Consider that the Company provided notice to stakeholders in May 2025 that "FirstEnergy Pennsylvania Electric Company (Company) plans to suspend the Low-Income Program, for new applications by customers located in the Penn Power Rate District, effective May 15, 2025. This suspension is due to the program nearing exhaustion of its approved program budget and managing to the total plan budget."[159] This occurred even though the Company currently forecasts that Penn Power will have roughly $270,000 in unspent Residential budgets at the end of Phase IV and a total of over $1.2 million in unspent funds for Penn Power.[160] I recognize that it would require approval from the Commission, but even without the consolidation, in order to maintain program availability for customers who clearly need them, the Company could have asked to reallocate funds that were projected to go unspent to allow it to prevent the Low-Income Program from going dark. However, there is no certainty the Commission would have approved such a request, and the Company chose instead to shutter the program, thus denying services to the very customers who need them most.

Q. How would the consolidation reduce the likelihood of the low-income program being closed again part-way through Phase V?

A. Across the four rate districts the Company currently forecasts over $1.6 million in unspent low-income budgets and over $3.5 million in unspent residential budgets at the close of Phase

[159] Notice of Program Suspension - Penn Power Low-Income Program, email transmitted by FirstEnergy on May 9, 2025, attached hereto at Appendix C

[160] FirstEnergy Response to CAUSE-PA Set 1, No. 036, Attachment A.

IV.[161] Because the consolidation allows company-wide rather than rate-district specific budgeting, it would allow unspent funds to be used where needed, regardless of the rate district. In this scenario the Penn Power program would not have to be closed because funds from the overall Company budgets could continue to be used. I maintain it is still important for to FE continue to track and report its EE&C Plan spending and performance at the rate district level and include this information in its semi-annual and annual reports, but it should also ensure that programs – especially the low-income programs – remain open to customers for the duration of Phase V.

Q. What do you recommend the Commission should expect if, despite consolidation, the Company finds it is short of funds for the low-income program before the end of Phase V?

A. It is unconscionable for the Company to close the low-income programs. Prior to such a decision in Phase V the Commission should expect the Company to first shift unspent funds to the low-income program from the general residential program budgets. If residential funds are also expended but non-residential funds are available, the Commission should expect the Company to request approval to shift those funds to the low-income program.

VI. RECOMMENDATIONS

Q. What are your recommendations to the Commission regarding approval of the Company's Act 129 Phase IV Filing?

A. I recommend the following:

1. Reject FirstEnergy's Plan as filed, and instead order the Company to revise its filing so that 1) it provides a revised Table 9 that reflects actual measure-level savings and participation estimates rather than opaque bundles that do not indicate what the underlying measure quantities are forecast to be, and 2) it revises the forecast measure quantities to be consistent

[161] Id.

with CAUSE-PA's recommendation that it "achieve no less than 25% of the low-income savings goal through comprehensive whole-home program measures" – specifically through heat pumps, heat pump water heaters, and building insulation and air sealing measures that will provide substantive, long lasting energy savings to participating households. I further recommend the Commission monitor the quantity of these deep-savings measures funded by the Company's EE&C programs annually and provide further direction to FE to increase installation of these measures if it does not meet its forecast participation. Such monitoring is consistent with the Commission's direction to the Bureau of Technical Utility Services to "work with the SWE to develop reporting requirements for comprehensive program offerings and whole-home, comprehensive measures for the EDCs' low-income programs in Phase V."[162]

2. I recommend the Commission direct the Company to submit with its revised Plan a supplemental health and safety protocol and reporting framework that includes the following:
    a. A description of protocols and processes for addressing health and safety issues, including clear criteria for making referrals to LIURP or outside agencies vs. addressing the health and safety issues within the Act 129 programs.
    b. A project tracking approach and tool to allow the Company to track when repairs are made and by whom, and to follow up by installing energy efficiency measures that had been deferred.
    c. Reporting metrics on the number of deferred jobs due to health and safety issues, the number of referrals for remediation through other programs, the number of

[162] Phase V Implementation Order at 72.

remediated jobs handled through Act 129, and the measures that were installed as a result of the remediation.

d. A process flow chart that illustrates the customer journey from audit through health and safety remediation through installation of energy efficiency measures.

3. I recommend the Commission direct FE to take the steps necessary to develop the seamless coordination practices I describe on pp. 46-51, and to require FE to file a report of its actions and results along with its first annual report in Phase V and with each subsequent annual report.

4. I recommend the Commission reject FE's FTM proposal outright because it will not cause any new benefits for ratepayers other than those that are already in the works in the Company's distribution system plans.

Q. Does this conclude your testimony?

A. Yes.

CAUSE-PA, Statement 1

Appendix A

Resume of Jim Grevatt

List of Proceedings in which Jim Grevatt has testified

Jim Grevatt

Managing Consultant

ENERGY FUTURES GROUP

Jim has 30 years of experience in energy efficiency, with a primary focus on residential and income-eligible program design and implementation. At Energy Futures Group Jim has advised regulators, program implementers, and advocates in two dozen states and provinces, and has provided expert witness testimony in fourteen of those jurisdictions, with a frequent emphasis on improving energy efficiency programs for customers in historically disadvantaged communities. Jim has hands-on experience with industry-leading approaches to designing and managing energy efficiency programs, including multi-family, low income, residential retrofit, new construction, HVAC, and efficient products programs. His in-depth knowledge of program operations and clear understanding of strategic thinking and planning ensure that programs achieve their desired market impacts. In past leadership roles at Efficiency Vermont, the DCSEU, and Vermont Gas, Jim had overall responsibility both for program design and operations.

jgrevatt@energyfuturesgroup.com (802) 373-2488 Hinesburg, VT

EXPERIENCE

Managing Consultant
Energy Futures Group, Hinesburg, VT
2013 - Present

Director, Targeted Implementation
Vermont Energy Investment Corp., Burlington, VT
2012 - 2013

Managing Consultant
Vermont Energy Investment Corp., Burlington, VT
2010 - 2012

Director, Residential Services
Vermont Energy Investment Corp., Burlington, VT
2005 - 2010

Manager, Energy Services
Vermont Gas Systems, S. Burlington, VT
2001 - 2005

Manager, Residential Energy Services
Vermont Gas Systems, S. Burlington, VT
1998 - 2001

Manager, HomeBase Retrofit Program
Vermont Gas Systems, S. Burlington, VT
1996 - 1998

Technical Specialist
Vermont Gas Systems, S. Burlington, VT
1994 - 1996

Associate Director and Technical Specialist
Champlain Valley Weatherization Program, Burlington, VT
1991 - 1994

EDUCATION

University of Illinois
B.F.A., University Honors
1982

SELECT PROJECTS

Southern Environmental Law Center

2015 - Present

Provided technical support to environmental and social justice advocates in the Carolinas, and ongoing participation in the Duke Energy EE Collaborative and Dominion South Carolina EE Advisory Group, as well as technical support for SELC staff regarding pre-pay programs and other policy issues.

Coalition of Maryland Energy Efficiency Advocates

2014 - Present

Prepared written comments and multiple appearances before the Commission to present evidence regarding Maryland utilities' 2015-2017, 2018-2020, 2021-2023, and 2024-2026 EmPOWER Maryland energy efficiency plans, and in additional proceedings related to utility goal setting, cost-effectiveness testing, best-practices in low-income programs, and energy efficiency financing.

Alliance for Affordable Energy

2025

Provided expert review and draft responsive comments regarding Entergy New Orleans' Implementation Plan for Program Years 16 Through 18 of the Energy Smart Program.

Pennsylvania Utility Law Project

2025

Provided expert review and technical support for responsive comments regarding Act 129 Phase V Implementation Order and Plan Template.

Appalachian Voices, New Virginia Majority, and Virginia Organizing, Inc.

2025

Provided expert witness testimony in Virginia Natural Gas' application for a general rate increase and for authority to revise the terms and conditions applicable to natural gas service.

(continued on next page)

Jim Grevatt
Managing Consultant

ENERGY FUTURES GROUP

SELECT PROJECTS (continued)

South Carolina Coastal Conservation League and Southern Alliance for Clean Energy 2025
Provided expert witness testimony in Dominion Energy South Carolina's Request for Approval of Pilot Demand Side Management Program for Income-Qualified, High-Use Residential Customers.

Appalachian Voices 2025
Provided expert witness testimony in Virginia Electric and Power Co.'s application for approval of its 2024 DSM Update.

Appalachian Voices 2025
Provided expert witness testimony in Appalachian Power Co.'s petition in the matter of establishing energy efficiency savings targets.

South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Vote Solar, and Upstate Forever 2025
Supported comment drafting regarding Duke Energy's request for approval of modifications to its DSM portfolio.

South Carolina Coastal Conservation League and Southern Alliance for Clean Energy 2025
Provided expert witness testimony on Dominion Energy South Carolina's 2025-2029 DSM Plan.

Appalachian Voices 2024
Provided expert witness testimony in Virginia Electric and Power Co.'s application in the matter of establishing energy efficiency savings targets.

West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia 2024
Provided expert witness testimony in Appalachian Power Company and Wheeling Power Company Petition for Review of EE/DR Programs, Approval of the Continuation of Certain Programs, the Approval of New Programs, and Authorization of an Increase in EE/DR Rider Rates.

South Carolina Coastal Conservation League and Southern Alliance for Clean Energy 2024
Provided expert witness testimony on the value of energy efficiency to mitigate rate impacts on vulnerable customers in Dominion Energy South Carolina's 2024 rate case.

Appalachian Voices 2024
Provided expert witness testimony in Virginia Electric and Power Co.'s application for approval of its 2023 DSM Update.

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania 2023
Provided expert witness testimony in Philadelphia Gas Works' Petition for Approval of Revised Demand Side Management Implementation Plan Fiscal Years 2025-2029.

Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association 2023
Provided expert witness testimony in Kentucky Utilities Company and Louisville Gas and Electric Company's Application for Approval of a Demand Side Management Plan.

South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Sierra Club 2023
Provided expert witness testimony on energy efficiency levels incorporated in Dominion Energy South Carolina's 2023 Integrated Resource Plan.

Jim Grevatt
Managing Consultant

ENERGY FUTURES GROUP

SELECT PROJECTS (continued)

Sierra Club and Earth Justice 2023
Provided expert witness testimony on electrification programs in Baltimore Gas and Electric Company's Application for an Electric and Gas Multi-Year Plan.

Sierra Club and Earth Justice 2023
Provided technical support for comments on Washington Gas Light Company's Application for Approval of Energy Efficiency Programs.

Appalachian Voices 2023
Provided expert witness testimony in Virginia Electric and Power Co.'s application for approval of its 2022 DSM Update.

Natural Resources Defense Council and Sierra Club 2022 - 2023
Provided expert witness testimony in Public Service Company of Colorado's Demand-Side Management and Beneficial Electrification Strategic Issues proceeding.

British Columbia Sustainable Energy Association 2022
Provided expert review, discovery, and evidence regarding Fortis BC's proposed RNG Gas Connections service.

The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Vote Solar 2022
Provided expert witness testimony describing the need for energy efficiency programming as a result of Duke Energy Progress' proposed rate increase.

The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy 2022
Provided expert witness testimony critiquing Dominion Energy South Carolina's petition for new natural gas efficiency programs.

Appalachian Voices 2022
Provided expert witness testimony in Virginia Electric and Power Co.'s application for approval of its 2021 DSM Update.

Natural Resources Defense Council and Sierra Club 2021
Provided expert witness testimony in Tri-State Generation and Transmission Association's 2020 Electric Resource Plan Proceeding.

West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia 2021
Provided expert witness testimony in Monongahela Power Company and the Potomac Edison Company Petition and General Investigation to Determine Reasonable Rates and Charges.

Natural Resources Defense Council and Sierra Club 2021
Provided expert witness testimony in Public Service Company of Colorado's 2021 Electric Resource Plan and Clean Energy Plan proceeding.

The Institute for Sustainable Communities 2022
Partnered with Common Spark Consulting to develop an energy efficiency action plan to support increased energy efficiency programs for disadvantaged communities of the Southeast Florida Regional Climate Change Compact.

Natural Resources Defense Council, Sierra Club, and Southwest Energy Efficiency Project 2021
Provided expert witness testimony to the Public Utility Commission of Nevada regarding the Application of Southwest Gas Corporation for Approval of a Conservation and Energy Efficiency Plan for the Years 2022, 2023 and 2024.

Energy Efficient West Virginia and West Virginia Citizen Action Group 2021
Provided expert witness testimony in Appalachian Power Company and Wheeling Power Company's Petition regarding EE/DR program approvals.

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Managing Consultant

ENERGY FUTURES GROUP

SELECT PROJECTS (continued)

Appalachian Voices 2021
Provided expert witness testimony in Virginia Electric and Power Co.'s EM&V proceeding and its application for approval of its 2020 DSM Update.

The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Sierra Club, and Natural Resources Defense Council 2021
Provided expert witness testimony critiquing the market potential study used in Duke Energy Carolinas and Duke Energy Progress 2020 Integrated Resource Plans.

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") 2020 - 2021
Provided expert witness testimony in support of robust low-income efficiency programs in Philadelphia Gas Works Petition for Approval of Demand-Side Management Plan and PECO, Duquesne, and First Energy Act 129 Phase IV Plan proceedings.

Appalachian Voices and Natural Resources Defense Council 2020
Provided expert witness testimony in Virginia Electric and Power Co. Phase VIII DSM Program Application.

Citizens Action Coalition of Indiana 2020
Provided expert witness testimony in Duke Energy Indiana 2020-2023 DSM Plan.

The Consumers' Association of Canada (Manitoba) and Winnipeg Harvest 2019 - 2020
Provided expert witness testimony in the Efficiency Manitoba 2020/23 Efficiency Plan proceeding.

British Columbia Sustainable Energy Association 2017 - 2020
Provided expert review, discovery, and evidence in DSM-related aspects of multiple proceedings with Fortis BC, BC Hydro, and FEI.

Southern Alliance for Clean Energy and Earthjustice 2019
Provided expert witness testimony in the Florida Energy Efficiency and Conservation Act goal setting proceeding.

Energy Efficient West Virginia and West Virginia Citizen Action Group 2019
Provided expert witness testimony in Appalachian Power Company and Wheeling Power Company's Petition regarding EE/DR program approvals.

Alliance for Affordable Energy and Natural Resources Defense Council 2019 - 2021
Provided expert technical support for Louisiana Public Service Commission EE Rulemaking and Entergy New Orleans DSM Plan.

New Jersey Clean Energy Program 2015 - 2020
Planning support for NJCEP implementation team. Facilitated focus groups, worked with Board of Public Utilities Staff, program administrators, utility companies, and other stakeholders to identify opportunities to improve NJCEP strategic direction and increase benefits for ratepayers. Lead author drafting strategic plan.

Natural Resources Defense Council and Sierra Club 2017 - 2020
Provided expert witness testimony in Public Service Company of Colorado's Strategic Issues, 2019-2020 DSM Plan, and 2021-2022 DSM Plan proceedings.

Natural Resources Defense Council and Sierra Club 2018 - 2021
Provided expert witness testimony in Nevada Energy Company's 2019-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan, and 2019 and 2020 DSM Update proceedings and participated in stakeholder collaboratives.

Jim Grevatt
Managing Consultant

ENERGY FUTURES GROUP

SELECT PROJECTS (continued)

Environmental Law & Policy Center and Iowa Environmental Council 2018
Provided expert witness testimony in DSM proceedings regarding MidAmerican Energy Company's and Interstate Power and Light's 2019-2023 Energy Efficiency Plans.

Pueblo County Colorado 2018
Provided expert witness testimony in DSM proceedings regarding Black Hills Energy Company's 2019-2021 DSM Plan.

Sierra Club 2017 - 2018
Provided expert witness testimony in proceedings regarding Kentucky Power Company's DSM programs and cost-effectiveness.

California Alternative Energy and Advance Transportation Financing Authority 2017 - 2019
Provide technical assistance on development of commercial energy efficiency financing pilot.

Energy Efficiency for All 2015 - 2020
Expert technical support for affordable multifamily energy efficiency advocacy in Pennsylvania and Virginia. Worked with a coalition of energy efficiency and affordable housing advocates to shape advocacy efforts with utilities and regulators.

Regulatory Assistance Project 2016
Researched and co-authored with Chris Neme: The Next Quantum Leap in Efficiency: 30 Percent Electric Savings in Ten Years, addressing program and policy questions related to doubling the best efficiency program results.

Natural Resources Defense Council 2013
Provided expert witness testimony in support of NRDC's intervention in Ameren Illinois' 2014-2016 energy efficiency plan. Testimony demonstrated that Ameren would be capable of capturing significantly greater efficiency savings than it had proposed.

Regulatory Assistance Project 2015
Expert technical support for DSM in China. Worked with various government agencies and grid companies, as well as advocacy organizations to provide technical support related to advancing DSM and energy efficiency in China.

Vermont Public Service Department 2014 - 2015
Evaluation of Clean Energy Development Fund. Conducted interviews of staff and key stakeholders under contract to NMR and prepared memo outlining process findings and recommendations.

Evaluation of Efficiency Maine Low-Income Multi-Family Weatherization Program 2014 - 2015
Responsible for program staff and building owner interviews and process evaluation under contract to NMR and Efficiency Maine.

Northeast Energy Efficiency Partnerships 2014
Researched and co-authored meta-study of the use of energy efficiency to defer T&D investments.

Northeast Energy Efficiency Partnerships 2014
Researched and co-authored meta-study of ductless heat pump performance and market acceptance.

New Hampshire Electric Co-op 2014
Conducted assessment of the co-op's environmental and social responsibility programs' promotion of whole building efficiency retrofits, cold climate heat pumps and renewable energy systems. Presented recommendations to the co-op Board.

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Managing Consultant

ENERGY FUTURES GROUP

SELECT PROJECTS (continued)

High Meadows Fund 2014
Co-authored a study assessing the market viability of "High Performance Homes" in Vermont.

Energy Savings Potential Study, Delaware Department of Natural Resources 2013 - 2014
Led narrative development for the residential programs for a study of the energy efficiency savings potential in Delaware.

Regulatory Assistance Project 2013 - 2017
Provided technical support to energy efficiency advocates in proceedings in Maryland, Mississippi, and Missouri.

Better Buildings Solutions Center, U.S. Department of Energy 2013 - 2014
Energy Futures Group's lead author in drafting and reviewing web content for ten how-to "handbooks" detailing proven approaches to designing and implementing residential retrofit efficiency programs.

Utility Program Benchmarking 2013
Led research on behalf of a large IOU to compare the cost of saved energy across ~10 leading utility portfolios. The research sought to determine if there are discernible differences in the cost of saved energy related to utility spending in specific non-incentive categories, including administration, marketing, and EM&V.

Research on Trends in Multi-Family, HVAC, and New Construction Programs 2013 - 2014
Developed an analysis of emerging program trends on behalf of a leading energy efficiency industry firm.

Efficiency Power Plant, Regulatory Assistance Project 2013
Partnered with RAP to develop a demonstration tool to show how energy efficiency measures can be used to mitigate air quality impacts related to power production.

Natural Gas Energy Efficiency Analysis, the Green Energy Coalition 2013
Provided analytical support to demonstrate in testimony that Enbridge Gas could reduce the scale of its proposed pipeline expansion by implementing aggressive energy efficiency programs.

Targeted Implementation, VEIC 2012 - 2013
Responsible for market analysis and strategic planning for a new division expanding VEIC's energy efficiency program implementation projects.

DC Sustainable Energy Utility 2011 - 2012
Led the planning and startup implementation of Residential programs for the DC SEU, including single and multi-family and retail market programs. Led the development of the initial portfolio-level Annual Plan. Led client and partner interactions around planning and policy development. Member of DC SEU Senior Management Team.

EmPOWER Maryland Critical Program Review 2010 - 2012
Expert consultant to the Maryland Office of Peoples' Counsel in EmPOWER Maryland hearings regarding utility energy efficiency planning and reporting. Represented the OPC in stakeholder meetings that informed the current 2012-2014 EmPOWER plans. Multiple appearances before the Maryland Public Service Commission.

Efficiency Vermont 20-Year Forecast of Efficiency Potential 2010 - 2011
Senior Advisor in developing the forecast scenarios that led to significantly increased efficiency investment in Vermont.

Efficiency Vermont Residential Programs 2005 - 2010
Directed 100% growth in program budgets to nearly $10M annually. Responsible for strategic direction, leadership, and results for Efficiency Vermont's award-winning residential retrofit, new construction, retail, and low-income programs. Supported excellence in a staff of 30.

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Managing Consultant

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SELECT PROJECTS (continued)

Vermont Gas Systems Efficiency Program Leader 2001 - 2005

Directed strategic planning and program operations that led to six programs and portfolio as a whole being recognized as exemplary in Responding to the Natural Gas Crisis: America's Best Natural Gas Energy Efficiency Programs (ACEEE, 2003). Built contractor infrastructure and internal support to consistently meet program objectives. Led development of Annual Reports, planning and budgeting. Collaborated with Efficiency Vermont staff to develop a fuel-blind, state-wide, jointly offered residential new construction program.

Residential Retrofit Program Development 1994 - 2005

Enhanced design and performance of VGS' residential retrofit offerings by streamlining delivery and building strong relationships with contractors, homeowners, and property managers.

Demonstrated Technical Excellence in Approaches to Residential Retrofits 1991 - 1998

Conducted hundreds of residential energy audits and quality assurance inspections for natural gas and alternative-fueled homes. Trained and coached installers to obtain desired quality. Worked to satisfy homeowners through explanation, education, sound listening to concerns, and ultimately assuring that concerns were addressed. Trained new staff in auditing techniques.

SELECT PRESENTATIONS

Small Steps in Coordination Equal Leaps and Bounds for Pennsylvania's Underserved Families: Driving Policy Improvements through Collaborative Advocacy. ACEEE 2018 Summer Study on Energy Efficiency in Buildings, August 2018.

Keys to the House: Unlocking Residential Savings with Program Models for Home Energy Upgrades. ACEEE 2016 Summer Study on Energy Efficiency in Buildings, August 2016.

Home Upgrade Program Design & Implementation Models for Acquiring Savings in Multiple Climate Zones. 2016 National Home Performance Conference, April 2016.

EERS Advancements in Maryland: EmPOWER After 2015. Presentation at ACEEE Energy Efficiency as a Resource Conference, September 2015.

Leveling the Playing Field for Distributed Energy Resources. Panelist discussing the use of energy efficiency to defer T&D investments, Acadia Center forum on Envisioning Our Energy Future, February 2015.

Residential Retrofit Programs: What's Working? Perspectives from National Program Leaders. Panelist at AESP National Conference 2012.

Elements of Retrofit Program Incentive Design. DOE Technical Assistance Program Publication, April 2011.

Designing Effective Incentives to Drive Residential Retrofit Participation. DOE Technical Assistance Program Webinar, October 2010.

Quality Assurance for Residential Retrofit Programs. DOE Technical Assistance Program Webinar, October 2010.

Home Performance with ENERGY STAR, Quality Assurance in Vermont. Panelist at the ACI Home Energy Retrofit Summit, April 2010.

Delivering on the Promise-Engaging Communities and the Public. Panelist at 2010 NEEP Summit, March 2010.

Home Performance with Energy Star in Vermont. Presentation at CEE Member meeting, June 2009.

Leading by Example: Exemplary Low Income Energy Efficiency Programs. Presented on Efficiency Vermont's Residential low income services at California's Low Income Energy Efficiency Symposium, June 2006.

Natural Gas Efficiency Policies, Responding to the Natural Gas Crisis One Therm at a Time. Co-presented with Dan York and Anna Monis Shipley of American Council for an Energy-Efficient Economy (ACEEE) -ACEEE/CEE Market Transformation Symposium, 2004.

List of Proceedings in which Jim Grevatt has testified

Jurisdiction	Date Filed	Docket	Client	Case
Illinois	11/5/2010	Docket No. 10-0568	Natural Resources Defense Council	Approval of Ameren Illinois Energy Efficiency and Demand-Response Plan
Illinois	10/18/2013	Docket No. 13-0498	Natural Resources Defense Council	Approval of Ameren Illinois Energy Efficiency and Demand-Response Plan
British Columbia, CN	2/9/2017	BCUC Project No. 3698869	B.C. Sustainable Energy Association and Sierra Club B.C.	British Columbia Hydro and Power Authority F2017-F2019 Revenue Requirements Application and F2017-F2019 Demand-Side Measures Expenditure Schedule
British Columbia, CN	5/25/2017	BCUC Project No. 3698896	B.C. Sustainable Energy Association and Sierra Club B.C.	Fortis B.C. Inc. 2016 Long Term Electric Resource Plan and Long Term Demand Side Management Plan
North Carolina	9/5/2017	Docket No. E-2, Sub 1145	North Carolina Justice Center and Southern Alliance for Clean Energy	Application of Duke Energy Progress, LLC for Approval of Demand-Side Management and Energy Efficiency Cost Recovery Rider
Kentucky	11/22/2017	Case No. 2017-00097	Beverly May, Jim Webb, and Sierra Club	Investigation of the Reasonableness of the Demand Side Management Programs and Rates of Kentucky Power Company
Colorado	12/5/2017	Proceeding NO. 17A-0462EG	Natural Resources Defense Council and Sierra Club	Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand Side Management Plan
Colorado	3/5/2018	Proceeding NO. 17A-0462EG	Natural Resources Defense Council and Sierra Club	Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand Side Management Plan
British Columbia, CN	8/9/2018	BCUC Project No. 1598946	B.C. Sustainable Energy Association and Sierra Club B.C.	FortisBC Energy Inc. 2017 Long Term Gas Resource Plan
Colorado	8/24/2018	Proceeding No. 18A-0279E	Pueblo County, Colorado	Application of Black Hills/Colorado Electric Utility Company, LP for approval of its electric demand side management (DSM) plan for program years 2019-2021 and for approval of changes to its electric DSM cost adustment tariff
Iowa	9/13/2018	Docket No. EEP-2018-0002	Environmental Law & Policy Center and Iowa Environmental Council	MidAmerican Energy Company Energy Efficiency Five-Year Plan

List of Proceedings in which Jim Grevatt has testified

Nevada	9/20/2018	Docket No. 18-06003	Sierra Club and Natural Resources Defense Council	Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for Approval of their 2019-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan
Iowa	10/2/2018	Docket NO. EEP-2018-0004	Environmental Law & Policy Center and Iowa Environmental Council	MidAmerican Energy Company Energy Efficiency Five-Year Plan
Iowa	10/22/2018	Docket No. EEP-2018-0003	Environmental Law & Policy Center and Iowa Environmental Council	IPL Energy Efficiency Five-Year Plan
Iowa	11/9/2018	Docket NO. EEP-2018-0003	Environmental Law & Policy Center and Iowa Environmental Council	IPL Energy Efficiency Five-Year Plan
Colorado	1/23/2019	PROCEEDING NO. 18A-0606EG	Natural Resources Defense Council and Sierra Club	Application of Public Service Company of Colorado for Approval of its Electric and Natural Gas Demand Side Management (DSM) Plan for Calendar Years 2019 and 2020
Virginia	2/6/2019	Case No. PUR-2018-00168	Appalachian Voices and Natural Resources Defense Council	Application of Virginia Electric and Power Company for approval to implement demand-side management programs and for approval of two updated rate adjustment clauses
Florida	6/10/2019	Docket Nos. 20190015-EG, 20190016-EG,20190018-EG, 20190019-EG, 20190020-EG, 20190021-EG	Southern Alliance for Clean Energy	Commission Review of Numeric Conservation Goals
West Virginia	7/10/2019	Case No. 19-0396-E-P	EEWV/CAG	Appalachian Power Company and Wheeling Power Company, Petition for Review of EE/DR Programs, Approval of New EE/DR Programs, Termination of an Existing EE/DR Program, Modifications to EE/DR Cost Calculation Methodology and Cost and Recovery Allocations, and an Increase in EE/DR Rider Rates
Manitoba	12/9/2019		Consumers' Association of Canada (Manitoba) and Winnipeg Harvest	Efficiency Manitoba 2020-23 DSM Plan
Indiana	3/2/2020	IURC CAUSE NO. 43955 DSM 8	Citizens Action Coalition of Indiana	Duke Energy Indiana Plan for DSM and EE Programs 2020-2023
Virginia	3/20/2020	SCC Case No. PUR-2019-00201	Appalachian Voices and Natural Resources Defense Council ("Environmental Respondents")	Virginia Electric and Power Company - For approval of its 2019 demand side management update pursuant to § 56-585.1 A 5 of the Code of Virginia

List of Proceedings in which Jim Grevatt has testified

Colorado	11/2/2020	Proceeding No. 20A-0287EG	Natural Resources Defense Council and Sierra Club	Application of Public Service Company of Colorado for Approval of its Electric and Natural Gas Demand Side Management (DSM) Plan for Calendar Years 2021 and 2022
Pennsylvania	12/22/2020, and 2/5/2021	Docket No. P-2014-2459362	The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA")	Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2016-2020
Pennsylvania	1/13/2021	Docket Nos. M-2020-3020820, M-2020-3020821, M-2020-3020822, M-2020-3020823	The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA")	Joint Petition for Consolidation of Proceedings and Approval of Phase IV Energy Effciency and Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company
Pennsylvania	1/14/2021	Docket No. M-2020-3020818	The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA")	Petition of Duquesne Light Company for Approval of Demand-Side Management Plan for FY 2016-2020
Pennsylvania	1/14/2021, and 1/27/2021	Docket No. M-2020-3020830	The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA")	Petition of PECO Energy Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan
S Carolina	2/5/2021	Docket Nos. 2019-224-E and 2019-225-E	The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Sierra Club, and Natural Resources Defense Council	Duke Energy Carolinas and Duke Energy Progress 2020 Integrated Resource Plan
S Carolina	4/15/2021	Docket Nos. 2019-224-E and 2019-225-E	The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Sierra Club, and Natural Resources Defense Council	Duke Energy Carolinas and Duke Energy Progress 2020 Integrated Resource Plan
Virginia	3/23/2021	Case No. PUR-2020-00156	Appalachian Voices	In the matter of baseline determination, methodologies for evaluation, measurement, and verification of existing demand-side management programs, and the consideration of a standardized presentation of summary data for Virginia Electric and Power Company.
Virginia	4/16/2021	Case No. PUR-2020-00274	Appalachian Voices	In the matter of the application of Virginia Electric and Power Company for approval of its 2020 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia

List of Proceedings in which Jim Grevatt has testified

W Virginia	7/23/2021	Case No. 21--0332-E-P	Energy Efficient West Virginia and West Virginia Citizen Action Group	Appalachian Power Company and Wheeling Power Company, Petition for Review of EE/DR Programs, Approval of Continuation of those Programs, and an Authorization of an Increase in EE/DR Rider Rates
Nevada	10/6/2021	Docket No. 21-06001 and Docket No. 21-06002 - Phase II	Sierra Club and Natural Resources Defense Council	Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for Approval of their 2019-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan and Application of Sierra Pacific Power Company d/b/a NV Energy for approval of its Natural Gas Conservation and Energy Efficiency Plan for the period 2022-2024.
Colorado	10/11/2021	Proceeding 21A-0141E	Sierra Club and Natural Resources Defense Council	Application of Public Service Company of Colorado for Approval of its 2021 Electric Resource Plan and Clean Energy Plan.
W Virginia	11/12/2021	Case No. 21-0658-E-ENEC	West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia	Monongahela Power Company and the Potomac Edison Company Petition and General Investigation to Determine Reasonable Rates and Charges for Monongahela Power Company and The Potomac Edison Company on and after January 1, 2022
Colorado	11/23/2021	Proceeding No, 20A-0528E	Natural Resources Defense Council, Sierra Club, and Western Colorado Alliance	Application of Tri-State Generation and Transmission Association, Inc. for Approval of its 2020 Electric Resource Plan
Virginia	3/22/2022	Case No. PUR-2021-00247	Appalachian Voices	Application of Virginia Electric and Power Company for approval of its 2021 DSM Update pursuant to § 56-585.1 A 6 of the Code of Virginia
S Carolina	4/4/2022	Docket # 2021-361-G	The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy	Dominion Energy South Carolina, Inc.'s Request for Approval of New Natural Gas Energy Efficiency Programs
S Carolina	4/18/2022	Docket # 2021-361-G	The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy	Dominion Energy South Carolina, Inc.'s Request for Approval of New Natural Gas Energy Efficiency Programs
S Carolina	12/1/2022	Docket No. 2022-254-E	The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Vote Solar	Application of Duke Energy Progress, LLC for Authority to Adjust and Increase its Electric Rate Schedules and Charges
British Columbia, CN	12/5/2022		B.C. Sustainable Energy Association	FortisBC Energy Inc. (gas), Stage 2 Biomethane Energy Recovery Charge Rate Methodology and Comprehensive Review of a Revised Renewable Gas Program

List of Proceedings in which Jim Grevatt has testified

Colorado	12/8/2022	Proceeding 22A-0309EG	Sierra Club and Natural Resources Defense Council	Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand Side Management and Beneficial Electrification Plan
S Carolina	12/22/2022	Docket No. 2022-254-E	The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Vote Solar	Application of Duke Energy Progress, LLC for Authority to Adjust and Increase its Electric Rate Schedules and Charges
Colorado	1/19/2023	Proceeding 22A-0309EG	Sierra Club and Natural Resources Defense Council	Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand Side Management and Beneficial Electrification Plan
S Carolina	1/12/2023	Docket No. 2022-254-E	The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Vote Solar	Application of Duke Energy Progress, LLC for Authority to Adjust and Increase its Electric Rate Schedules and Charges
Virginia	3/29/2023	Case No. PUR-2022-00210	Appalachian Voices	Application of Virginia Electric and Power Company for approval of its 2021 DSM Update pursuant to § 56-585.1 A 6 of the Code of Virginia
Maryland	6/20/2023	Case No. 9692	Sierra Club	Baltimore Gas and Electric Company's Application for an Electric and Gas Multi-Year Plan
S Carolina	6/27/2023	Docket No. 2023-9-E	South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Sierra Club	Dominion Energy South Carolina, Incorporated's 2023 Integrated Resource Plan (IRP)
Kentucky	7/14/2023	Case No. 2022-00402	Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association	Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of a Demand Side Management Plan
Pennsylvania	11/13/2023	Docket No. P-2014-2459362	The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA").	Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2025-2029
Pennsylvania	1/11/2024	Docket No. P-2014-2459362	The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA").	Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2025-2029
Virginia	3/26/2024	Case No. PUR-2023-00217	Appalachian Voices	Application of Virginia Electric and Power Company for approval of its 2023 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia

List of Proceedings in which Jim Grevatt has testified

S Carolina	6/5/2024	Docket No. 2024-34-E	South Carolina Coastal Conservation League and Southern Alliance for Clean Energy	Application of Dominion Energy South Carolina, Inc. for Authority to Adjust and Increase its Retail Electric Rate Schedules, Tariffs, and Terms and Conditions
W Virginia	7/10/2024	Case No. 24-0332-E-P	West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia	Appalachian Power Company and Wheeling Power Company Petition for Review of EE/DR Programs, Approval of the Continuation of Certain Programs, the Approval of New Programs, and Authorization of an Increase in EE/DR Rider Rates.
Virginia	9/16/2024	Case No. PUR-2023-00227	Appalachian Voices	In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company
S Carolina	9/19/2024	Docket No. 2024-192-E	South Carolina Coastal Conservation League and Southern Alliance for Clean Energy	Application of Dominion Energy South Carolina, Inc.for Approval to Continue Its Portfolio of Demand Side Management Programs to Include Approval of a New Residential Demand Response Program and Reaffirmation of Its Demand Side Management Rate Rider
Virginia	9/30/2024	Case No. PUR-2024-00134	Appalachian Voices	In the matter of establishing energy efficiency savings targets for Appalachian Power Company pursuant to VA Code § 56-596.2 B 3
Virginia	3/24/2025	Case No. PUR-2024-00222	Appalachian Voices	Virginia Electric and Power Company - For approval of its 2024 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia
Virginia	6/16/2025	Case No. PUR-2024-00048	Appalachian Voices, New Virginia Majority, and Virginia Organizing, Inc.	Application of Virginia Natural Gas, Inc. for a general rate increase and for authority to revise the terms and conditions applicable to natural gas service
S Carolina	11/4/2025	Docket No. 2025-173-E	South Carolina Coastal Conservation League and Southern Alliance for Clean Energy	Dominion Energy South Carolina’s Request for Approval of Pilot Demand Side Management Program for Income-Qualified, High-Use Residential Customers

CAUSE-PA Statement 1, Grevatt

Appendix B

Interrogatories of CAUSE-PA to FirstEnergy

FirstEnergy Response to CAUSE-PA Set 1, No. 002, Attachment A
FirstEnergy Response to CAUSE-PA Set 1, No. 003, Attachment A
FirstEnergy Response to CAUSE-PA Set 1, No. 008, Attachment A
FirstEnergy Response to CAUSE-PA Set 1, No. 017
FirstEnergy Response to CAUSE-PA Set 1, No. 020
FirstEnergy Response to CAUSE-PA Set 1, No. 023
FirstEnergy Response to CAUSE-PA Set 1, No. 024
FirstEnergy Response to CAUSE-PA Set 1, No. 036, Attachment A
FirstEnergy Response to CAUSE-PA Set 1, No. 038
FirstEnergy Response to CAUSE-PA Set 1, No. 039
FirstEnergy Response to CAUSE-PA Set 1, No. 043
FirstEnergy Response to CAUSE-PA Set 1, No. 044, Attachment A
FirstEnergy Response to CAUSE-PA Set 1, No. 054
FirstEnergy Response to CAUSE-PA Set 1, No. 055

FirstEnergy Response to CAUSE-PA Set 2, No. 015

FirstEnergy Response to CAUSE-PA Set 4, No. 001, Attachment A
FirstEnergy Response to CAUSE-PA Set 4, No. 002, Attachment A

Interrogatories of CAUSE-PA to Duquesne Light Company

Duquesne Response to CAUSE-PA II-20, Attachment A

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 002

"For June 2021 to date, please identify, disaggregated by month, as of the last day of the month, the average monthly kWh electricity usage per electric heating residential account in the company's service territory, disaggregated by the following residential customer segments:

a) All residential customers
b) Confirmed low income customers
c) CAP customers
d) Confirmed low income customers, excluding CAP customers
e) Residential customers, excluding confirmed low income customers and CAP customers

Please provide this data in a fully functional Excel spreadsheet and indicate the source data relief upon for each response."

RESPONSE:

See CAUSE-PA Set 1, No. 002 Attachment A for the requested data pertaining to subparts a through e. "Confirmed low-income customers," and "CAP customer" are based upon the customer's heating type, low income status, and CAP status as of November 2025.

Company Code	Year Month	Heating Source Description	Mean Residential kWh	Mean KWH Low Income	Mean KWH CAP	Mean KWH LowIncome W/O Cap	Mean Resi kWh W/O CAP/CLI
ME01	202106	Electric Heating	824	792	829	807	867
ME01	202107	Electric Heating	979	921	949	942	1,018
ME01	202108	Electric Heating	999	943	966	974	1,044
ME01	202109	Electric Heating	999	950	974	974	1,040
ME01	202110	Electric Heating	750	721	747	735	783
ME01	202111	Electric Heating	836	835	883	837	890
ME01	202112	Electric Heating	1,243	1,314	1,412	1,314	1,379
ME01	202201	Electric Heating	1,560	1,618	1,729	1,617	1,731
ME01	202202	Electric Heating	1,784	1,872	2,027	1,868	1,991
ME01	202203	Electric Heating	1,437	1,530	1,663	1,543	1,622
ME01	202204	Electric Heating	1,145	1,201	1,301	1,208	1,271
ME01	202205	Electric Heating	886	917	998	928	968
ME01	202206	Electric Heating	812	783	820	792	848
ME01	202207	Electric Heating	956	910	943	920	994
ME01	202208	Electric Heating	1,042	989	1,035	1,001	1,084
ME01	202209	Electric Heating	956	914	961	933	999
ME01	202210	Electric Heating	745	734	785	739	783
ME01	202211	Electric Heating	834	865	941	868	906
ME01	202212	Electric Heating	1,247	1,311	1,440	1,301	1,377
ME01	202301	Electric Heating	1,625	1,717	1,887	1,711	1,807
ME01	202302	Electric Heating	1,415	1,534	1,705	1,531	1,597
ME01	202303	Electric Heating	1,316	1,415	1,553	1,406	1,482
ME01	202304	Electric Heating	1,055	1,126	1,240	1,124	1,181
ME01	202305	Electric Heating	765	782	857	789	826
ME01	202306	Electric Heating	727	695	721	699	763
ME01	202307	Electric Heating	905	850	879	868	937
ME01	202308	Electric Heating	970	924	954	947	1,011
ME01	202309	Electric Heating	929	882	915	894	961
ME01	202310	Electric Heating	721	707	752	715	755
ME01	202311	Electric Heating	836	862	951	864	905
ME01	202312	Electric Heating	1,251	1,332	1,489	1,331	1,387
ME01	202401	Electric Heating	1,485	1,584	1,776	1,572	1,653
ME01	202402	Electric Heating	1,524	1,646	1,833	1,640	1,711
ME01	202403	Electric Heating	1,245	1,353	1,524	1,344	1,405
ME01	202404	Electric Heating	1,026	1,095	1,224	1,099	1,144
ME01	202405	Electric Heating	796	806	885	810	856
ME01	202406	Electric Heating	797	771	812	773	835
ME01	202407	Electric Heating	1,018	961	995	977	1,057
ME01	202408	Electric Heating	1,005	986	980	1,099	1,072
ME01	202409	Electric Heating	859	828	858	840	896
ME01	202410	Electric Heating	702	683	712	686	734
ME01	202411	Electric Heating	783	798	864	788	840
ME01	202412	Electric Heating	1,212	1,264	1,346	1,245	1,335
ME01	202501	Electric Heating	1,719	1,788	1,935	1,750	1,902
ME01	202502	Electric Heating	1,746	1,797	1,942	1,657	1,927
ME01	202503	Electric Heating	1,397	1,509	1,643	1,479	1,577
ME01	202504	Electric Heating	990	1,038	1,103	1,033	1,102
ME01	202505	Electric Heating	742	755	792	754	803
ME01	202506	Electric Heating	694	490	251	594	724
ME01	202507	Electric Heating	977	919	917	941	1,017
ME01	202508	Electric Heating	972	852	752	926	1,013
ME01	202509	Electric Heating	797	712	647	737	827
ME01	202510	Electric Heating	718	707	732	703	755
ME01	202511	Electric Heating	880	913	959	910	961
PN01	202106	Electric Heating	646	627	663	640	701
PN01	202107	Electric Heating	710	680	709	704	775
PN01	202108	Electric Heating	717	694	724	710	784
PN01	202109	Electric Heating	746	711	736	726	805
PN01	202110	Electric Heating	584	559	584	569	625
PN01	202111	Electric Heating	718	710	765	713	777
PN01	202112	Electric Heating	1,016	1,044	1,158	1,038	1,145
PN01	202201	Electric Heating	1,221	1,248	1,387	1,235	1,371
PN01	202202	Electric Heating	1,405	1,437	1,605	1,407	1,571
PN01	202203	Electric Heating	1,181	1,202	1,349	1,174	1,312
PN01	202204	Electric Heating	960	964	1,065	959	1,063
PN01	202205	Electric Heating	740	735	813	739	814
PN01	202206	Electric Heating	601	590	627	598	663
PN01	202207	Electric Heating	712	682	714	701	776
PN01	202208	Electric Heating	729	698	736	714	798
PN01	202209	Electric Heating	684	649	684	665	740
PN01	202210	Electric Heating	613	604	662	609	666
PN01	202211	Electric Heating	721	730	825	724	789
PN01	202212	Electric Heating	1,033	1,064	1,207	1,053	1,153
PN01	202301	Electric Heating	1,315	1,342	1,542	1,313	1,464
PN01	202302	Electric Heating	1,170	1,213	1,392	1,194	1,316
PN01	202303	Electric Heating	1,087	1,131	1,287	1,107	1,226
PN01	202304	Electric Heating	903	919	1,033	907	1,006
PN01	202305	Electric Heating	667	671	757	673	738
PN01	202306	Electric Heating	588	553	583	560	673
PN01	202307	Electric Heating	657	640	681	657	672
PN01	202308	Electric Heating	689	656	692	669	754
PN01	202309	Electric Heating	687	640	680	648	729
PN01	202310	Electric Heating	569	560	604	562	620
PN01	202311	Electric Heating	714	732	826	728	791
PN01	202312	Electric Heating	1,015	1,050	1,201	1,030	1,134
PN01	202401	Electric Heating	1,182	1,223	1,410	1,182	1,319
PN01	202402	Electric Heating	1,201	1,233	1,400	1,206	1,343
PN01	202403	Electric Heating	988	1,025	1,163	1,000	1,110
PN01	202404	Electric Heating	848	858	976	842	940
PN01	202405	Electric Heating	649	635	712	630	704
PN01	202406	Electric Heating	600	575	622	579	649
PN01	202407	Electric Heating	737	702	739	712	804
PN01	202408	Electric Heating	728	693	741	695	792
PN01	202409	Electric Heating	658	621	659	620	706
PN01	202410	Electric Heating	578	556	598	557	619
PN01	202411	Electric Heating	674	674	760	657	735
PN01	202412	Electric Heating	1,012	1,028	1,151	991	1,125

Company Code	Year Month	Heating Source Description	Mean Residential kWh	Mean KWH Low Income	Mean KWH CAP	Mean KWH LowIncome W/O Cap	Mean Resi kWh W/O CAP/CLI
PN01	202501	Electric Heating	1,352	1,360	1,536	1,296	1,492
PN01	202502	Electric Heating	1,374	1,376	1,543	1,316	1,520
PN01	202503	Electric Heating	1,145	1,165	1,324	1,110	1,276
PN01	202504	Electric Heating	839	848	941	833	939
PN01	202505	Electric Heating	605	568	573	583	663
PN01	202506	Electric Heating	550	366	198	482	593
PN01	202507	Electric Heating	739	720	737	729	817
PN01	202508	Electric Heating	737	656	598	719	816
PN01	202509	Electric Heating	612	536	503	556	650
PN01	202510	Electric Heating	565	552	577	550	610
PN01	202511	Electric Heating	772	794	880	769	856
PP01	202106	Electric Heating	926	819	863	815	961
PP01	202107	Electric Heating	863	762	805	759	885
PP01	202108	Electric Heating	991	886	912	880	1,023
PP01	202109	Electric Heating	999	891	927	881	1,021
PP01	202110	Electric Heating	805	735	750	732	835
PP01	202111	Electric Heating	898	855	904	840	969
PP01	202112	Electric Heating	1,387	1,364	1,462	1,325	1,555
PP01	202201	Electric Heating	1,627	1,573	1,673	1,538	1,840
PP01	202202	Electric Heating	2,014	1,942	2,098	1,877	2,269
PP01	202203	Electric Heating	1,712	1,715	1,828	1,678	1,947
PP01	202204	Electric Heating	1,349	1,349	1,452	1,298	1,506
PP01	202205	Electric Heating	996	973	1,051	957	1,092
PP01	202206	Electric Heating	848	746	774	738	864
PP01	202207	Electric Heating	1,017	883	912	874	1,025
PP01	202208	Electric Heating	1,007	898	939	874	1,027
PP01	202209	Electric Heating	962	851	876	852	982
PP01	202210	Electric Heating	809	759	805	752	851
PP01	202211	Electric Heating	918	895	950	888	1,006
PP01	202212	Electric Heating	1,367	1,361	1,473	1,334	1,538
PP01	202301	Electric Heating	1,800	1,738	1,870	1,692	2,014
PP01	202302	Electric Heating	1,633	1,627	1,776	1,595	1,856
PP01	202303	Electric Heating	1,397	1,403	1,529	1,385	1,606
PP01	202304	Electric Heating	1,254	1,256	1,372	1,221	1,413
PP01	202305	Electric Heating	919	892	976	886	1,008
PP01	202306	Electric Heating	801	711	742	712	828
PP01	202307	Electric Heating	932	803	834	803	934
PP01	202308	Electric Heating	964	870	890	876	996
PP01	202309	Electric Heating	947	838	878	839	958
PP01	202310	Electric Heating	761	705	766	693	783
PP01	202311	Electric Heating	890	866	950	836	969
PP01	202312	Electric Heating	1,294	1,299	1,446	1,260	1,463
PP01	202401	Electric Heating	1,560	1,548	1,709	1,523	1,782
PP01	202402	Electric Heating	1,571	1,600	1,779	1,572	1,821
PP01	202403	Electric Heating	1,333	1,366	1,513	1,338	1,533
PP01	202404	Electric Heating	1,144	1,165	1,282	1,158	1,298
PP01	202405	Electric Heating	870	843	917	828	932
PP01	202406	Electric Heating	827	738	773	719	838
PP01	202407	Electric Heating	1,000	871	890	854	1,003
PP01	202408	Electric Heating	1,038	924	966	892	1,046
PP01	202409	Electric Heating	948	838	870	813	963
PP01	202410	Electric Heating	800	733	779	721	827
PP01	202411	Electric Heating	846	827	891	798	918
PP01	202412	Electric Heating	1,290	1,250	1,312	1,238	1,458
PP01	202501	Electric Heating	1,813	1,751	1,863	1,684	2,060
PP01	202502	Electric Heating	1,982	1,953	2,101	1,896	2,281
PP01	202503	Electric Heating	1,607	1,619	1,721	1,591	1,879
PP01	202504	Electric Heating	1,066	1,062	1,123	1,044	1,214
PP01	202505	Electric Heating	830	805	758	802	897
PP01	202506	Electric Heating	782	642	583	676	806
PP01	202507	Electric Heating	1,019	796	663	872	1,030
PP01	202508	Electric Heating	1,089	913	825	933	1,110
PP01	202509	Electric Heating	870	709	625	768	885
PP01	202510	Electric Heating	753	679	677	694	774
PP01	202511	Electric Heating	965	942	950	953	1,080
WP01	202106	Electric Heating	872	821	903	855	946
WP01	202107	Electric Heating	968	887	967	930	1,040
WP01	202108	Electric Heating	971	897	967	941	1,055
WP01	202109	Electric Heating	981	907	963	942	1,050
WP01	202110	Electric Heating	786	737	794	762	840
WP01	202111	Electric Heating	868	873	963	898	949
WP01	202112	Electric Heating	1,364	1,421	1,592	1,451	1,533
WP01	202201	Electric Heating	1,590	1,639	1,842	1,676	1,782
WP01	202202	Electric Heating	1,938	2,003	2,257	2,041	2,177
WP01	202203	Electric Heating	1,620	1,691	1,906	1,723	1,836
WP01	202204	Electric Heating	1,286	1,327	1,500	1,356	1,445
WP01	202205	Electric Heating	959	970	1,095	999	1,062
WP01	202206	Electric Heating	818	770	839	802	885
WP01	202207	Electric Heating	984	910	976	955	1,066
WP01	202208	Electric Heating	983	902	979	937	1,060
WP01	202209	Electric Heating	960	875	948	905	1,054
WP01	202210	Electric Heating	796	776	855	805	826
WP01	202211	Electric Heating	903	928	1,044	955	1,000
WP01	202212	Electric Heating	1,382	1,435	1,633	1,470	1,558
WP01	202301	Electric Heating	1,781	1,830	2,084	1,865	2,006
WP01	202302	Electric Heating	1,606	1,686	1,931	1,715	1,829
WP01	202303	Electric Heating	1,367	1,427	1,614	1,456	1,551
WP01	202304	Electric Heating	1,212	1,260	1,417	1,288	1,370
WP01	202305	Electric Heating	867	878	994	893	958
WP01	202306	Electric Heating	581	527	556	535	601
WP01	202307	Electric Heating	885	814	888	833	938
WP01	202308	Electric Heating	946	872	949	901	1,024
WP01	202309	Electric Heating	951	868	934	889	1,003
WP01	202310	Electric Heating	748	704	778	716	786
WP01	202311	Electric Heating	887	898	1,023	905	965
WP01	202312	Electric Heating	1,304	1,372	1,593	1,374	1,469
WP01	202401	Electric Heating	1,581	1,652	1,896	1,651	1,784

Company Code	Year Month	Heating Source Description	Mean Residential kWh	Mean KWH Low Income	Mean KWH CAP	Mean KWH LowIncome W/O Cap	Mean Resi kWh W/O CAP/CLI
WP01	202402	Electric Heating	1,585	1,658	1,925	1,661	1,799
WP01	202403	Electric Heating	1,333	1,406	1,618	1,416	1,523
WP01	202404	Electric Heating	1,108	1,145	1,312	1,155	1,236
WP01	202405	Electric Heating	835	817	917	829	905
WP01	202406	Electric Heating	800	744	813	759	853
WP01	202407	Electric Heating	1,005	919	987	939	1,075
WP01	202408	Electric Heating	1,029	948	1,025	966	1,113
WP01	202409	Electric Heating	924	853	915	864	982
WP01	202410	Electric Heating	770	722	776	732	817
WP01	202411	Electric Heating	829	831	927	842	905
WP01	202412	Electric Heating	1,299	1,312	1,442	1,311	1,447
WP01	202501	Electric Heating	1,823	1,841	2,062	1,819	2,042
WP01	202502	Electric Heating	1,967	1,989	2,161	2,019	2,235
WP01	202503	Electric Heating	1,559	1,572	1,663	1,604	1,785
WP01	202504	Electric Heating	1,039	1,048	1,147	1,060	1,161
WP01	202505	Electric Heating	779	737	749	749	856
WP01	202506	Electric Heating	711	485	258	638	764
WP01	202507	Electric Heating	999	901	909	924	1,075
WP01	202508	Electric Heating	1,044	902	839	948	1,123
WP01	202509	Electric Heating	851	731	681	752	896
WP01	202510	Electric Heating	738	683	715	696	782
WP01	202511	Electric Heating	956	983	1,079	987	1,063

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 003

"For June 2021 to date, please identify, disaggregated by month, as of the last day of the month, the average monthly kWh electricity usage per non-electric-heating residential account in the company's service territory, disaggregated by the following residential customer segments:

a) All residential customers
b) Confirmed low-income customers
c) CAP customers
d) Confirmed low-income customers not enrolled in CAP
e) Residential customers, excluding confirmed low income customers and CAP customers

Please provide this data in a fully functional Excel spreadsheet and indicate the source data relief upon for each response."

RESPONSE:

See CAUSE-PA Set 1, No. 003 Attachment A for the requested data pertaining to subparts a through e. "Confirmed low-income customers" and "CAP customer" are based upon the customer's heating type, low income status, and CAP status as of November 2025.

Company Code	Year Month	Heating Source Description	Mean Residential kWh	Mean KWH Low Income	Mean KWH CAP	Mean KWH LowIncome W/O Cap	Mean Resi kWh W/O CAP/CLI
ME01	202106	Non-Electric Heating	795	808	798	814	866
ME01	202107	Non-Electric Heating	1,060	1,063	1,052	1,065	1,147
ME01	202108	Non-Electric Heating	1,106	1,113	1,100	1,119	1,199
ME01	202109	Non-Electric Heating	1,095	1,103	1,089	1,116	1,190
ME01	202110	Non-Electric Heating	758	776	768	784	827
ME01	202111	Non-Electric Heating	665	715	709	718	737
ME01	202112	Non-Electric Heating	768	884	876	893	896
ME01	202201	Non-Electric Heating	904	1,031	1,020	1,041	1,057
ME01	202202	Non-Electric Heating	894	1,069	1,055	1,078	1,077
ME01	202203	Non-Electric Heating	795	937	931	944	948
ME01	202204	Non-Electric Heating	720	819	813	831	839
ME01	202205	Non-Electric Heating	667	728	727	735	753
ME01	202206	Non-Electric Heating	811	824	821	828	884
ME01	202207	Non-Electric Heating	1,033	1,043	1,036	1,050	1,123
ME01	202208	Non-Electric Heating	1,166	1,175	1,165	1,187	1,264
ME01	202209	Non-Electric Heating	1,046	1,063	1,057	1,079	1,141
ME01	202210	Non-Electric Heating	681	719	722	725	751
ME01	202211	Non-Electric Heating	635	702	706	706	716
ME01	202212	Non-Electric Heating	775	898	897	899	908
ME01	202301	Non-Electric Heating	933	1,090	1,086	1,096	1,108
ME01	202302	Non-Electric Heating	811	968	970	971	990
ME01	202303	Non-Electric Heating	769	912	912	914	901
ME01	202304	Non-Electric Heating	688	793	792	801	812
ME01	202305	Non-Electric Heating	622	664	667	667	707
ME01	202306	Non-Electric Heating	680	699	687	700	729
ME01	202307	Non-Electric Heating	965	967	970	974	1,043
ME01	202308	Non-Electric Heating	1,073	1,091	1,095	1,105	1,170
ME01	202309	Non-Electric Heating	1,012	1,026	1,027	1,041	1,102
ME01	202310	Non-Electric Heating	694	724	730	732	763
ME01	202311	Non-Electric Heating	645	710	719	711	726
ME01	202312	Non-Electric Heating	784	915	923	913	922
ME01	202401	Non-Electric Heating	885	1,041	1,042	1,037	1,050
ME01	202402	Non-Electric Heating	847	1,012	1,014	1,011	1,018
ME01	202403	Non-Electric Heating	744	885	891	884	888
ME01	202404	Non-Electric Heating	677	776	787	773	789
ME01	202405	Non-Electric Heating	657	704	718	707	731
ME01	202406	Non-Electric Heating	811	836	845	836	883
ME01	202407	Non-Electric Heating	1,133	1,146	1,158	1,144	1,226
ME01	202408	Non-Electric Heating	1,124	1,150	1,156	1,156	1,222
ME01	202409	Non-Electric Heating	917	943	947	949	1,004
ME01	202410	Non-Electric Heating	682	713	716	713	747
ME01	202411	Non-Electric Heating	631	686	682	687	707
ME01	202412	Non-Electric Heating	766	876	844	880	892
ME01	202501	Non-Electric Heating	952	1,109	1,091	1,094	1,124
ME01	202502	Non-Electric Heating	909	1,088	1,065	1,076	1,097
ME01	202503	Non-Electric Heating	787	944	941	931	945
ME01	202504	Non-Electric Heating	670	758	755	748	773
ME01	202505	Non-Electric Heating	623	668	664	668	692
ME01	202506	Non-Electric Heating	696	606	424	684	747
ME01	202507	Non-Electric Heating	1,076	1,065	1,000	1,089	1,163
ME01	202508	Non-Electric Heating	1,090	980	813	1,054	1,166
ME01	202509	Non-Electric Heating	853	832	736	852	921
ME01	202510	Non-Electric Heating	707	744	734	748	777
ME01	202511	Non-Electric Heating	667	753	754	750	758
PN01	202106	Non-Electric Heating	608	652	648	663	700
PN01	202107	Non-Electric Heating	754	788	782	804	854
PN01	202108	Non-Electric Heating	771	809	801	820	876
PN01	202109	Non-Electric Heating	794	827	815	841	899
PN01	202110	Non-Electric Heating	582	614	609	624	659
PN01	202111	Non-Electric Heating	577	643	635	656	676
PN01	202112	Non-Electric Heating	663	770	758	783	803
PN01	202201	Non-Electric Heating	763	886	866	904	930
PN01	202202	Non-Electric Heating	758	933	894	974	966
PN01	202203	Non-Electric Heating	693	827	846	799	846
PN01	202204	Non-Electric Heating	627	732	721	748	766
PN01	202205	Non-Electric Heating	571	631	609	657	678
PN01	202206	Non-Electric Heating	599	638	639	651	687
PN01	202207	Non-Electric Heating	754	794	791	806	861
PN01	202208	Non-Electric Heating	783	822	818	834	892
PN01	202209	Non-Electric Heating	716	752	749	762	813
PN01	202210	Non-Electric Heating	560	612	612	620	646
PN01	202211	Non-Electric Heating	555	637	634	645	662
PN01	202212	Non-Electric Heating	666	786	780	796	816
PN01	202301	Non-Electric Heating	793	946	937	956	985
PN01	202302	Non-Electric Heating	689	839	836	847	866
PN01	202303	Non-Electric Heating	668	805	797	814	831
PN01	202304	Non-Electric Heating	594	708	699	723	738
PN01	202305	Non-Electric Heating	528	597	601	602	624
PN01	202306	Non-Electric Heating	536	572	565	579	615
PN01	202307	Non-Electric Heating	684	723	728	729	778
PN01	202308	Non-Electric Heating	738	771	778	776	836
PN01	202309	Non-Electric Heating	704	737	745	740	798
PN01	202310	Non-Electric Heating	549	593	596	598	629

Company Code	Year Month	Heating Source Description	Mean Residential kWh	Mean KWH Low Income	Mean KWH CAP	Mean KWH LowIncome W/O Cap	Mean Resi kWh W/O CAP/CLI
PN01	202311	Non-Electric Heating	559	641	648	644	664
PN01	202312	Non-Electric Heating	665	788	799	787	810
PN01	202401	Non-Electric Heating	740	880	885	883	910
PN01	202402	Non-Electric Heating	704	851	859	852	879
PN01	202403	Non-Electric Heating	621	745	752	746	768
PN01	202404	Non-Electric Heating	579	680	688	681	703
PN01	202405	Non-Electric Heating	540	602	615	599	629
PN01	202406	Non-Electric Heating	594	638	649	635	676
PN01	202407	Non-Electric Heating	787	829	839	830	895
PN01	202408	Non-Electric Heating	783	823	832	819	887
PN01	202409	Non-Electric Heating	685	718	722	720	772
PN01	202410	Non-Electric Heating	557	598	596	604	639
PN01	202411	Non-Electric Heating	550	627	632	627	648
PN01	202412	Non-Electric Heating	660	765	746	766	797
PN01	202501	Non-Electric Heating	791	928	919	917	962
PN01	202502	Non-Electric Heating	755	914	898	905	942
PN01	202503	Non-Electric Heating	671	812	814	797	833
PN01	202504	Non-Electric Heating	580	677	676	675	702
PN01	202505	Non-Electric Heating	510	558	543	567	594
PN01	202506	Non-Electric Heating	543	502	378	569	618
PN01	202507	Non-Electric Heating	802	820	772	843	909
PN01	202508	Non-Electric Heating	804	764	652	827	908
PN01	202509	Non-Electric Heating	639	631	581	655	714
PN01	202510	Non-Electric Heating	543	592	589	590	621
PN01	202511	Non-Electric Heating	586	683	690	675	694
PP01	202106	Non-Electric Heating	807	743	723	738	829
PP01	202107	Non-Electric Heating	856	774	758	765	869
PP01	202108	Non-Electric Heating	994	948	937	941	1,048
PP01	202109	Non-Electric Heating	997	958	949	951	1,050
PP01	202110	Non-Electric Heating	746	755	745	749	809
PP01	202111	Non-Electric Heating	659	684	669	677	724
PP01	202112	Non-Electric Heating	780	833	800	826	878
PP01	202201	Non-Electric Heating	884	945	906	939	1,004
PP01	202202	Non-Electric Heating	885	1,000	962	996	1,047
PP01	202203	Non-Electric Heating	825	936	904	935	971
PP01	202204	Non-Electric Heating	738	815	791	812	857
PP01	202205	Non-Electric Heating	662	701	691	695	738
PP01	202206	Non-Electric Heating	752	693	677	681	770
PP01	202207	Non-Electric Heating	1,008	917	899	909	1,032
PP01	202208	Non-Electric Heating	1,019	986	973	986	1,087
PP01	202209	Non-Electric Heating	942	909	898	908	999
PP01	202210	Non-Electric Heating	685	721	722	717	759
PP01	202211	Non-Electric Heating	626	667	652	663	696
PP01	202212	Non-Electric Heating	776	841	817	837	883
PP01	202301	Non-Electric Heating	920	1,000	971	992	1,064
PP01	202302	Non-Electric Heating	821	923	902	922	974
PP01	202303	Non-Electric Heating	735	833	818	832	873
PP01	202304	Non-Electric Heating	710	781	775	779	831
PP01	202305	Non-Electric Heating	631	658	652	649	702
PP01	202306	Non-Electric Heating	685	647	630	639	706
PP01	202307	Non-Electric Heating	895	830	823	817	920
PP01	202308	Non-Electric Heating	974	923	906	928	1,031
PP01	202309	Non-Electric Heating	927	886	880	877	971
PP01	202310	Non-Electric Heating	668	685	688	675	727
PP01	202311	Non-Electric Heating	628	671	667	663	695
PP01	202312	Non-Electric Heating	755	816	804	804	855
PP01	202401	Non-Electric Heating	861	929	904	919	982
PP01	202402	Non-Electric Heating	783	900	889	887	931
PP01	202403	Non-Electric Heating	731	821	813	816	858
PP01	202404	Non-Electric Heating	681	749	737	743	783
PP01	202405	Non-Electric Heating	647	660	659	652	702
PP01	202406	Non-Electric Heating	755	707	703	684	778
PP01	202407	Non-Electric Heating	1,010	906	891	882	1,020
PP01	202408	Non-Electric Heating	1,052	1,009	1,007	988	1,105
PP01	202409	Non-Electric Heating	923	893	886	874	982
PP01	202410	Non-Electric Heating	727	740	738	727	790
PP01	202411	Non-Electric Heating	623	659	651	649	689
PP01	202412	Non-Electric Heating	745	785	741	779	841
PP01	202501	Non-Electric Heating	924	993	965	961	1,060
PP01	202502	Non-Electric Heating	902	1,024	1,006	993	1,072
PP01	202503	Non-Electric Heating	791	910	886	888	944
PP01	202504	Non-Electric Heating	643	699	673	676	733
PP01	202505	Non-Electric Heating	612	629	568	620	669
PP01	202506	Non-Electric Heating	674	594	517	616	700
PP01	202507	Non-Electric Heating	1,043	870	752	904	1,047
PP01	202508	Non-Electric Heating	1,125	1,009	863	1,061	1,193
PP01	202509	Non-Electric Heating	858	805	724	816	911
PP01	202510	Non-Electric Heating	684	665	653	659	726
PP01	202511	Non-Electric Heating	671	716	710	704	749
WP01	202106	Non-Electric Heating	808	834	814	816	917
WP01	202107	Non-Electric Heating	1,016	1,042	1,058	1,077	1,162
WP01	202108	Non-Electric Heating	1,044	1,077	1,089	1,105	1,192
WP01	202109	Non-Electric Heating	1,033	1,063	1,071	1,092	1,176

Company Code	Year Month	Heating Source Description	Mean Residential kWh	Mean KWH Low Income	Mean KWH CAP	Mean KWH LowIncome W/O Cap	Mean Resi kWh W/O CAP/CLI
WP01	202110	Non-Electric Heating	770	832	818	830	880
WP01	202111	Non-Electric Heating	667	729	753	774	785
WP01	202112	Non-Electric Heating	792	938	934	972	977
WP01	202201	Non-Electric Heating	893	1,044	1,043	1,077	1,097
WP01	202202	Non-Electric Heating	913	1,109	1,104	1,147	1,158
WP01	202203	Non-Electric Heating	839	1,010	1,010	1,045	1,058
WP01	202204	Non-Electric Heating	756	885	890	913	929
WP01	202205	Non-Electric Heating	675	771	781	794	812
WP01	202206	Non-Electric Heating	768	814	826	830	887
WP01	202207	Non-Electric Heating	1,036	1,067	1,079	1,089	1,183
WP01	202208	Non-Electric Heating	1,051	1,084	1,100	1,105	1,196
WP01	202209	Non-Electric Heating	986	1,017	1,031	1,033	1,119
WP01	202210	Non-Electric Heating	715	789	786	791	823
WP01	202211	Non-Electric Heating	635	722	750	761	769
WP01	202212	Non-Electric Heating	797	948	955	975	988
WP01	202301	Non-Electric Heating	949	1,126	1,130	1,162	1,189
WP01	202302	Non-Electric Heating	851	1,038	1,046	1,071	1,083
WP01	202303	Non-Electric Heating	755	913	918	941	953
WP01	202304	Non-Electric Heating	727	868	868	898	907
WP01	202305	Non-Electric Heating	638	724	740	743	761
WP01	202306	Non-Electric Heating	516	529	516	529	574
WP01	202307	Non-Electric Heating	894	927	945	940	1,018
WP01	202308	Non-Electric Heating	1,014	1,057	1,058	1,117	1,165
WP01	202309	Non-Electric Heating	968	977	1,010	947	1,081
WP01	202310	Non-Electric Heating	687	730	748	740	783
WP01	202311	Non-Electric Heating	637	734	753	748	759
WP01	202312	Non-Electric Heating	772	924	941	947	958
WP01	202401	Non-Electric Heating	891	1,064	1,082	1,087	1,109
WP01	202402	Non-Electric Heating	814	996	1,009	1,018	1,037
WP01	202403	Non-Electric Heating	755	915	927	933	953
WP01	202404	Non-Electric Heating	690	814	836	825	848
WP01	202405	Non-Electric Heating	656	726	752	729	771
WP01	202406	Non-Electric Heating	781	821	848	825	895
WP01	202407	Non-Electric Heating	1,063	1,094	1,124	1,096	1,205
WP01	202408	Non-Electric Heating	1,114	1,143	1,170	1,135	1,260
WP01	202409	Non-Electric Heating	952	982	997	984	1,079
WP01	202410	Non-Electric Heating	737	772	779	779	841
WP01	202411	Non-Electric Heating	629	714	721	724	744
WP01	202412	Non-Electric Heating	761	890	870	907	933
WP01	202501	Non-Electric Heating	949	1,115	1,097	1,124	1,181
WP01	202502	Non-Electric Heating	941	1,142	1,121	1,155	1,202
WP01	202503	Non-Electric Heating	812	960	910	984	1,033
WP01	202504	Non-Electric Heating	656	762	761	774	804
WP01	202505	Non-Electric Heating	614	668	647	680	722
WP01	202506	Non-Electric Heating	669	600	447	677	752
WP01	202507	Non-Electric Heating	1,057	1,056	998	1,091	1,196
WP01	202508	Non-Electric Heating	1,146	1,062	929	1,137	1,282
WP01	202509	Non-Electric Heating	885	854	787	868	985
WP01	202510	Non-Electric Heating	698	731	732	737	811
WP01	202511	Non-Electric Heating	680	789	786	805	801

Petition of FirstEnergy Pennsylvania	**:**	
Electric Company for Approval of a	**:**	**Docket No. M-2025-3057327**
Phase V Energy Efficiency and	**:**	
Conservation Plan	**:**	

CAUSE-PA Set 1, No. 008

"Using the most recent data available, please provide the quantity of each of the measure types indicated in response to CAUSE-PA 1-7 that were provided through the company's general residential EE&C programs during Phase IV, disaggregated by program year. If quantity refers to anything other than individual units, please specify the units used (i.e., number of heat pumps, square feet of insulation, etc.). Please provide this data in the original Excel or Word format."

RESPONSE:

Please see CAUSE PA Set 1, No. 1-8 Attachment A.

Reporting Category	Program	PY	TRCMeasure	Quantity	Incentive	Verified MWh	Verified Lifecycle MWh	Footnote
general residential (non-Low Income)	EEP	13	Air Conditioner	482	$75,300	206	3,088	
general residential (non-Low Income)	EEP	13	Air Purifier	3,373	$84,325	2,140	19,259	
general residential (non-Low Income)	EEP	13	Bathroom Fan	18	$180	1	13	
general residential (non-Low Income)	EEP	13	Ceiling Fan	2,104	$31,560	88	1,320	
general residential (non-Low Income)	EEP	13	Circulating Pump	4	$120	1	15	
general residential (non-Low Income)	EEP	13	Clothes Dryer	934	$23,650	26	308	
general residential (non-Low Income)	EEP	13	Clothes Washer	1,598	$39,950	186	2,051	
general residential (non-Low Income)	EEP	13	Dehumidifier	26,171	$654,325	5,607	67,279	
general residential (non-Low Income)	EEP	13	Dehumidifier Recycling	1,461	$60,775	809	3,236	
general residential (non-Low Income)	EEP	13	Dishwasher	1,781	$44,525	48	480	
general residential (non-Low Income)	EEH	13	EE Kits - Electric	80,336	$2,592,049	14,248	177,853	
general residential (non-Low Income)	EEH	13	EE Kits - Standard	64,013	$2,066,200	7,982	115,377	
general residential (non-Low Income)	EEP	13	Freezer	171	$4,325	6	63	
general residential (non-Low Income)	EEP	13	Freezer Recycling	2,857	$183,975	1,829	7,316	
general residential (non-Low Income)	EEP	13	Furnace Fan	784	$78,400	197	2,959	
general residential (non-Low Income)	EEP	13	GSHP	81	$52,650	263	3,951	
general residential (non-Low Income)	EEP	13	Heat Pump	448	$156,750	632	9,481	
general residential (non-Low Income)	EEP	13	Heat Pump Water Heater	1,040	$519,635	1,852	18,525	
general residential (non-Low Income)	EEH	13	HER	113,741	$0	4,202	4,202	
general residential (non-Low Income)	EEP	13	HVAC - Tune-up	232	$11,591	45	134	
general residential (non-Low Income)	EEH	13	LED Nightlight	117	$580	1	7	
general residential (non-Low Income)	EEP	13	Minisplit AC	13	$2,600	4	58	
general residential (non-Low Income)	EEP	13	Minisplit HP	605	$121,000	915	12,792	
general residential (non-Low Income)	EEH	13	New Home	2,299	$1,322,620	4,397	65,957	
general residential (non-Low Income)	EEH	13	Non-Energy	107	$15,225	-	-	2
general residential (non-Low Income)	EEH	13	Online Audit Behavioral	14,971	$0	-	-	
general residential (non-Low Income)	EEP	13	Pool Pump	43	$12,900	65	651	
general residential (non-Low Income)	EEP	13	RAC Recycling	2,268	$93,175	270	810	
general residential (non-Low Income)	EEP	13	Refrigerator	1,742	$54,700	122	1,710	
general residential (non-Low Income)	EEP	13	Refrigerator Recycling	10,984	$684,750	10,194	50,968	
general residential (non-Low Income)	EEH	13	Residential Lighting	1,697	$23,223	74	1,104	
general residential (non-Low Income)	EEP	13	Room Air Conditioner	2,275	$57,590	58	519	
general residential (non-Low Income)	EEH	13	School Education kits	10,442	$283,528	1,275	16,589	
general residential (non-Low Income)	EEH	13	Smart Power Strip	105	$7,373	14	71	
general residential (non-Low Income)	EEH	13	Smart Thermostat	7,245	$363,023	2,211	24,317	
general residential (non-Low Income)	EEH	13	Tank Temperature Setback	2	$0	0	0	
general residential (non-Low Income)	SCI	14	Aerator	240	$1,415	17	171	
general residential (non-Low Income)	EEP	14	Air Conditioner	645	$101,250	294	4,404	
general residential (non-Low Income)	EEP	14	Air Purifier	3,903	$149,227	2,306	20,757	
general residential (non-Low Income)	EEH	14	Air Sealing	3	$325	3	42	
general residential (non-Low Income)	EEH	14	Attic Insulation	5	$750	4	58	
general residential (non-Low Income)	EEP	14	Bathroom Fan	186	$1,860	9	128	
general residential (non-Low Income)	EEP	14	Ceiling Fan	2,023	$30,345	84	1,253	
general residential (non-Low Income)	EEP	14	Circulating Pump	13	$390	3	42	
general residential (non-Low Income)	EEP	14	Clothes Dryer	1,451	$36,650	43	519	
general residential (non-Low Income)	EEP	14	Clothes Washer	2,394	$59,850	311	3,420	
general residential (non-Low Income)	EEP	14	Dehumidifier	35,874	$896,850	7,573	90,877	
general residential (non-Low Income)	EEP	14	Dehumidifier Recycling	1,339	$42,000	781	3,126	
general residential (non-Low Income)	EEP	14	Dishwasher	2,952	$73,800	87	867	
general residential (non-Low Income)	EEH	14	EE Kits - Electric	110,559	$3,868,307	23,149	277,783	
general residential (non-Low Income)	EEH	14	EE Kits - Standard	78,024	$2,674,449	11,574	167,829	
general residential (non-Low Income)	EEH	14	Foundation Insulation	2	$475	4	53	
general residential (non-Low Income)	EEP	14	Freezer	311	$7,775	11	124	
general residential (non-Low Income)	EEP	14	Freezer Recycling	2,487	$139,575	1,693	6,774	
general residential (non-Low Income)	EEP	14	Furnace Fan	1,170	$117,000	282	4,229	
general residential (non-Low Income)	EEP	14	GSHP	105	$68,250	300	4,505	
general residential (non-Low Income)	EEP	14	Heat Pump	750	$267,450	1,068	16,018	
general residential (non-Low Income)	EEP	14	Heat Pump Water Heater	1,847	$923,500	3,370	33,697	
general residential (non-Low Income)	EEH	14	HER	208,253	$0	10,818	23,252	
general residential (non-Low Income)	EEP	14	HVAC - Tune-up	1,343	$67,143	184	552	
general residential (non-Low Income)	EEH	14	Knee Wall Insulation	2	$200	5	79	
general residential (non-Low Income)	SCI	14	LED Nightlight	3,833	$19,160	122	975	
general residential (non-Low Income)	EEH	14	LI School Education Kits	19,515	$261,063	2,871	38,758	
general residential (non-Low Income)	EEP	14	Minisplit AC	3	$600	1	10	

general residential (non-Low Income)	EEP	14	Minisplit HP	1,000	$200,000	1,323	19,845	
general residential (non-Low Income)	EEH	14	New Home	2,219	$1,574,371	5,408	81,122	
general residential (non-Low Income)	SCI	14	Non-Energy	1,576	$224,325	-	-	2
general residential (non-Low Income)	EEH	14	Online Audit Behavioral	16,967	$0	1,004	1,004	
general residential (non-Low Income)	EEP	14	Pool Pump	150	$58,900	256	2,556	
general residential (non-Low Income)	EEP	14	RAC Recycling	5,870	$266,425	737	2,211	
general residential (non-Low Income)	EEP	14	Refrigerator	3,104	$90,725	226	3,167	
general residential (non-Low Income)	EEP	14	Refrigerator Recycling	10,266	$558,700	10,027	50,133	
general residential (non-Low Income)	EEH	14	Residential Lighting	23,130	$303,336	912	13,685	
general residential (non-Low Income)	EEP	14	Room Air Conditioner	17,191	$597,845	416	3,746	
general residential (non-Low Income)	SCI	14	Showerhead	133	$4,655	46	411	
general residential (non-Low Income)	SCI	14	Smart Power Strip	1,209	$68,605	158	792	
general residential (non-Low Income)	EEH	14	Smart Thermostat	9,997	$497,604	3,086	33,942	
general residential (non-Low Income)	EEH	14	Tank Temperature Setback	10	$0	1	2	
general residential (non-Low Income)	EEP	14	Freezer Recycling - MS	5	$250	3	14	
general residential (non-Low Income)	EEP	14	Refrigerator Recycling - MS	746	$37,300	733	3,666	
general residential (non-Low Income)	EEH	15	Aerator	385	$2,340	49	488	
general residential (non-Low Income)	EEP	15	Air Conditioner	547	$86,950	251	3,762	
general residential (non-Low Income)	EEP	15	Air Purifier	7,094	$280,984	3,613	32,517	
general residential (non-Low Income)	EEH	15	Air Sealing	3	$650	10	153	
general residential (non-Low Income)	EEP	15	Bathroom Fan	226	$2,260	12	177	
general residential (non-Low Income)	EEP	15	Ceiling Fan	65	$975	3	39	
general residential (non-Low Income)	EEP	15	Circulating Pump	15	$450	4	59	
general residential (non-Low Income)	EEP	15	Clothes Dryer	1,493	$37,800	44	523	
general residential (non-Low Income)	EEP	15	Clothes Washer	2,281	$57,025	290	3,189	
general residential (non-Low Income)	EEP	15	Dehumidifier	31,026	$498,870	4,293	51,515	
general residential (non-Low Income)	EEP	15	Dehumidifier Recycling	109	$2,725	63	252	
general residential (non-Low Income)	EEP	15	Dishwasher	2,239	$55,975	64	645	
general residential (non-Low Income)	EEH	15	Duct Insulation	1	$150	1	11	
general residential (non-Low Income)	EEH	15	EE Kits - Electric	95,248	$3,128,132	19,882	238,578	
general residential (non-Low Income)	EEH	15	EE Kits - Standard	74,232	$2,437,213	10,893	157,951	
general residential (non-Low Income)	EEH	15	Foundation Insulation	1	$250	1	20	
general residential (non-Low Income)	EEP	15	Freezer	279	$6,975	10	109	
general residential (non-Low Income)	EEP	15	Freezer Recycling	284	$14,225	187	747	
general residential (non-Low Income)	EEP	15	Furnace Fan	1,249	$124,809	333	4,991	
general residential (non-Low Income)	EEH	15	Furnace Whistle	1	$5	0	0	
general residential (non-Low Income)	EEP	15	GSHP	124	$80,600	419	6,279	
general residential (non-Low Income)	EEP	15	Heat Pump	648	$251,500	966	14,491	
general residential (non-Low Income)	EEP	15	Heat Pump Water Heater	1,519	$759,500	2,603	26,032	
general residential (non-Low Income)	EEH	15	HER	241,186	$0	8,010	13,028	
general residential (non-Low Income)	EEH	15	Hot Water Pipe Insulation	212	$110	2	27	
general residential (non-Low Income)	EEP	15	HVAC - Tune-up	529	$26,412	86	257	
general residential (non-Low Income)	EEH	15	LED Nightlight	5,846	$29,095	190	1,523	
general residential (non-Low Income)	EEP	15	Minisplit AC	8	$1,600	2	35	
general residential (non-Low Income)	EEP	15	Minisplit HP	939	$187,800	1,475	22,126	
general residential (non-Low Income)	EEH	15	New Home	2,081	$1,797,620	6,020	90,304	
general residential (non-Low Income)	EEH	15	Non-Energy	2,177	$314,400	-	-	2
general residential (non-Low Income)	EEH	15	Online Audit Behavioral	17,660	$0	1,700	1,700	
general residential (non-Low Income)	EEP	15	RAC Recycling	126	$3,150	15	46	
general residential (non-Low Income)	EEP	15	Refrigerator	3,247	$96,300	233	3,268	
general residential (non-Low Income)	EEP	15	Refrigerator Recycling	1,148	$56,700	1,102	5,509	
general residential (non-Low Income)	EEH	15	Residential Lighting	21,427	$310,740	994	2,528	
general residential (non-Low Income)	EEP	15	Room Air Conditioner	9,416	$293,080	308	2,776	
general residential (non-Low Income)	EEH	15	School Education kits	13,806	$355,565	2,024	27,326	
general residential (non-Low Income)	EEH	15	Showerhead	170	$5,900	61	553	
general residential (non-Low Income)	EEH	15	Smart Power Strip	2,266	$126,610	297	1,487	
general residential (non-Low Income)	EEH	15	Smart Thermostat	7,712	$385,182	2,432	26,751	
general residential (non-Low Income)	EEH	15	Tank Temperature Setback	30	$0	3	6	
general residential (non-Low Income)	EEP	15	Refrigerator Recycling - MS	167	$8,350	161	805	
general residential (non-Low Income)	EEH	15	Attic Insulation	3	$550	6	87	
general residential (non-Low Income)	EEH	15	Knee Wall Insulation	1	$200	9	129	
general residential (non-Low Income)	EEH	16	Aerator	634	$3,330	72	717	
general residential (non-Low Income)	EEP	16	Air Conditioner	920	$145,000	409	6,140	
general residential (non-Low Income)	EEP	16	Air Purifier	2,850	$42,750	394	3,544	
general residential (non-Low Income)	EEH	16	Air Sealing	7	$1,268	10	147	
general residential (non-Low Income)	EEH	16	Attic Insulation	12	$2,735	15	221	
general residential (non-Low Income)	EEP	16	Bathroom Fan	272	$2,720	12	176	

general residential (non-Low Income)	EEP	16	Circulating Pump	5	$150	1	18	
general residential (non-Low Income)	EEP	16	Clothes Dryer	1,203	$30,850	36	428	
general residential (non-Low Income)	EEP	16	Clothes Washer	1,883	$47,075	307	3,379	
general residential (non-Low Income)	EEP	16	Dehumidifier	22,301	$334,515	2,772	33,265	
general residential (non-Low Income)	EEP	16	Dehumidifier Recycling	890	$22,250	518	2,073	
general residential (non-Low Income)	EEP	16	Dishwasher	1,511	$37,775	80	798	
general residential (non-Low Income)	EEH	16	EE Kits - Electric	112,138	$3,651,223	23,553	282,638	
general residential (non-Low Income)	EEH	16	EE Kits - Standard	103,476	$3,370,194	15,049	218,217	
general residential (non-Low Income)	EEH	16	Foundation Insulation	5	$666	22	323	
general residential (non-Low Income)	EEP	16	Freezer	298	$7,450	11	116	
general residential (non-Low Income)	EEP	16	Freezer Recycling	1,378	$34,450	924	3,695	
general residential (non-Low Income)	EEP	16	Furnace Fan	1,346	$134,600	309	4,634	
general residential (non-Low Income)	EEH	16	Furnace Whistle	10	$50	1	3	
general residential (non-Low Income)	EEP	16	GSHP	92	$59,800	205	3,070	
general residential (non-Low Income)	EEP	16	Heat Pump	733	$282,000	918	13,765	
general residential (non-Low Income)	EEP	16	Heat Pump Water Heater	806	$290,095	1,355	13,550	
general residential (non-Low Income)	EEH	16	HER	398,383	$0	26,319	39,238	
general residential (non-Low Income)	EEH	16	Hot Water Pipe Insulation	124	$110	1	14	
general residential (non-Low Income)	EEP	16	HVAC - Tune-up	694	$34,486	88	265	
general residential (non-Low Income)	EEH	16	Knee Wall Insulation	2	$500	9	138	
general residential (non-Low Income)	SCI	16	LED Nightlight	5,134	$25,665	153	1,228	
general residential (non-Low Income)	EEP	16	Minisplit AC	7	$1,400	2	32	
general residential (non-Low Income)	EEP	16	Minisplit HP	1,182	$236,400	1,774	26,605	
general residential (non-Low Income)	EEH	16	New Home	2,347	$2,226,536	7,323	109,850	
general residential (non-Low Income)	SCI	16	Non-Energy	2,488	$316,575	-	-	2
general residential (non-Low Income)	EEH	16	Online Audit Behavioral	13,608	$0	586	586	
general residential (non-Low Income)	EEP	16	RAC Recycling	3,436	$171,810	423	1,268	
general residential (non-Low Income)	EEP	16	Refrigerator	2,858	$87,500	174	2,442	
general residential (non-Low Income)	EEP	16	Refrigerator Recycling	6,809	$333,700	6,541	32,703	
general residential (non-Low Income)	EEH	16	Residential Lighting	18,651	$275,032	890	2,263	
general residential (non-Low Income)	EEP	16	Room Air Conditioner	1,737	$47,320	90	809	
general residential (non-Low Income)	EEH	16	School Education kits	13,837	$356,364	2,010	27,134	
general residential (non-Low Income)	EEH	16	Showerhead	255	$8,920	82	737	
general residential (non-Low Income)	SCI	16	Smart Power Strip	2,177	$110,040	257	1,284	
general residential (non-Low Income)	EEH	16	Smart Thermostat	11,090	$554,200	3,130	34,427	
general residential (non-Low Income)	EEH	16	Solar PV	15	$7,500	238	3,569	
general residential (non-Low Income)	EEH	16	Tank Temperature Setback	31	$0	3	5	
LI - C&I Multifamily subprograms	SCI	13	Aerator	428	$2,890	31	375	1
LI - C&I Multifamily subprograms	SCI	13	LED Nightlight	2,834	$17,339	59	703	1
LI - C&I Multifamily subprograms	SCI	13	Non-Energy	1,711	$152,926	-	-	1 & 2
LI - C&I Multifamily subprograms	SCI	13	Refrigerator Replacement	1,244	$1,238,488	662	7,897	1
LI - C&I Multifamily subprograms	SCI	13	Residential Lighting	10,606	$227,227	931	11,306	1
LI - C&I Multifamily subprograms	SCI	13	Showerhead	112	$4,644	25	310	1
LI - C&I Multifamily subprograms	SCI	13	Smart Power Strip	575	$37,445	52	570	1
LI - C&I Multifamily subprograms	SCI	13	Exit Signs	140	$9,734	22	270	1
LI - C&I Multifamily subprograms	SCI	14	LED Nightlight	1,394	$9,229	35	276	1
LI - C&I Multifamily subprograms	SCI	14	Non-Energy	966	$97,376	-	-	1 & 2
LI - C&I Multifamily subprograms	SCI	14	Refrigerator Replacement	671	$775,928	419	2,511	1
LI - C&I Multifamily subprograms	SCI	14	Residential Lighting	3,227	$74,716	298	4,463	1
LI - C&I Multifamily subprograms	SCI	14	Smart Power Strip	331	$24,565	40	201	1
LI - C&I Multifamily subprograms	SCI	14	Aerator	1	$7	0	1	1
LI - C&I Multifamily subprograms	SCI	14	Showerhead	1	$44	0	3	1
LI - C&I Multifamily subprograms	SCI	15	LED Nightlight	314	$2,636	9	72	1
LI - C&I Multifamily subprograms	SCI	15	Non-Energy	226	$29,829	-	-	1 & 2
LI - C&I Multifamily subprograms	SCI	15	Refrigerator Replacement	434	$601,682	274	1,642	1
LI - C&I Multifamily subprograms	SCI	15	Residential Lighting	4,739	$448,269	1,319	3,297	1
LI - C&I Multifamily subprograms	SCI	15	Smart Power Strip	126	$12,498	13	63	1
LI - C&I Multifamily subprograms	SCI	15	Exit Signs	116	$10,420	37	553	1
LI - C&I Multifamily subprograms	SCI	16	LED Nightlight	382	$1,528	11	89	1
LI - C&I Multifamily subprograms	SCI	16	Non-Energy	342	$33,875	-	-	1 & 2
LI - C&I Multifamily subprograms	SCI	16	Refrigerator Replacement	118	$148,083	76	456	1
LI - C&I Multifamily subprograms	SCI	16	Residential Lighting	4,372	$593,150	1,330	3,325	1
LI - C&I Multifamily subprograms	SCI	16	Smart Power Strip	88	$9,072	15	73	1
LI - C&I Multifamily subprograms	SCI	16	Aerator	14	$5	1	15	1
LI - C&I Multifamily subprograms	SCI	16	Showerhead	7	$16	2	20	1
Low-Income measures	LIP	13	Aerator	536	$2,204	72	717	1
Low-Income measures	LIP	13	Air Purifier	10	$375	5	43	

Low-Income measures	LIP	13	Air Sealing	20	$2,597	4	59	1
Low-Income measures	LIP	13	Attic Insulation	6	$903	2	28	1
Low-Income measures	LIP	13	Clothes Dryer	41	$2,100	1	14	
Low-Income measures	LIP	13	Clothes Washer	83	$4,125	10	114	
Low-Income measures	LIP	13	Dehumidifier	44	$1,381	8	101	1
Low-Income measures	LIP	13	Dehumidifier Recycling	141	$8,815	79	316	
Low-Income measures	LIP	13	DHW Pipe Insulation	7,008	$2,698	42	543	1
Low-Income measures	LIP	13	Dishwasher	70	$3,500	2	20	
Low-Income measures	LIP	13	Freezer	8	$400	0	3	
Low-Income measures	LIP	13	Freezer Recycling	383	$33,574	253	1,013	1
Low-Income measures	LIP	13	Freezer Replacement	45	$16,768	13	67	1
Low-Income measures	LIP	13	Furnace Whistle	296	$1,019	19	96	1
Low-Income measures	LIP	13	Heat Pump Water Heater	106	$229,673	198	1,985	1
Low-Income measures	LIP	13	LED Nightlight	1,450	$4,868	41	331	1
Low-Income measures	LIP	13	LI EE Kits - Electric	72,241	$701,172	4,390	41,190	
Low-Income measures	LIP	13	LI EE Kits - Standard	12,040	$498,837	2,516	28,264	
Low-Income measures	LIP	13	LI School Education Kits	8,711	$338,916	1,917	25,353	
Low-Income measures	LIP	13	LIHER	40,089	$0	2,615	2,615	
Low-Income measures	LIP	13	New Home	49	$37,548	110	1,656	
Low-Income measures	LIP	13	Non-Energy	9,546	$1,013,373	-	-	1 & 2
Low-Income measures	LIP	13	Online Audit Behavioral	1,618	$0	-	-	
Low-Income measures	LIP	13	RAC Recycling	395	$24,265	41	123	
Low-Income measures	LIP	13	Refrigerator	95	$5,575	7	98	
Low-Income measures	LIP	13	Refrigerator Recycling	1,603	$138,850	1,524	7,618	1
Low-Income measures	LIP	13	Refrigerator Replacement	436	$239,104	317	1,901	1
Low-Income measures	LIP	13	Residential Lighting	51,846	$535,074	2,566	38,494	1
Low-Income measures	LIP	13	Room Air Conditioner	11	$555	0	3	
Low-Income measures	LIP	13	Showerhead	492	$12,299	160	1,438	1
Low-Income measures	LIP	13	Smart Power Strip	2,072	$83,312	293	1,467	1
Low-Income measures	LIP	13	Smart Thermostat	99	$5,982	24	261	1
Low-Income measures	LIP	13	Tank Temperature Setback	54	$341	6	11	1
Low-Income measures	LIP	14	Aerator	939	$4,367	113	1,130	1
Low-Income measures	LIP	14	Air Purifier	35	$1,943	21	190	
Low-Income measures	LIP	14	Air Sealing	100	$11,659	20	294	1
Low-Income measures	LIP	14	Attic Insulation	37	$4,868	23	342	1
Low-Income measures	LIP	14	Clothes Dryer	72	$3,650	2	26	
Low-Income measures	LIP	14	Clothes Washer	126	$6,300	17	191	
Low-Income measures	LIP	14	Dehumidifier	159	$4,556	30	355	1
Low-Income measures	LIP	14	Dehumidifier Recycling	84	$3,860	50	199	
Low-Income measures	LIP	14	DHW Pipe Insulation	8,027	$2,931	41	530	1
Low-Income measures	LIP	14	Dishwasher	147	$7,350	5	46	
Low-Income measures	LIP	14	Freezer	16	$800	1	6	
Low-Income measures	LIP	14	Freezer Recycling	334	$26,364	246	982	1
Low-Income measures	LIP	14	Freezer Replacement	138	$57,720	27	137	1
Low-Income measures	LIP	14	Furnace Whistle	216	$825	14	70	1
Low-Income measures	LIP	14	Heat Pump Water Heater	111	$214,410	209	2,092	1
Low-Income measures	LIP	14	LED Nightlight	3,394	$13,690	97	775	1
Low-Income measures	LIP	14	LI EE Kits - Electric	12,354	$562,019	3,476	33,018	
Low-Income measures	LIP	14	LI EE Kits - Standard	7,984	$353,937	1,806	20,764	
Low-Income measures	LIP	14	LIHER	45,508	$0	1,930	4,491	
Low-Income measures	LIP	14	New Home	18	$19,719	62	926	
Low-Income measures	LIP	14	Non-Energy	27,187	$2,996,404	-	-	1 & 2
Low-Income measures	LIP	14	Online Audit Behavioral	1,854	$0	827	827	
Low-Income measures	LIP	14	RAC Recycling	1,202	$81,030	140	421	
Low-Income measures	LIP	14	Refrigerator	182	$10,100	13	186	
Low-Income measures	LIP	14	Refrigerator Recycling	1,560	$121,915	1,646	8,229	1
Low-Income measures	LIP	14	Refrigerator Replacement	1,111	$728,860	820	4,921	1
Low-Income measures	LIP	14	Residential Lighting	53,282	$573,880	2,701	40,510	1
Low-Income measures	LIP	14	Room Air Conditioner	70	$4,310	2	16	
Low-Income measures	LIP	14	School Education kits	6,407	$471,143	1,540	20,023	
Low-Income measures	LIP	14	Showerhead	652	$17,919	211	1,901	1
Low-Income measures	LIP	14	Smart Power Strip	2,109	$86,399	329	1,647	1
Low-Income measures	LIP	14	Smart Thermostat	133	$8,176	46	510	1
Low-Income measures	LIP	14	Tank Temperature Setback	49	$337	5	10	1
Low-Income measures	LIP	15	Aerator	1,004	$4,151	111	1,107	1
Low-Income measures	LIP	15	Air Conditioner	1	$61	1	14	1
Low-Income measures	LIP	15	Air Purifier	10,035	$651,934	4,564	41,077	

Low-Income measures	LIP	15	Air Sealing	231	$22,439	95	1,430	1
Low-Income measures	LIP	15	Attic Insulation	114	$12,461	52	782	1
Low-Income measures	LIP	15	Clothes Dryer	75	$3,775	2	26	
Low-Income measures	LIP	15	Clothes Washer	132	$6,600	17	188	
Low-Income measures	LIP	15	Dehumidifier	136	$3,341	17	202	1
Low-Income measures	LIP	15	Dehumidifier Recycling	8	$280	5	19	
Low-Income measures	LIP	15	DHW Pipe Insulation	7,851	$2,538	38	491	1
Low-Income measures	LIP	15	Dishwasher	86	$4,300	3	26	
Low-Income measures	LIP	15	Freezer	28	$1,400	1	11	
Low-Income measures	LIP	15	Freezer Recycling	53	$3,277	32	128	1
Low-Income measures	LIP	15	Freezer Replacement	389	$142,337	67	336	1
Low-Income measures	LIP	15	Furnace Whistle	162	$509	10	51	1
Low-Income measures	LIP	15	Heat Pump Water Heater	126	$208,439	244	2,438	1
Low-Income measures	LIP	15	LED Nightlight	9,104	$31,877	260	2,076	1
Low-Income measures	LIP	15	LI EE Kits - Electric	12,177	$518,924	3,173	30,148	
Low-Income measures	LIP	15	LI EE Kits - Standard	8,621	$364,110	1,808	20,787	
Low-Income measures	LIP	15	LI School Education Kits	7,283	$272,361	1,610	20,931	
Low-Income measures	LIP	15	LIHER	50,511	$0	3,007	3,158	
Low-Income measures	LIP	15	New Home	26	$24,155	64	958	
Low-Income measures	LIP	15	Non-Energy	60,988	$5,513,384	-	-	1 & 2
Low-Income measures	LIP	15	Online Audit Behavioral	2,247	$0	1,415	1,415	
Low-Income measures	LIP	15	RAC Recycling	20	$700	2	7	
Low-Income measures	LIP	15	Refrigerator	206	$11,600	15	214	
Low-Income measures	LIP	15	Refrigerator Recycling	143	$9,709	143	715	1
Low-Income measures	LIP	15	Refrigerator Replacement	2,387	$1,361,240	1,599	9,591	1
Low-Income measures	LIP	15	Residential Lighting	59,472	$550,797	3,082	7,706	1
Low-Income measures	LIP	15	Room Air Conditioner	41	$2,100	2	16	
Low-Income measures	LIP	15	Showerhead	581	$13,335	197	1,773	1
Low-Income measures	LIP	15	Smart Power Strip	2,591	$93,251	360	1,800	1
Low-Income measures	LIP	15	Smart Thermostat	99	$6,622	42	465	1
Low-Income measures	LIP	15	Tank Temperature Setback	81	$492	9	14	1
Low-Income measures	LIP	15	Minisplit HP	1	$121	2	32	1
Low-Income measures	LIP	16	Aerator	1,858	$8,242	207	2,069	1
Low-Income measures	LIP	16	Air Purifier	10	$400	2	14	
Low-Income measures	LIP	16	Air Sealing	123	$10,323	46	697	1
Low-Income measures	LIP	16	Attic Insulation	76	$7,079	95	1,427	1
Low-Income measures	LIP	16	Clothes Dryer	54	$2,750	2	20	
Low-Income measures	LIP	16	Clothes Washer	103	$5,150	17	189	
Low-Income measures	LIP	16	Dehumidifier	96	$2,362	18	211	1
Low-Income measures	LIP	16	Dehumidifier Recycling	35	$1,225	21	84	
Low-Income measures	LIP	16	DHW Pipe Insulation	7,421	$2,273	37	477	1
Low-Income measures	LIP	16	Dishwasher	74	$3,700	4	37	
Low-Income measures	LIP	16	Freezer	14	$700	0	5	
Low-Income measures	LIP	16	Freezer Recycling	67	$2,400	49	195	1
Low-Income measures	LIP	16	Freezer Replacement	458	$173,744	67	334	1
Low-Income measures	LIP	16	Furnace Whistle	48	$166	3	15	1
Low-Income measures	LIP	16	Heat Pump Water Heater	117	$192,128	206	2,056	1
Low-Income measures	LIP	16	LED Nightlight	12,032	$43,747	346	2,766	1
Low-Income measures	LIP	16	LI EE Kits - Electric	11,142	$471,585	3,109	29,538	
Low-Income measures	LIP	16	LI EE Kits - Standard	8,486	$359,241	1,899	21,833	
Low-Income measures	LIP	16	LI School Education Kits	7,137	$266,901	1,667	21,665	
Low-Income measures	LIP	16	LIHER	72,502	$0	3,372	5,069	
Low-Income measures	LIP	16	Minisplit HP	2	$150	4	66	1
Low-Income measures	LIP	16	Non-Energy	68,497	$6,029,902	0	0	1 & 2
Low-Income measures	LIP	16	Online Audit Behavioral	1,512	$0	377	377	
Low-Income measures	LIP	16	RAC Recycling	262	$17,030	31	94	
Low-Income measures	LIP	16	Refrigerator	173	$9,975	10	141	
Low-Income measures	LIP	16	Refrigerator Recycling	368	$23,364	406	2,030	1
Low-Income measures	LIP	16	Refrigerator Replacement	2,972	$1,812,278	1,978	11,867	1
Low-Income measures	LIP	16	Residential Lighting	48,913	$456,435	2,484	6,211	1
Low-Income measures	LIP	16	Room Air Conditioner	11	$560	1	5	
Low-Income measures	LIP	16	Showerhead	661	$16,159	222	1,994	1
Low-Income measures	LIP	16	Smart Power Strip	3,195	$101,750	450	2,251	1
Low-Income measures	LIP	16	Smart Thermostat	53	$3,385	15	168	1
Low-Income measures	LIP	16	Tank Temperature Setback	54	$299	6	12	1
Low-Income measures	LIP	16	Air Conditioner	1	$120	0	6	1
Low-Income measures	LIP	16	New Home	38	$37,366	120	1,804	

Low-Income measures	LIP	16	Heat Pump	1	$230	-	-	1

1. All measure level values are based on the Company's tracking system data for the PY13-PY16 annual reports. For measures provided through Direct Installation projects (Weatherization, etc.), measure level incentives are estimated based on allocation of the reported program-level incentive costs
2. The Non-Energy measure indicates an Audit was performed for the participant

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 017

"Please indicate whether the company provides for remediation of health and safety issues that impair the delivery of comprehensive measures to low-income residential customers through its EE&C program in Phase IV. If yes, please provide:
a) The criteria the company uses to determine whether to remediate health and safety issues present at a customer's home;
b) The forecast dollar amount of the Phase IV EE&C Plan budget dedicated to the remediation of health and safety issues;
c) The dollar amount of actual Phase IV EE&C expenditures for remediation of health and safety issues, disaggregated by program year;
d) The dollar amount of any maximum individual allowance or per-job spending limit for remediating health and safety issues present at a customer's home."

RESPONSE:

Yes, the Company's Low-Income Energy Efficiency Program provides remediation for certain health and safety measures if the weatherization project includes air sealing and insulation measures.

a. Health and safety measures are completed if air sealing and insulation are part of the weatherization project.
b. No funding was explicitly budgeted for remediation of health and safety issues in the Phase IV Plan budget. Rather, the Company budgets for completion of weatherization projects inclusive of Health and Safety remediation.
c. PY13 – $51,949
   PY14 – $494,358
   PY15 – $922,122
   PY16 – $946,272
   PY17 - $474,263
d. Health and safety investments are capped at up to 50% of the total weatherization project cost.

Petition of FirstEnergy Pennsylvania	**:**	
Electric Company for Approval of a	**:**	**Docket No. M-2025-3057327**
Phase V Energy Efficiency and	**:**	
Conservation Plan	**:**	

CAUSE-PA Set 1, No. 020

"Of the customers identified in response to CAUSE-PA 1-19, please identify the number of customers in each segment who were unable to receive comprehensive measures because landlord consent was not obtained, disaggregated by in-home versus virtual audits and by program year."

RESPONSE:

The Company's Low-Income Program requires landlord agreement before the energy audit is scheduled. The Company does not track instances where landlord consent was not obtained.

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 023

"Of the customers identified in CAUSE-PA 1-18 and 1-19, please identify the number of customers in each segmentation who were unable to receive comprehensive measures or who received only partial services following an energy audit in Phase IV due to health and safety issues with the property, disaggregated by the specific type of health and safety issue present and by program year.

Please provide this data in a fully functional Excel spreadsheet."

RESPONSE:

The Company does not track health and safety measures by the specific type of health and safety issues. The Company tracks, on a running total basis and not by year, if a job is placed on a 6-month hold due to health and safety issues that need to be rectified prior to completion of comprehensive measures. The chart below provides the totals from 06/01/2021 through 11/30/2025:

Job Didn't Receive Full Array of Measures	848
Shell Measures Delayed - Structure Needs Repair	285

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 024

"Of the customers identified in CAUSE-PA-1-23, please identify the following for each customer segmentation, disaggregated by program year:

a) The number of customers whose health and safety issues were remediated using EE&C funds;
b) The number of customers whose health and safety issues were remediated using LIURP funds;
c) The number of customers who received referrals to housing services providers for remediation of health and safety issues;
d) The number of customers whose health and safety issues were remediated using EE&C funds and who subsequently received comprehensive EE&C measures;
e) The number of customers whose health and safety issues were remediated using LIURP funds and who subsequently received comprehensive EE&C measures;
f) The number of customers who received referrals to housing services providers for remediation of health and safety issues and who subsequently received comprehensive EE&C measures.

Please provide this data in a fully functional Excel spreadsheet."

RESPONSE:

a. The Company's tracking system does not have the ability to report the number of customers who had health and safety issues remediated through the use of EE&C funds.
b. The Company's Low-Income Energy Efficiency Program does not use LIURP funds to provide health and safety remediation.
c. The Company does not currently track referrals to housing services providers for remediation of health and safety issues. However, see the Company's response to CAUSE-PA Set 1, No. 23 for the count of jobs that were placed on a 6-month hold due to health and safety issues that needed to be rectified prior to completion of comprehensive measures.

d. The Company's tracking system does not have the ability to report the number of customers who received comprehensive measures having previously remediated health and safety issues.
e. Please see the response to sub-part b, above
f. Please see the response to sub-part d, above.

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 036

"Please provide the projected dollar amount of the company's Phase IV EE&C plan budgets that the company projects will remain unspent by the end of Phase IV for each of the following customer segments. Please describe how the company arrived at this projection.

a) Residential Customers
b) Low Income Residential Customers
c) Small Commercial & Industrial Customers
d) Large Commercial & Industrial Customers"

RESPONSE:

Please see CAUSE-PA Set 1, No. 36 Attachment A. Actual results will vary for many reasons including, but not limited to, changes in customer participation, market conditions, economic conditions, program activity, and other factors impacting the program expenditures.

Rate District	Sector	Ph IV Plan Budgets	Ph IV Current Estimated Spend [1]	Remaining
Met-Ed	Residential Programs	$ 36,568,730	$36,250,000	$ 318,730
	Low Income Residential Programs	$ 15,177,618	$13,750,000	$ 1,427,618
	Small Commercial & Industrial Programs	$ 35,972,550	$30,500,000	$ 5,472,550
	Large Commercial & Industrial Programs	$ 36,565,313	$27,000,000	$ 9,565,313
	Totals	**$ 124,284,211**	**$107,500,000**	**$ 16,784,211**
Penelec	Residential Programs	$ 30,637,267	$29,000,000	$ 1,637,267
	Low Income Residential Programs	$ 16,367,293	$ 16,367,293	$ -
	Small Commercial & Industrial Programs	$ 39,250,350	$ 37,250,000	$ 2,000,350
	Large Commercial & Industrial Programs	$ 28,561,378	$ 24,000,000	$ 4,561,378
	Totals	**$ 114,816,289**	**$106,617,293**	**$ 8,198,996**
Penn Power	Residential Programs	$ 11,519,383	$11,250,000	$ 269,383
	Low Income Residential Programs	$ 4,027,362	$ 4,027,362	$ -
	Small Commercial & Industrial Programs	$ 10,062,961	$ 9,500,000	$ 562,961
	Large Commercial & Industrial Programs	$ 7,678,371	$ 7,250,000	$ 428,371
	Totals	**$ 33,288,078**	**$32,027,362**	**$ 1,260,716**
West Penn	Residential Programs	$ 39,277,133	$38,000,000	$ 1,277,133
	Low Income Residential Programs	$ 15,998,343	$15,750,000	$ 248,343
	Small Commercial & Industrial Programs	$ 34,578,664	$ 34,578,664	$ -
	Large Commercial & Industrial Programs	$ 27,901,633	$ 25,000,000	$ 2,901,633
	Totals	**$ 117,755,773**	**$113,328,664**	**$ 4,427,109**

1. Current Estimated Spend is based on current expectations and are subject to change over the remaining Phase IV period. Additionally, actual results will vary for many reasons (e.g. changes in customer participation, market conditions, economic conditions, program activity, and other factors impacting program expenditures, etc.)

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 038

"The Commission's *Template for Pennsylvania EDC Energy-Efficiency and Conservation Plans* requires that section 3.1.6 "Describe any front-of-the meter (FTM) measure(s) included in the EE&C plan. Include the expected contribution to portfolio MWh and MW savings and disclose all non-Act 129 funding sources the EDC plans to leverage for FTM measure installation." Please refer to Section 3.1.6 of the Company's Plan: "While the Phase V Plan was designed to achieve the Company's goals with no energy savings or demand reductions from FTM measures, the Company intends to identify and promote energy efficiency and demand reductions through Company and other project developer initiatives implemented during the course of Phase V supporting achieving energy savings and system load relief."

a) Please explain, specifically, how the Company will "identify and promote" FTM projects."

RESPONSE:

The Company's EE&C team plans to engage Company personnel involved in the operation, design and budgeting process for its energy delivery system to identify and promote implementation of front-of-the meter ("FTM") measures that provide energy savings or demand reductions. Examples of this planned engagement including, but not limited to:

1. As recognized by the Commission in the Final Implementation Order, EDCs completed successful Conservation Voltage Reduction ("CVR") programs that achieved energy and demand savings in earlier phases of Act 129. The Company plans to engage its personnel involved in the operations of its energy delivery system to promote and identify opportunities for CVR implementation during the Phase V period.
2. The Company has a Long-Term Infrastructure Improvement Plan ("LTIIP"), which was approved for 2025 through 2029,[1] which includes capital investment to the Company's energy delivery system that are FTM measures. Projects involved in this plan include potential energy efficiency or demand reduction measures, such as, but not limited, substation equipment upgrades, distribution equipment upgrades, reconductoring projects, and battery storage. Through engagement with the Company personnel responsible for

[1] *See Petition of FirstEnergy Pennsylvania Electric Company for Approval of its Third Long-Term Infrastructure Improvement Plan*, Docket No. P-2024-3050269 (Opinion and Order entered December 19, 2024).

development and implementation of the LTIIP, the Company's Energy Efficiency and Conservation ("EE&C") team will identify and review opportunities for implementation of energy efficient equipment for consideration as a measure to target through the FTM program component.

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 039

"Please refer to Section 3.1.6 of the Company's Plan: "The Phase V Plan budget includes the costs associated with the Company's EE&C department identifying, promoting, and coordinating with the implementation of applicable Company and other project developer initiatives."

a) What is the amount, by year, that is included in the costs referenced in this statement?

b) How are these costs allocated between the residential, low-income, small commercial, and large commercial segments?

c) Other than what is referenced in the statement, has the Company included any additional budget from its forecast Act 129 budget for FTM measures?

d) The Company states that "There are no incentives associated with FTM EE&C measures included in the Company's Plan." [Plan, p. 51 of 157]. If the Company does identify and promote FTM measures, and claims any resultant savings towards compliance with its Act 129 savings requirements, will it also use Act 129 funding to pay for all or part of the cost of such measures?

i) If yes, how will it determine the amount of funding to allocate to Act 129?

ii) If yes, are those funds currently budgeted, or would they need to be assigned from other budgets in the Plan? Please explain."

RESPONSE:

a. The Company has projected total costs of $31,340 per year as part of the budgets included in its Proposed Plan related to the EE&C Team's engagement with Company personnel as noted in the Company's response to CAUSE-PA Set 1, No. 38 and for EE&C administrative activities (e.g. tracking and reporting, evaluation, measurement and verification) associated with including front-of-the meter ("FTM") measures in the Company's Proposed Plan.
b. The costs were equally allocated to the residential, small commercial and industrial and large commercial and industrial sectors in the Company's Proposed Plan budgets.
c. No.
d. Yes, subject to the response to sub-part ii, below.

i. The Company anticipates that the amount of funding would be developed based on several considerations including, but not limited to, the amount of energy savings, the cost and incremental cost of energy efficiency measure, and available program budgets.

ii. These funds are not currently allocated. If the Company identifies any FTM measures that it proposes to use Act 129 funding to pay for all or part of the cost of such measures, the Company would propose a plan change using either the Commission's standard procedures for rescission and amendment of Commission orders, or the expedited review process outlined in the Commission's Minor Plan Change Order on Act 129 Energy Efficiency and Conservation Program[1] and as affirmed in the Commission's Phase V Implementation Order.[2]

[1] *Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887 (Order entered June 10, 2011) ("Minor Plan Change Order").
[2] *Energy Efficiency and Conservation Program,* Docket No. M-2025-3052826 at pg. 202 (Implementation Order entered June 18, 2025) ("Phase V Implementation Order").

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 043

"Regarding DLS and PDR in the Residential Energy Solutions program the Company states "Participating customers with program eligible connected devices will allow for the control, cycling and/or optimization of their enrolled equipment during the PA Act 129 summer and winter peak load periods." [Plan, p. 41 of 157].
a) Will the Company provide incentives for smart thermostats for customers who do not already have them? Please explain."

RESPONSE:

Yes, the Company's Proposed Plan includes prescriptive rebate opportunities for smart thermostats across all customer sectors. See Appendix B, Table 8, Eligible Measures and the Residential Energy Solutions Program (Products and HVAC & Solar Components), C&I Energy Solutions Program Small (Prescriptive Component) and C&I Energy Solutions Program Large (Prescriptive Component).

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 044

"The Company states "the Low-Income Energy Efficiency Program is an umbrella program that includes multiple program components, delivery channels, and vendors to support broad customer engagement, education, and participation to achieve energy savings in low-income households." [Plan, p. 58 of 157]. For each of the listed subcomponents of this program (Products, HVAC, Braided Funding Audits, Behavioral, Multifamily, New Homes, Weatherization) please provide a table in fully functional Excel format, with the following information, disaggregated by program year:

a) Forecast first year MWh savings;
b) Forecast budget;
c) Forecast participation (households)"

RESPONSE:

a. Please see CAUSE PA Set 1, No. 044 Attachment A.
b. See the response to subpart a, above.
c. Please see Appendix B, Table 8 of the Company's Proposed Plan for the eligible measures and their unit for each Program Component, and Appendix B, Table 9 of the Company's Proposed Plan for projected participation by measure.

a)

First Year MWh Savings

FE PA		PY18	PY19	PY20	PY21	PY22	TOTAL
Program	Program Component	MWh	MWh	MWh	MWh	MWh	MWh
Low Income Energy Efficiency Program	Weatherization	4,069	4,069	4,069	4,069	4,069	20,345
	LI - Products	4,994	4,994	4,994	4,835	4,835	24,651
	LI - HVAC	13	13	13	3	3	44
	LI - Audits	-	-	-	-	-	-
	LI - Behavioral	2,992	4,182	3,773	2,656	2,218	15,821
	LI - New Homes	82	82	82	82	82	412
	LI - Multifamily - Res	1,843	1,843	1,843	1,843	1,843	9,214
	Total	**13,992**	**15,182**	**14,773.43**	**13,488**	**13,050**	**70,486**

b)

Projected Budget

FE PA		PY18	PY19	PY20	PY21	PY22	TOTAL
Program	Program Component						
Low Income Energy Efficiency Program	Weatherization	$ 6,600,568.50	$ 6,468,907.86	$ 6,453,921.94	$ 6,458,340.86	$ 6,468,177.25	$ 32,449,916.41
	LI - Products	$ 2,240,523.88	$ 2,138,833.53	$ 2,124,302.00	$ 2,055,011.88	$ 2,064,429.63	$ 10,623,100.91
	LI - HVAC	$ 13,173.58	$ 9,776.49	$ 9,722.92	$ 6,935.52	$ 6,964.27	$ 46,572.77
	LI - Audits	$ 16,384.58	$ 14,477.78	$ 14,430.27	$ 14,436.02	$ 14,467.18	$ 74,195.84
	LI - Behavioral	$ 382,822.91	$ 372,345.67	$ 423,139.66	$ 416,098.97	$ 309,107.77	$ 1,903,514.97
	LI - New Homes	$ 68,860.57	$ 61,827.43	$ 61,556.88	$ 61,620.57	$ 61,798.11	$ 315,663.55
	LI - Multifamily - Res	$ 1,805,867.99	$ 1,759,849.15	$ 1,753,343.78	$ 1,755,050.26	$ 1,759,319.63	$ 8,833,430.80
	Total	**$ 11,128,202**	**$ 10,826,018**	**$ 10,840,417**	**$ 10,767,494**	**$ 10,684,264**	**$ 54,246,395**

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 054

"Please refer to this statement on p 71 of 157: "Added new measure for Customer Engagement including community outreach, in home assessments and/or welcome kits/giveaways." Table 9: Estimated Savings and Participation indicates that the measure labeled "Customer Engagement – LI is forecast to save 4,189.77 MWh in first year savings over the course of Phase V."
a) Please explain the source of the forecast savings, including the specific measures that result in savings and the quantity of each that is incorporated in each year's forecast. "

RESPONSE:

The Company's Customer Engagement measure includes both Welcome Kits and In-Home assessments. The Welcome Kits are intended to provide approximately 90 kWh of annual electric savings from measures including, but not limited to: Weather Stripping, Caulking, Outlet Gaskets, Advanced Power Strips and Air Handler Filter Whistles. The In-Home assessments are anticipated to provide approximately 120 kWh of annual electric savings from direct installation of measures such as, but not limited to: LED lighting, LED Nightlights, Water Heater Temperature Setback, Low Flow Faucet Aerators, Low Flow Shower Heads, and Outlet Gaskets. See Attachment A of the Company's Petition, Appendix B, Table 9 for the estimated annual participation for Phase V. The Company's proposed Phase V EE&C Plan's projection of 4,189.77 MWh assumes a 50/50 take rate in Welcome Kits and In-Home Assessments, with the savings assumptions based on the PA Phase V Technical Reference Manual ("TRM").

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 1, No. 055

"Please refer to tab "Table 9" in 56826613-v1-Exhibit PUC Tables-FE PA.

a) The measure "Warm Plus" in rows 364-367 shows an estimated 1,500 participants per year with a forecast 1,871.37 MWh savings per year. Please explain the source of the forecast savings, including the specific measures that result in savings and the quantity of each that is incorporated in each year's forecast.

b) The measure "Warm Extra Measures" in rows 368-371 shows an estimated 1,000 participants per year with a forecast 1,000 MWh savings per year. Please explain the source of the forecast savings, including the specific measures that result in savings and the quantity of each that is incorporated in each year's forecast.

RESPONSE:

a.) Please see Attachment A to the Company's filing, Appendix C, Table 2 for the Company's measure assumptions. The basis of the forecasted savings for the WARM Plus measure is historical actual results and anticipates an expanded focus on comprehensive weatherization. The Company's saving assumption for the WARM Plus measure is at a project level and represents a blended average of all eligible weatherization measures and does not include specific weatherization measure level estimates. The WARM Plus measure provides customers with education, comprehensive weatherization services (e.g. insulation, air sealing, etc.) and HVAC, water heating and/or appliance replacements or other efficiency upgrades supported by the PA Phase V Technical Reference Manual ("TRM").

b.) Please see the Company's proposed Plan at Appendix C, Table 2 for the Company's measure assumptions. The basis of the forecasted savings for the WARM Extra Measures represents a blended average of all eligible Extra Measures based on historical actual results and anticipates an expanded focus on heat pump offerings. The WARM Extra Measures provides customers with installation of electric energy savings measures to customers participating in LIURP or other conservation programs, including, but not limited to, heat pump water heaters, appliances or other efficient products supported by the PA Phase V TRM.

Petition of FirstEnergy Pennsylvania	**:**	
Electric Company for Approval of a	**:**	**Docket No. M-2025-3057327**
Phase V Energy Efficiency and	**:**	
Conservation Plan	**:**	

CAUSE-PA Set 2, No. 015

Please identify the measure types offered to the residential sector in the company's proposed Phase V Plan for which the company:

A) will require landlord approval before installing in tenant customer housing
B) will not require landlord approval before installing in tenant customer housing.

RESPONSE:

a. In general, the Company requires prior landlord approval for all direct install or in-home retrofit measures installed by the Company. More specifically, measures installed by the Company that require prior landlord approval include those provided under the Residential Energy Solutions Program, Comprehensive Audits and Multifamily program components, the Low-Income Energy Efficiency Program, Weatherization and Multifamily program components, and those provided under master metered Multifamily program components. Please see Appendix B, Table 8: Eligible Measures, for the listing of measures by program component.
b. Please see the Company's response to sub-part a, above, of this request. No other measures are installed by the Company in tenant housing without landlord approval.

Petition of FirstEnergy Pennsylvania	**:**	
Electric Company for Approval of a	**:**	**Docket No. M-2025-3057327**
Phase V Energy Efficiency and	**:**	
Conservation Plan	**:**	

CAUSE-PA Set 4, No. 001

From the date that First Energy implemented its current maximum CAP credit policy, to the most recent date available, disaggregated by month and year, as of the last day of the month/ year, please indicate how many CAP customers exceeded their maximum CAP credit limit in that month.

Please provide this data in a live Excel spreadsheet.

RESPONSE:

Please refer to CAUSE-PA Set 4, No. 001 Attachment A.xlsx.

FE PA CAP Customers Exceeded Their Maximum CAP Credit Limit	
Month	**No. of Accounts Exceeding Maximum Credit Limit**
December	0
January	0
February	0
March	5
April	17
May	14
June	730
July	1520
August	2080
September	2021
October	1727
November	2273
December	3653

*FE PA started tracking customers exceeding their maximum credit limits in March of 2025.

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	**:**	**Docket No. M-2025-3057327**

CAUSE-PA Set 4, No. 002

From the date that First Energy implemented its current maximum CAP credit policy, to the most recent date available, to date, disaggregated by month and year, as of the last day of the month/ year, please indicate for customers who exceeded their maximum CAP credit limits; please provide this data in a live Excel spreadsheet:

a. The number of CAP participants who had their rates increased as a result of exceeding their maximum CAP credit limits;
b. The average monthly bill that these customers received after exceeding their maximum CAP credit limits;
c. The average difference between the monthly bills before and after exceeding their maximum CAP credit limits;
d. The number of customers who were terminated for nonpayment after exceeding their maximum CAP credit limits, within the following intervals of exceeding their maximum CAP credit limits (1) 0-30 days; (2) 31-60 days; (3) 61-90 days; (4) 91-120 days; and (5) 121 days or later.
e. The number of customers who received a termination notice after exceeding their maximum CAP credit limits, within the following intervals of exceeding their maximum CAP credit limits (1) 0-30 days; (2) 31-60 days; (3) 61-90 days; (4) 91-120 days; and (5) 121 days or later.
f. For the customers identified in response to subpart (d), please indicate the total amount(s) of uncollectible expenses related to these accounts and/or account balances.

RESPONSE:

Please see the following for the response:

a. CAUSE-PA has informed the Company that it has withdrawn this request.
b. CAUSE-PA has informed the Company that it has withdrawn this request.
c. CAUSE-PA has informed the Company that it has withdrawn this request.
d. See CAUSE-PA Set 4, No. 002 Attachment A.
e. See CAUSE-PA Set 4, No. 002 Attachment B.
f. CAUSE-PA has informed the Company that it has withdrawn this request.

FE PA Response to CAUSE-PA Interrgatory Set 4, No. 002
Witness: Edward Miller
Attachment A

2d.

FE CAP Participants Exceeding Max Subsidy with Termination	
No. of Days Between Reaching Max Subsidy and Termination	**No. of Accounts Disconnected**
0-30	38
31-60	77
61-90	103
91-120	95
>121	30

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company	:	
For Approval of its Phase V	:	
Energy Efficiency and Conservation Plan	:	Docket No. M-2025-3057325

Duquesne Light Company's Responses to Interrogatories and Requests for Production of Documents
Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)

Set II

Response by: David Defide

CAUSE-PA-II-20

Refer to Table 9: Estimated Savings and Participation on pages 144-184 of 213. Please reproduce Table 9 including only those measures that will be provided to low-income customers through the Company's targeted low-income programs. Provide measure name, 2026 TRM Measure Number, and the following metrics values for only low-income customers: Energy Savings (MWh), Summer Demand Reduction (MW), Winter Demand Reduction (MW) and Projected Participation. Provide these by year for Py18, PY19, PY20, PY21, PY22, and PY18-PY22 Total.

Response:

See the Excel workbook entitled "CAUSE-PA_Interrogs-II-20.xlsx" for the Company's response to CAUSE-PA-II-20. The response provides a version of Table 9 with measures solely from the Company's low-income programs.

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
LED Parking Garage and Canopy Fixtures and Retrofit Kits	2.1.1	Energy Savings (MWh)	32.82	32.82	32.82	32.82	32.82	164.10
		Summer Demand Reduction (MW)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0073
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	60	60	60	60	60	301
LED Replacement Lamps (Tubes)-2' & 4'	2.1.1	Energy Savings (MWh)	507.33	507.33	507.33	507.33	507.33	2,536.66
		Summer Demand Reduction (MW)	0.0693	0.0693	0.0693	0.0693	0.0693	0.3464
		Winter Demand Reduction (MW)	0.0668	0.0668	0.0668	0.0668	0.0668	0.3341
		Projected Participation	6,356	6,356	6,356	6,356	6,356	31,782
Lighting - LED A-Line	2.1.1	Energy Savings (MWh)	384.90	384.90	384.90	384.90	384.90	1,924.50
		Summer Demand Reduction (MW)	0.3620	0.3620	0.3620	0.3620	0.3620	1.8099
		Winter Demand Reduction (MW)	0.4336	0.4336	0.4336	0.4336	0.4336	2.1682
		Projected Participation	16,731	16,731	16,731	16,731	16,731	83,654
Lighting - LED Globe/Specialty	2.1.1	Energy Savings (MWh)	171.30	171.30	171.30	171.30	171.30	856.49
		Summer Demand Reduction (MW)	0.1609	0.1609	0.1609	0.1609	0.1609	0.8046
		Winter Demand Reduction (MW)	0.1928	0.1928	0.1928	0.1928	0.1928	0.9639
		Projected Participation	4,958	4,958	4,958	4,958	4,958	24,788
Lighting - LED Other	2.1.1	Energy Savings (MWh)	484.76	484.76	484.76	484.76	484.76	2,423.78
		Summer Demand Reduction (MW)	0.4018	0.4018	0.4018	0.4018	0.4018	2.0088
		Winter Demand Reduction (MW)	0.2975	0.2975	0.2975	0.2975	0.2975	1.4873
		Projected Participation	3,427	3,427	3,427	3,427	3,427	17,137
Lighting - LED Reflector	2.1.1	Energy Savings (MWh)	98.94	98.94	98.94	98.94	98.94	494.70
		Summer Demand Reduction (MW)	0.0935	0.0935	0.0935	0.0935	0.0935	0.4677
		Winter Demand Reduction (MW)	0.1121	0.1121	0.1121	0.1121	0.1121	0.5604
		Projected Participation	4,338	4,338	4,338	4,338	4,338	21,688
Residential Occupancy Sensors	2.1.2	Energy Savings (MWh)	0.04	0.00	0.00	0.00	0.00	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	1	0	0	0	0	1
LED Nightlight	2.1.3	Energy Savings (MWh)	42.58	42.58	42.58	42.58	42.58	212.88
		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	2,065	2,065	2,065	2,065	2,065	10,326
Holiday Lights	2.1.4	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
		Projected Participation	1	0	0	0	0	1
Air Source Heat Pump - SEER 17.5 / SEER2 16.3 HSPF 9.7 / HSPF2 8.2 +	2.2.1	Energy Savings (MWh)	65.73	65.73	65.73	65.73	65.73	328.66
		Summer Demand Reduction (MW)	0.0101	0.0101	0.0101	0.0101	0.0101	0.0506
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	115	115	115	115	115	575
Central Air Conditioner SEER 17.5 / SEER2 16.3	2.2.1	Energy Savings (MWh)	20.86	20.86	20.86	20.86	20.86	104.28
		Summer Demand Reduction (MW)	0.0145	0.0145	0.0145	0.0145	0.0145	0.0724
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	90	90	90	90	90	448
Ductless Mini-Split ENERGY STAR Cold Climate rated	2.2.1	Energy Savings (MWh)	203.58	203.58	203.58	203.58	203.58	1,017.88
		Summer Demand Reduction (MW)	0.0145	0.0145	0.0145	0.0145	0.0145	0.0725
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	85	85	85	85	85	424

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Duct Sealing & Duct Insulation	2.2.10	Energy Savings (MWh)	1.11	0.00	0.00	0.00	0.00	1.11
		Summer Demand Reduction (MW)	0.0001	0.0000	0.0000	0.0000	0.0000	0.0001
		Winter Demand Reduction (MW)	0.0003	0.0000	0.0000	0.0000	0.0000	0.0003
		Projected Participation	1	0	0	0	0	1
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 Certified Smart Thermostat	2.2.12	Energy Savings (MWh)	177.38	177.38	177.38	177.38	177.38	886.90
		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	0.0000
		Projected Participation	310	310	310	310	310	1,551
Furnace Maintenance	2.2.13	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
Furnace Circulation Fan - High Efficiency (ECM - Variable Speed)	2.2.4	Energy Savings (MWh)	4.48	4.48	4.48	4.48	4.48	22.38
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	24	24	24	24	24	120
GSHP Desuperheaters	2.2.5	Energy Savings (MWh)	0.50	0.00	0.00	0.00	0.00	0.50
		Summer Demand Reduction (MW)	0.0001	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	0	0	0	0	1
Air Conditioner & Heat Pump Maintenance	2.2.6	Energy Savings (MWh)	0.49	0.00	0.00	0.00	0.00	0.49
		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	2	0	0	0	0	2
Room A/C – Recycling	2.2.8	Energy Savings (MWh)	0.81	0.81	0.81	0.81	0.81	4.03
		Summer Demand Reduction (MW)	0.0022	0.0022	0.0022	0.0022	0.0022	0.0109
		Winter Demand Reduction (MW)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
		Projected Participation	37	37	37	37	37	185
Window Heat Pump	2.2.9	Energy Savings (MWh)	1.96	0.00	0.00	0.00	0.00	1.96
		Summer Demand Reduction (MW)	0.0001	0.0000	0.0000	0.0000	0.0000	0.0001
		Winter Demand Reduction (MW)	0.0006	0.0000	0.0000	0.0000	0.0000	0.0006
		Projected Participation	1	0	0	0	0	1
Heat Pump Water Heater	2.3.1	Energy Savings (MWh)	312.43	312.43	312.43	312.43	312.43	1,562.17
		Summer Demand Reduction (MW)	0.0282	0.0282	0.0282	0.0282	0.0282	0.1409
		Winter Demand Reduction (MW)	0.0520	0.0520	0.0520	0.0520	0.0520	0.2600
		Projected Participation	176	176	176	176	176	879
Smart Water Heater Controls	2.3.10	Energy Savings (MWh)	0.03	0.00	0.00	0.00	0.00	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	1	0	0	0	0	1
Solar Water Heaters	2.3.2	Energy Savings (MWh)	1.88	0.00	0.00	0.00	0.00	1.88
		Summer Demand Reduction (MW)	0.0002	0.0000	0.0000	0.0000	0.0000	0.0002
		Winter Demand Reduction (MW)	0.0003	0.0000	0.0000	0.0000	0.0000	0.0003
		Projected Participation	1	0	0	0	0	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Water Heater Tank Wrap	2.3.3	Energy Savings (MWh)	0.09	0.00	0.00	0.00	0.00	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	1	0	0	0	0	1
Water Heater Temperature Setback	2.3.4	Energy Savings (MWh)	0.06	0.00	0.00	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	1	0	0	0	0	1
Water Heater Pipe Insulation	2.3.5	Energy Savings (MWh)	17.57	17.57	17.57	17.57	17.57	87.86
		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	207	207	207	207	207	1,034
Low-Flow Faucet Aerator	2.3.6	Energy Savings (MWh)	5.15	5.15	5.15	5.15	5.15	25.73
		Summer Demand Reduction (MW)	0.0008	0.0008	0.0008	0.0008	0.0008	0.0042
		Winter Demand Reduction (MW)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0077
		Projected Participation	413	413	413	413	413	2,066
Low-Flow Showerhead	2.3.7	Energy Savings (MWh)	7.79	7.79	7.79	7.79	7.79	38.96
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0034
		Winter Demand Reduction (MW)	0.0013	0.0013	0.0013	0.0013	0.0013	0.0063
		Projected Participation	207	207	207	207	207	1,034
Thermostatic Showerhead	2.3.8	Energy Savings (MWh)	2.99	2.99	2.99	2.99	2.99	14.94
		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	104	104	104	104	104	519
Drain Water Heat Recovery Units	2.3.9	Energy Savings (MWh)	0.23	0.00	0.00	0.00	0.00	0.23
		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 Ceiling Fans	2.4.13	Energy Savings (MWh)	0.03	0.00	0.00	0.00	0.00	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	1	0	0	0	0	1
Refrigerator / Freezer Recycling with and without Replacement	2.4.3	Energy Savings (MWh)	121.55	121.55	121.55	121.55	121.55	607.76
		Summer Demand Reduction (MW)	0.0202	0.0202	0.0202	0.0202	0.0202	0.1011
		Winter Demand Reduction (MW)	0.0179	0.0179	0.0179	0.0179	0.0179	0.0893
		Projected Participation	285	285	285	285	285	1,423
Low-Capacity Refrigerator / Freezer Recycling without Replacement	2.4.4	Energy Savings (MWh)	0.45	0.00	0.00	0.00	0.00	0.45
		Summer Demand Reduction (MW)	0.0001	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	2	0	0	0	0	2
ENERGY STAR Coolers	2.4.5	Energy Savings (MWh)	0.04	0.00	0.00	0.00	0.00	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	1	0	0	0	0	1
Cooler Recycling with and without Replacement	2.4.6	Energy Savings (MWh)	0.31	0.00	0.00	0.00	0.00	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	0.0000	0.0000
		Projected Participation	2	0	0	0	0	2

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Residential Induction Cooktop	2.4.7	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
Advanced Power Strips	2.5.1	Energy Savings (MWh)	223.93	223.93	223.93	223.93	223.93	1,119.66
		Summer Demand Reduction (MW)	0.0313	0.0313	0.0313	0.0313	0.0313	0.1563
		Winter Demand Reduction (MW)	0.0403	0.0403	0.0403	0.0403	0.0403	0.2013
		Projected Participation	1,859	1,859	1,859	1,859	1,859	9,295
Air Sealing	2.6.1	Energy Savings (MWh)	36.94	36.94	36.94	36.94	36.94	184.70
		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	35	35	35	35	35	174
Weather Stripping	2.6.2	Energy Savings (MWh)	17.16	17.16	17.16	17.16	17.16	85.80
		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	207	207	207	207	207	1,034
Insulation, Basement Wall	2.6.3	Energy Savings (MWh)	54.61	54.61	54.61	54.61	54.61	273.05
		Summer Demand Reduction (MW)	0.0015	0.0015	0.0015	0.0015	0.0015	0.0073
		Winter Demand Reduction (MW)	0.0017	0.0017	0.0017	0.0017	0.0017	0.0087
		Projected Participation	40	40	40	40	40	200
Insulation, Ceiling	2.6.3	Energy Savings (MWh)	165.51	165.51	165.51	165.51	165.51	827.55
		Summer Demand Reduction (MW)	0.0072	0.0072	0.0072	0.0072	0.0072	0.0361
		Winter Demand Reduction (MW)	0.0086	0.0086	0.0086	0.0086	0.0086	0.0432
		Projected Participation	168	168	168	168	168	840
Insulation, Exterior Wall	2.6.3	Energy Savings (MWh)	24.71	24.71	24.71	24.71	24.71	123.57
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0045
		Projected Participation	16	16	16	16	16	79
Insulation, Floor	2.6.3	Energy Savings (MWh)	12.51	12.51	12.51	12.51	12.51	62.56
		Summer Demand Reduction (MW)	0.0007	0.0007	0.0007	0.0007	0.0007	0.0037
		Winter Demand Reduction (MW)	0.0009	0.0009	0.0009	0.0009	0.0009	0.0044
		Projected Participation	8	8	8	8	8	40
Basement or Crawl Space Wall Insulation	2.6.4	Energy Savings (MWh)	0.00	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	20	20	20	20	20	100
ENERGY STAR Windows	2.6.5	Energy Savings (MWh)	0.00	0.00	0.00	0.00	0.00	0.01
		Summer Demand Reduction (MW)	0.0010	0.0010	0.0010	0.0010	0.0010	0.0051
		Winter Demand Reduction (MW)	0.0010	0.0010	0.0010	0.0010	0.0010	0.0052
		Projected Participation	1	1	1	1	1	6
Residential New Construction	2.7.1	Energy Savings (MWh)	4.47	0.00	0.00	0.00	0.00	4.47
		Summer Demand Reduction (MW)	0.0006	0.0000	0.0000	0.0000	0.0000	0.0006
		Winter Demand Reduction (MW)	0.0009	0.0000	0.0000	0.0000	0.0000	0.0009
		Projected Participation	1	0	0	0	0	1
ENERGY STAR Manufactured Homes	2.7.2	Energy Savings (MWh)	18.86	0.00	0.00	0.00	0.00	18.86
		Summer Demand Reduction (MW)	0.0026	0.0000	0.0000	0.0000	0.0000	0.0026
		Winter Demand Reduction (MW)	0.0037	0.0000	0.0000	0.0000	0.0000	0.0037
		Projected Participation	1	0	0	0	0	1

Measure	2026 TRM Measure Number	Metric	PY18	PY19	PY20	PY21	PY22	Total
Home Energy Reports	2.7.3	Energy Savings (MWh)	4,200.00	0.00	0.00	0.00	0.00	4,200.00
		Summer Demand Reduction (MW)	0.8900	0.0000	0.0000	0.0000	0.0000	0.8900
		Winter Demand Reduction (MW)	0.8900	0.0000	0.0000	0.0000	0.0000	0.8900
		Projected Participation	1	0	0	0	0	1
ENERGY STAR Pool Pumps	2.8.1	Energy Savings (MWh)	0.11	0.00	0.00	0.00	0.00	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	1	0	0	0	0	1
Single Speed Pool Pump Replacement	2.8.2	Energy Savings (MWh)	1.17	0.00	0.00	0.00	0.00	1.17
		Summer Demand Reduction (MW)	0.0005	0.0000	0.0000	0.0000	0.0000	0.0005
		Winter Demand Reduction (MW)	0.0006	0.0000	0.0000	0.0000	0.0000	0.0006
		Projected Participation	1	0	0	0	0	1
Photovoltaic (PV) Solar Generation	2.8.3	Energy Savings (MWh)	7.33	0.00	0.00	0.00	0.00	7.33
		Summer Demand Reduction (MW)	0.0023	0.0000	0.0000	0.0000	0.0000	0.0023
		Winter Demand Reduction (MW)	0.0001	0.0000	0.0000	0.0000	0.0000	0.0001
		Projected Participation	1	0	0	0	0	1
Kit - Electric Hot Water Kit (SF or MF)	multiple	Energy Savings (MWh)	96.77	96.77	96.77	96.77	96.77	483.86
		Summer Demand Reduction (MW)	0.0101	0.0101	0.0101	0.0101	0.0101	0.0504
		Winter Demand Reduction (MW)	0.0186	0.0186	0.0186	0.0186	0.0186	0.0931
		Projected Participation	598	598	598	598	598	2,992
Kit - Gas Hot Water Kit (SF or MF)	multiple	Energy Savings (MWh)	83.48	83.48	83.48	83.48	83.48	417.40
		Summer Demand Reduction (MW)	0.0079	0.0079	0.0079	0.0079	0.0079	0.0396
		Winter Demand Reduction (MW)	0.0146	0.0146	0.0146	0.0146	0.0146	0.0731
		Projected Participation	908	908	908	908	908	4,540

CAUSE-PA Statement 1, Grevatt

Appendix C

Notice of Program Suspension – Penn Power Low-Income Program

Email Notification Received on May 9, 2025

From: Butch, Ron
Sent: Friday, May 9, 2025 3:16 PM
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Cc: Butch, Ron
Subject: Notice of Program Suspension - Penn Power Low-Income Program

Dear Pennsylvania Act 129 Stakeholder:

FirstEnergy Pennsylvania Electric Company (“Company”) plans to suspend the Low-Income Program, for new applications by customers located in the Penn Power Rate District, effective May 15, 2025. This suspension is

due to the program nearing exhaustion of its approved program budget and managing to the total plan budget.

To continue to target and provide services to low-income customers in the Penn Power Rate District, the Company plans to leverage its general residential programs. This includes the Comprehensive Audits, Behavioral and School Education subprograms to the Energy Efficient Homes Program, among others. Further, the Company will continue to promote and coordinate with its Low-Income Usage Reduction Program ("LIURP") which provides comprehensive weatherization program services.

All program services to be provided for low-income customers are in accordance with the Company's approved Act 129 Energy Efficiency and Conservation Plan and are within its approved plan and program budgets for the Penn Power Rate District.

If you have any comments or questions, feel free to contact Ron Butch at rbutch@firstenergycorp.com or 330-810-1628.

FirstEnergy

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation Plan	: : : :	Docket No. M-2025-3057327

PREPARED HEARING EXHIBIT LIST OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) intends to move for admission of the following evidence at the January 29, 2026, evidentiary hearing in the above-captioned matter:

- Direct Testimony of Jim Grevatt on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA Statement 1)
  - 58 pages of written testimony
  - Appendix A: Resume of Jim Grevatt & List of Proceedings in which Jim Grevatt has testified
  - Appendix B: Cited Discovery Responses
  - Appendix C: Notice of Program Suspension – Penn Power Low-Income Program, Email Notification Received on May 9, 2025
- Verification of Jim Grevatt

Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

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Dated: January 28, 2026

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition for Approval of the Phase V Energy Efficiency and Conservation Plan of FirstEnergy Pennsylvania Electric Company	: : : : : : :	Docket No. M-2025-3057327

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TESTIMONY

OF

JEANNEEN ZAPPA

On Behalf of

Keystone Energy Efficiency Alliance

Topics Addressed:

5

January 16, 2025

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I. IDENTIFICATION

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.?

A. My name is Jeaneen Ann Zappa, and I am the Executive Director at the Keystone Energy Efficiency Alliance ("KEEA"), a 501(c)(6) trade association of 81 energy efficiency organizations who do business in the Commonwealth of Pennsylvania. Our mailing address is 614 S. 4th Street, Unit #307, Philadelphia, PA 19147. I also serve as the Executive Director of the affiliated 501(c)(3) non-profit organization, the Energy Efficiency Alliance ("EEA"), which is dedicated to advancing energy efficiency in the Mid-Atlantic through education and awareness.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. My testimony is submitted on behalf of KEEA.

Q. PLEASE BRIEFLY DESCRIBE YOUR QUALIFICATIONS?

A. My career experience spans roles in the for-profit, public, and not-for-profit sectors. Since July of 2021, I have served as the Executive Director for KEEA, after joining the organization one year prior. For the past five years, I have worked with our trade association energy efficiency business members in Pennsylvania and New Jersey to understand and represent their viewpoints and concerns. These energy efficiency member businesses focus on areas spanning from legal counsel, equipment manufacturing, contractors, and program implementers in the residential, commercial, and industrial sectors. Our work focuses on critical industry shaping trends and their impacts on businesses and individuals.

Prior to joining KEEA, I served as the Executive Director of Conservation Consultants Inc. ("CCI") for seven years. CCI implemented utility programs with a focus on residential energy efficiency and healthy home performance programs. CCI worked with multiple utility companies in the Commonwealth, including Columbia Gas of Pennsylvania, Peoples Gas Company, and Duquesne Light Company on both Act 129 and LIURP programming. CCI also implemented other programs that included those focused-on home repairs and energy retrofits, energy efficiency marketing, and comprehensive home energy audits. Prior to joining CCI my roles include serving as the first Sustainability Manager for Allegheny County, where I was part of a large ESCO project team for County facilities. My early career involved work in marketing for the health care and technology sectors.

I hold a dual degree in Magazine Journalism and Marketing from Syracuse University and an MBA from the University of Pittsburgh. My complete resume is attached to my testimony as Exhibit KEEA-1.

Q. HAVE YOU PRESENTED TESTIMONY IN PROCEEDINGS BEFORE THIS OR OTHER REGULATORY BOARDS?

A. Yes. I presented verbal testimony before the Pennsylvania PUC as part of a hearing on Resource Capacity (Docket No. M-2024-3051988) held on November 25, 2024, with subsequent written testimony submitted in January 2025.

II. INTRODUCTION AND SUMMMARY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony will be focused on addressing certain aspects of FirstEnergy Pennsylvania Electric Company's ("FE PA" or the "Company") Act 129 Phase V Energy Efficiency and Conservation Plan Filing ("Phase V Plan"). Those aspects are the importance of maximizing ratepayer funded energy efficiency, health and safety barrier mitigation, coordination of marketing activities, coordination of electrification programs, and workforce development and training.

Q. ARE YOU SPONSORING ANY EXHIBITS IN THIS PROCEEDING?

A. Yes. I am sponsoring the following exhibits:

Exhibit KEEA-1 – Resume of Jeaneen Zappa
Exhibit KEEA-2 - H&S Budgets Workpaper

Q. PLEASE SUMMARIZE YOUR TESTIMONY AND FINDINGS.

A. First, I discuss the importance of ratepayer funded energy efficiency and the myriad benefits it provides the Commonwealth. I then discuss the importance of health and safety barrier mitigation and recommend that FE PA allocate funding, as their peers did, specifically for the mitigation of health and safety barriers that are preventing the households with the greatest need for energy savings from participating in their

programs. Next, I discuss how FE PA can coordinate marketing activities with other EDCs to better leverage program outcomes and utilize funding to spread energy efficiency messaging to as many residents of the Commonwealth as possible. I then explore how FE PA should coordinate efforts with other state electrification programs to more robustly serve their customers by ensuring that all incentives available are applied toward their energy saving projects. I finish up with recommendations on how FE PA should address workforce development and more specifically provide training to the workforce on the most impactful areas of need to better serve their customers and lead to deeper energy savings. In summary, I recommend that, as part of its Phase V Plan, FE PA should:

1. Set aside funding of up to $2.6 million, (5%) of its low-income program for health and safety barrier mitigations;
2. Include an assessment in its low-income program that aligns with the Healthy Home Evaluator evaluations from the Building Performance Institute and adopt the Healthy Home Evaluator certification as a requirement for contractors;
3. Align with the other Act 129 EDCs around developing and supporting a single point of entry for their Act 129 programs under a single umbrella label;
4. Include in their annual report the to the PUC a summary of their outreach activities to each sector (small business, commercial and industrial, residential, and low income);
5. Conduct a survey to track awareness of Act 129 programs and to publicly share the findings and use this information as a basis for further considering marketing coordination;
6. Coordinate with the Pennsylvania Department of Environmental Protection ("PA DEP") on exactly how incentive "braiding" will occur, including ways to streamline application processes and reduce duplicative data collection;

7. Make efficient heat pump and heat pump water heater ("HPWH") incentives available to customers regardless of the fuel used for space and water heating prior to the purchase of the new high efficiency equipment;

8. Cover any costs for ASHRAE Level 2 audits not covered by the HER program for participants in both programs;

9. Include a more robust workforce development training plan with specified budgets and participation projections in their Phase V Plan, focused on high efficiency cold climate heat pump technology, heat pump water heater technology, and a whole home comprehensive project approach and report on results in its semi-annual and annual reports.

10. Coordinate with the other Act 129 EDCs and state programs, such as the PA DEP's HEAR and TREC, to combine resources to deliver workforce development training on the focus areas referenced above.

III. IMPORTANCE OF MAXIMIZING RATEPAYER FUNDED ENERGY EFFICIENCY

Q. WHAT IS THE IMPORTANCE OF ENERGY EFFICIENCY TO THE ECONOMY OF AND BUSINESSES WITHIN PENNSYLVANIA?

A. Energy efficiency has a significant economic impact on the Commonwealth of Pennsylvania, and continued investment through Act 129 will deliver both direct and indirect benefits to its businesses and residents. The energy efficiency industry employs 76,289 people in the Commonwealth, making it the largest component of Pennsylvania's clean energy sector jobs.[1] But it's not just the clean energy sector. Energy efficiency is the largest employer in all energy sectors in the Commonwealth – including energy transmission & distribution, nuclear, and traditional fossil fuels.[2] Additionally, the energy efficiency sector is a strong driver for small business growth and success, with nearly

[1] E2, *Clean Jobs Pennsylvania 2025* (Nov. 24, 2025) https://e2.org/reports/clean-jobs-pennsylvania-2025/.

[2] Building Performance Association, *Energy Efficiency Jobs in America – Pennsylvania* (Dec. 2025) https://building-performance.org/education/resources/pennsylvania-energy-efficiency-jobs-in-america-report/.

93% of energy efficiency businesses employing fewer than 100 people.[3] Each job and each business sends a ripple of economic activity through Pennsylvania from wages, payroll taxes and direct expenditures on goods and services. Moreover, energy efficiency has been a growing jobs sector for the past several years.

Q. WHAT IS THE IMPORTANCE OF ENERGY EFFICIENCY TO THE PEOPLE OF PENNSYLVANIA?

A. Energy efficiency plays a critical role in delivering multiple benefits to the people of Pennsylvania. Energy savings and the associated cost savings are perhaps the biggest direct benefit of energy efficiency in the Commonwealth. In the most recent measured year of Act 129 ('23-'24), every dollar spent on energy efficiency resulted in a return of $1.44 in benefits, including avoided energy costs and operation and maintenance savings.[4] Across the current five-year phase, Act 129 programs are expected to achieve nearly a 3.1% cumulative reduction in annual electricity use statewide, which directly lowers participant bills.[5] According to a recent RMI Strategic Insight, energy efficiency saves the average Pennsylvanian $500 annually.[6] Notably, Pennsylvania's energy cost savings is just under half of the national average savings of $1,000 per person from energy efficiency, suggesting that Pennsylvania's energy efficiency programs have room to achieve higher savings still.[7] Weatherization programming plays a unique role as an economic revitalization tool for low-income communities. The return on investment for these programs is compelling, where every $1.00 invested returns $1.72 in energy benefits, contributing to an annual household energy cost savings of over $372.[8]

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[3] *Id.*

[4] Public Utility Commission, *SWE Final Annual Report: Act 129 Program Year 15*, 13 (Dec. 14, 2024) https://www.puc.pa.gov/media/3262/swe_py15_final_annual_report120424.pdf.

[5] *Id.* at 15.

[6] RMI, *How to Save Money for All Americans: Efficiency* (Apr. 14, 2025) https://rmi.org/how-to-save-money-for-all-americans-efficiency/.

[7] *Id.*

[8] U.S. Dept. of Energy, *Weatherization Assistance Program Fact Sheet*, 1 (June 2022) https://www.energy.gov/sites/default/files/2022-06/wap-fact-sheet_0622.pdf.

Commercial properties can also make improvements through energy efficiency and reap significant savings. According to the US Environmental Protection Agency, commercial properties can reduce their energy consumption by up to 50% through energy efficiency alone.[9] The Department of Energy reports that commercial buildings achieve an average energy savings of 30% when they implement comprehensive energy efficiency measures.[10] As evidence of this, the 540 commercial property owners participating in the Pittsburgh area 2030 District saw a 26.5% energy reduction and a $56M combined reduction in their energy bills in 2023.[11]

Energy efficiency also reduces carbon emissions, which improves public health. The Pittsburgh 2030 District saw a 52.3% reduction in carbon across participating commercial properties, and the PA PUC's own report shows 2,115,577 short tons of avoided carbon dioxide emissions so far in Phase IV.[12] Public health research shows that carbon emissions reduction strategies significantly enhance human health, improving air quality, and reducing mortality and morbidity.[13] Energy consumption and energy production generate the highest amounts of Greenhouse Gas (GHG) emissions, including Carbon Dioxide in Pennsylvania. Electricity generation contributes 29% of the state's GHG total, and the industrial sector's energy consumption contributes 31% of the total.[14]

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[9] CIM, *Energy Efficiency in Commercial Buildings* (Apr. 7, 2025) https://www.cim.io/blog/energy-efficiency-in-commercial-buildings#:~:text=The%20U.S.%20Department%20of%20Energy%20reports%20that%20commercial,savings%20directly%20boost%20operational%20budgets%20and%20profit%20margins.

[10] *Id*.

[11] Green Building Alliance, *Pittsburgh 2030 District: 2024 Annual Progress Report* (May 2025) https://www.gba.org/wp-content/uploads/Pittsburgh-2030-District-2024-Progress-Report_Reduced-Size-002.pdf.

[12] Compiled from Act 129 Phase IV SWE Annual Reports, PY13-16. https://www.puc.pa.gov/filing-resources/issues-laws-regulations/act-129/act-129-statewide-evaluator-swe/.

[13] Abdala SA, Khomsi K, Houdou A, *et al.* Emission Reduction strategies and health: a systematic review on the tools and methods to assess co-benefits. *BMJ* Open (Dec. 9, 2024) https://pmc.ncbi.nlm.nih.gov/articles/PMC11628954/.

[14] *Pennsylvania Greenhouse Gas (GHG) Inventory*, https://www.pa.gov/agencies/dep/residents/climate-change/ghg-inventory.

Q. WHAT ARE SOME OTHER WAYS THAT ENERGY EFFICIENCY BENEFITS THE COMMONWEALTH?

A. Energy efficiency reduces the strain on our energy grid. In a time of rising electricity rates with increased demand on the grid, reducing energy usage provides a twofold benefit – both as a cost savings to the rate payer and as a way to reduce load on the already strained power grid. First, costs to ratepayers are indeed higher: Pennsylvania ranked 14th on a list of the most expensive for energy in the nation.[15] The problem is projected to escalate with rising forecasts for electrical demand**.** PJM estimates an increased load of 32 GW from 2024 to 2030.[16] Pennsylvanians face higher electricity bills, with the average charge hitting 20.49 cents/kWh in October of 2025 for the residential sector.[17] This follows a long upward climb in rates, particularly during periods of summer peak demand. August bills in all states increased from 2015 to 2023 by an average of nearly 27%. That roughly equals an increase of $40 for just the month of August. Utility rates over the same period rose on average by 23.2%. The average August residential kWh consumption fell during the same period by 2.83%, so while energy usage decreased, both what people were charged per unit of energy and how much they paid increased.[18] Energy efficiency – particularly energy efficiency measures that also shave peak demand – helps both ratepayers' corporate coffers and personal financial outlook, but it also helps the entire regional transmission grid by reducing the load necessary to flow through the grid.

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[15]Nicole Spector, "Energy Bill Breakdowns in All 50 States" *GoBankingRates* (Apr. 8, 2025) https://www.gobankingrates.com/money/economy/energy-bill-breakdowns-in-all-50-states/?hyperlink_type=manual&utm_term=incontent_link_4&utm_campaign=1319350&utm_source=yahoo.com&utm_content=6&utm_medium=rss.

[16]*2025 Long-Term Load Forecast Report Predicts Significant Increase in Electricity Demand*, PJM Inside Lines (Jan. 30, 2025) https://insidelines.pjm.com/2025-long-term-load-forecast-report-predicts-significant-increase-in-electricity-demand/.

[17] *Electric Power Monthly*, U.S. Energy Information Administration https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_5_06_a.

[18]"Study: Despite Gains in Energy Efficiency and Green Energy Generation – Electricy Bills have Increased 27% Since 2015", *Texas Electricity Ratings* (Aug. 2024) https://www.texaselectricityratings.com/resources/study-despite-gains-in-energy-efficiency-electricity-bills-are-higher.

For Pennsylvanians who are low-income, this is even more critical. National research shows that energy insecure households were billed more than other households for energy, making energy savings critically important to these families.[19] According to the American Council for an Energy Efficiency Economy's 2020 report, "How High Are Household Energy Burdens?," the mid-Atlantic region on average experiences an energy burden of 3.4%, while low-income households experience a much higher median of 9.4% energy burden. The ACEEE updated fact sheet from 2024 shows that low-income renters and homeowners in the Pennsylvania cities of Pittsburgh and Philadelphia have a much higher average energy burden still (approximately 16%). These households need and deserve a robust investment in energy efficiency in the Commonwealth. As explained further throughout this testimony, ensuring that households which are systematically deferred from existing energy efficiency programs can access these resources saves money for all ratepayers in the long term. When the most egregiously poor performing dwellings are repaired and are improved to be higher performing homes, the ratepayer costs for other services are lessened, along with reduced demand on the grid.

IV. HEALTH AND SAFETY BARRIER MITIGATION

Q. WHY IS IT IMPORTANT TO PROVIDE SPECIFIC FUNDING FOR HEATLH AND SAFETY BARRIER MITIGATION?

A. Today, all too often, health and safety-related issues prevent participation in residential, low-income energy efficiency programs. Anecdotal evidence suggests up to 30% of prospective program participants are deferred from services due to health and safety issues which prevent the performance of blower door tests, the installation of insulation, and air sealing to make a home less drafty. These barriers include items such as knob and tube wiring, significant roof damage, various moisture issues, the presence of mold, and the presence of asbestos. Common HVAC issues like cracked heat exchangers or even a fossil fuel heating system that has not received a clean and tune for several years can lead to high carbon monoxide levels, which also prevents a customer from participating in much needed energy efficiency programming. While these HVAC situations are

[19] "U.S. energy insecure households were billed more for energy than other households," U.S. Energy Information Administration (May 30, 2023) https://www.eia.gov/todayinenergy/detail.php?id=56640.

problematic, they can be addressed through dedicated pools of funding for emergency repairs to heating equipment or to remediate other health and safety issues, while other reasons for deferrals cannot. Choosing to invest in these much-needed improvements will help routinely deferred households by taking the worst-performing homes and transforming them into safer, more comfortable homes that have lower energy bills.

Moving customers from deferral lists into programs also helps to increase program participation rates and misconceptions that energy efficiency programs are saturated. There are many homes that have not yet received but desperately need services; energy efficiency programs just have not offered the breadth of health and safety repairs required to allow for the necessary improvements to a large percentage of households in need. Making these robust health and safety improvements is making a commitment to longer-term improvements for customers that are systematically overlooked.

Q. DID THE COMMISSION ADDRESS THIS ISSUE IN ITS IMPLEMENTATION ORDER?

A. Yes. Page 167 of the Implementation Order stated that the EE&C Plan Template will include a section to discuss the health and safety issues that arise in the delivery of the Act 129 services. In addition, the Commission states that the "remediation of health and safety issues is an ideal area for coordination" (Order, p. 167).

Q. WHAT DOES FIRSTENERGY PROPOSE REGARDING HEALTH AND SAFETY BARRIER MITIGATION IN THEIR PHASE V PLAN?

A. FE PA explains that they will coordinate with "LIURP and other external programs for possible eligible remediation of health and safety issues" (FE PA Plan, p. 135) but falls short of committing any specific funds or establishing a pilot project that addresses health and safety barriers.

Q. WHAT DO YOU REFCOMMEND THAT FE PA DOES TO ADDRESS HEALTH AND SAFETY BARRIER MITIGATION?

A. While coordination with LIURP and other external programs is valuable and important, FE PA needs to do more to address the barriers, avoid customer deferrals and achieve deeper savings. It is not enough to rely on other programs to address barriers, as those program's budgets are designed to maximally serve their participants. To maximize the customer benefit of the Act 129 program and achieve as much savings as possible in each home served by the program, dedicated funding for health and safety barrier mitigation is necessary within FE PA's Act 129 programs.

I recommend that FE PA follow in the footsteps of their EDC peers, PECO and PPL, and allocate funding from within their Act 129 portfolio to address these barriers. As shown in Table 1, PECO and PPL both established Health and Safety budgets, with PECO's representing 6.4% and PPL's representing 3.0% of their respective low-income program budgets. I recommend that FE PA set aside up to 5% of their Phase V low-income program budget to be used to address health and safety barriers. This would be a budget over five years of $2.6 million, or $520,000 per year, which would put it within the range of budgets from PECO and PPL.

Table. 1 - Comparison of Health and Safety Budget Allocations

	Proposed H&S Budget		**Proposed LI Budget**
EDC	***$000***	***% of LI***	***$000***
PECO	$3,000	6.4%	$47,147
PPL	$1,500	3.0%	$49,352
FE PA (Proposed)	$2,600	5.0%	$52,154

Q. HAVE YOU ANALYZED THE IMPACT OF YOUR RECOMMENDATION ON THE COST EFFECTIVENESS OF FE PA'S PORTFOLIO?

A. Yes. First, FE PA's low-income program is projected to be more cost-effective than the market rate residential program sector in FE PA's Phase V Plan,[20] which helps with maintaining cost-effectiveness at the program and portfolio level. I project that net benefits would drop by approximately $3.0 million given a $2.6 million allocation towards health and safety measures using the TRC Benefit-Cost-Ration ("BCR") for the Low-income program of 1.15.[21] This would make net benefits for the low-income program $7.7 million and the TRC BCR for the program would be 1.11, which is still higher than the 1.08 BCR for the market rate residential program. The overall portfolio would also still be cost-effective with a TRC BCR that is largely unchanged at 1.10.

Q. WHAT HEALTH AND SAFETY MEASURES SHOULD BE COVERED BY THE HEALTH AND SAFETY FUNDS?

A. Funding for health and safety barrier remediation should address the full range of problems served in the state's former Whole House Preservation program. Specifically, issues tied to moisture – like mold and rot, and the consequently needed repairs to building envelope or interior – should be eligible as a health and safety measure. Knob and Tube wiring upgrades should be permitted repairs. Similarly, significant combustion hazards like excessive wood shavings or other debris or even hoarding situations present a health and safety obstacle. Additionally, health problems such as pest infestations, the remediation of asbestos, and mold treatment should be covered. Additionally, lower-cost

[20] Petition of FirstEnergy Pennsylvania Electric Company for Approval of a Phase V Energy Efficiency and Conservation, Appendix B, Table 1.

[21] *Id.*

items such as heating system clean-and-tunes, repairs, and cooktop/oven repairs should be allowed if needed to reduce carbon monoxide levels.

Q. HOW SHOULD FE PA IDENTIFY HEALTH AND SAFETY ISSUES THAT NEED TO BE REMEDIATED?

A. With standardized training and certification now well established, FE PA should incorporate an assessment that aligns with the Healthy Home Evaluator evaluations from the Building Performance Institute. They should also adopt the Healthy Home Evaluator certification as a requirement for contractors. This credential is designed to augment standard Building Performance Institute credentials like the Building Analyst, Quality Control Inspector, Energy Auditor, or Multifamily Building Analyst. Additionally, under Phase V, collecting and reporting the data to the PA PUC would lead to a bigger picture of the value of the overall health and safety program, much like today's carbon emissions reduction calculations and reporting in the Act 129 program. While not part of energy savings calculations, carbon tracking provides valuable information on Act 129's impact.

Q. HOW WILL FE PA'S PHASE V PLAN BE IMPROVED BY YOUR RECOMMENDATION TO MAKE FUNDS AVAILABLE FOR HEALTH AND SAFETY BARRIER REMEDIATION?

A. FE PA has the opportunity to increase program participation rates, achieve greater energy reductions and potentially reduce the need for additional assistance and services by delivering deep energy retrofit improvements to residential units that are regularly deferred from weatherization and energy efficiency programs. Delivering increased services and deeper retrofits typically means spending more money per unit served and also reducing the total count of units that are served annually, but this comprehensive approach delivers lasting savings – both to the individual ratepayer and to the entire rate base, which ultimately supports programs to provide emergency repairs and subsidizes

the bills of underperforming housing stock. The benefit adder for low to moderate income ("LMI") households in the Phase V Total Resource Cost Test confirms this fact.[22] Existing health and safety programs offered by utilities to test for natural gas leaks and carbon monoxide issues tied to combustion appliances are valuable and commendable. However, these are not as helpful in most Act 129 electric programming, and that limiting health and safety to these matters misses the bigger opportunity for health and safety impact in households served under Act 129.

While health and safety spending may not directly reduce energy usage, they do provide a range of non-energy benefits, such as environmental, habitability, and comfort improvements realized once homes are weatherized. Habitability of homes significantly improved following these upgrades, and as a result, contributes to an average annual savings of $514 per household in out-of-pocket medical expenses.[23] Similarly, these health improvements kept residents at work, saving workers an average of $538 annually due to missing fewer days of work from illness.[24] Cumulatively, the total annual health and household-related benefits for a weatherized unit averages $14,148.[25] In addition, the direct reduction of energy usage is prevented in households where health and safety barriers exist.

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[22] Final Order, Docket No. M-2024-3048998 (Nov. 7, 2024) https://www.puc.pa.gov/pcdocs/1855583.pdf.

[23] National Association for State Community Service Programs. (2022). *Weatherization Assistance Program Funding Report Program Year 2022*. https://nascsp.org/wp-content/uploads/2023/12/PY22-WAP-Annual-Funding-Report-1.pdf.

[24] *Id*.

[25] Tonn, B., Rose, E., Hawkins, B., Conlon, B., Oak Ridge National Laboratory, & Oak Ridge Institute for Science and Education. (2014). *Health and Household-Related Benefits attributable to the Weatherization Assistance Program*. https://weatherization.ornl.gov/wp-content/uploads/pdf/WAPRetroEvalFinalReports/ORNL_TM-2014_345.pdf.

V. COORDINATION OF MARKETING ACTIVITY

Q. WHAT DID THE PHASE V IMPLEMENTATION ORDER SAY REGARDING THE COORDINATION OF MARKETING ACTIVITY?

A. While the Commission did not establish a common statewide marketing platform, they reiterated their position that EDCs should coordinate marketing efforts when likely to leverage program outcomes.[26]

Q. WHAT COORDINATION OF MARKETING DOES FE PA DESCRIBE IN THEIR PHASE V PLAN?

A. FE PA does not specifically address the coordination of marketing efforts with other EDCs to leverage program outcomes in their Phase V Plan. Marketing is referenced throughout each component of the Plan, most notably on page 42 where FE PA states "With oversight from the Company, the CSP(s) hired by the Company to implement the Residential Energy Solutions Program components, through marketing and outreach activities, will coordinate and encourage participation in the various components of the program and also other Act 129 programs where applicable." It is assumed, but unclear, that FE PA is referring to other programs within their Plan's portfolio in this section and not the coordination with other EDC's programs.

Q. DOES FE PA ADEQUATELY ADDRESS MARKETING COORDINATION IN THEIR PHASE V PLAN?

A. No. FE PA needs to provide greater clarity and explicitly state how it will handle marketing coordination with other EDCs. In my role, I regularly hear from front-line community group representatives and business organizations that their members are not aware of existing Act 129 programs, nor how to access them. Each utility has elected to lean into creating their own branded web sites and marketing material about their Act 129

[26] Phase V Final Implementation Order at 190.

programs. They vary significantly in how information is presented to consumers and how to find the detailed information on rebates and eligibility. For a business owner or head of household seeking assistance, this framework can be confusing.

I recommend that FE PA, along with the other participating EDCs should align around developing and supporting a single point of entry for their Act 129 programs under a single umbrella label. For a minimum of disruption to existing branding and structure, this web site could then re-direct the visitor to each utility's existing web sites and services. However, the joint utilities should invest in marketing this single umbrella entry point, using all available successful marketing tactics, in addition to leveraging key industry groups. Specifically - establishing or refreshing partnerships and outreach channels with the network of Chambers of Commerce, property owners and managers' associations and other likely access points to the state's business owners and commercial property owners can help to engage business owners – especially small business owners who typically do not have the benefit of professional Certified Energy Managers to guide them or property management services who may be more familiar with energy efficiency programs and opportunities. Given the absence of a statewide benchmarking requirement for commercial property owners relative to their energy efficiency performance, the need to build this common informational runway from the combined utilities is imperative. Many times, businesses may have multiple locations in multiple electric territories, so a single point of entry can help to reduce confusion.

Further, the EDCs should be required to include in their annual report the PUC a summary of their outreach activities to each sector (small business, commercial and

industrial, residential, and low income) to better gauge the success or shortcoming of those efforts in each sector.

Lastly, I recommend that the EDCs conduct a survey to track awareness of Act 129 programs and to publicly share the findings and use this information as a basis for further consideration of marketing coordination.

VI. COORDINATION WITH ELECTFICATION PROGRAMS

Q. WHAT DID THE COMMISSION'S PHASE V IMPLEMENTATION ORDER SAY REGARDING AVAILABILITY OF HIGH EFFICINECY HEAT PUMP AND HEAT PUMP WATER HEATER INCENTIVES?

A. The Commission ordered the EDCs to make these "measures available to HEAR and other non-Act 129 program participants along with a description of how program delivery will target these bundled, or interwoven, funding opportunities."[27]

Q. DID FE PA INCLUDE THESE MEASURES IN THEIR PLANS?

A. Yes. On page 35 of their Phase V Plan, they confirmed that high efficiency heat pumps and HPWHs will be available across all customer sectors and that the program CSPs will provide education around how to combine incentives. I recommend that the EDCs, including FE PA, coordinate with the PA DEP on exactly how this incentive "braiding" will occur, including ways to streamline application processes and reduce duplicative data collection. I want to make sure that FE PA will make these incentives available to customers regardless of the fuel used for space and water heating prior to the purchase of the new high efficiency equipment.

[27] Phase V Final Implementation Order at 174.

Q. WHAT OTHER WAYS DID THE COMMISSION REQUIRE THE EDCS TO COORDINATOE WITH OTHER PROGRAMS?

A. On page 187 of the Phase V Final Implementation Order, the Commission required the EDCs to "co-fund ASHRAE Level 2 audits or similar technical scoping studies with other program administrators."

Q. DOES FE PA FOLLOW THIS DIRECTIVE?

A. Yes. FE PA explicitly supports ASHRAE Level 2 audits as part of its "Braided Funding Audits" component described on page 58 of the Company's Phase V Plan. This is an important first step, and I recommend that FE PA makes sure that they cover any costs for the ASHRAE Level 2 audit that are not covered by the HER Program.

Q. WHY IS IT IMPORTANT TO COVER THE ENTIRE ASHRAE LEVEL 2 AUDIT COST?

The target market for this offering is multifamily buildings that often do not have the funding to perform a comprehensive audit, such as ASHRAE Level 2. These customers are traditionally underserved and eliminating the cost barrier for an audit should help overcome some of the historical underinvestment in the sector. This is the reason that PA DEP has decided to focus the HER program specifically on multifamily buildings in the Commonwealth. Additionally, low-income multifamily buildings need particular support right now, as rising prices hit these residences particularly hard. Less visibly, the rules governing subsidized housing mean that higher utility costs often reduce allowable rent, leaving landlords with fewer resources to invest in energy-saving upgrades.

VII. WORKFORCE DEVELOPMENT

Q. WHY IS WORKFORCE DEVELOPMENT IMPORTANT?

A. Workforce development is an important part of a successful utility energy efficiency program. Ensuring that the workforce is properly trained and educated on the latest technologies, implementation strategies, and customer-centric project approaches is critical to achieving positive outcomes in overall energy savings, occupant health and safety, and project cost-effectiveness, for the utility program administrator, the participating contractor, and the utility customer.

Q. DOES FE PA INCLUDE WORKFORCE DEVELOPMENT IN THEIR PHASE V PLAN?

A. There are two references to workforce development throughout FE PA's Phase V Plan. The references pertain to the Strategic Energy Management ("SEM")/Virtual SEM components of both the C&I Energy Solutions - Small and C&I Energy Solutions - Large programs. On pages 79 and 101 of 157, FE PA states "Building Operations Training provides incentives and/or training for qualified personnel, contractors, consultants, and

customer building operations personnel, to participate in nationally recognized training and workforce development, which may include O&M training and certification programs related to efficient design, operations, and maintenance of buildings, such as BOC through a certified training program."

In addition to the Small and Large C&I Energy Solutions Programs, the HVAC and Solar components of the Residential Energy Solutions Program briefly mentions a training element, without specifically addressing workforce development. On page 40 of its Phase V Plan, FE PA states in reference to the HVAC and Solar component that "The program component also provides promotional support such as point-of-sale materials, training, and sponsorship of and participation in promotional events to highlight the benefits of the purchase, installation, and/or maintenance of energy efficiency HVAC products and solar PV equipment."

Q. DOES THIS ADEQUATELY ADDRESS WORKFORCE DEVELOPMENT IN THE FE PA PHASE V PLAN?

A. No. The inclusion of the potential Building Operations Training within the C&I Energy Solutions - Small and Large Programs and the brief mention of training within the HVAC and Solar component of the Residential Energy Solutions Program is a good start, but there needs to be more workforce development training included in the Phase V Plan for it to be considered adequate.

Q. WHAT WORKFORCE DEVELOPMENT TRAINING NEEDS TO BE INCLUDED IN THE PLAN FOR IT TO BE CONSIDERED ADEQUATE?

A. I recommend that FE PA include a more robust workforce development training plan with specified budgets and participation projections in their Phase V Plan. The training plan should be focused on high efficiency cold climate heat pump technology, heat pump

water heater technology, and a whole home comprehensive project approach. The focus on high efficiency cold climate heat pumps and heat pump water heaters would address two technologies that are critical to the success of FE PA's Phase V Plan. When these two technologies are installed in the wrong application and/or not sized correctly for that application, less than desired energy savings will be realized, leading to program under performance and customer dissatisfaction. The focus on a whole home comprehensive approach training would lead to deeper project energy savings and occupant health and safety being addressed at the same time. This approach, where a project is evaluated by the needs of the home and the customer with all programs available for that specific home being utilized, streamlines the approach for the customer and leads to overall positive outcomes for the utility program administrator, the participating contractor, and the utility customer.

Furthermore, I recommend that FE PA coordinate with the other Act 129 EDCs and state programs, such as the PA DEP's HEAR, to combine resources to deliver workforce development training on the focus areas referenced above. The same focus areas are important to all Act 129 EDCs and other state programs. This coordination would "improve the leverage ratio of Phase V EE&C plans", similar to that of the coordinated marketing efforts that the Commission urged EDCs to explore on page 190 of the final Act 129 Implementation Order.

Q. WHAT METRICS AND REPORTING SHOULD BE INCLUDED IN THE RECOMMENDED WORKFORCE DEVELOPMENT TRAINING PLAN?

A. To measure the success of the Workforce Development Training Plan, the following metrics should be reported on in FE PA's semi-annual and annual reports.

- Training Topic
- Number of Participants
- Number of Contractor/Company Participants
- Future Scheduled Training Events

VIII. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

VERIFICATION

I, Justin L. Carpenter, Esquire, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein made are subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities.

Respectfully submitted,

/s/ Justin L. Carpenter

_____

Justin L. Carpenter, Esq.
Policy Counsel
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January 16, 2026

Jeaneen A. Zappa

Glenshaw, Pennsylvania 15116 ▪ 412-693-0319, 412-480-1223

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Executive Leader/Government Affairs Advocate/Energy Efficiency Champion

Track record of success in nonprofit executive leadership, setting strategic direction, and advancing policy objectives & awareness.

Dynamic, hands-on leader, experienced in handling fast-paced daily operations and building and leading small talented teams through coaching and mentorship. Effective collaborator with strong partnerships and industry network. Strategic thinker able to navigate complex policy issues, and deliver creative and strategic messaging to constituents. Solid executive, seasoned in working with boards of directors and closely managing the P&L/financial performance of the organization.

Career Experience

Keystone Energy Efficiency Alliance/Energy Efficiency Alliances of New Jersey & affiliated Energy Efficiency Alliance

EXECUTIVE DIRECTOR (July 2021 to present; started July 2020 as Director of Operations)

Lead 7-person nonprofit and trade associations focused on advancing energy efficiency and EE-adjacent industry in Pennsylvania and New Jersey. Establish and work through key partnerships, secure funding, manage business memberships and services, and with Board oversight, set strategic policy priorities and objectives.

- Provided “steady hand” management: Helmed the organization through an executive change and 90% staff turnover. Ramped up new team members. Identified and added needed back-office and operating systems (HR, CRM, committees).
- Boosted organization profile: Led efforts to conduct increasingly successful 2022, 2023 and 2024 Annual Policy Conferences, growing sponsorships from $80 to $100k and attendance from 160 to 270, featuring multiple speakers and sessions. Drove planning process and directed efforts to grow.
- Honed policy focus: Crafted inaugural process to winnow and prioritize policy goals, engaging staff, Committee and Board members. Sparked and coalesced board/committee/staff work to introduce first set of clear, documented ‘policy principles’ for the organization.
- Pushed policy actions: Engaged with coalition partners to pass expanded Commercial Property Assessed Clean Energy legislation in PA in support of energy efficiency, resilience, and indoor air quality measures plus multi-family buildings. Supported team’s work on Whole Home Repair in PA & NJ and PJM. Led efforts on several workforce development events and projects. Wrote & delivered testimony/comments.
- Served as Spokesperson: Speak at multiple public events and represent the organizations publicly and with media. Selected to serve on PA Governor Josh Shapiro’s Transition Team for Energy & Environment. Delivered various presentations on federal funding incentives, SWPA decarbonization, clean energy workforce, rising energy bills, etc. and represented the organization at press conferences and in media interviews.

continued…

Conservation Consultants Inc. – Pittsburgh, Pennsylvania

EXECUTIVE DIRECTOR (October 2013 to June 2020)

Strategically led and transformed the operational performance of a 40-year-old non-profit business with the aid of a 25-member team. Implemented energy efficiency programs for low- and moderate-income households for utility clients, serving approximately 4500 households annually. Strengthened strategic alliances and participation in high profile public events.

- Negotiated and secured three major contracts that represented $2.5M in new business within the first four months of tenure. Renewed each contract three years later before expiry.
- Constructed and strengthened a management team that enabled the team to become one of the first "Healthy Home Evaluator" certified teams in the entire country.
- Refreshed an 11-year-old strategic plan after evaluating current and forecasted business operations. Overhauled the company's brand identity, mission statement, and customer commitment.
- Delivered on goal of 2850 annual home visits, despite challenges presented by client's failed back-office system upgrade project, developing an in-house data-mining technique to generate leads.

Allegheny County Government – Pittsburgh, Pennsylvania

SUSTAINABILITY MANAGER (2009 to 2013)

Constructed the first-ever sustainability program office for the Allegheny County government. Drafted and implemented environmentally appropriate best practices in all facilities, operations, and departments.

- Successfully submitted bids that secured $40k in grants for the South Park Sustainable planning project, $153k for a planned solar hot water project, and $250k for a planned geothermal project.
- Spearheaded efforts that resulted in the county being awarded the "Top Performer" award in Sustainable Pittsburgh's annual "Green Workplace Challenge."
- Boosted staff engagement from 20 to 200 after implementing new tools that enabled transparent communication across a 6k member, multiple-site enterprise.

Green Building Alliance – Pittsburgh, Pennsylvania

DEPUTY DIRECTOR (2006 to 2008); **BUSINESS DEVELOPMENT DIRECTOR** (2008 to 2009)

Directly oversaw efforts that guided daily operations, explored new business development relationships, and secured added revenue growth for the entire organization.

- Expanded the attendance of the annual conference from 150 to 400 and membership from 125 to 370 with $54k in membership dues. Secured additional donations/sponsorships of $150k+.
- Recruited and selected the team tasked with the build-out of a new green office space to LEED®-ND Platinum certification.
- Guided the daily operations of the company, hiring an additional five team members and directly supervising a team of eight. Strengthened skills through training and mentorship opportunities.
- Facilitated compelling presentations and publicly represented the company. Improved relationships and satisfaction throughout the customer base.

Additional Professional Experience

DIRECTOR OF MARKETING ▪ Summa Technologies – Pittsburgh, Pennsylvania

Established robust strategy for customer retention that captured customer involvement in five new case studies. Facilitated "thought leader" events that captivated customer audiences.

MANAGER OF STRATEGIC ASSETS ▪ Vocollect – Pittsburgh, Pennsylvania

Implemented a strategic marketing plan that protected intellectual property, strengthened product development, and supported a domestic sales force of 15 alongside a 20-member international distribution network.

DIRECTOR OF STRATEGIC MARKETING ▪ Descartes Systems Group – Pittsburgh, Pennsylvania

Guided a cross-functional team in the demo creation of a five-product portfolio. Executed new program initiatives in record time. Empowered the sales team with new literature, training, and other tools.

MANAGER OF MARKETING COMMUNICATIONS ▪ E-Transport – Pittsburgh, Pennsylvania

Drafted and published key messaging, marketing strategy, and support materials for sales teams. Flawlessly launched 10+ software products that captured and retained new/existing customers.

Education & Credentials

Master of Business Administration (MBA)

University of Pittsburgh, Joseph M. Katz Graduate School of Business – Pittsburgh, Pennsylvania

Bachelor of Science – Magazine Journalism and Bachelor of Science – Marketing

Syracuse University – Syracuse, New York

Professional Development

- Certificate – Principles of Building Performance Institute (BPI); Trained in Home Energy Score rating tool
- LEED® Accredited Professional – U.S. Green Building Council, Leadership in Energy & Environmental Design
- Graduate: Home Performance 101 – Dale Carnegie & Pragmatic Marketing Courses
- Graduate: CORO Center for Civic Leadership Women in Leadership Program
- Certificate: Society of Competitive Intelligence Professionals

Affiliations & Awards/Recognition

- Recognized by Cribs for Kids as the 2017 Women of Achievement Awardee (Environment Category)
- Member – Low-Income Advisory Council, PA Weatherization Assistance Program
- Member – (while at CCI) Keystone Energy Efficiency Alliance (KEEA) Annual Conference Planning Committee
- Past Member – Society of Competitive Intelligence Professionals, Supply Chain Management Professionals
- Past Board Member – PA Solar Center, NeighborWorks Western PA, Nine Mile Run Watershed Association, Allegheny Land Trust, Crafton Public Library, Hollow Oak Land Trust
- Current Board of Directors - Pittsburgh Gateways Inc.

Recent Presentations & Media Hits

Webinar Speaker: SAM.gov Registration and Training
November 20, 2025
https://www.localgovernmentacademy.org/sam-gov-registration-training-and-live-webinar/

ACEEE Energy Efficiency As a Resource Conference
October 8, 2025
Moderator of panel: Delivering Affordable Efficiency and Flexibility

Webinar Speaker:Act 129: Understanding the Basics
April 14, 2025
https://energyefficiencyalliance.org/act-129-understanding-the-basics-april-14-2025/

Webinar Speakerr: Why is My Electricity Bill So High?
March 4, 2025
https://www.youtube.com/watch?v=A0w-llk86f0

Webinar Speaker: Understanding PRESS: The Proposed New Reliable Energy Standard for PA
April 29, 2024
https://energyefficiencyalliance.org/understanding-press-the-proposed-new-reliable-energy-standard-for-pa/

Workforce Development: The Clean Energy Jobs Challenge in Southwest PA
March 30, 2023 – Speaker and co-organizer in collaboration with Sustainable Pittsburgh and E2.

Saving Energy Together - CLEAResult - PA Energy Conference
March 8 – 9, 2023 – Speaker on New Federal Financial Incentives for Energy Efficiency and led session on Act 129.

Organized event:
March 15 , 2023 - KEEA & EEA-NJ's webinar on "Diversify or Die" about supply chain diversification.

Southwest PA Decarbonization Forum - Pennsylvania Environmental Council
March 16, 2023 – Panelist on “Creating Jobs & Driving Economic Growth

Media Notes:

Trib Live - June 12, 2025
https://triblive.com/local/regional/republican-budget-bill-will-cost-thousands-of-clean-energy-jobs-millions-in-investment-advocates-say/
Republican budget bill will cost thousands of clean energy jobs, millions in investment, advocates say

PA Environmental Digest Blogspot - July 22, 2025
https://paenvironmentdaily.blogspot.com/2025/07/what-ai-data-center-energy-summit.html
What The A.I. Data Center & Energy Summit Missed: Exploding Electricity Demand Already Raising Prices - Ratepayers Need Protection; No Longer An ‘All Of The Above’ Energy Strategy

Tribune Review - July 21, 2025
https://community.triblive.com/news/3841186
Gregory Bengrnardi and Jeaneen A. Zappa: Local action can protect Allegheny County from rising energy costs

Washington Examiner - June 30, 2025
https://www.washingtonexaminer.com/news/3458301/debated-energy-tax-credits-necessary-pennsylvania/ *Debated energy tax credits still necessary in Pennsylvania, says industry*

Evergreen Press Release - April 15, 2025
https://www.evergreenaction.com/press/new-report-shapiro-administration-rep-steele-and-keystone-energy-efficiency-alliance-join-evergreen-to-highlight-that-fixing-pjm-can-lower-energy-costs-and-create-jobs-across-the-mid-atlantic
NEW REPORT: Shapiro Administration, Rep. Steele, and Keystone Energy Efficiency Alliance Join Evergreen to Highlight that Fixing PJM Can Lower Energy Costs and Create Jobs Across the Mid-Atlantic

Pittsburgh Post-GazetteFebruary 2, 2025
https://www.post-gazette.com/business/powersource/2025/02/02/electricity-prices-grid-pennsylvania-shapiro-pjm-utlities/stories/202501310087
Region's power grid presents a math problem for Pennsylvania

NJ Spotlight
https://www.njspotlightnews.org/2023/05/op-ed-nj-businesses-heat-pump-benefits/

Pittsburgh Magazine
https://www.pittsburghmagazine.com/can-pittsburgh-save-the-planet/

Post Gazette
https://www.post-gazette.com/opinion/Op-Ed/2022/03/26/jeaneen-zappa-rggi-pennsylvania-climate-change-fossil-fuels/stories/202203260006

Podcast Interviews:

PA Environmental Council	https://pecpa.org/news/pennsylvania-legacies-181-homework/ *Whole House was successful in PA. Now it needs to be expanded and fully funded.*
Penn Future	https://www.buzzsprout.com/1944759/11524553 Grant Street Experience https://open.spotify.com/episode/6C9AZWxkjLenZtGzygKUva

Recommended

EDC	H&S Budget	H&S Budget as a % of LI Budget	Res Budget	Total Budget
PECO	$3,000	6.36%	2.20%	0.70%
PPL	$2,500	5.07%	2.17%	0.81%
FE PA	$2,600	4.99%	1.59%	0.67%
DLC	$800	4.99%	2.33%	0.82%

Actual H&S Allocation

EDC	H&S Budget	H&S Budget as a % of LI Budget	Res Budget	Total Budget
PECO	$3,000	6.36%	2.20%	0.70%
PPL	$1,500	3.04%	1.30%	0.49%
FE PA	0	0.00%	0.00%	0.00%
DLC	0	0.00%	0.00%	0.00%

PECO

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY
	$0	%	$0	%	$0
Residential Market Rate	$16,888	22%	$18,461	22%	$17,756
Residential Low-Income	$9,358	12%	$9,401	11%	$9,712
Small C&I	$18,521	24%	$21,852	26%	$23,545
Large C&I	$17,537	23%	$21,963	26%	$25,626
Common Costs	$13,455	18%	$13,455	16%	$13,455
Total Portfolio Budget [1]	**$75,759**	**100%**	**$85,132**	**100%**	**$90,094**
SWE Cost	$0		$0		$0

1 Cells with total percentages in row 11 will be green when the totals are above 99.9% and below 100.1%. All of these

Source: Phase V Plan, pg. 11

Health and Safety Budget $3,000,000 *Source: Phase V Plan, pg. 68*
Part of the Residential Low income Program

PPL

Table 8. PA PUC Table 5 - Summary of Portfolio Costs

Sector	PY18		PY19		PY
	$0	%	$0	%	$0
Residential Market Rate	$12,928	22%	$13,290	21%	$13,571
Residential Low-Income	$10,952	18%	$10,267	16%	$10,235
Small C&I	$17,718	30%	$20,507	32%	$20,176
Large C&I	$9,796	16%	$12,028	19%	$13,423

Common Costs	$8,420	14%	$8,420	420	$8,420
Total Portfolio Budget2	$59,547	100%	$64,991	100%	$66,511
SWE Cost	$1,000		$1,000		$1,000

Source: PPL Phase V Plan, pg. 15

Health and Safety Budget $1,500,000 *Source: PPL Phase V Plan, pg. 198*
Part of the Resource Constrainted Residential Low income Program

FE PA

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY
	$0	%	$0	%	$0
Residential Market Rate	$23,305	29%	$23,384	30%	$23,038
Residential Low-Income	$10,618	13%	$10,408	13%	$10,458
Small C&I	$22,916	28%	$22,306	28%	$22,320
Large C&I	$19,272	24%	$18,843	24%	$18,846
Common Costs	$4,814	6%	$4,047	5%	$3,601
Total Portfolio Budget [1]	**$80,924**	**100%**	**$78,988**	**100%**	**$78,262**
SWE Cost2	$800		$800		$800

1 Cells with total percentages in row 11 will be green when the totals are above 99.9% and below 100.1%. All of these

Source: FE PA Phase V Plan, Appendix B, Table 5

Health and Safety Budget $0 *Source: FE PA Phase V Plan, pg. 135*

DLC

Table 5: Summary of Portfolio Costs

Sector	PY18		PY19		PY
	$0	%	$0	%	$0
Residential Portfolio Budget	3,393	20.90%	3,703	19.80%	3,811
Residential Low-Income Portfolio B	3,237	20.00%	3,149	16.80%	3,178
Commercial/Industrial Small Portfo	4,102	25.30%	4,594	24.60%	5,327
Commercial/Industrial Large Portfo	4,608	28.40%	6,378	34.10%	7,698
Common Costs	881	5.40%	881	4.70%	881
Total Portfolio Budget	16,222	100.00%	18,705	100.00%	20,896
SWE Cost	$0		$0		$0

Source: DLC Phase V Plan, p.g 130

Health and Safety Budget $0 *Source: DLC Phase V Plan, pg. 68*
Part of the Residential Low income Program

LI Budget Total	% of Total Res	% of Total	Total Res (LI + RES) Res Budget	% of Total	Total Budget
$47,147	34.50%	11.03%	$136,660	31.98%	$427,386
$49,352	42.80%	16.05%	$115,319	37.50%	$307,507
$52,154	31.91%	13.36%	$163,459	41.88%	$390,320
16,033	46.68%	16.41%	34,343	35.14%	97,729.76

LI Budget Total	% of Total Res	% of Total	Total Res (LI + RES) Res Budget	% of Total	Total Budget
$47,147	34.50%	11.03%	$136,660	31.98%	$427,386
$49,352	42.80%	16.05%	$115,319	37.50%	$307,507
$52,154	31.91%	13.36%	$163,459	41.88%	$390,320
16,033	46.68%	16.41%	34,343	35.14%	97,729.76

'20	PY21		PY22		Phase V	
%	$0	%	$0	%	$0	%
20%	$18,161	19%	$18,247	22%	$89,513	20.90%
11%	$10,002	11%	$8,675	11%	$47,147	11.00%
26%	$24,629	26%	$18,775	23%	$107,323	25.10%
28%	$28,414	30%	$22,588	28%	$116,127	27.20%
15%	$13,455	14%	$13,455	16%	$67,275	15.70%
100%	**$94,661**	**100%**	**$81,740**	**100%**	**$427,386**	**100%**
	$0		$0		**$0**	

cells should be green once filled out to ensure correct cell values.

'20	PY21		PY22		Phase V	
%	$0	%	$0	%	$0	%
21%	$12,963	21%	$13,215	24%	$65,967	21.50%
16%	$9,580	15%	$8,318	15%	$49,352	16.00%
31%	$18,092	29%	$14,997	27%	$91,489	29.80%
20%	$12,856	21%	$10,495	19%	$58,598	19.10%

13$	$8,420	13%	$8,420	14$	$8,420	13.70%
100%	$61,975	100%	$54,483	100%	$307,507	100.00%
	$1,000		$1,000		$5,000	

'20	PY21		PY22		Phase V	
%	$0	%	$0	%	$0	%
29%	$20,692	27%	$20,885	27%	$111,305	28.50%
13%	$10,383	14%	$10,287	13%	$52,154	13.40%
29%	$22,346	29%	$22,366	29%	$112,254	28.80%
24%	$18,863	25%	$18,871	25%	$94,694	24.30%
5%	$3,610	5%	$3,843	5%	$19,913	5.10%
100%	**$75,894**	**100%**	**$76,251**	**100%**	**$390,320**	**100%**
	$800		$800		**$4,000**	

cells should be green once filled out to ensure correct cell values. 2 Company Assumption Based on PH IV alloca

'20	PY21		PY22		Phase V	
%	$0	%	$0	%	$0	%
18.20%	3,725	16.80%	3,678	18.60%	18,310	18.70%
15.20%	3,207	14.50%	3,261	16.50%	16,033	16.40%
25.50%	6,025	27.20%	4,899	24.80%	24,947	25.50%
36.80%	8,343	37.60%	7,006	35.50%	34,032	34.80%
4.20%	881	4.00%	881	4.50%	4,407	4.50%
100.00%	22,181	100.00%	19,726	100.00%	97,729.76	100.00%
	$0		$0		**$0**	

Original

Table 1: Portfolio Summary of Lifetime Costs

Sector	nted Lifetime	ed Lifetime E
Market Rate Residential (exclusi	$344,312	$314,199
Residential Low-Income	$62,503	$78,938
Small Commercial & Industrial	$316,367	$449,338
Large Commercial & Industrial	$375,196	$534,973
Total Portfolio	$1,098,378	$1,377,448

Source: PECO Phase V Plan, pg. 6

Original

Table 1: Portfolio Summary of Lifetime Costs

Sector	nted Lifetime	ed Lifetime E
Market Rate Residential (exclusi	$124,095	$156,458
Residential Low-Income	$51,075	$107,547
Small Commercial & Industrial	$431,459	$711,778
Large Commercial & Industrial	$239,514	$441,497
Total Portfolio	$846,143	$1,417,280

Source: PPL Phase V Plan, pg. 5

Original

Table 1: Portfolio Summary of Lifetime Cost

Sector	nted Lifetime	ed Lifetime E
Market Rate Residential (exclusi	$236,618	$255,609
Residential Low-Income	$69,638	$80,373
Small Commercial & Industrial	$366,833	$427,391
Large Commercial & Industrial	$381,610	$401,116
Total Portfolio	$1,054,699	$1,164,489

1 "Net" refers to the arithmetic difference between the previous two columr

Source: FE PA Phase V Plan, Appendix B, Table 1

Table 1: Portfolio Summary of Lifetime Cost

Sector	nted Lifetime	ed Lifetime E
Residential	$48,523	$38,392
Residential Low-Income	$9,590	$19,288
Residential Behavioral	$5,009	$7,049
Low Income Behavioral	$836	$958
Large Commercial C	$36,173	$89,288
Large Industrail (I	$11,168	$49,146
Small C&I	$39,951	$105,021
Total Portfolio	$151,251	$309,141

Source: DLC Phase V Plan, pg. 126

$0

Updated Analysist $0

e of Net1 Bene	ost Ratio (TR	3 Decimal BCR	Costs	Benefits	Net
-$30,113	0.9	0.913	$344,312	$314,199	-$30,113
$16,435	1.3	1.263	$62,503	$78,938	$16,435
$132,972	1.4	1.420	$316,367	$449,338	$132,971
$159,777	1.4	1.426	$375,196	$534,973	$159,777
$279,070	1.3	1.254	$1,098,378	$1,377,448	$279,070
			0	0	

$1,000

Updated Analysist $2,106

e of Net1 Bene	ost Ratio (TR	3 Decimal BCR	Costs	Benefits	Net
$32,364	1.26	1.261	$124,095	$156,458	$32,363
$56,472	2.11	2.106	$51,075	$105,441	$54,366
$280,319	1.65	1.650	$431,459	$711,778	$280,319
$201,983	1.84	1.843	$239,514	$441,497	$201,983
$571,137	1.67	1.675	$846,143	$1,415,174	$569,031

0 0

$2,600

Updated Analysist $3,001

ıe of Net1 Bene	ost Ratio (TR(	3 Decimal BCR	Costs	Benefits	Net
$18,991	1.1	1.080	$236,618	$255,609	$18,991
$10,735	1.2	1.154	$69,638	$77,372	$7,734
$60,558	1.2	1.165	$366,833	$427,391	$60,558
$19,507	1.1	1.051	$381,610	$401,116	$19,506
$109,790	1.1	1.104	$1,054,699	$1,161,488	$106,789

ıs. It does not refer to net verified savin

0 0

$800

Updated Analysist $1,609

ıe of Net1 Bene	ost Ratio (TR(	3 Decimal BCR	Costs	Benefits	Net
-$10,131	0.79	0.791	$48,523	$38,392	-$10,131
$9,698	2.01	2.011	$9,590	$17,679	$8,089
$2,039	1.41	1.407	$5,009	$7,049	$2,040
$122	1.15	1.146	$836	$958	$122
$53,115	2.47	2.468	$36,173	$89,288	$53,115
$37,977	4.4	4.401	$11,168	$49,146	$37,978
$65,070	2.63	2.629	$39,951	$105,021	$65,070
$157,890	2.04	2.044	$151,251	$309,141	$157,890

0 0

Additional H&S Allocation
Reduction in Benefits

BCR
0.913
1.263
1.420
1.426
1.254

Additional H&S Allocation
Reduction in Benefits

BCR
1.261
2.064
1.650
1.843
1.673

Additional H&S Allocation
Reduction in Benefits

BCR
1.080
1.111
1.165
1.051
1.101

Additional H&S Allocation
Reduction in Benefits

BCR
0.791
1.843
1.407
1.146
2.468
4.401
2.629
2.044

FE PA Testimony

	Proposed H&S Budget		Proposed LI Budget
EDC	***$000***	***% of LI***	***$000***
PECO	$3,000	6.4%	$47,147
PPL	$1,500	3.0%	$49,352
FE PA (Proposed	$2,600	5.0%	$52,154

DLC Testimony

	Proposed H&S Budget		Proposed LI Budget
EDC	***$000***	***% of LI***	***$000***
PECO	0	#DIV/0!	0
PPL	0	#DIV/0!	0
FE PA (Proposed	$3,000	#DIV/0!	0

PPL Testimony

	Proposed H&S Budget		Proposed LI Budget
EDC	***$000***	***% of LI***	***$000***
PECO	$18,521	#######	$0
PPL	$17,537	#######	$0
FE PA (Proposed	$0	0.0%	$0